

# *Publication Draft*

## *Public Participation Report*

1. Introduction, Vision and Objectives

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### *Representations*

### *Nature Summary of Main Issue/Change to Plan*

### *Council's Assessment*

### *Action*

## **1. Introduction, Vision and Objectives**

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65669 - Mr Edward Walpole-Brown [7504]

Object

The vision is inconsistent with the Plan Period. Insufficient evidence has been supplied about the cooperation which has taken place to achieve a Plan that satisfies needs of neighbouring authorities. The Plan as prepared is not consistent entirely with the four key tests of soundness. Plan has been rushed through without the necessary tests being undertaken and that it is premature. Hatton Green / Hatton Park should receive a higher land allocation to reflect evidence of substantial employment needs and out commuting from this area. Insufficient regard has been given to the key strategic priority of supporting sustainable communities and enabling improvements to facilitate key services, such as was indicated in terms of outlining the benefits of the land at Hatton Green.

*Link vision more strongly to Plan period and provide further evidence with regard to cooperation. More priority should be given to the key strategic priority of supporting sustainable communities and enabling improvements to facilitate key services.*

The vision is considered to be consistent with the Plan period.

A report on Duty to Cooperate processes and activities will be submitted alongside the Local Plan.

Sustainable communities is set out as a priority and the policies to deliver this are incorporated in section 5 of the Plan. This includes policies to deliver key services such as schools, transport, shops and open space

65666 - Mr Ray Steele [5886]

Object

Part 'B' is unsuitable to make detailed comments about specific elements of the Local Plan. It does not permit any detail regarding events leading up to when the public were informed of the Local Plan.

For this reason I have submitted separately my personal reasons with full details of events that have led to the Local Plan being unsound

Please refer to my representation attached to my email sent on Tuesday 24th Jun 2014

*None suggested*

No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66718 - Mr. A. Burrows [2117]	Object	<p>The public consultation process has been very poor. Local drop in sessions at village halls etc were very well attended by the public.</p> <p>However the experience at Hatton Park was that there were some 150-200 members of the public but only two WDC staff who were unable to provide any detailed answers or definitions. Many attendees did not get the chance to talk to the WDC staff and left feeling that the process was a waste of time. Very little notice appears to have been taken of the formal public responses and certainly no reasons given by WDC as to why these responses were dismissed.</p> <p>Some revisions were made in response to consultation, but at Hatton Park, for example, the proposed housing site (H28) was revised in a major way, with area and housing density changed, without further consultation on such significant changes.</p> <p><i>None</i></p>	The consultation was undertaken in line with the Planning Regulations. Points noted, but no further response required.	
66710 - Gleeson Developments [5117]	Support	<p>The overall vision and objectives of the Plan are supported. The Plan has been positively prepared and its spatial strategy has been developed over a number of years following extensive public consultation. The Council has sought to set out a robust framework over a reasonable time period. The Council's vision to deliver sustainable development by balancing social, economic and environmental imperatives is compliant with the NPPF and is supported. The Council's following objectives are positively prepared and consistent with the NPPF:</p> <ul style="list-style-type: none"> <li>* Sustainable levels of growth;</li> <li>* Well-designed new developments; and,</li> <li>* Improvements and growth to the District's infrastructure.</li> </ul> <p><i>None</i></p>	Noted	
66148 - HSE Health and Safety Executive (John Moran) [12848]	Support	<p>We have no representation to make on this occasion. This is because the land allocated in your consultation document does not appear to encroach on the consultation zones of major hazard installations or MAHPs2. If there is no encroachment the HSE does not need to be informed of the next stages in the adoption of the Pre-Submission Draft Local Plan.</p> <p><i>None</i></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>Purpose and role of the Draft Local Plan</i>				
64518 - Mr Richard Thwaites [11460]	Object	<p>The Local Plan fails 2 of the 4 tests of soundness. Justified. The plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.</p> <p>In Hampton Magna, the preferred option is not the most appropriate, other alternatives are more compliant with NPPF policy and guidelines and the evidence base used was flawed.</p> <p>Consistent with national policy NPPF enables local people to be empowered to shape their surroundings, yet Hampton Magna residents objections have been ignored or overruled. Possible use of brownfield land within Hampton Magna has been ignored.</p> <p><i>None (although see also reps regarding Hampton Magna)</i></p>	<p>The consultation process has complied with the Planning Regulations. Comments noted for future reference, but no further response required</p>	
65714 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Paragraph 157 of the NPPF clearly expects that Local Authorities Plan for a 15-year period post-adoption and to comply with this we consider that the Council should be planning to, as a minimum, 2031. In all likelihood following the submission of the Plan and the Examination process, adoption would be in mid-2015 at the earliest and thus the Plan is likely to cover a period of less than 14 years post-adoption. The decision not to plan to 2031 is further questioned given that Table 97 of the Coventry and Warwickshire joint-SHMA sets out a housing requirement covering the period up to 2031 for the District; and this provides a critical part of the time-sensitive evidence base.</p> <p><i>Extend the Plan Period to cover up to 2031 at the earliest, in accordance with the requirements of the NPPF.</i></p>	<p>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.</p>	

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66633 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>Paragraphs 1.6 and 1.7 of the Local Plan are welcome and supported, however there is concern that no reference is made to paragraphs 58 and 69 of the National Planning Policy Framework (NPPF). These state that planning policies and decisions should aim to achieve places which promote: -</p> <p>'Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'</p> <p>Paragraphs 58 and 69 of the NPPF put in planning terms the following statutory duty of local authorities: -</p> <p>'Without prejudice to any other obligation imposed upon it, it shall be the duty of each local authority to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area.' Section 17(1) of the Crime and Disorder Act 1998.</p> <p><i>To resolve all of our concerns, we recommend that paragraph 1.7 includes the following additional bullet point: -</i></p> <p><i>* Promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</i></p>	<p>Para 1.7 is drawn directly from para 157 of the NPPF. It would not be appropriate to include an additional bullet point at 1.7 without distorting the meaning of the NPPF. Crime and fear of crime are identified as issues for the Plan to address (para1.30) and this is further reflected in the Plan's policies.</p>	
65359 - ms monica fletcher [7372]	Object	<p>Concerned that access to health services, particularly the impact on Warwick Hospital has not be fully considered. It is essential that any planned growth in population needs to consider the impact on both primary care and hospital services. If the South Warwickshire General Hospitals Trust expand it may have to be on the Stratford site and thus Warwick residents will have to travel to Stratford for appointments they currently would have in Warwick</p> <p>Document does not comply with duty to cooperate</p> <p><i>Include more consultation about the impact on health services</i></p>	<p>Extensive work has been undertaken in working with South Warwickshire Foundation Trust to understand the impact on their services and the required service enhancements to support new development (see Infrastructure Delivery Plan)</p>	

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64585 - Mr Haydn Rees [7859]	Support	<p>I believe that the processes have been lengthy, thorough and fair. Any exercise of this kind is going to cause a lot of concern and unhappiness, but I think that the process has been well-handled. There have been many opportunities for people and organisations to express views, and in the case of Kingswood/Lapworth it is clear that those representations have been considered, examined, and accepted in many cases. It is to be hoped that any future amendments will be equally fairly reviewed and consulted on.</p> <p><i>None</i></p>	Noted	
<i>Spatial Portrait</i>				
65188 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	<p>The Kenilworth Civic Society considers that the Plan is unsound because the 17% growth rate is a) outdated and b) an overestimate. It is not supported by the latest population projections, which were published by the ONS in May 2014.</p> <p><i>To make the Plan sound in respect of policies to meet housing needs we would expect to see a reappraisal of population figures and household numbers, and, where necessary, appropriate adjustments made to the Plan's provision for housing land and to figures for new dwellings. The reductions should be spread across Warwick District.</i></p>	The spatial portrait will be reviewed prior to submission to ensure it is up to date	
<i>Duty to Cooperate and Strategic Planning</i>				
66018 - Centaur Homes [9117]	Object	<p>Para 1.28 The evidence relied upon for Green Belt is not up to date. This is the Joint Green Belt Study prepared in 2009 and due to its age this does not conform with paragraph 158 of the NPPF.</p> <p><i>The Green Belt Study 2009 needs updating to ensure that the Local Plan is based on sound information</i></p>	The Green Belt Study is considered to be sufficiently robust as to be relied upon in considering the most appropriate locations for green belt releases.	
66772 - Burman Brothers [9138]	Object	<p>The influence of the sub regional Cov and Warks sub regional study including the housing figures has not been fully taken on board. Nor has effect of City of Birmingham overspill has been translated into a requirement for Warwick district to assist with. The LEP is carrying out a housing study where the details of this will be known this year, so again this ought to be taken account of by WDC in amending their Plan. Concerned that economic effects have not been properly and fully translated into the need and requirements for this Plan</p> <p><i>None suggested</i></p>	Policy DS20 address potential future needs arising elsewhere. See Duty to Cooperate Statement for further details.	

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65712 - Mr Chris Walkingshaw [12824]	Object	Support in principle the acknowledgement in paragraph 1.26 that advanced manufacturing and engineering is an important key employment sector and acknowledge the Former Honiley Airfield as an important investment site. However objects that the plan will not meet the Council's vision unless further employment land is allocated. The SEP sets out that the availability of employment land is fundamental to attracting new investment. It forms part of the evidence base but its observations on the growth sectors in the district and sub region have been ignored in the development of the policy. Plans should be complimenting each other to ensure there is an appropriate strategy moving forward. Development of the site will complement the growth of other key automotive sector employment with test tracks such as (JLR) Gaydon and MIRA. Offers a discreet setting for R&D provision but well located to transport networks. The Coventry and Warwickshire City Deal has already released £559,000 of funding to Warwick District Council for highway upgrades scheduled in 2014/2015, and there is to be additional funding released for initial utilities upgrades in late 2015 (following the completion of Phase 1 of the extant planning permission). As well as physical infrastructure, the CWLEP are seeking a capital investment of c£1.25m to enable the provision of superfast broadband to the site.	In allocating employment sites that are consistent with the SEP the Local Plan seeks to complement the SEP and the ambitions of the LEP. Honiley Airfield is part of this picture.	
67143 - Mr Ray Steele [5886]	Object	There have been many attempts by local authorities to co-operate with WDC but nothing have been changed to alter the intention to build the majority of the homes in the south of the district - reference because the developers already owned that land	None of the neighbouring authorities have objected to the spatial distribution of housing within the District.	
65654 - Crest Strategic Projects [9115]	Object	<p>Objects to the approach to approach to duty to co-operate. The Council should be looking to meet all of its objectively assessed housing needs now and that includes any unmet need from adjoining Districts.</p> <p>The approach adopted by the Council is in conflict with the NPPF and recent case law which requires the objectively assessed need to be met immediately and not deferred for another Plan period. To adopt such an approach is not planning positively as required by the NPPF.</p> <p><i>The Council has not discharged its duty to co-operate and the objectors consider that the Plan should not proceed until the Council are fully aware of the unmet housing needs that need to be met within the District and that their needs are met.</i></p>	See Duty to Cooperate Statement for further detail. the Council is planning to meet all its objectively assessed need and Policy DS20 addresses potential future unmet need that may arise elsewhere	

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65315 - Mr Brian Bate [1611]	Object	<p>NPPF states that the Local Plan should be based on cooperation with neighbouring authorities. Warwick District Council has not taken into account the development by Stratford upon Avon District Council of 3,800 homes on land situated at Gaydon / Lighthorne, which is a short distance from the proposed developments south of Gallows Hill on the same Banbury Road. This other development would add considerably to the vehicle movements on the only road into Warwick and over the Castle Bridge</p> <p><i>The homes development by Stratford upon Avon District Council should be included in the Transport Assessment for Warwick and Leamington Spa.</i></p> <p><i>The land offered by Coventry City Council should be obtained as it would mean 5,000 homes taken from the 12,900 homes to the south of Warwick.</i></p>	<p>Extensive cooperation has been undertaken with Stratford District Council and Warwickshire County Council regarding Gaydon/Lighthorne Heath, this has included a "Cumulative Transport Assessment". See Duty to Cooperate statement for further detail.</p>	

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66546 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Localism Act and paragraphs 17, 157 and 178 of NPPF require neighbouring authorities to work in a joint manner and co-operate in order to address planning issues which cross administrative boundaries or on matters that are larger than local issues. Council is working closely with other authorities from within the sub-region (Coventry, North Warwickshire, Nuneaton &amp; Bedworth and Rugby) that have been involved directly in the production of the joint-SHMA. Furthermore, Solihull MBC, Birmingham City Council, Stratford-on-Avon District Council and Warwickshire County Council have been engaged as consultees in this process.</p> <p>As is set out in paragraph 3.20 of the Coventry Sub-Regional Housing Study (Appendix 2), although North Warwickshire and Stratford-on-Avon demonstrate strong linkages to the Birmingham HMA, they are also share economic and political ties with Coventry and Warwickshire. As such it is not unreasonable to assess housing need for the sub region as a coherent HMA.</p> <p>In terms of the duty-to-cooperate, fundamentally our concern relates to the point set out by the Council in paragraph 1.22 of the Publication Draft Local Plan:</p> <p>"Each of the authorities within the sub region is at a different stage in preparing their local plan or core strategy. The capacity of the other districts to deliver their housing requirement in full is therefore not known. In this context, the potential remains that one or more of these authorities will not be able to meet their housing requirement within their boundaries."</p> <p>However, the NPPF states the following in relation to the duty to cooperate:</p> <p>"179. ... Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas - for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework...</p> <p>181. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination..."</p> <p>Therefore, in our view it is clear that the duty to cooperate requires local planning authorities to meet - and therefore understand through joint working - the housing needs of authorities within the wider Housing Market Area who are unable to accommodate their own needs.</p> <p>In essence what the Council are attempting to achieve is an agreement to cooperate at an undefined date in the future, when in reality there is no mechanism available to developers or neighbouring authorities to force Warwick District to review the Local Plan - particularly given the substantial areas of Green Belt</p>	<p>The Council is strongly encouraged to get its local plan in place as soon as possible. In this context it is not appropriate to wait for neighbouring authorities to progress their local plan processes before proceeding with ours. It is therefore inevitable that there will be some unknown factors at the time of submission. The Council believes its commitment to the process agreed by the Economic Prosperity Board along with Policy DS20 is the most appropriate and effective way of dealing with this.</p>	

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66032 - Catesby Property Group (Mr David Morris) [7776]	Object	<p>which will to a large extent protect the District from appeals based on a housing land shortfall.</p> <p>Given this position it is wholly appropriate that the Council continue to engage fully with the other HMA authorities until such time as the housing needs of each area - and the ability of those areas to accommodate their own needs - is understood.</p> <p>If the Council chooses to proceed with the New Local Plan without this information, and with the same housing target, then one option to plan positively and give some confidence to developers and the Planning Inspectorate that the Council will assist neighbouring authorities if required, is to safeguard sustainable areas of land such as the land east of Radford Semele as shown at Appendix 1 to meet housing needs from across the HMA, should it be required.</p> <p>This would add an amount of additional flexibility to the New Local Plan and ensure that the Council progress a Plan that is able to respond to changing circumstances over the plan period, as encouraged in paragraphs 21 and 50 of the NPPF.</p> <p>The site would need to be clearly shown on the Key Diagram and the following draft policy wording is proposed for i...</p> <p><i>If the Council chooses to proceed with the New Local Plan without this information, and with the same housing target, then one option to plan positively and give some confidence to developers and the Planning Inspectorate that the Council will assist neighbouring authorities if required, is to safeguard sustainable areas of land such as the land east of Radford Semele as shown at Appendix 1 to meet housing needs from across the HMA, should it be required.</i></p>	<p>At the time of preparing the Publication Draft Plan, Coventry City Council had not completed their SHLAA. It was and continues to be impossible to plan for the unknown. Until such time that work at a sub-regional level has been further progressed, it is not known the scale and nature of any additional housing requirement arising from Coventry and (if there is) whether any of this is best located in Warwick District. In this event the Council's commitment to the report agreed by the Economic Prosperity Board and Policy DS20 address the issue.</p>	<i>Document does not comply with duty to cooperate</i>

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66366 - Mr John Fletcher [8466]	Object	Discussion with Stratford on Avon and Coventry City Councils minimal and unproductive. No indication these developments taken into account. Stratford has proposed for large development with impact on Warwick. Coventry in process of gaining approval for Gateway employment area	The Duty to Cooperate Statement demonstrates that extensive and effective cooperation has taken place with both Stratford District Council and Coventry City Council	
64987 - Solihull MBC (Mr Maurice Barlow) [12664]	Support	The Council is satisfied that there are no strategic matters between Solihull and Warwick District that have been identified within either the Solihull Local Plan or the Warwick District Publication Draft. Accordingly, Solihull MBC believes that Warwick District Council has met the Duty to Cooperate as far as Solihull is concerned.  <i>None</i>	Noted	
<i>Plan Period</i>				
66398 - The Warwick Society (James Mackay) [3080]	Object	The NPPF, quoted at para 1.7, prefers that the Plan should be drawn up over a 15 year period. This Plan (para 1.29) covers the 18 years 2011 to 2029.  <i>The modification necessary to make the Plan sound in respect of its time period is for it to cover the 15 years 2011-2026. This modification would enable the Plan to be updated in the light of circumstances over the years ahead in plenty of time to react to those circumstances and alter the Plan. Making provision now for growth which may or may not happen late in the Plan period misdirects development to sites which should have a lower priority, in particular encouraging the development of greenfield sites and inhibiting the release of windfall and other brownfield sites</i>  <i>Correcting the Plan period to match national policy would cause a further reduction in the housing need of some 1,300. This would give a comfortable margin for all of the necessary new homes to be built without using any greenfield sites, and such sites would still be available should growth late in the Plan period require their future allocation.</i>	The NPPF requires the plan to be drawn up over an appropriate time horizon and this needs to be from the date of adoption rather than the date from which the Plan is based. The Council believes therefore that it would not be appropriate to end the plan period in 2026.	

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65231 - Deeley Group Ltd [11623] 65261 - A C Lloyd Homes Ltd [5958] 65717 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Object	Deeley Group object to the Plan period of 2011- 2029. It is considered that the plan period should be extended from 2029 to 2031. The current approach is considered 'unsound' as it does not conform with the provisions of NPPF which requires Plans to cover an appropriate time period, preferably a 15 year time horizon but which takes account of longer term requirements.  The period covered by the Local Plan is 2011 to 2031. <i>The period covered by the Local Plan is 2011 to 2031.</i>	The Council considers that the Plan period (2011 to 2029) is an appropriate period particularly in the context of an intention to undertake an early review if required (see policy DS20). The NPPF states "preferably a 15 year time horizon". This is not a requirement and the period to 2029 is only marginally less than 15 years.	
65325 - Mr Carl Stevens [4873]	Object	Projecting housing needs so far into the future when other professional bodies have questioned the perceived number of houses is unreliable  <i>More work is required to assess housing needs , the time frame reduced for that assessment and review periods (like a break in a lease) are needed to reassess thinking. Critically the green belt useage should be an absolute last resort and therefore final build late in the time line</i>	It is accepted that projections become less reliable the further in to the future they project. However, the Council's approach is consistent with National Planning Guidance. The uncertainty underlines the importance of monitoring (see policy DM1) and if necessary an early plan review (see policy DS20)	
65420 - mrs j mackenzie [315]	Object	Plan Period  <i>The entire plan is based on now outdated ONS figures which are now shown to have materially changed. Population growth is 30% less than originally estimated. This makes all projections for infrastructure and housing and employment included in the plan overstated by the same margin.</i>	The requirements for housing and employment have been reassessed in light of updated ONS projections	

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<i>Issues</i>				
66540 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>The strategy has changed against the wishes of local people. The previous plan was conservation-minded, but the proposed approach now if for growth with higher levels of employment, population and housing than needed. The New Local Plan is unsound because it does not contain adequate justification for this fundamental change of approach.</p> <p>Maintaining and enhancing the environment of the district does not appear in the list of five key priorities in paragraph 1.40, yet this is important to the character of the District.</p> <p>It is not clear from the Plan what provision is currently made to meet the housing needs of neighbouring areas. It seems to us that because the Plan assumes substantial continuing in-migration, there is already in effect significant provision for meeting needs originating elsewhere. However Policy DS20 of the Plan is ominous because it envisages even higher housing provision.</p> <p><i>The direction of the Local Plan is so flawed that a revision of the objectives is needed. Such a revision would be too significant to set out here.</i></p>	<p>The objective of seeking growth is an appropriate strategy and is consistent with the NPPF and the evidence base. If evidence indicates that it is necessary, policy DS20 allows for the potential for further growth beyond that which is planned for in this Local Plan. This again is considered to be a sound approach</p>	
65318 - Mr Brian Bate [1611]	Object	<p>WDC is required to address a number of issues. Item 6. Road congestion and air pollution, particularly around the main junctions along the A46 and M40, the routes into the towns, and within the town centres.</p> <p>They have not in the Transport Assessment considered the number of river and railway bridges that cause traffic congestion. They also have not included journeys to schools by car in the figures.</p> <p>They have not considered that a number of roads already suffer excessive air pollution levels. Additional vehicles will only make it worse.</p> <p><i>A new Transport Assessment needs to be done which includes all bridges as congestion points and also include all vehicle movements to and from Schools.</i></p>	<p>The Strategic Transport Assessments have considered the impacts on river and rail crossings, including all peak hour journeys. An air quality assessment has been produced and published.</p>	

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66250 - Lenco Investments [1165]	Object	<p>RPS objects to the Council's approach in selecting strategic sites for development. It is not compliant with the requirement of the Strategic Environmental Assessment Directive or that of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The Council's reasoning for excluding Land at Baginton from previous consultations has been based upon assumptions for which the Council held no evidence. It is long established that all reasonable alternatives should be considered within the development plan and SEA/SA process, and that failure to do so is a matter of serious concern which can deem the Plan unlawful.</p> <p>RPS contests that the Council has appropriately appraised this site and that no reason has been provided in any Environmental Assessment on why the land south of Coventry promoted by RPS has been excluded.</p> <p>RPS therefore presents evidence that the Council has failed in its SEA/SA process to appraise Lenco Investments land south of Coventry as a strategic alternative alongside other reasonable alternatives, as well as a part of a smaller local village allocation. It has failed on two counts.</p> <p><i>The Plan has failed its statutory requirement to comply with the Strategic Environmental Assessment Directive and the Environmental Assessment of Plans and Programmes Regulations 2004, in failing to consider a reasonable alternative and prejudicially discounting a site from option appraisal while holding no firm evidence supporting its exclusion. The land that RPS promotes has not been subject to an appraisal process that is equitable, fair and by public scrutiny, as is required by law.</i></p>	<p>NB: TO BE REVIEWED</p> <p>The 2014 SHLAA has found that (apart from a small part of the north eastern part this site which has been allocated), the site is not suitable for development (see response to rep.66195 for further details). Further evidence submitted in 2014 as part of the Village Housing Options consultation has been reviewed and the Council still contend that the site is not suitable due to access, noise, and potential odours. As with all sites that are unsuitable in the SHLAA, this meant that the site cannot be considered to be a reasonable alternative and was not therefore assessed in the sustainability appraisal.</p> <p>For the above reasons, the Council does not accept the suggestions set out in this representation.</p>	
66632 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Support	<p>Paragraph 1.30 criterion (k) as they recognise the crime and the fear of crime, particularly in town centres and the need to protect the community from harm.</p> <p>Paragraph 1.30 (k) also provides reinforcement for the delivery of the emergency services element of the Council's 'Draft Infrastructure Delivery Plan - April 2014', as the funding of such infrastructure will be vital if this issue is to be full addressed over the plan period.</p>	Noted	

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*Consultation*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66848 - Patricia Hollis [6286] 66905 - Colin Sharp [1913] 66913 - Ms Alison Cox [588] 66921 - Alison Kelly [9014] 66929 - Andrew Cliffe [6235] 66937 - Angelo Cugini [12883] 66945 - Barbara Groves [8940] 66953 - Professor Bob Ireland [7882] 66961 - Christopher Paden [8844] 66969 - Elizabeth Cliffe [6234] 66977 - Mrs Kay Cugini [1743] 66985 - Mr David Ramsbottom [2030] 66993 - Mr David Drinkhall [12839] 67001 - Ian Frost [2024] 67009 - Mr Geoff Reynolds [8107] 67017 - John Griffiths [8071] 67025 - Justin Richards [8806] 67033 - Louise Kalus [8998] 67041 - Paul Kalus [8995] 67049 - Mr Bernard Hollis [1810] 67057 - Mr R Komarasinha [6306] 67065 - Caroline Komarasinha [12793] 67073 - Matthew Drinkhall [8910] 67081 - Oliver Lane [8814] 67089 - Ms Helen Maclagan [12783] 67097 - Mr and Mrs J Pennington [600] 67105 - Mr Peter Lamb [3491] 67113 - Sarah Hunt [7309] 67121 - Mr Ben Orme [12882]	Object	<p>There have been serious shortcomings in the processes the Council has used in the development of the Plan. The Council has not properly considered the representations on the Local Plan submitted by residents and the community.</p> <p>*The Plan does not comply in terms of the letter and spirit of the NPPF and the Council's own Statement of Community Involvement (SCI)</p> <p>*The Council's approach to "pre-determination" has inhibited the full and proper debate of the plan and the consultations involved in its adoption.</p> <p>*It is the view of Save Warwick that the processes undertaken in the course of the preparation of the local plan by the District Council denied the public, councillors and other consultees genuine participation in the plan making process by:-</p> <p>-Ignoring representations and / or delaying the council's responses to the representations until the plan had moved on irrevocably. In particular (by omission or neglect) the council's elected Members were not given the opportunity to give proper and timely consideration of the representations made to the council by residents and other interested parties in response to the consultation which took place in July 2013. Councillors did not see anything other than summaries until March 2014 at the same meeting they were being asked to approve the local plan. Since it is the role of officers to advise and members to decide this seems inadequate / unsatisfactory. With such a process it is impossible for those who made representations to have confidence that due consideration was given to their concerns.</p> <p>-Using the delay of consideration of representations as a tool to enable pre-empting of the local plan by enabling developers and landowners to submit applications for development of the southern areas to which numerous and serious objections and representations had been lodged and not resolved. Officers were afforded the ability to press on with master planning for the areas south of Warwick, Leamington and Whitnash in face of the objections.</p> <p>-The consideration of new ONS statistics on population growth was delayed which has led to more land and housing being allocated than what is actually required. This will require the loss of more precious agricultural land than is really necessary).</p> <p>Operating a regime where the threat of "pre-determination" was used in contravention of the spirit of the Localism Act as a means of (unintentionally or not) of quelling proper debate in council, and</p>	<p>The consultation process has complied with the Planning Regulations and the Statement of Community Involvement. All representations have been read and considered and a report of consultation has been prepared and reported to members at each stage.</p> <p>Whilst it has sometimes taken a considerable period of time to summarise and analyse all the responses (due the number of responses received) there has been no manipulation of the process as implied.</p> <p>All planning applications received during the Plan preparation process have been considered in light of the NPPF, extant local plan policies and in line with the presumption of favour sustainable development. The "pre-determination" regime implied has not quelled the appropriate debate regarding allocations or planning applications. It is considered that sites that have achieved planning consent prior to the adoption of the Local Plan have done so in line with current planning regulations/legislation and are therefore legally robust.</p>	

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

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councillor involvement in community debate on planning issues. A culture was established which prevented the healthy debate of planning matters (in contravention of the provisions set out in the plain English Guide to the Localism Act 2011). The approach adopted by the Council to "predetermination" has inhibited the full and proper debate of the plan and the consultations involved in its adoption. By doing so it is doubtful that it has complied with the letter of Section 25 of the Localities Act.

\*In summary the Council has not followed the correct processes and has not properly engaged with its consultees and its community. It is Save Warwick's opinion that the Council has been reluctant to accept the role of community in the formulation of planning strategy, and in doing so may have opened itself to the possibility of legal challenge about the process it has followed.

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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>
66686 - Save Warwick (MR DAVID WILLIAMS) [4506]	Object	<p>There have been serious shortcomings in the processes the Council has used in the development of the Plan. The Council has not properly considered the representations on the Local Plan submitted by residents and the community.</p> <p>*The Plan does not comply in terms of the letter and spirit of the NPPF and the Council's own Statement of Community Involvement (SCI)</p> <p>*The Council's approach to "pre-determination" has inhibited the full and proper debate of the plan and the consultations involved in its adoption.</p> <p>*It is the view of Save Warwick that the processes undertaken in the course of the preparation of the local plan by the District Council denied the public, councillors and other consultees genuine participation in the plan making process by:-</p> <p>-Ignoring representations and / or delaying the council's responses to the representations until the plan had moved on irrevocably. In particular (by omission or neglect) the council's elected Members were not given the opportunity to give proper and timely consideration of the representations made to the council by residents and other interested parties in response to the consultation which took place in July 2013. Councillors did not see anything other than summaries until March 2014 at the same meeting they were being asked to approve the local plan. Since it is the role of officers to advise and members to decide this seems inadequate / unsatisfactory. With such a process it is impossible for those who made representations to have confidence that due consideration was given to their concerns.</p> <p>-Using the delay of consideration of representations as a tool to enable pre-empting of the local plan by enabling developers and landowners to submit applications for development of the southern areas to which numerous and serious objections and representations had been lodged and not resolved. Officers were afforded the ability to press on with master planning for the areas south of Warwick, Leamington and Whitnash in face of the objections.</p> <p>-The consideration of new ONS statistics on population growth was delayed which has led to more land and housing being allocated than what is actually required. This will require the loss of more precious agricultural land than is really necessary). Operating a regime where the threat of "pre-determination" was used in contravention of the spirit of the Localism Act as a means of (unintentionally or not) of quelling proper debate in council, and</p>	<p>The consultation process has complied with the Planning Regulations and the Statement of Community Involvement. All representations have been read and considered and a report of consultation has been prepared and reported to members at each stage.</p> <p>Whilst it has sometimes taken a considerable period of time to summarise and analyse all the responses (due the number of responses received) there has been no manipulation of the process as implied.</p> <p>All planning applications received during the Plan preparation process have been considered in light of the NPPF, extant local plan policies and in line with the presumption of favour sustainable development. The "pre-determination" regime implied has not quelled the appropriate debate regarding allocations or planning applications. It is considered that sites that have achieved planning consent prior to the adoption of the Local Plan have done so in line with current planning regulations/legislation and are therefore legally robust.</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>councillor involvement in community debate on planning issues. A culture was established which prevented the healthy debate of planning matters (in contravention of the provisions set out in the plain English Guide to the Localism Act 2011). The approach adopted by the Council to "predetermination" has inhibited the full and proper debate of the plan and the consultations involved in its adoption. By doing so it is doubtful that it has complied with the letter of Section 25 of the Localities Act.</p> <p>*In summary the Council has not followed the correct processes and has not properly engaged with its consultees and its community. It is Save Warwick's opinion that the Council has been reluctant to accept the role of community in the formulation of planning strategy, and in doing so may have opened itself to the possibility of legal challenge about the process it has followed.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65419 - mrs j mackenzie [315] 65690 - Richard Evans [852] 65890 - Mr Robin Fryer [7457]	Object	<p>Changes to the Plan have been introduced at a late stage without prior consultation</p> <p><i>a) Carry out a public consultation exercise on all aspects of the local plan to include elements added to this version as the current exercise is too legalistic and excludes the general public.</i></p> <p><i>b) Publish the sub-regional plan, if it exists and carry out a public consultation on the contents because this is a key policy underlying the Warwick District Local Plan that the community has been denied access to</i></p> <p><i>c) Delete all references to a sub-regional strategy in the current local plan if b) not carried out.</i></p> <p><i>d) Carry out a new objective sustainability assessment that complies with the 3 core principles in the NPPF for all major proposals in the local plan</i></p> <p><i>e) to justify the claimed duty to co-operate provide evidence that the adjoining local authorities have a genuine need for land in Warwick District that they are unable to meet in their own area and submit the evidence for public comment</i></p> <p><i>f) Revise housing numbers and employment land requirement downwards to comply with current statistical evidence to justify the proposals</i></p> <p><i>g) Omit the vague and undefined proposals from the Local Plan or provide revised information proving they are justified and effective.</i></p> <p><i>h) Delay submission of the Local Plan until the defects are remedied and put before the local community for a new consultation.</i></p>	<p>It is the nature of the Plan making process that changes are made up until the point to the publication draft is agreed. It is therefore accepted that changes have been made. However the regulation 19 consultation provides an opportunity to raise points of soundness and legality with regard to these changes. The consultation process has been consistent with the 2012 Planning Regulations.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64519 - Mr Richard Thwaites [11460] 65326 - Mr Carl Stevens [4873] 65750 - Mr Robert Price [11538] 66203 - Hatton Parish Council (M C L Le Tocq) [1045] 66350 - Mr Dean Epton [8244] 66354 - Miss Emma Bromley [3610] 66355 - Mr & Mrs Peter & Linda Bromley [1086] 66375 - Mrs Elaine Kemp [4935] 66395 - Cllr Elizabeth Higgins [1080] 67141 - Mr Ray Steele [5886]	Object	The consultation has not been genuine and views of local people have been ignored, for example local people have indicated a preference for a lower level of growth than that being planned.	The consultation process has been consistent with the SCI and the planning regulations. All representations received at all stages of the Plan's development have been read, considered and summarised in reports of consultation. It is always difficult to balance local views with the evidence. Ultimately the Council can only take in to account well evidence and material planning considerations and in this respect the consultations have helped inform the development of the Plan. Preparing a soundly based plan is of paramount importance	No change
66367 - Mr John Fletcher [8466]	Object	Several held and absence of district councillors and lack of changes as result of public objections evident	The consultations have informed earlier stages of the plan's preparation and the proposals have changed as a result.	No change
65643 - Mr Barry Lovekin [6972]	Object	The allotted time period of 6 weeks for comments before the plan is submitted to the Secretary of State is surely too short for obtaining a considered reply from the majority of citizens of Warwick, Leamington and surrounding villages, given the extent of the planned expansion and complexity of the plan which will have a profound effect on Warwick District and this part of England.	The 6 week time period is compliant with the 2012 Planning Regulations	
66386 - Warwick Town Council (Mr Derek Maudlin) [1059]	Object	Local councils and people have been firm in their assessment that the number of dwellings proposed is far in excess of local needs. These views have been repeatedly rejected by WDC and at no time has it shown a willingness to work with Warwick town Council or local residents to achieve a draft plan which reflected local views and could be supported.  The District Council consultation ignored the intentions and expectations of the Localism Act 2011, which is that the Local Plan would be fully reflective of decision making by local people. Confirmed by Andrew Langley MP whose advice was that WDC would apply the NPPF in the context of decision making by local people.	it is not possible to prepare a plan which aligns with the views of all residents, particularly as the Plan has to be based on sound evidence. It is recognised that many residents would have liked to see lower levels of housing provision. However the Council believes that the evidence does not support this.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66542 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>The strategy has changed against the wishes of local people. The previous plan was conservation-minded, but the proposed approach now if for growth with higher levels of employment, population and housing than needed. The New Local Plan is unsound because it does not contain adequate justification for this fundamental change of approach.</p> <p>Maintaining and enhancing the environment of the district does not appear in the list of five key priorities in paragraph 1.40, yet this is important to the character of the District.</p> <p>It is not clear from the Plan what provision is currently made to meet the housing needs of neighbouring areas. It seems to us that because the Plan assumes substantial continuing in-migration, there is already in effect significant provision for meeting needs originating elsewhere. However Policy DS20 of the Plan is ominous because it envisages even higher housing provision.</p>	the strategy of the emerging plan is significantly different to previous plans. This reflects the NPPF and local evidence regarding the need for growth. It is correct that this approach does not align with the views of many residents	No change
66418 - Sharba Homes Group [12779]	Object	<p>It is our belief that consultation responses to the plan, and other supporting reports to inform it have not been fully considered; in particular there has been no detailed response made to our, or most of other party's comments to the VHO, or previous versions of the Local Plan.</p> <p>In light of this, we submit that the plan cannot be declared positively prepared until such consultation is shown to have directly informed plan making, with detailed responses to consultations having been published.</p>	The representations to the Village Housing Options were summarised and considered by Councillors in May 2014. the report of consultation has been published on the Council's website	No change
<i>Evidence</i>				
65327 - Mr Carl Stevens [4873]	Object	<p>Evidence has not been assessed fully enough at a local level to each recommended site in the plan</p> <p><i>Review all local areas impacted where there is loss of green belt in beautiful rural areas should be reassessed</i></p>	There is an extensive body of local evidence that has informed site selection - see the Site Selection Methodology and Matrix and the evidence on the WDC website	
64520 - Mr Richard Thwaites [11460]	Object	<p>The evidence used to select the preferred option for development was factually inaccurate leading to a flawed decision.</p> <p><i>All the sites in Hampton Magna need to be independently reassessed.</i></p>	The evidence regarding village sites is set out in the Site Selection matrix. All sites have been fairly assessed	

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65563 - Midland Red (South) Ltd. dba Stagecoach Midlands (Dr Nicholas Small) [8352]	Object	<p>The Plan has failed to evaluate a strategy that better mitigates transport impacts by focusing on sustainable transport measures, which may be more cost-effective and deliverable. The evidence base of the plan with regard to transport impacts has followed, not informed the preparation of the Plan. The LPA has failed to positively consult with Stagecoach to inform the Plan strategy</p> <p><i>The Plan needs to be refocused around a strategy that takes account of the WSTA evidence in full, which is likely to require specific deliverable improvements to sustainable transport infrastructure and services to be identified.</i></p>	<p>The STAs do include proposals for sustainable transport and do take account of a modal shift in the modelling. Further evidence regarding sustainable transport proposals is being developed to ascertain whether the STA proposals can be improved or supplemented.</p>	
65319 - Mr Brian Bate [1611]	Object	<p>Re: Strategic Transport Assessment.</p> <p>The Assessment did not include the fact that there is a river and a railway running through Warwick and Leamington Spa. The only road into Warwick has a river bridge. The assessment shows improvements to a junction just prior to the bridge but does not consider that improving the junction cannot change the number of vehicles using the bridge.</p> <p>The Assessment also did not include vehicle movements going to and from Schools. These journeys add considerably to the morning traffic figures.</p> <p><i>The Transport Assessment needs to be looked at again and include a study of the bridge congestion and school traffic.</i></p>	<p>The Strategic Transport assessments have been undertaken in accordance with nationally accepted methodology. The assessments do take account of the river and railway and have modelled the impact on the Avon Bridge on Warwick</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65362 - Cycleways (Dr Katharina Dehnen-Schmutz) [12716]	Object	<p>This objection relates to the STA evidence document. With regard to cycling, as part of the SWOT analysis (table 2.1, p.16), it quotes a "well developed cycling network" as presented as a strength of the area. In section 2.2.24 the document refers to a figure of 3.5% of the population as cycling to work from the 2001 census while also claiming that the "cycle network has been expanded and improved over the last 10-15 years" (section 2.2.22). However, more recent census data from 2011 (<a href="http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/cycling-to-work/2011-census-analysis---cycling-to-work.html">http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/cycling-to-work/2011-census-analysis---cycling-to-work.html</a>) show a decline in the cycling to work percentage from the 3.5% in 2001 to 3.1% for the district.</p> <p>Thus, in spite of the investment in cycle infrastructure over the last 10 years there has been no corresponding increase in cycling. The 2011 census also shows that in the same timeframe other local authorities have succeeded in increasing these percentages from similar levels over the last 10 years to much higher percentages in 2011. The lack of an increase in cycling in the Warwick District, in spite of the increase in the cycling infrastructure, could be attributed to its poor quality, as identified in a recent study by Cycleways, (<a href="http://www.cycleways.org.uk/campaign/review-of-cycling-provision/">http://www.cycleways.org.uk/campaign/review-of-cycling-provision/</a>). The study shows that much of the problem lies in poor design and in non compliance of planning standards. In addition, one of the most salient features of the STA, in relation to cycling, is the lack of an integrated approach to transport, as identified in Cycleways' Cycle Review (section 7.1.2.).</p> <p>In conclusion, there is no evidence base to support the claim of a well developed cycling network that encourages more sustainable transport in the district and would be able to mitigate increases in transport from the proposed developments of the Local Plan. Getting the evidence wrong has resulted in a lack of development planning for sustainable transport options and cycling in particular in the Local Plan.</p> <p><i>A thorough analysis of current cycling provisions within the district needs to be done as a starting point for future developments. This analysis should include a public consultation on transport issues to find out the barriers to higher percentages of people switching to sustainable transport.</i></p>	<p>the Strategic Transport assessments do consider sustainable forms and transport and include proposals for improved cycle provision. However, they are predominantly strategic in nature and do not go to the level of detail proposed in this representation. This level of detail will be considered through plan delivery and specifically in the detailed planning of infrastructure</p>	

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66022 - Centaur Homes [9117]	Object	Para 1.38 Centaur Homes object to the evidence used to formulate the plan. It is not considered fully up to date and therefore, not in accordance with paragraph 158 of the NPPF	The Council consider that the evidence base is proportionate, up to date and relevant	
		<i>The evidence base needs updating</i>		
65133 - Sport England (Mr Bob Sharples) [1355]	Support	Paragraph 1.38  As a point of clarification, the Sports Pitches and indoor sports strategy are not completed, if they are not completed and adopted by the time of the EIP, I would have to consider them unsound as an evidence base.	Noted	
<i>Vision for the District</i>				
65328 - Mr Carl Stevens [4873]	Object	The plan fails the safeness, health and well being and sustainability vision as by definition this district will become the opposite with 13000 more houses it will not cope with	The plan has been carefully prepared, taking in to account a wider range of evidence to ensure the need for sustainable new development is delivered at the same time as balancing safety, health and wellbeing	No change
		<i>Independent investigations and audit in these areas is required to understand the true risks that all the resident in the district know and understand on the ground in adopting this plan</i>		
67127 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	The Council's vision is broadly appropriate and we particularly agree that ensuring the level of housing provision enables development that is both of a high quality and affordable is critical to the future prosperity of Warwick District. In addition we agree with the aspiration to support growth in the economy and note that providing the right type of housing in the right locations is critical to the Council in achieving this. Agree green belt release should only be enabled where exceptional circumstances exist, consider that the release of additional green belt land around H28 at Hatton Park would form a sustainable development opportunity.	Noted. The issue regarding site H28 at Hatton Park is addressed elsewhere (see for instance rep 65348)	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65723 - Gallagher Estates [644]	Object	The strategy of the plan is considered to be inherently sound and positively prepared. However considers that the plan may not be able to achieve its 15 year vision due to the end date of 2029. This should be extended at the very least to 2030, however to built in flexibility should the plan slip extending the period to 2031 would be justified. Encouraged by the Council's commitment to ensuring the duty to cooperate is met. However it is important that mechanisms are in place to ensure compliance with the duty and further detail about the process are made available perhaps in the form of a duty to cooperate statement. This should also address how co-operation has been discharged in neighbouring housing market areas, particularly the major urban areas. Endorses the view that high house prices are a key issue in the district and that the local plan needs to tackle the issue. Share the view of the Local Plan that, in order to do so, there is a need to plan positively to provide more housing to meet future needs. Supports vision for the district, it is clear and concise. The spatial strategy in para 1.43 is sound however there is concern that it is very much in summary form. This is easily overcome by paragraph 1.43 cross referring to the full spatial strategy contained at Policy DS4 of the Plan.	Note that the vision is supported  The Council considers that the plan period is appropriate in the context of the NPPF	
64684 - Federation of Small Businesses (Mrs Linsey Luke) [5626] 65360 - Centro (Mr Jonathan Haywood) [12722] 66541 - Taylor Wimpey (Mrs Sarah Milward) [272] 66634 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066] 66668 - Warwickshire County Council (Monica Fogarty) [12790]	Support	Support the vision	Noted	
		<i>None required</i>		
<i>Local Plan Strategy</i>				
66258 - Mr Andrew Instone [5100]	Object	There is too much new development proposed , with questions about whether the size of the new communities (for instance in Kenilworth) can be managed and controlled with impact on crime and the capacity of local shops, particularly in light of cut backs to public services. By planning to meet the needs of major cities there is a danger that there will be an impact on crime.	The plan seeks to meet objectively assessed need as well as contributing to meeting the needs of the whole HMA. Infrastructure requirements have been assessed and Warwickshire Police have provide representation on crime which have been taken in to account.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65632 - Mr Kelvin Lambert [8939]	Object	<p>Despite the best efforts of the WDC planning staff in trying to find solutions, significant problems remain with the proposals for 2900 houses around Europa Way and Harbury Lane.</p> <p>Transport and sustainability: incidents such as gas pipe repairs and problems on the M40 cause serious congestion on the south side of Warwick and Leamington. There are long queues on Europa Way and Gallows Hill. It is hard to say how widening such roads will solve the problem and undermines claims that the south side of the towns is better placed to cope with traffic than the north. The extra 2900 houses proposed for the south of the towns will make this worse on a daily basis as the river crossings will not be improved under the local plan. Estimated transport costs quoted come to more than £30m. If the Local Plan is 'sustainable' in terms of transport, why must so much money be spent on roads?</p> <p>It is difficult to understand the thoughts behind remarks that a development on the south side of Leamington will be closer to facilities when the route to Warwick Hospital is through congested roads. The connections to both stations are through congested roads with little parking - the distances are too far for most people to walk or cycle. The supermarkets have congested approaches.</p> <p><i>Changes to Plan:</i>  <i>Basing development on railway lines with new stations goes a lot further to addressing such access problems and sets up the residents with a fast, convenient, and reliable public transport option from the outset. It will be a good use of keeping 'Green Belt' land 'green' in the most environmental sense. Creating such settlements will not contribute to the coalescence of Leamington with Coventry or Kenilworth. Why cannot settlements be based around sites with new stations such as Hatton Park and between Leek Wootton and Hill Wootton?</i>  <i>: WDC must also take into account the recent option of development in the area between Stoneleigh and Kenilworth. It would spread the housing out across the district. It is close to the A46 and within a mile of where the Coventry to Leamington railway crosses Stoneleigh Road at Gibbet Hill. This site could be used for a station that would also serve the university.</i></p>	<p>The sites discussed in the representation have been fully assessed (including in relation to Transport) and have been found to be sustainable locations which are supported by the evidence (see site selection methodology). The proposed area at Stoneleigh/Kenilworth is within the green belt and no exceptional circumstances have been identified</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66255 - Mr Philip Batt [3101]	Object	<p>Agree with representations of Save Warwick Group. In addition, 3000 houses are planned for Gaydon which will also have a detrimental effect on Warwick and the traffic issues will be multiplied several times. the Local Plan does not address this.</p> <p>no consideration given to agricultural land south of Warwick much of which is grade 2. The judgement to sacrifice the best agricultural land to protect the green belt is wrong.</p> <p>Myton Road is seriously overloaded with significant congestion. there should be no further houses built with access to Myton Road.</p> <p>It was promised that the cycleway at Saumur Way would provide a permanent southern edge to the town. The plan does not address this.</p> <p>The plan does not consider the impacts of the windfall sites.</p> <p><i>The plan should go back to the drawing board to take account of latest ONS projections and the Gaydon/Lighthorne proposals.</i></p> <p><i>Land north of Gallows Hill should be removed to maintain the space between Warwick and Leamington.</i></p>	<p>A study has been undertaken to assess the impact of the latest ONS projections and the Council believes that this does not provide justification for changing the Plan's housing requirement. The Gaydon/LH proposals have been taken into account in the Plan. The site north of Gallows Hill has been assessed as a sustainable location for development (see site selection methodology)</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65616 - Warwickshire County Council (Monica Fogarty) [12790] 65638 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>It is not clear whether any regard has been given to the SCS for Warwickshire, 'People, Places and Prosperity'. This document is neither referenced within the Local Plan Publication Draft consultation document nor appears in the list of evidence base documents on the WDC website. The three elements of the vision for Warwickshire, as set out in the Warwickshire SCS, are: tackling inequities existing either by geography or within communities; ensuring good access to services, choice and opportunity; and pursuing sustainability with respect to people, place and prosperity. The strategy set out at paragraph 1.42 of the Local Plan Publication Draft consultation document does not make reference to tackling inequality or facilitating access. It is therefore unclear whether these matters have been considered through the plan-making process. The Planning Inspectorate document 'Examining Local Plans Procedural Practice' (December 2013) identifies at part B that "the Plan must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. County and District)". Furthermore, the slightly older Planning Inspectorate document 'Local Development Frameworks: Examining Development Plan Documents: Soundness Guidance'. Specifies at paragraph 1.1 that the submission of a SCS is necessary for the Examination, which in the case of a District Local Planning Authorities should also include one copy of the County's SCS.</p> <p>It is not clear whether WDC intends to submit a copy of the Warwickshire SCS, given the absence of this document in the list of evidence base documents on the WDC website. Furthermore it is not clear whether the Warwickshire SCS has even been taken into account in the preparation of the Local Plan. On this basis, WCC questions whether the Local Plan is legally compliant</p>	The proposed amended wording to 1.42 is accepted. Warwickshire SCS will form part of the Local Plan's supporting documentation.	<p>Amended wording of para 1.42 to read: "This Plan aligns with both the Warwick District and Warwickshire County Sustainable Community Strategies by focusing on the following strategic priorities:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Supporting Prosperity: seeking to enable the District's economy to prosper by providing opportunities for businesses to grow and relocate is an important priority for the Local Plan. To achieve this, the Plan sets out policies and proposals to support employment, vibrant town centres, and a strong cultural offer and enable good access to these facilities.</li> <li><input type="checkbox"/> Providing the homes the District needs: providing opportunities to deliver the housing needed to support the District's changing and growing population is central to the Plan, ensuring this is high quality and affordable, at the same time as meeting the needs of everyone including those with specialist needs.</li> <li><input type="checkbox"/> Supporting sustainable communities (including health and wellbeing and community safety): there are many aspects to the delivery of sustainable communities including the design and layout of new development; provision of infrastructure; spaces and services to enable healthy and safe lifestyles; regeneration and enhancement of existing communities and environments, including tackling inequalities, and the protection of</li> </ul>
		<p><i>Changes to Plan:</i> <i>The Local Plan Publication Draft consultation document needs to be thoroughly reviewed to ensure that it has taken the Warwickshire SCS into account. This should be evidenced in the wording used within the Local Plan and justification provided as part of the suite of</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>
		<p>submission documents as to how the Local Plan takes account of the Warwickshire SCS and what modifications have been made to ensure that this has been taken into account.</p> <p>WCC suggests that the updating should include amendments to the wording of paragraph 1.42 of the Local Plan Publication Draft consultation document, as follows]:</p> <p>"This Plan aligns with both the Warwick District and Warwickshire County Sustainable Community Strategies by focusing on the following strategic priorities:</p> <ul style="list-style-type: none"> <li>□ Supporting Prosperity: seeking to enable the District's economy to prosper by providing opportunities for businesses to grow and relocate is an important priority for the Local Plan. To achieve this, the Plan sets out policies and proposals to support employment, vibrant town centres, and a strong cultural offer and enable good access to these facilities.</li> <li>□ Providing the homes the District needs: providing opportunities to deliver the housing needed to support the District's changing and growing population is central to the Plan, ensuring this is high quality and affordable, at the same time as meeting the needs of everyone including those with specialist needs.</li> <li>□ Supporting sustainable communities (including health and wellbeing and community safety): there are many aspects to the delivery of sustainable communities including the design and layout of new development; provision of infrastructure; spaces and services to enable healthy and safe lifestyles; regeneration and enhancement of existing communities and environments, including tackling inequalities, and the protection of the natural and built environment." </li></ul>		
66024 - Centaur Homes [9117]	Object	<p>Para 1.42 and 1.43 Centaur Homes objects to the allocation of Land at Arras Boulevard in Hampton Magna because it is considered to lead to the coalescence between Hampton Magna and Warwick</p> <p>Changes to Plan: Removal of the allocated site at Arras Boulevard, Hampton Magna. <i>Removal of the allocated site at Arras Boulevard, Hampton Magna.</i></p>	The Council does not accept that this site would lead to coalescence	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65672 - Roger Saunders [7213]	Object	In my view, and as illustrated by such groups as Save Warwick, the developments South of Warwick continue to be disproportionate to reasonable need. Without additional significant infrastructure investment it will impact Warwick Town and District detrimentally. A more reasonable i.e. reduced provision of development would have a far less negative impact on traffic, pollution, character, and attractiveness (to residents and businesses new, old, and potential) of the Town and District. It would be more likely to enable Well Being and Healthy Living. It would be less likely to require additional significant infrastructural investments or Social Provision. The ambitions of the current Plan are beyond reasonable need and contrary to the wishes of significant numbers of the local population: it feels rather undemocratic! and lacking in wisdom and sustainable vision.	The proposals are based on sound evidence of need and the proposed distribution aligns with the Council's spatial strategy and evidence base. Consultations have taken place and these have helped to shape the Plan	No change
65629 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	Plan is unsound for the following reasons: The Local Plan Strategy 1.43 on page 11 says the strategic priorities, are supported by a Spatial Strategy which seeks to: <input type="checkbox"/> maximise use of brownfield sites; <input type="checkbox"/> only bring forward greenfield sites in sustainable locations; Contradiction of what is actually happening. Majority of housing developments are taking place south of River Leam on Greenfield sites. 4655 dwellings currently scheduled to be built on Greenfield sites. Plan not positively prepared and does not demonstrate effective joint working with neighbouring authorities. WDC could alleviate disproportionate number of houses in one area of district. Applications in the pipeline already amount to 6.5 yr supply. Supportive of need for houses for local people, however claimed numbers are exaggerated to increase Govt. revenue to WDC. Houses planned not aimed at first time buyers but at executive buyers from beyond area. Need for bungalows and housing mix. Fails to avoid coalescence - Development sites between Myton Road and Europa Way, land south of Harbury Lane and east of railway in Whitnash and south of Campion School coalesces the large part of S Leamington, Whitnash and Warwick. WDC has not consulted with local people over number of houses required and location. Local people have had no input into the LP.	Whilst these points are noted, the Council takes a different view. The sites selected are consistent with the spatial strategy and are supported by evidence (see site selection methodology). The Council believes it has fulfilled the Duty to Cooperate and has played an active role in this. The strategy avoids coalescence between the main urban areas and villages. The site referred to sits between Warwick and Leamington. However, these settlements are already joined and the site provides an otherwise sustainable location.	No change
65957 - CWLEP Planning Business Group (Lizzie Beresford) [12841] 66023 - Centaur Homes [9117]	Support	Support the Local Plan Strategy	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>Providing sustainable levels of growth in the District</i>				
66128 - Hallam Land Management and William Davis [8278]	Object	<p>The primary objective of the plan should be to provide for sustainable levels of growth in the district, in line with advice set out in the NPPF.</p> <p>Para. 1.46 refers to a secondary objective, to provide a sustainable level of housing growth by identifying and maintaining a supply of land for housing to meet objectively assessed needs for market and affordable housing. Whilst this is entirely appropriate, it is not considered that it has sufficient regard to the emphasis in national policy for the need to boost significantly the supply of housing, in order to achieve five years worth of housing. As a consequence the Plan is not sound as it is not consistent with national policy and does not enable the delivery of sustainable development in accordance with the policies in the NPPF.</p>	The proposed level of housing in the Plan is supported by evidence in the Joint SHMA and has been set at a level which does significantly boost the supply of housing in the District.	No change
64553 - Mr Graham Butt [3737] 64555 - Mr Graham Butt [3737]	Object	<p>1) Levels of growth too high. Increased economic activity generates new housing needs. Without the increased economic activity new housing needs for people coming into the district will be reduced. Therefor less employment AND housing land needs to be released.</p> <p>2) Reconsideration with the Gaydon new-town development in mind as much of the need in the south may be met by this</p> <p>3) Decreased conversion of housing in south Leamington to shared student accommodation and reversal of such conversions would meet part of the housing need. High density student accommodation on brownfield sites (or in Coventry) would achieve this.</p> <p><i>Revised growth targets (lower)</i></p> <p><i>Policy on a 'ban' on shared occupancy conversions</i></p>	<p>The growth targets are supported by evidence (eg the Joint SHMA). The proposals have been taken in to account in preparing the Plan.</p> <p>Policy H6 seeks to control concentrations of HMOs and student accommodation whilst recognising the benefits these can bring</p>	No change
66786 - Gallagher Estates [644]	Object	<p>Paragraph 1.46 states that the Local Plan will identify and maintain a supply of land for housing to meet the objectively assessed needs for market and affordable housing. This objective of the Local Plan is supported as sound and responds to the issue of affordability identified at paragraph 1.30 part (b) of the Plan and the strategic priority to provide the homes the District needs identified at paragraph 1.42 of the Plan. There is a concern that in practice the policies of the Plan which follow (particularly Policy DS6) are at risk of failing to meet the objectively assessed need for housing contrary, not only to the NPPF, but to the strategic priority and objective 1 of the draft Plan.</p>	Support for the objective is noted. The Council believe that the level of growth proposed is consistent with the NPPF and the objectives. See responses to DS6 for further details	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65330 - Mr Carl Stevens [4873]	Object	<p>Sustainability with the size and intensity / density of house building will stretch public facilities utilities and transport networks to breaking point.</p> <p><i>More work is required and independent of the council to assess the sustainability of the plan particularly in transport infrastructure. WDC has relied too heavily on their own blinkered assessment of what impact it will be.</i></p>	The sustainability of sites has been assessed including strategic transport assessments which show the proposed distribution of development can be supported	No change
65316 - Mr Brian Bate [1611]	Object	<p>The NPPF states: identify and maintain supply of land for housing to meet the objectively assessed needs for market and affordable housing ensuring this is of the right size, has the right tenure, and is in the right location;</p> <p>WDC have not ensured that the land for housing is in the right location. They have simply looked at the area and said that they will not build on green belt land so selected land to the south of Warwick and Leamington Spa for over 90% of the proposed new homes as it is green field land.</p> <p><i>WDC should spread the number of new houses around the district and not take the easy road and dump most of them in one area that has serious traffic infrastructure problems.</i></p>	The allocated sites have been carefully selected following an appraisal of options and assessment of a range of sites. the proposed distribution of development is considered to be sustainable and can be supported by transport infrastructure	No change
64680 - Federation of Small Businesses (Mrs Linsey Luke) [5626] 66025 - Centaur Homes [9117] 66164 - Friends of the Earth (John Brightley) [1113]	Support	Support for objective 1	Noted	

Providing well-designed new developments that are in the right location and address climate change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Providing well-designed new developments that are in the right location and address climate change</i>				
64522 - Mr Richard Thwaites [11460]	Object	<p>New developments are required to be in the right location to maintain and improve the built and natural environments and historic areas, respecting the integrity of existing settlements. The preferred option overlooks and is visible from the Race Course. The existing settlement will overlook houses built on the preferred option.</p> <p>More traffic will be generated through the existing estate roads. The existing settlement will be worsened not improved. The Maple Lodge site will remove heavy lorries from the village environment and allow the protection of the last remains of the Budbroke Barracks</p> <p><i>The Maple Lodge site should be the preferred site for development within Hampton Magna</i></p>	The Maple Lodge site has been considered but was not allocated for a number of reasons including its location in an area of high landscape value.	No change
64554 - Mr Graham Butt [3737]	Object	<p>Removal of Development East of Whitnash. Development is unbalanced in district for political reasons. Time that other areas of district share in the development (if indeed it is truly necessary). Maybe we should wait until the HS2 decision is finalised and place housing in the areas close to the line which those to the north of the town seemingly consider will be blighted beyond use anyway. These new houses will be even closer to Briar Hill and St Margaret's Primary so there will be even more parents chasing few places. Some of the fields in question are often subject to flooding. Any work to reduce their flooding risk could lead to increased risk elsewhere</p> <p><i>Removal of Development East of Whitnash</i></p>	This site has been assessed as a sustainable location for development, including an assessment of flooding	No change
66063 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>1.54 EH welcomes the principle of this sub objective however suggests a minor clarification to ensure consistency with national planning policy.</p> <p><i>The following additional text is suggested.</i></p> <p><i>...in a sensitive way appropriate for their significance.</i></p>	Proposed amendment is accepted	Amend wording of para 1.54 to add "for their significance." at the end

Providing well-designed new developments that are in the right location and address climate change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64678 - Federation of Small Businesses (Mrs Linsey Luke) [5626]	Support	SME's rarely have the ready funds, or time, to instruct a design and build of new premises and need space quickly, at a cost that is affordable. The FSB therefore believes that new developments should consider an allocation of space for smaller units alongside the larger ones. However, the FSB appreciates that this does increase developer costs. Could the Warwick District Council encourage developers to consider speculative smaller units, similar to housing developers needing to include a set percentage of affordable housing?	It is acknowledged that smaller units should be available to meet the full range of needs during the plan period. The District's portfolio of employment land includes a range in the type and location of sites available and the Council would expect this to be capable of delivering different sizes of unit (for example town centre sites as well as larger out of centre sites). Employment premises will be delivered according to market requirements such as the development of some smaller starter office units on large sites to meet demand of this nature.	No change required
65134 - Sport England (Mr Bob Sharples) [1355]	Support	Suggest a revision to 1.53 to include sport i.e. 1.53 Make sure new developments provide public and private open spaces where there is a choice of areas of shade, shelter, recreation and access to sport facilities which will benefit people and wildlife and provide flood storage and carbon management.  <i>1.53 Make sure new developments provide public and private open spaces where there is a choice of areas of shade, shelter, recreation and access to sport facilities which will benefit people and wildlife and provide flood storage and carbon management.</i>	Proposed revised wording is accepted	Revise wording of para 1.53 to read: Make sure new developments provide public and private open spaces where there is a choice of areas of shade, shelter, recreation and access to sport facilities which will benefit people and wildlife and provide flood storage and carbon management.
<i>Enabling the District's infrastructure to improve and support growth</i>				
66433 - Ms Myra Styles [9988] 66442 - Mr Robert Cochrane [9989]	Object	Infrastructure assessment incomplete - flooding still an issue, schools are full	See infrastructure evidence and IDP for details on infrastructure. Flooding has been assessed - see site selection methodology	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66636 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>There is considerable concern that paragraphs 1.55 - 1.59 make no reference at all to enabling the emergency services to provide and maintain facilities and services people currently need, or to enabling them to improve their infrastructure and services so that they can meet people's future needs.</p> <p>The omission is at odds with the Council's own 'Draft Infrastructure Delivery Plan - April 2014', which includes the police and other emergency services. A number of infrastructure requirements are listed for the emergency services, which are deemed either strategically essential or strategically desirable by the Council.</p> <p>We contend that as it stands paragraphs 1.55 - 1.59 of the Local Plan are not in accordance with following provisions of the National Planning Policy Framework (NPPF): -</p> <ul style="list-style-type: none"> <li>* Securing sufficient facilities and services to meet local needs is a core planning principle (paragraph 17).</li> <li>* Planning is to deliver facilities and services that communities need (paragraph 70).</li> <li>* Local plan policies should deliver the provision of security infrastructure and other local facilities (paragraph 156).</li> <li>* Local plan policy and decision making should be seamless (paragraph 186).</li> <li>* Infrastructure planning should accompany development planning by LPAs (paragraph 177) who should work together with infrastructure providers (paragraph 162).</li> <li>* The NPPF seeks environments where crime and disorder and the fear of crime do not undermine the quality of life and community cohesion (paragraph 69) and planning policies and decisions should deliver this (paragraph 58).</li> </ul> <p>Should there be any remaining doubts regarding whether the Local Plan should support the delivery of emergency services infrastructure, please be aware that Ian Dove QC was instructed by the Association of Chief Police Officers (ACPO) to provide written advice in respect of developer contributions towards policing services. A copy of his advice is enclosed in Appendix 1 to these representations. His advice concluded that there is no difficulty in the proposition of Section 106 agreements and CIL contributions towards police infrastructure in the context of the Planning Act 2008.</p>	Proposed revised wording of para 1.56 is accepted	<p>Amend wording of para 1.56 to read:</p> <p>Enable energy, communications, the emergency services, water and waste organisations to improve their infrastructure and services so that they can meet people's current and future needs, protect the environment, and contribute towards dealing with the causes and mitigating the effects of climate change.</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><i>To resolve the above concerns, it is recommend that the following amendment is made to paragraph 1.56 of the Local Plan: -</i></p> <p><i>'Enable energy, communications, the emergency services, water and waste organisations to improve their infrastructure and services so that they can meet people's current and future needs, protect the environment, and contribute towards dealing with the causes and mitigating the effects of climate change.'</i></p> <p><i>As well as improving the effectiveness of the Local Plan in delivering emergency services infrastructure and its resulting consistency with the NPPF, it should not be forgotten that the emergency services are quite literally on the front line when it comes to dealing with the effects of climate change. The recent floods in January - March 2014 in Warwickshire and the actions taken by the emergency services to help local communities in the face of these bear witness to this fact. Therefore, support for the delivery of emergency services infrastructure in the Local Plan is absolutely vital.</i></p>		
64679 - Federation of Small Businesses (Mrs Linsey Luke) [5626]	Support	<p>Infrastructure, utilities and broadband are all issues that need addressing to attract investment on allocated employment land. Speculative builds need confidence they will be able to access the site and have sufficient broadband and utilities. This is a particular concern for rural businesses. Our members tell us that they now consider the broadband speeds when looking to occupy a new premise. Broadband and utility providers are less interested in supporting developments on a smaller scale. Rural businesses particularly suffer from lack of suitable broadband, as well as accessibility. This needs to be considered when developing employment opportunities in rural areas.</p>	Noted	

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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>
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***2. Development Strategy***

*DS1 Supporting Prosperity*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67220 - Bloor Homes Midlands [11532]	Object	<p>The draft Local Plan has failed to demonstrate:</p> <ul style="list-style-type: none"> <li>* it has proactively driven/supported sustainable economic development, and done everything it can to support sustainable economic growth;</li> <li>* it meets the business needs of the area and delivers homes to support the growth of the local economy;</li> <li>* it is based on the most up-to-date and robust evidence about the economic prospects and needs of the area; and,</li> <li>* it integrates the strategic policies for prosperity (Strategic Policies DS1 and DS8) and housing (Strategic Policies DS2 and DS6).</li> </ul> <p>The level of economic growth to be provided for is not defined within the draft Local Plan.</p> <p>The strategy for prosperity in the draft Local Plan is to provide for the growth of the local and sub-regional economy by ensuring sufficient/appropriate employment land is available to meet the existing/future needs of businesses (Strategic Policy DS1). Policy DS8 provides for a minimum of 66ha of employment land to meet local need (for the period 2011 to 2030). The strategy for housing is to provide in full the objectively assessed need (Strategic Policy DS2). Policies DS6, DS7 and DS10 provides for 12,860 new homes (for the period 2011 to 2029).</p> <p>The evidence base fails to support Paragraph 2.7 of the LP that economic growth has been balanced with housing growth, and that meeting the full objectively assessed need for housing will complement and meet the economic and business needs and ambitions of the District.</p> <p>The evidence can be found within the Economic and Demographic Forecasts Study (EDFS) (December 2012), the Employment Land Review Update (ELR) (May 2013), and its economic ambitions can be found within the Strategic Economic Plan for Coventry &amp; Warwickshire LEP (SEP) (March 2014).</p> <p>The economic strength of Warwick is undeniable, and is summarised in paragraphs 3.1 to 3.6 of the ELR. Its economy has outperformed the West Midlands and UK in terms of its growth and is forecast to continue that trend (both in terms of GVA and employment) into the plan period. Warwick has an economic structure which is aligned to the future growth sectors, such as professional services, healthcare, and IT.</p> <p>Warwick also has a particular strength in the automotive/vehicle manufacturing sector, with several major employers including Jaguar Land Rover (JLR) who have facilities located both within and on the edge of the District. Given the significance of JLR to the national economy, it is no surprise that the Vision for Coventry &amp; Warwickshire in 2025 within the SEP is to be recognised as a global hub and a UK Centre of Excellence in the advanced</p>	<p>The Council considers it is making adequate provision for employment land to support the economy during the plan period and that it has taken into account the objectives of the CWLEP. The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this is response to representations made to DS2.</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>manufacturing and engineering sector. Many of the SEP's priorities and actions are focussed around facilitating the growth of this sector, including investment to deliver new/expanded facilities at several employment sites within and bordering Warwick District. The SEP has estimated its actions alone may generate over 50,000 jobs by 2030 across the subregion.</p> <p>It is very clear from the evidence that the Warwick economy is undoubtedly the 'powerhouse' within the sub-region and West Midlands region. Its future economic performance and continued success is therefore critical to the overall performance of the sub-region and regional economy, and the delivery of the ambitions within SEP.</p> <p>Whilst the availability of suitable employment land is a key factor influencing Warwick's future economic growth and prosperity, it is not the only component that the Local Plan will need to influence. A key challenges is to ensure that the planned growth of Warwick and the sub-region's economy is not frustrated by lack of access to skilled workforce. To deliver a global hub and national centre of excellence, requires businesses to be able to attract the necessary talent. Providing access to available homes of a high quality is an essential component of the offer. SEP recognises that the shortage of new homes can be a significant barrier to sustainable economic growth. In this context, it is of concern that the objectively assessed housing need figure chosen by the Council fails to support a growth in labour supply that meets the forecasts for employment growth. The chosen housing figure only supports labour supply growth of 8,996 for the period 2011 to 2031 leaving a shortfall against the forecast of between 1,304 and 1,904 jobs.</p> <p>This shortfall is likely to be under-estimated as the employment forecasts preceded the publication of the SEP and have not taken account of its potential influence in accelerating the rate of growth of growing sectors within Warwick. Mindful of the growth in housing supply not keeping pace with the economic ambitions for the area, it is noted that the SEP prioritises a review of additional future housing numbers across the sub-region by the end of March 2015 (page 8). The draft Local Plan does state that it has taken account of the SEP, although there is no reference to a review of its housing numbers within the draft Local Plan.</p> <p>Whilst it is recognised that the shortfall in labour supply growth might be mitigated through people holding down more than one job, or increased in-commuting from outside of the District (as suggested within paragraph 7.28 of the SHMA), it is noted that when recommending the chosen housing figure, the SHMA advised the Council to consider its alignment with forecast economic growth, and how employment</p>		

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>growth will be supported.</p> <p>It is not clear whether the Council has undertaken this exercise as the draft Local Plan does not explain how the shortfall between growth in labour supply and growth in jobs will be addressed, or what the implications may be. In commuting from outside the District is one possible consequence.</p> <p>In this context, it is considered that the strategy has not been positively prepared as it has not proactively driven and supported sustainable economic development, or done everything it can to support sustainable economic growth. It does not meet the objectively assessed development requirements as set out in the evidence base, and therefore is not in accordance with the Framework.</p> <p>The Council should therefore review its objectively assessed housing need figure prior to submission.</p> <p>In the context of delivering sustainable development, this review should consider economic, social and environmental effects of increasing the level of housing growth in order to balance with the forecast economic growth and economic ambitions of the Council. Other representations made by Bloor Homes Limited to the draft Local Plan have identified locations where additional housing growth can be accommodated.</p> <p>In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan '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>
66251 - Lenco Investments [1165]	Object	<p>The Council's proposals are woefully short on the number of homes required and fail to balance the level of housing and jobs provided within the strategy of the plan, or the core Objectives of it.</p> <p>A key component of the above Objective and the Plan's Strategy is the Council's reference to balancing economic and housing growth. This is specifically referred to (paragraph 2.4 refers) in respect of balancing the number of jobs in the District and the working age population to boost economic development, and the supply of jobs. RPS fully supports this approach and the objective set out above as it is reflective of the NPPF.</p> <p>However, having set out all of the above, the plan then fundamentally fails to deliver on the Strategy and Objectives it has set out.</p> <p>The proposals in the plan fail to provide for the objectively assessed need for housing, but more importantly fail to balance the provision of homes and jobs as advocated by the authority as being a fundamental component of the Plan's strategy and policy framework. It is therefore ineffective and unjustified.</p>	The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this in response to representations made to Policy DS2.	No change needed
66787 - Gallagher Estates [644]	Object	<p>Policy DS1 supports the vision of the Council to facilitate the growth of the local economy and is supported as consistent with the NPPF's objective for the country to build a strong, competitive economy. There is a concern however that the Plan is not effectively balancing housing and employment growth as currently drafted. In order to help support economic growth and meet the projected target (11.6% employment jobs growth) for Warwick District over the plan period, there needs to be an increase in population, in particular the working population. This, in essence, requires an increase in the supply of housing over that currently proposed in the Plan. Please refer to the representations to Policy DS6 and Policy PC0.</p>	The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this in response to representations made to DS2.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66491 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>It is essential that the District Council fully considers the housing / employment balance. If the number of jobs in Warwick District significantly exceeded the resident workforce, this will result in considerable levels of commuting into the District. This could also create recruitment difficulties for employers, further adding to housing pressures in the District including affordable rents. The Coventry and Warwickshire SHMA has considered population dynamics, economic growth trends and potential, housing market dynamics and affordable housing needs in each area. These are brought together to provide an assessment of housing need for each local authority.</p> <p>The SHMA concludes that provision of between 3,335 - 4,100 homes per annum would be appropriate. The mid-point of this range for 3,750 homes per annum would represent a reasonable level of provision across the HMA.</p> <p>The SHMA is intended to provide a consistent assessment of need across the HMA. However, it is a strategic-level assessment and through the development of individual authorities' development plans there may be wider evidence which forms part of the evidence base regarding more local dynamics and issues, including in regard to local economic growth potential, which may provide a basis for refining needs estimates. In interpreting the conclusions herein, greater weight should be attached to the HMA-wide findings. Unless, there is significant other evidence that we are not aware of, the County Council supports the conclusions of the Joint SHMA as robust strategic evidence and therefore fundamental in shaping development strategies and strategic policies.</p> <p><i>Further explanation should be provided on how the District has arrived at striking the balance between meeting the Warwick District wide housing and employment requirement to enable District communities to be more sustainable.</i></p>	The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this in response to representations made to DS2.	No change needed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65483 - The Community Group (David G Wintle) [9097]	Object	<p>'We will provide for the growth of the local and sub-regional economy by ensuring sufficient and appropriate employment land is available within the District to meet the existing and future needs of businesses.'</p> <p>Warwick DC cannot and should not provide the land for all sub-regional needs as the adverse impacts to the District would significantly and demonstrably outweigh any perceived benefit!</p>	<p>The NPPF requires local authorities to work together with neighbouring authorities and the Local Enterprise Partnership to plan for the business needs of the area. As part of this the Council jointly commissioned a sub regional employment land study with the other authorities in the sub region and the LEP to understand employment land needs over the plan period. The Council has a role in helping to address this need as well as delivering the Strategic Economic Plan and City Deal. The Study identified the Coventry and Warwickshire Gateway site as a key site in delivering the employment needs of the sub region over the next 15 years.</p> <p>It is not suggested that the District should solely meet the sub regional needs, to clarify this it would be useful to add further text in the explanation to refer to the authorities role in helping to deliver the sub regional economy.</p>	<p>Amend policy wording to state: We will provide for the growth of the local economy and working with neighbouring local authorities the sub regional economy, by ensuring sufficient and appropriate employment land is available within the District to meet the existing and future needs of businesses.</p>
		<p><i>'We will provide for the growth of the local economy by ensuring appropriate land is available to meet the reasonable existing and future needs of businesses and will work with other Local Authorities towards together providing appropriate land to support the sub-regional economy.'</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>
66197 - Mr David A Ellwood [7659]	Object	Wording in DS1 suggests the Council is willing to provide all the land for the growth of both the local and sub regional economy. That would not allow the balance between the three roles economic, social and environmental - the NPPF requires this and it is not appropriate or acceptable.	<p>The NPPF requires local authorities to work together with neighbouring authorities and the Local Enterprise Partnership to plan for the business needs of the area. As part of this the Council jointly commissioned a sub regional employment land study with the other authorities in the sub region and the LEP to understand employment land needs over the plan period. The Council has a role in helping to address this need as well as delivering the Strategic Economic Plan and City Deal. The Study identified the Coventry and Warwickshire Gateway site as a key site in delivering the employment needs of the sub region over the next 15 years.</p> <p>It is not suggested that the District should solely meet sub regional needs, to clarify this it would be useful to amend the policy to refer to the need to work with neighbouring authorities in helping to deliver the sub regional economy.</p>	Amend policy wording to state: We will provide for the growth of the local economy and working with neighbouring local authorities the sub regional economy, by ensuring sufficient and appropriate employment land is available within the District to meet the existing and future needs of businesses.
		<i>We will provide for the growth of the local economy, consistent with social and environmental considerations, by ensuring appropriate land is available to meet the existing and future needs of local businesses, subject to those considerations, and will work with other Local Authorities in the sub-region towards together providing appropriate land to support the sub-regional economy, again subject to the same considerations.</i>		
66478 - Friends of the Earth (John Brightley) [1113]	Support	Support	Noted	No change needed

### *DS2 Providing the Homes the District Needs*

66788 - Gallagher Estates [644]	Object	In light of the statement of intent proffered through Strategic policy DS2 that the full objectively assessed need for housing will be met in the Plan is robust, credible and sound. Policy DS2 is therefore supported as sound. It is laudable that the LPA has produced a joint SHMA however there are concerns about the robustness of the findings and, as a consequence, whether the housing requirement figure contained within the Plan at Policy DS6 (12,860 new dwellings as derived from the SHMA) is sufficient to meet the full, objectively assessed need for housing.	Support in principle for policy DS2 is noted. For further details regarding the JSHMA and the housing requirement, please see responses to policy DS6	
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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>
66226 - Crest Strategic Projects [9115]	Object	<p>We support this policy in principle which seeks to provide in full the objectively assessed housing need for the District as well as any other housing needs for adjoining Districts etc. However, the Local Plan does not carry through this objective and does not meet its full objectively assessed housing need either for the District or indeed adjoining Districts.</p> <p><i>The Local Plan must meet its full objectively assessed housing need.</i></p>	Support for Policy DS2 noted. For responses regarding the District's housing requirement, please see responses to Policy DS6	
65715 - Centaur Homes [9117]	Object	<p>Centaur Homes object to Policy DS2 in entirety. It is not required as the aims of the policy are within the Framework and the policy does not deviate or go beyond these.</p> <p><i>This policy should be omitted</i></p>	<p>Policies DS1 to DS4 seek to provide the overall strategic framework for the other policies and proposals in the Plan. The District's requirement is clearly a key part of the Plan and as such the plan would be imbalanced if this was not addressed in the strategic overview policies.</p> <p>In this context, the Council contends it is important to retain this policy to ensures the Council's ambitions are clearly set out</p>	
65747 - The Leamington Society (Richard Ashworth) [4687]	Object	<p>The population projections on which the plan is based are out of date. The 2012 ONS projections show a lower population growth. This is also true for most neighbouring districts with the exception of Coventry. If WDC continue with their plans to build homes, this will mean the homes are built in the wrong place.</p> <p>Projections in population growth in Coventry are uncertain due to volatile inward migration from abroad. The ONS figures for Coventry represent 1.2% increase per year which implausibly large in comparison with national picture and other cities. This should not therefore be used to justify building homes in Warwick.</p> <p>The latest ONS projections provide the best basis for the Local Plan, however these demonstrate that the Plan is unsound as they indicate the population is projected to be over 6000 fewer than those on which the Plan is based.</p> <p>The need for additional homes is sensitive to average household size. The Plan assumes 2.181 by 2029 on the basis that the trend will decrease. However the are conflicting possible trends and this trend is not supported by the 2001 and 2011 census data. 12,860 is therefore an excessive figure and even if the ave. household size is 2.181 this is 2760 more dwellings than are needed.</p> <p><i>Recognise the ONS population projections and recalibrate housing needs accordingly. The Plan should propose a housing target somewhere between 10,100 and 6,672.</i></p>	<p>The Joint SHMA Addendum reflects the 2012 ONS Population projections. The Council remains committed through policy DS2 to meet the OAN in full and as required by the NPPF this needs to address the OAN for the whole Housing Market Area. For further information, please see responses to Policy DS6</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66381 - Mr Robert Price [11538]	Object	<p>The calculation of housing numbers is highly speculative and inevitably based on poor quality evidence and data. Another equally competent assessment reached a figure of 5,500 rather than 12,900. Given development pressure for greenfield sites it would be safer to plan for a lower figure. This could be revised upwards if need demonstrated during the 15 year period. The recently published ONS projections show a 29% reduction on the previous estimate showing the need for caution.</p> <p><i>WDC should use the ONS statistics to accurately reflect the number of homes required. Show and prove the proper planning on how to support the infrastructure financially and practically. Define and show what the exceptional circumstances are to build on green belt</i></p>	<p>The Joint SHMA Addendum reflects the 2012 ONS population projections. The Council has employed well respected experts to assess the housing needs of the Housing Market Area and the District. In this context, the Council contends it has sound evidence on which to base the housing requirement and is planning appropriately for the District's housing needs.</p> <p>The IDP sets out the infrastructure plans to support the proposed growth. Exceptional circumstances have be provided for the release of green belt to meet development needs - See responses to Policy DS10 and DS11 for details</p>	
66490 - The Trustees of the F S Johnson 78NEL Settlement [7206]	Object	<p>The housing requirement should as a minimum correspond with the full objectively assessed need identified in the Joint SHMA. This represents a need for an additional 100 dwellings over the plan period. The requirement is also likely to increase in response to the legal obligations arising from the duty to cooperate. It is likely that a number of Councils in the housing market area will have a shortfall, other risks may arise from Birmingham. Policy DS20 provides too much 'wriggle room' for the authority to escape its obligations. The policy does not have a timescale for reviewing the plan, instead there should be a commitment for doing so within 3 years in order to address the needs of the housing market area.</p> <p><i>Land Fronting Station Lane, Kingswood should be allocated for housing. This comprises discounted site 9 together with land to the east up to the existing field boundary</i></p>	<p>Policy DS2 provides the framework for more detailed policies in the Plan including Policy DS6. Policy DS6 sets out the District's housing requirement which takes account of the OAN for both the District and the HMA. For full responses on this, please see responses to Policy DS6</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66252 - Lenco Investments [1165]	Object	<p>RPS objects to the Council's development strategy proposals set out in Section 2 of the Draft Plan, and principally how they are delivered through Policy DS1 Supporting Prosperity and Policy DS2 Providing the Homes the District Needs.</p> <p>The Council's proposals are woefully short on the number of homes required and fail to balance the level of housing and jobs provided within the strategy of the plan, or the core Objectives of it.</p> <p>Policy DS2 logically follows Policy DS1 which sets out that the authority will meet its full objectively assessed needs. RPS supports the general thrust and compatibility of these two policies.</p> <p>The plan seeks to present a logical relationship between balancing local housing and employment need, and gives the impression that these are in harmony. Yet Policy DS16 identifies employment land at the Gateway Site of sub-regional significance which is over and above its local employment requirements. RPS's objection is that the plan fails when considering the commensurate level of housing required, as no account of this major sub-regional employment location is taken in respect of the balance between of jobs and homes.</p> <p>The proposals in the plan fail to provide for the objectively assessed need for housing, but more importantly fail to balance the provision of homes and jobs as advocated by the authority as being a fundamental component of the Plan's strategy and policy framework. It</p>	<p>Support in principle for Policy DS2 is noted. The Council contends that the Plan clearly meets the District's objectively assessed need and strikes an appropriate balance between employment growth and housing growth in line with the evidence, NPPF and NPPG. Please see responses to Policy DS6 for full details in response to the specific points raised regarding the District's housing requirement.</p>	
66083 - Gleeson Developments [5117]	Object	<p>Strategic Policy DS2 refers to the need to provide in full for the objectively assessed housing need. However, it does not plan for any unmet need in the surrounding areas. The Plan goes on to recognise a potential unmet need in Coventry and Birmingham. The Strategic Policy should recognise the potential need in this regard.</p> <p><i>Add an addition sentence to state:</i></p> <p><i>"We will provide in full for the objectively assessed housing need and any unmet need arising from outside of the District..."</i></p>	<p>Whilst the District's Housing requirement may take account of unmet need arising from elsewhere as required by the NPPF, the minimum the District needs to plan for is its OAN. this overarching policy therefore correctly commits the Council to planning to meet OAN for the District even though the Housing Requirement set out in Policy DS6 is in excess of that.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66008 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>Wish to help devise a sound local plan, but the publication draft is not sound for a number of reasons. The overriding reason is that the housing requirement doesn't take account of mid 2012 population projections. This means the plan is based on outdated data. The 2012 projections show population growth 28.7% less than used for the Joint SHMA. this changes the no. of dwellings required and means less infrastructure investment is needed. This in turn changes the selection of housing sites and allows brownfield sites to be committed before green field sites. This in turn enables a realistic achievable plan to be prepared.</p> <p>PPG: 2a-003 "Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur." Ensuring there is a supply of sites is necessary with affordable housing. but the Plan also needs to comply with Para 157 of the NPPF. It is also important to keep a balance between jobs and homes.</p> <p>DTC is also important the JSHMA achieves this, but this needs to be re-examined to address the ONs projections, taking a particular problem with Coventry in to account. The JSHMA indicated a need for 67,536 homes over 18 years across the HMA. The revised projections (based on 2012 ONS) indicate a need for 68,152. However this masks an issue with Coventry's requirement whereby international migration makes up a significant element of the projected increase in Coventry's population. However international students inflow has increased since 2005, but corresponding outflow has not to the same extent (as students are generally resident for 3 years). This indicates that the increase in inflow may be due to international students on courses that are not yet completed. This temporary anomaly is projected forward in the population projections. It does not make sense to provide housing for this population as they won't be there.</p> <p>If adjustments are made to reflect this, then a worst case scenario for Coventry would be an inflow of 40,000 (instead of 74,000) which is still lower than the JSHMA figure. This in turn would lead to a reduction in the HMA's housing requirement from 68,152 to 51,327.</p> <p>with this level of housing Warwick District could justify a lower level of housing at the same time as fulfilling the DTC.</p> <p><i>Plan for 9,217 dwellings over the Plan period</i></p>	<p>See responses to Policy DS6 for details as to how the Council has assessed the District's housing need.</p> <p>This policy commits to ensuring the OAN is met. In assessing the OAN, the Council has participated in an update of the JSHMA to take account of the latest ONS projections. In the context of the Housing Market Area as a whole, the Council contends that the level of housing proposed in the publication draft is reasonable.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66717 - Mr. A. Burrows [2117]	Object	<p>There are grave concerns about the lack of detail and lack of proper planning for infrastructure needs associated with all the allocated development in the Local Plan.</p> <p>Many of the schools and roads are already full and sufficient planning and money has not been allocated to resolve the additional pressures that the planned development would bring. Indeed any plans that would solve the problems would in themselves ruin the local area and be completely unsustainable (NPPF requires development to be sustainable).</p>	<p>The Infrastructure Delivery Plan sets out how and where infrastructure will be provided to support the proposed development in the District.</p>	
65513 - Sharba Homes Group [12779]	Object	<p>This policy should be more clearly tied into Policies DS4 and DS7, to clearly set out what the housing needs are for Warwick District, and how these will be explicitly be delivered within the district. At present, this policy seems incomplete and almost unnecessary, due to other policies more clearly being able to translate into development on the ground whilst considering objectively assessed need.</p> <p><i>Please see the attached representation submitted by PJ Planning on behalf of Sharba Homes Group</i></p>	<p>This policy seeks to provide part of the strategic framework to inform the Plan's more specific proposals and policies. The Council contends it is entirely consistent with policies DS4 and DS7, but in particular, it seeks to inform policies DS6, H1 to H9</p>	
65711 - West Midlands HARP Planning Consortium [5118]	Object	<p>Concern is expressed over the evidence provided by the Council to meet its objectively assessed housing need. The figure of 268 new affordable houses per year between 2013 and 2031 has been calculated based on an assumed period of 18 years over which the backlog of affordable housing should be met. However the 2012 SHMA identified a need for 698 affordable dwellings per annum in the District; a figure which is significantly higher than that of the joint SHMA, but which is only one year older. Further concern is that the 2013 Joint SHMA incorporates an assumption of zero migration; this is in contrast to the 2012 SHMA for Warwick which included trend based migration of 460 persons per annum. The zero migration scenario employed in the 2013 SHMA is likely to have underestimated the need for affordable housing.</p>	<p>The Joint SHMA Addendum is based on ONS population projections (as required by the NPPG) which in turn is based on migration trends.</p> <p>The District's affordable housing requirement is set out in the Joint SHMA. This indicates a need for just under 40% of the District's new housing to be affordable. This is then reflected in policies DS6 and H2</p>	
65635 - Mr Ian Lovecy [8036]	Object	<p>Very definite numbers of houses required over a period of 18 years - Calling something an Objectively Assessed Need does not make it any more firm a prediction than an informed guess - and experience elsewhere shows that such estimates can be inaccurate by considerable margins in either direction. Over a period of 18 years the potential changes in demography, ways of working through increased use of telecommunications and policy changes by three Governments make the prediction to the nearest ten houses either cynical or an indicator of naivety</p> <p><i>Is in need of substantial and realistic revision before it submitted to the Secretary of State.</i></p>	<p>The NPPF requires that the Objectively Assessed Need is met in full. It is accepted that projection may not be accurate, but the Council has used data from a range of sources to ensure the OAN is met in full (see Joint SHMA and Joint SHMA Addendum)</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67221 - Bloor Homes Midlands [11532]	Object	<p>The draft Local Plan has failed to demonstrate:</p> <ul style="list-style-type: none"> <li>* it has proactively driven/supported sustainable economic development, and done everything it can to support sustainable economic growth;</li> <li>* it meets the business needs of the area and delivers homes to support the growth of the local economy;</li> <li>* it is based on the most up-to-date and robust evidence about the economic prospects and needs of the area; and,</li> <li>* it integrates the strategic policies for prosperity (Strategic Policies DS1 and DS8) and housing (Strategic Policies DS2 and DS6).</li> </ul> <p>The level of economic growth to be provided for is not defined within the draft Local Plan.</p> <p>The strategy for prosperity in the draft Local Plan is to provide for the growth of the local and sub-regional economy by ensuring sufficient/appropriate employment land is available to meet the existing/future needs of businesses (Strategic Policy DS1). Policy DS8 provides for a minimum of 66ha of employment land to meet local need (for the period 2011 to 2030). The strategy for housing is to provide in full the objectively assessed need (Strategic Policy DS2). Policies DS6, DS7 and DS10 provides for 12,860 new homes (for the period 2011 to 2029).</p> <p>The evidence base fails to support Paragraph 2.7 of the LP that economic growth has been balanced with housing growth, and that meeting the full objectively assessed need for housing will complement and meet the economic and business needs and ambitions of the District.</p> <p>The evidence can be found within the Economic and Demographic Forecasts Study (EDFS) (December 2012), the Employment Land Review Update (ELR) (May 2013), and its economic ambitions can be found within the Strategic Economic Plan for Coventry &amp; Warwickshire LEP (SEP) (March 2014).</p> <p>The economic strength of Warwick is undeniable, and is summarised in paragraphs 3.1 to 3.6 of the ELR. Its economy has outperformed the West Midlands and UK in terms of its growth and is forecast to continue that trend (both in terms of GVA and employment) into the plan period. Warwick has an economic structure which is aligned to the future growth sectors, such as professional services, healthcare, and IT.</p> <p>Warwick also has a particular strength in the automotive/vehicle manufacturing sector, with several major employers including Jaguar Land Rover (JLR) who have facilities located both within and on the edge of the District. Given the significance of JLR to the national economy, it is no surprise that the Vision for Coventry &amp; Warwickshire in 2025 within the SEP is to be recognised as a global hub and a UK Centre of Excellence in the advanced manufacturing and engineering sector. Many of the SEP's priorities and actions are</p>	<p>The OAN has been reviewed - see the JSHMA Addendum. This not only takes account of the 2012 ONS population projections but also looks at two different economic forecasts. The proposed level of housing growth for the District falls between the levels of growth indicated by the employment growth forecasts of the two econometric models.</p> <p>the Council therefore contends that the level of housing growth proposed in Policy DS6 meets the OAN for the District, the HMA and provide a sensible balance in relation to employment growth. For further details on this, please see responses to Policy DS6</p>	

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
66498 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	<p>focused around facilitating the growth of this sector, including investment to deliver new/expanded facilities at several employment sites within and bordering Warwick District. The SEP has estimated its actions alone may generate over 50,000 jobs by 2030 across the sub-region.</p> <p>It is very clear from the evidence that the Warwick economy is undoubtedly the 'powerhouse' within the sub-region and West Midlands region. Its future economic performance and continued success is therefore critical to the overall performance of the sub-region and regional economy, and the delivery of the ambitions within SEP.</p> <p>Whilst the availability of suitable employment land is a key factor influencing Warwick's future economic growth and prosperity, it is not the only component that the Local Plan will need to influence. A key challenges is to ensure that the planned growth of Warwick and the sub-region's economy is not frustrated by lack of access to skilled workforce. To deliver a global hub and national centre of excellence, requires businesses to be able to attract the necessary talent. Providing access to available homes of a high quality is an essential component of the offer. SEP recognises that the short...</p> <p><i>The Council should therefore review its objectively assessed housing need figure prior to submission.</i></p> <p><i>In the context of delivering sustainable development, this review should consider economic, social and environmental effects of increasing the level of housing growth in order to balance with the forecast economic growth and economic ambitions of the Council.</i></p> <p><i>Other representations made by Bloor Homes Limited to the draft Local Plan have identified locations where additional housing growth can be accommodated.</i></p> <p><i>In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</i></p>	<p>Planning applications have been considered on their merits at the time they were submitted.</p> <p>The Council has undertaken several consultations in preparing the Local Plan and has used these to inform the policies and proposals of the Plan.</p> <p>The Council is supporting parish councils in preparing Neighbourhood Plans in line with the Neighbourhood Planning Regulations</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66199 - Mr Trevor Wood [5457]	Object	<p>New LP prepared knowing ONS was reviewing population projections and therefore that forecast housing development/5 year land supply may need revisiting. ONS figures indicate forecast housing development can be reduced by 30% and there is a 5 year requisite land supply. WDC should review projections. Many housing developments have been rushed through by developers/WDC to beat these new figures.</p> <p>These outline, developments have been approved without adequate consideration to infrastructure. There are no local schools places, GP and NHS capacity, insufficient road infrastructure. Comments from local residents not taken into account in approving applications.</p> <p>Concentration of housing is illogical and does not take into account infrastructure and travel restrictions such as bridges to places of work and emergency services.</p> <p>Alternatives are largely ignored. Recent offer of 5000 house site at Stoneleigh was dismissed without consideration. Other alternatives offered but not considered.</p> <p>Compliance/adherence to the NPPF has been poor/non existent/selective.</p> <p>No respect when approving developments next to existing businesses some of which may go out of business due to poorly considered applications.</p>	<p>The Joint SHMA Addendum (2014) takes account of the updated 2012 ONS Population projections. In this context and in the context of the need to take account of the OAN for the whole of the Housing Market Area, the Council considers that Policy DS6 is still consistent with the framework provided by Policy DS2.</p> <p>The planning applications referred to have been or will be assessed on their merits at the time they were made.</p>	
65682 - Cllr Bob Dhillon and family [2006] 66732 - Hatton Parish Council (M C L Le Tocq) [1045]	Object	<p>Objects on the following grounds: Population released in the ONS show the 12,900 in the plan are too high and 8800 seems more in line with what is required by the area.</p> <p>Infrastructure plan are not in place to provide the facilities to accommodate the high numbers stated in the plan</p> <p>The cost of the infrastructure is under stated and in current climate not achievable.</p> <p>The High number will have an adverse impact on the historical and medieval town of Warwick.</p> <p>Air Quality is currently above the EEC limits and the plan will only see a rise such as Asthma and breathing related problems as per the report from WCC Health assessment.</p> <p><i>Urges the Council to reconsider the plan and adjust the numbers to reflect real need for the future</i></p>	<p>The NPPF requires that Objectively Assessed Need (OAN) is set in full. The Council has used data from a number of sources to assess housing need, including the most up to date ONS population projections. This data is reflected in the Joint SHMA and its 2014 addendum.</p> <p>The IDP shows the infrastructure required to support the level of growth required along with delivery proposals for all the priority infrastructure required in the earlier part of the Plan period.</p> <p>Issues relating to air quality and historic environment are covered in responses to DS10 and 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>
66180 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	High Employment/housing ratio - This is potentially quite difficult in that it raises long term development issues that could lead to housing choices needing to be made in the future presenting WDC with some very difficult strategic housing land decisions about the whole balance of the development of Warwick/Leamington. This could eventually lead to a need to consider Green Belt releases to the north	This policy provides the strategic framework for Policy DS6. In turn, Policy DS6 sets out the District's housing requirement. the responses to DS6 explain to the relationship between housing and employment growth. If circumstances change within the Plan period such that the housing requirement, employment requirement or the distribution of these need to change, then Policy DS20 will be employed to trigger a review 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>
66578 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Net in-migration fell from a figure of over 2,000 per annum in the years immediately following the millennium to 400 in 2008-9 and net out-migration of 700 in 2009-10. In view of this dramatic change it is not acceptable, as the 2012 SHMA did, to take the 460 average and simply project it forward over the plan period. There is a real possibility that there will be net out-migration from rather than in-migration to the district over the plan period. The past rate of growth of population and in-migration is unsustainable. the District Council should be planning for a very much lower level of growth in which housing and employment are balanced against environmental objectives.</p> <p>The SHMAs cannot claim to have been an objective assessment of housing need. The work was commissioned by local authorities and the steering committees were dominated by development interests who have a vested interest in talking up the housing needs figures. Wider interests such as residents' groups and environmental bodies were excluded from the process. WDC have assumed population growth of 17% between 2011 and 2029. This rate of growth would be above that for almost all the SHMA Projection Scenarios, despite the plan period being two years shorter than that of the SHMA. No justification is provided in the Plan for the choice of this figure. Employment forecasts are subject to great uncertainty and cannot be reliably used.</p> <p>The proposal for 12860 houses is not justified in the text. The Plan is therefore unsound in its provision for housing.</p> <p>The Plan does not take account of the latest ONS population projections, which shows a much lower rate of population growth than assumed in the JSHMA. This could suggest a reduction in the housing requirement of about 3700 homes. Further average household has recently stabilised, but the plan assumes continued reductions.</p> <p>Taking all these factors into account, we consider that the Plan is unsound because its housing provision is based on out-of-date information and on an over-optimistic, inflated view of both employment and population growth prospects.</p> <p><i>Amend policy DS6</i></p>	<p>The JSHMA Addendum is based on the ONS population projections which use a statistically sound methodology to take account of past migration trends.</p> <p>the SHMA and its 2014 addendum were prepared independently and provide the evidence on which to base the District's OAN. The development community were involved only to provide advice in delivery (without delivery information, the evidence would have been flawed).</p> <p>For further details regarding the reasoning behind Policy DS6, please see responses to Policy DS6.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66416 - Mr Robin Fryer [7457]	Object	<p>It is claimed that the new housing requirement is the Districts objectively assessed need which is based on the needs of the Coventry and Warwickshire sub-region. No sub-regional plan has been published so the validity of these claims cannot be assessed. As this is stated to be the basis of the housing need in Warwick District the evidence should be presented to allow community consultation on the officers recommendations for the JSHMA. If areas of Warwickshire are to be given to Coventry to fulfil its building requirements the residents must be presented with proof that Coventry has done everything possible inside its own boundaries. The policy of safeguarding areas of greenspace around Coventry needs to be critically addressed as the purpose of the 2009 green belt review was to find extra land for Coventry and not consider the needs of Warwickshire or adjoining communities. The basis of the calculation for housing development has been undermined by the recently stated aim of Coventry City Council to build housing development on Kings Hill.</p> <p>Changes to Plan:</p> <ul style="list-style-type: none"> <li>a) Carry out a public consultation exercise on all aspects of the local plan to include elements added to this version as the current exercise is too legalistic and excludes the general public.</li> <li>b) Publish the sub-regional plan, if it exists and carry out a public consultation on the contents because this is a key policy underlying the Warwick District Local Plan that the community has been denied access to</li> <li>c) Delete all references to a sub-regional strategy in the current local plan if b) not carried out.</li> <li>d) Carry out a new objective sustainability assessment that complies with the 3 core principles in the NPPF for all major proposals in the local plan</li> <li>e) to justify the claimed duty to co-operate provide evidence that the adjoining local authorities have a genuine need for land in Warwick District that they are unable to meet in their own area and submit the evidence for public comment</li> <li>f) Revise housing numbers and employment land requirement downwards to comply with current statistical evidence to justify the proposals</li> <li>g) Omit the vague and undefined proposals from the Local Plan or provide revised information proving they are justified and effective.</li> <li>h) Delay submission of the Local Plan until the defects are remedied and put before the local community for a new consultation.</li> </ul> <p><i>a) Carry out a public consultation exercise on all aspects of the local plan to include elements added to this version as the current exercise is too legalistic and excludes the general public.</i></p> <p><i>b) Publish the sub-regional plan, if it exists and carry out a public</i></p>	<p>The District's housing requirement reflects the Joint SHMA and its 2014 addendum and this evidence looks across the whole housing market area. Development at Kings Hill is not proposed in the Plan.</p> <p>The Council contends that proposed level of growth set out in DS6 reflects the District's and the Housing Market Area's OAN in line with the Joint SHMA.</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>consultation on the contents because this is a key policy underlying the Warwick District Local Plan that the community has been denied access to</p> <p>c) Delete all references to a sub-regional strategy in the current local plan if b) not carried out.</p> <p>d) Carry out a new objective sustainability assessment that complies with the 3 core principles in the NPPF for all major proposals in the local plan</p> <p>e) to justify the claimed duty to co-operate provide evidence that the adjoining local authorities have a genuine need for land in Warwick District that they are unable to meet in their own area and submit the evidence for public comment</p> <p>f) Revise housing numbers and employment land requirement downwards to comply with current statistical evidence to justify the proposals</p> <p>g) Omit the vague and undefined proposals from the Local Plan or provide revised information proving they are justified and effective.</p> <p>h) Delay submission of the Local Plan until the defects are remedied and put before the local community for a new consultation.</p>		
64681 - Federation of Small Businesses (Mrs Linsey Luke) [5626]	Support	The Fire Service strongly recommends an inclusion on the use (as a requirement) of The number of jobs created, rather than the size of land allocated is important to FSB. Any employment land allocation should be matched to the location of new housing sites. We need to think about the occupiers and their travel to work patterns. The Warwick District local plan therefore needs to look wider than the sub region; particularly to neighbouring authorities such to evaluate the impact of their employment land allocations on the residents and businesses in the district.	The Joint SHMA and the Joint Employment Land Review have looked beyond the District's boundaries to consider the relationship between housing and jobs. The District's approach of providing employment land close to areas of housing land, plus a sub-regional employment site to meet the needs of Coventry and the surrounding districts is appropriate	
65662 - McCarthy & Stone Retirement Lifestyles Ltd [4782]	Support	sub-clause b) the inclusion of wording detailing a requirement for older persons housing is noted and supported.	Support noted	
64508 - Warwickshire Fire & Rescue (Area Cmdr Greg Pace) [12410]	Support	The Fire Service strongly recommends an inclusion on the use (as a requirement) of fire sprinklers in residential developments in accordance with the business case submitted.	Through the Housing Standards Review, the government is seeking to reduce "additional requirements" on house building and is seeking to ensure all requirements are reflected in the building regulations and not elsewhere. The requirement proposed in this rep is therefore not considered to align with the government's approach.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65994 - Richborough Estates Ltd [5927] 65998 - Mr H E Johnson [12846] 66479 - Friends of the Earth (John Brightley) [1113] 66760 - Coventry City Council (Mr Mark Andrews) [12864]	Support	Strategic Policy DS2 is supported in principle, in particular the Council's ambition to provide in full (emphasis added) for the objectively assessed housing need. It is considered that Strategic Policy DS2 is positively prepared; justified; effective; and consistent with national policy as set in paragraphs 47, 50 and 159 of the Framework.	Support noted	

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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>
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*DS3 Supporting Sustainable Communities*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66650 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>There are no references at all within Strategic Policy DS3, or within supporting paragraphs 2.9 - 212, to either of the following: -</p> <ul style="list-style-type: none"> <li>* Designing out crime</li> <li>* Emergency services infrastructure provision</li> </ul> <p>This is a fact that also seriously undermines the achievement of the objectives contained within the following strategy documents: -</p> <ul style="list-style-type: none"> <li>* A Shared Vision - Warwick District's Sustainable Community Strategy 2009-2026</li> <li>*South Warwickshire Community Safety Partnership - Partnership Plan - April 2014 - March 2017</li> <li>*Garden Town, Villages and Suburbs - A Prospectus for Warwick District Council - May 2012</li> </ul> <p><i>Changes to Plan:</i>  <i>To resolve all of our concerns, we request that the following amendments are made to Strategic Policy DS3 and supporting paragraph 2.9 (as highlighted in bold): -</i></p> <p><i>'Strategic Policy DS3: Supporting Sustainable Communities</i>  <i>We will promote high quality new development including...</i></p> <p><i>f)delivering communities and developments that are safe, secure and enjoy very low crime levels.</i></p>	These additions could be made to support the objectives of the policy	<p>Add to Strategic Policy DS3  We will promote high quality new development including  'f) delivering communities and developments that are safe, secure and experience very low crime levels'  and add  We will expect development which enables new communities to develop and sustain themselves. As part of this we will provide for the infrastructure needed to support communities and business including...</p> <p>b)social infrastructure (such as education, health, the emergency services and sports facilities)...  and at 2.9 add  '2.9 It is important that new development is high quality, safe and secure. This underpins sustainable and cohesive communities and engenders a strong sense of civic pride. It enables new housing and new employment to develop into thriving low crime communities for local residents and business. High quality development not only enhances people's lives, but also enhances the reputation of the areas and therefore brings associated economic benefits. Good design is good business.'</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>We will expect development which enables new communities to develop and sustain themselves. As part of this we will provide for the infrastructure needed to support communities and business including...</p>		
		<p>b)social infrastructure (such as education, health, the emergency services and sports facilities)...</p>		
		<p><i>Explanation</i></p>		
		<p>2.9It is important that new development is high quality, safe and secure. This underpins sustainable and cohesive communities and engenders a strong sense of civic pride. It enables new housing and new employment to develop into thriving low crime communities for local residents and business. High quality development not only enhances people's lives, but also enhances the reputation of the areas and therefore brings associated economic benefits. Good design is good business.'</p>		
		<p>Inserting all of the above amendments would make Strategic Policy DS3 and supporting paragraphs 2.9 - 2.12 wholly consistent with the NPPF and consequently ensure their effectiveness upon delivery.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66257 - Miss Jennifer Instone [5102]	Object	There is too much new development proposed , with questions about whether the size of the new communities (for instance in Kenilworth) can be managed and controlled with impact on crime and the capacity of local shops, particularly in light of cut backs to public services. By planning to meet the needs of major cities there is a danger that there will be an impact on crime.	Additional wording suggested by the Police will be inserted to address their concerns which will also address this objection	<p>Add to Strategic Policy DS3 We will promote high quality new development including 'f) delivering communities and developments that are safe, secure and experience very low crime levels' and add We will expect development which enables new communities to develop and sustain themselves. As part of this we will provide for the infrastructure needed to support communities and business including...</p> <p>b)social infrastructure (such as education, health, the emergency services and sports facilities)... and at 2.9 add '2.9 It is important that new development is high quality, safe and secure. This underpins sustainable and cohesive communities and engenders a strong sense of civic pride. It enables new housing and new employment to develop into thriving low crime communities for local residents and business. High quality development not only enhances people's lives, but also enhances the reputation of the areas and therefore brings associated economic benefits. Good design is good business.'</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65155 - Mrs Pat Robinson [7802]	Object	<p>There is a funding shortfall which will prevent the proper development of infrastructure. This will mean that the major developments will become dormitory / overspill areas for Birmingham and Coventry. Travelling to work to Birmingham or Coventry fails the sustainability test.</p> <p><i>Developments should be placed where there is easy access to workplaces, and where there is significant economic development. Developing south of Warwick fails the sustainability test</i></p>	<p>The intention within policy EC1 is to ensure that employment uses likely to generate significant traffic movements are located in urban areas where there are more opportunities to utilise more sustainable transport alternatives. This does not preclude rural development where it would be necessary to access the site via car but seeks to ensure that it would not compromise overall sustainability objectives.</p>	Not required
67140 - Mr Ray Steele [5886]	Object	<p>Should have safeguarded land that separates neighbouring communities. Applies to Whitnash but will disappear under Local Plan</p>	<p>The coalescence of communities is an important issue, but in the case of Whitnash, an area of green space would still exist between neighbouring communities, but new developments need to be close to existing communities in order to share amenities and services. This part of the district is outside the green belt and therefore under more pressure for development: it does not however mean that there will be no separation between new and existing communities or that communities will join together that are currently apart</p>	Not required
66388 - Warwick Town Council (Mr Derek Maudlin) [1059]	Object	<p>There is a funding shortfall which will prevent the proper development of infrastructure. This will mean that the major developments will become dormitory / overspill areas for Birmingham and Coventry. Travelling to work to Birmingham or Coventry fails the sustainability test.</p> <p><i>Developments should be placed where there is easy access to workplaces, and where there is significant economic development. Developing south of Warwick fails the sustainability test</i></p>	<p>The intention within policy EC1 is to ensure that employment uses likely to generate significant traffic movements are located in urban areas where there are more opportunities to utilise more sustainable transport alternatives. This does not preclude rural development where it would be necessary to access the site via car but seeks to ensure that it would not compromise overall sustainability objectives.</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>
66162 - Hallam Land Management and William Davis [8278]	Object	<p>This strategic policy should encourage the enhancement of the ability to appreciate heritage assets where appropriate, in line with NPPF para.126, namely:</p> <p>'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment ... In developing this strategy, local planning authorities should take into account...</p> <p>- 'the desirability of new development making a positive contribution to local character and distinctiveness and'</p> <p>-'opportunities to draw on the contribution made by the historic environment to the character of a place'.</p> <p>It is considered that the policy would be more effective if it did not distinguish between 'built' and 'cultural heritage' but rather used the term 'cultural heritage'.</p> <p><i>Paragraph 2.8 (b) should be amended to read as follows:</i></p> <p><i>'Caring for, and where appropriate enhancing the appreciation of, the District's cultural and natural heritage'</i></p> <p><i>Paragraph 2.10 should be amended to read as follows:</i></p> <p><i>"... integrate new development into the natural, built and historic environment, and simultaneously to look for opportunities to enhance those environments and people's appreciation of their special interest and their potential to contribute positively to quality of life of future users and residents."</i></p>	<p>These issues are dealt with under separate chapter headings. There is no need to repeat them here as the Local Plan should be read as a whole.</p>	Not required
64523 - Mr Richard Thwaites [11460]	Object	<p>Policy DS3 requires high quality layout yet the preferred option for development within Hampton Magna will require all new traffic generated to pass through the existing estate roads leading to congestion at the junction on a blind bend on Old Budbrooke Road. The Maple Lodge site will have the least effect on the traffic flow through the village and will improve the layout of the roads, particularly the junction between Old Budbrooke Road and Woodway.</p> <p><i>The Maple Lodge site should be the preferred site for development within Hampton Magna</i></p>	<p>The Maple Lodge site has been considered but is in an area of high landscape value and was not therefore allocated</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66472 - Friends of the Earth (John Brightley) [1113]	Object	<p>Paragraph 2.8 - a definition of 'high quality' will be needed - it is not clear at the moment. It may be most appropriate to provide this in a separate Supplementary Planning Document.</p> <p>Paragraph 2.11 - It should be noted that it will not be appropriate for all new developments to be designed on 'garden city' principles. The text of the policy (in paragraph 2.8 a) already includes the words 'where appropriate' and this is acceptable.</p> <p><i>Paragraph 2.11 should read '...delivering new strategic development sites some of which may be based on the principles of garden towns...'</i></p>	The policy does state that new developments will be based on the principles of garden cities 'where appropriate' and it is considered that this is an acceptable way to phrase the policy. Paragraph 2.11 states that 'the Council is aiming to do this...'. This is obviously an ambition rather than an obligation for each site and therefore it is not considered necessary to change the wording.	Not required
66383 - Mr Robert Price [11538]	Object	<p>Increased congestion, loss of open countryside, burden on infrastructure and fundamental change to the character of the district will do nothing to better the lives of present or future generations. This is not in line with achieving sustainability</p> <p><i>WDC should use the ONS statistics to accurately reflect the number of homes required. Show and prove the proper planning on how to support the infrastructure financially and practically. Define and show what the exceptional circumstances are to build on green belt</i></p>	The Government's agenda for growth and house building requires land to be utilised for new development since the number of previously developed (brown field) sites are much reduced now. Management of this and mitigation is therefore very important and is taken into account in policies contained throughout the Plan. There is a balance to be reached between accommodating future generations and providing a healthy economic base with the loss of some green field sites and planning to utilise existing infrastructure and provide for new. The housing figures are considered to be robust and the arguments over which data to use have been examined in the housing chapter conclusion. There is only a small amount of land allocated within the Green Belt and the special circumstances have been outlined in the sections dealing with these specific sites	Not required
66394 - Cllr Elizabeth Higgins [1080]	Object	<p>Social infrastructure impact is not ready. Large gap in infrastructure funding (£150M has been quoted).</p>	The Infrastructure Delivery Plan has been further updated since the Publication Draft was prepared. This includes updates regarding health, education, sports facilities and libraries. The IDP shows which pieces of infrastructure will be prioritised for investment.	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>
65079 - Katharine Mary Silvester [5076]	Support	Please consider the development of a Marina at the Oaklands farm site on the A4177. This would fit with all the objectives outlined in this section of the LDP. Sustainable communities that combine the expertise of the charitable sector, private sector and local government, appeal particularly to the retired population, mix of housing, low carbon lifestyles, rejuvenation of historic assets, and support for small local businesses to service the population and boats using the Grand Union Canal.	This is not a proposal put through the Local Plan process this time, but one which was examined and dismissed through the last Local Plan since such facilities should be located in the town centre first and then a sequential test adopted to locate in the most sustainable location. This site is not in the most sustainable location and is out of town centres and cannot therefore be considered for allocation as such through the Local Plan	Not required
		<i>Not required</i>		
64682 - Federation of Small Businesses (Mrs Linsey Luke) [5626]	Support	Planning is a big barrier for small business. The cost of submitting a proposal, even before they get to the build phase, is expensive, (planning fees, architects costs etc). If a business is refused planning it impacts on them financially, along with their confidence to do business in the area. The FSB would encourage Council to be more flexible with their planning processes, particularly around change of use, and have an open door planning process generally. Simplifying planning applications for minor building works will also help small businesses grow or diversify.	response is ok	
		<i>Not required</i>		
66725 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Support	Strongly supports this policy	Not required	Not required
		<i>Not required</i>		
65229 - Lapworth Parish Council (Mrs Elaine Priestly) [1334]	Support	DS3 Lapworth Parish Council supports the importance of "protecting areas of significance including high quality landscapes, heritage assets and ecological assets". It commends Warwick DC for listening to local views, visiting particular sites to carry out full evaluations and being willing to amend initial proposals in the light of those investigations. This reflects well on the thoroughness and professionalism of the processes used in reaching the current stage of the Local Plan	Not required	Not required
		<i>Not required</i>		
66260 - Mr H E Johnson [12846]	Support	We support the Council's aim of supporting sustainable communities by providing high quality new development.	Not required	Not required
		<i>Not required</i>		
66064 - English Heritage (Mr Rohan Torkildsen) [205]	Support	We welcome, support and endorse this policy.	Not required	Not required
		<i>Not required</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65336 - Mr Peter Barclay [12714]	Support	<p>I support the plan as drafted, as it provides for the integration of new developments into existing communities. However I am concerned that the recent news in the press regarding Kings Hill may be re-considered as a possible development site for 5,000 homes within the new local plan. This type of development would be unsustainable as the community it would create would so large it would be an isolated social housing development that would give rise to special needs</p> <p><i>Not required</i></p>	<p>There are no current plans to develop in the Kings Hill area. Should Coventry City Council or another authority in the local area require Warwick District to assist in meeting their housing need however, additional sites may be required. This will however trigger an early review of the Local Plan together with consultation on any new sites brought forward through that process.</p>	Not required
64717 - Mr Haydn Rees [7859]	Support	<p>Very pleased to see that the importance of protecting areas of significance including high quality landscape, heritage assets and ecological assets is recognised. Such land should only be available for development if there is a very clear and obvious local reason to do so. If not clear and obvious reasons, then alternative sites have to be found. This applies to all such sites including Sites 8 and 9 in Kingswood which were under consideration until reviewed and examined properly</p> <p><i>Not required</i></p>	Not required	Not required
66007 - David Wilson Homes [11681]	Support	<p>Representations set out elsewhere within this submission promote Land off Cromwell Lane, Burton Green, which is in a sustainable location and has excellent public transport connections. The associated promotional document demonstrates the site would deliver a high quality design and layout and could be developed at a low density in keeping with the existing properties with the village</p> <p><i>Not required</i></p>	Not required	Not required
65135 - Sport England (Mr Bob Sharples) [1355]	Support	<p>I would like to support this policy in particular bullet points b &amp; c. Sport is one of the corner stones to a healthy and cohesive sustainable community</p> <p><i>Not required</i></p>	Not required	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>
66451 - Environment Agency (Becky Clarke) [6581]	Support	<p>Recommend two amendments to chapter 2.8</p> <p>Within point .a) physical infrastructure the text should be amended to include 'Flood defence structures' within the examples given.</p> <p>We would recommend that point c) of this policy is expanded to highlight the multiple benefits that green infrastructure can deliver, in your policy the provided examples include parks, open space and playing pitches.</p> <p>Does not accurately identify range of ecosystem services that green infrastructure provides, including surface water management and improving water quality, through Sustainable Drainage Systems (SuDS), habitat and green routes for biodiversity movement, to support nature conservation/expansion of habitat. Assists with reducing the urban heat island by providing thermal cooling as an adaptation of climate change in addition to providing health and social benefits. It should be considered as integral to all new developments rather than as separate entity such as formal green space for recreational uses.</p> <p>c) Recommend bullet point be amended to include the following text: „Ecosystem services including Sustainable Drainage Systems (SuDS), expansion of habitat and as an adaptation to climate change „is added to the end of the sentence.</p>	Agreed	<p>Make two amendments to 2.8</p> <p>Within point a) physical infrastructure the text should be amended to include 'Flood defence structures' within the examples given.</p> <p>We would recommend that point c) of this policy is expanded to highlight the multiple benefits that green infrastructure can deliver, in your policy the provided examples include parks, open space and playing pitches.</p> <p>Does not accurately identify range of ecosystem services that green infrastructure provides, including surface water management and improving water quality, through Sustainable Drainage Systems (SuDS), habitat and green routes for biodiversity movement, to support nature conservation/expansion of habitat. Assists with reducing the urban heat island by providing thermal cooling as an adaptation of climate change in addition to providing health and social benefits. It should be considered as integral to all new developments rather than as separate entity such as formal green space for recreational uses.</p> <p>c) bullet point be amended to include the following text: „Ecosystem services including Sustainable Drainage Systems (SuDS), expansion of habitat and as an adaptation to climate change „is added to the end of the sentence.</p>
66604 - Richborough Estates Ltd [5927]	Support	<p>It is considered that the policy provisions as set out within Strategic Policy DS3 accord with the core land-use planning principles as set out at Paragraph 17 of the Framework. It is considered that Strategic Policy DS3 is positively prepared; justified; effective; and consistent with national policy.</p> <p><i>Not required</i></p>	Not required	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>DS4 Spatial Strategy</i>				
66778 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	DS4 is not be observed in other policies indicating inconsistencies. In the first instance, allocations will be directed to previously developed land within urban areas - if this is the case why have 5 major sites been approved in advance of previously developed land within the urban areas? greenfield sites will not need to be identified for housing because the revised population projection shows that the number of homes have either already been built, permission granted, allocated without involving greenfield or green belt for up to 10,100 homes, more than is now known to be required.	The allocation of sites in the Plan has been undertaken in accordance with DS4. The granting of planning permissions is a separate matter. The homes allocated are required as evidenced by the Joint SHMA and the JSHMA Annex (see responses to DS6 for further details.	No change
66615 - Mr William Blagburn [5448]	Object	<p>The Local Plan does not include the need for Warwick University to expand or any anticipated housing required for the 10,000 employees to work at the Coventry &amp; Warwickshire Gateway Site if it goes ahead.</p> <p>Why does the Plan not refer to the Kings Hill site as there may be a case for it to go ahead to meet the future needs as it is near both the University of Warwick &amp; Gateway. The increase in congestion of the already hard pressed local road structure will need dramatic action.</p> <p>The B4113 which already services the developing sites of Stoneleigh Park &amp; Abbey Park will not only have to take increased traffic to/from Gateway from the South but cope with this possible increased housing.</p> <p>WDC should consider replacing the B4113 river bridge at Stoneleigh, which can not even take two HGV vehicles crossing at a time. If the river bridge was sited 450m upstream a small by pass could be built to bypass the village completely and cut out many of the traffic problems caused by the village being sited on the cross road and river bridge.</p> <p>The Local Plan should include any additional housing requirement of any Warwick University enlargement and also those of The Gateway employees and comment upon additional sites and their development ideas</p> <p><i>The Local Plan should include any additional housing requirement of any Warwick University enlargement and also those of The Gateway employees and comment upon additional sites and their development ideas</i></p>	<p>The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this in response to representations made to Policy DS6</p> <p>Kings Hill has not been allocated as it is within the green belt and there are no exceptional circumstances to allocate this at the moment. It is not therefore consistent with Policy DS4 or the NPPF.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65510 - Sharba Homes Group [12779]	Object	<p>Support of point c), as it ensures long term employment opportunities for all areas of the district, which will in itself enhance the long term sustainability of both main urban areas and villages throughout the plan area.</p> <p>Point e) is overly restrictive, in that the base point for a determination on allocation is 'no'. NPPF paragraphs 133 and 134 require that the significance of harm that would be caused be the determining factor as to whether the 'presumption' in favour of sustainable development is applied, and to what degree public benefits of proposals should be assessed. The proposed policy conflicts with national policy, is therefore 'unsound' and should be either altered or removed.</p> <p>Support principle of point g) of the policy, with the caveat of the requirement of the need to show exceptional circumstances in order to favourably consider Green Belt sites, with all other avenues first being exhausted before considering sites within the Green Belt.</p> <p><i>Point e) should be amended or removed to support presumption in favour of sustainable development</i></p>	Point e) is consistent with paras 132, 133 and 134 of the NPPF	No change
66558 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>We welcome the efforts of the District Council in Policy DS4 to prioritise housing development on brownfield sites / Completions and sites with planning permission account for 3,629 dwellings. Small urban sites, consolidation of existing employment sites and the allowance for windfall sites account for a further 3,147 dwellings.</p> <p>Despite the above, the District Council are proposing to provide almost half the total provision in the form of sites newly allocated in the Plan.</p> <p>850 would be on the southeast side of Kenilworth in the Green Belt. As noted in other responses, we do not consider that the Plan demonstrates the exceptional circumstances required to remove land from the Green Belt for new allocated housing sites.</p> <p>Sites on the edge of villages and in the rural area account for a further 763 dwellings. Some of the proposals involve substantial expansion of relatively small settlements and we are particularly concerned about those for Leek Wootton, Kingswood (Lapworth), Bishops Tachbrook, Cubbington, Hampton Magna and Radford Semele.</p> <p><i>Delete references to development of land in the Green Belt for new housing allocations.</i></p>	The Spatial Strategy seeks to only allocate sites in the greenbelt where exceptional circumstances can be justified. These allocation of sites has been consistent with this approach	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66378 - Mr Barry Lovekin [6972]	Object	<p>The problem with the plan is the sheer scale of the proposed expansion which will put a huge strain on local services, hospitals, schools and transport/travel on local roads which is already at peak times a problem.</p> <p>It will also use large areas of the south midlands green belt and change forever the the nature and environment of the historic towns of Warwick and Leamington and the surrounding villages.</p> <p>Warwick District is not an isolated part of UK and being close to Coventry, Birmingham and with good rail links to London! ie if Coventry, Birmingham and London continue to prosper then nearby towns such as Warwick and Rugby will also continue to prosper! Also has proper account been taken of the effect of the expansion plans for Coventry and South Birmingham</p> <p><i>A more modest expansion of some villages and making the most of available brownfield sites within Warwick and Leamington areas would be acceptable to the majority of people who already live in the area, and given that there are already approved plans for new housing under the old plan!</i></p>	The evidence (e.g the Joint SHMA) supports to proposed scale of development	No change
64521 - Mr Richard Thwaites [11460]	Object	<p>The spatial strategy seeks to maximise the use of brown field sites. The Maple Lodge site in Hampton Magna is approx 25% brown field. The strategy is to avoid the coalescence between settlements but the preferred option draws Hampton Magna towards the edges of Warwick</p> <p>The strategy requires the protection of heritage assets yet the preferred development option impinges on Warwick Racecourse whilst development of the Maple Lodge site would allow for the protection of the last remaining evidence of the historically significant Budbrooke Barracks.</p> <p><i>The Maple Lodge site should be the preferred development option in Hampton Magna</i></p>	The Maple Lodge site has been considered but is in an area of high landscape value and for this reason (amongst others) was not allocated.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65671 - Mr. Paul Hodge [7249] 65955 - Mrs Luisa Hodge [206]	Object	<p>The plan is not justified as it advocates so much new development into the already congested south part of the district, when the pressure on the schools and the road system is already immense. The road network between Myton Road and Europa Way will not cope with the development.</p> <p>The plan is not justified because it is creating more car-dependent suburbs.</p> <p>The plan is unsound because it will contribute to the already illegal air quality in central Warwick. This problem has been in existence long before the Preferred Options were set out and remains in breach of these regulations today. I object to the increased public health risk which adding more cars to the centre of Warwick at peak times will certainly contribute to.</p> <p><i>There needs to be a better and more balanced spread of new housing allocations included in the Plan through an alternative approach to locational distribution of housing in order to avoid some 52% (or 3245) of the 'new' sites (6188) being located South of Warwick town, by:</i></p> <ol style="list-style-type: none"> <li><i>1. Increased provision on the northern side of the main settlements, i.e., on the Birmingham and Coventry sides, where a significant proportion of the car borne workers travel daily, and especially the northern side of Warwick town.</i></li> <li><i>2. Such locations should include: Budbrooke which is close to the park and Ride facility and the A46 corridor; Hatton, with similar advantages; and areas adjoining Coventry (airport and Gateway, where very large scale employment proposals of a regional scale are becoming available.</i></li> </ol>	<p>The impact of the allocated sites on congestion and air quality has been assessed and has been found to be acceptable (see Strategic Transport Assessments and the Air Quality Study). Sites to the north of the towns and around Budbrooke are in the green belt and should only be allocated where there are exceptional circumstances</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65707 - Barwood Development Securities Ltd [12821] 65719 - Barwood Strategic Land II Limited [9441]	Object	<p>Whilst the Council's allocation strategy may have been to firstly review previously developed land sites, this cannot be enforced as a delivery policy. A 'brownfield first' approach is not consistent with the Framework, which does not advocate this priority or inflexibility. The Spatial Strategy should not be used negatively to prevent sustainable development. Policy DS4 has identified the broad locations which are to deliver growth over the Plan period, and allocated specific sites accordingly, therefore the Council should not promote a hierarchical approach to their allocations.</p> <p><i>Policy DS4 as currently drafted is not justified nor is it effective. To ensure Policy DS4 is compliant with the Framework, Barwood suggest that the following amendment is made.</i></p> <p><i>"Allocated Housing and Employment will be distributed across the District to take account of the following:</i></p> <p><i>a) Allocations will be directed to previously developed land within the urban areas and in particular those areas where there is greatest potential for regeneration and enhancement;..."</i></p>	DS14 as drafted is consistent with Para 17 of the NPPF.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66134 - La Salle Investments [5130]	Object	<p>Policy not sound due to criterion A, C and G of the policy. Parts A &amp; C advise that new employment development will, in the first instance, be directed to previously developed land in the urban area and where greenfield sites are required for employment they should be allocated in accessible locations in close proximity to existing or proposed housing. This does not address the unique circumstances in the District where a number of significant previously developed sites are located in the green belt including Stoneleigh Park. In para 3.157 onwards the Council supports the unique role of the Park and its economic benefits and notes that a review of the master plan may be needed during the plan period. However A to C as drafted would direct development away from the park. Additional text should be included within the explanation to advise that this does not apply to previously developed land in the green belt. Criteria G advises that development in the green belt will be limited to locations where exceptional circumstances can be justified. This test only applies in the plan making process when local authorities are in the process of altering green belt boundaries. It is therefore inappropriate for criteria g to refer to exceptional circumstances. Instead it should advise that the construction of new buildings in the green belt will be considered as inappropriate with the following exceptions:</p> <ul style="list-style-type: none"> <li>* Buildings for Agricultural and Forestry</li> <li>* Provision of appropriate facilities for outdoor sport, outdoor recreation and cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes including land within it;</li> <li>* The extension or alteration of a building providing that it does not result in disproportionate additions over and above the size of the original building</li> <li>* Replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.</li> <li>* Limited infilling in villages, and limited affordable housing for local community needs in accordance with wider policies in the Local Plan; or</li> <li>* Limited infilling or the partial or complete redevelopment of previously developed sites (Brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have greater impact on the openness of the Green Belt and the purposes of including the land within it than the existing development. The previously developed sites in the Green Belt include those identified by Local Plan Policy LS2 - Major Site in the Green Belt.</li> <li>* In all other circumstances it will be necessary for an applicant to demonstrate "very special circumstances" for development in the Green Belt to be considered acceptable.</li> </ul>	<p>This policy seeks to set out the broad spatial strategy to inform and explain the site allocations and proposals set out elsewhere in the plan. It is not intended that this policy is used directly in determining planning applications as it does not provide sufficient detail to do so. However, the determination of planning applications will take account of the Council's strategic ambitions as set out in this policy. The Policy should therefore be read in conjunction with other, more specific policies, including policy MS2 which indicates that there "may be very special circumstances" for development at Stoneleigh Park. Clauses A-C represent the Council's preferred approach and the policies set out in the rest of the Plan are consistent with this.</p> <p>It is accepted that clause g) requires amendment to demonstrate conformity with the NPPF.</p>	<p>Amend DS4 g) to read: "taking the national Green Belt policy in to account, sites that are currently in the green belt will only be allocated where exceptional circumstances can be justified."</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><i>It is suggested that the following amendments are required to the policy:</i></p> <p><i>* Specific guidance should be included within the explanatory text to explain that the approach to the distribution of development outlined in Parts A - F of the policy are not directly applicable to the redevelopment of previously developed sites in the Green Belt.</i></p> <p><i>* Part G of the policy, that relates to Green Belt development, should be amended to be in conformity with the Framework as identified in box 7 above</i></p>		
66028 - David Pickering [12849]	Object	<p>We do not believe that all the sites proposed to be allocated in the Primary and Secondary Service Villages, will be found to be available or deliverable. The process has failed to examine whether other limited infill villages might benefit from modest further development.</p> <p>We cite the example of Rowington Green where a further limited amount of residential development - beyond the suggested one or two dwellings set out in the policy - would meet the wider identified needs of the community. The strong locational synergy between Kingswood and Rowington would mean that release of this site at Rowington Green would either take the place of at least one of the sites identified at Kingswood to fulfil the number of dwellings required in that settlement (100-150) of which sites for only 62 were originally designated, now reduced to 43, or contribute additional housing to the total provision being sought by the Council in rural areas.</p> <p><i>Include specific policy with criteria about rural exception sites, which is not clearly apparent in the current list of proposed policies. These sites can be identified by local communities in Parish Plans or Neighbourhood Plans so giving greater credence to the localism agenda.</i></p>	<p>The village settlement hierarchy indicated that Rowington Green was not an appropriate location for significant development allocations. The site assessments have indicated that the allocated rural sites are deliverable. Policies H3, H11 and H12 already set out the circumstances in which development in rural areas may be permitted.</p>	
66396 - Cllr Elizabeth Higgins [1080]	Object	<p>This DLP will damage our historic environment. Health Impact Study not considered.</p> <p>The DLP is patently unsound in its protecting of what we all treasure, our historic town centres, our visitor economy and of both Castles and to our graceful Regency Town.</p>	<p>Historic environment, health, the vitality of town centres and the economy have all been taken in to account in developing the Local Plan. It is therefore considered that the proposals are robust and justified</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66163 - Hallam Land Management and William Davis [8278]	Object	<p>Hallam Land Management and William Davis Limited broadly support the overall strategy for the distribution of housing and employment across the District.</p> <p>Paragraph (e) states that: "Sites which have a detrimental impact on the significance of heritage assets will be avoided unless suitable mitigation can be put in place".</p> <p>The wording of this paragraph is not considered consistent with the objectives of the National Planning Policy Framework. It implies a general principle of restraint.</p> <p><i>Paragraph (e) of Policy DS4 should be redrafted as follows:</i></p> <p><i>"The effects proposed sites on the significance of heritage assets will be assessed on a case by case basis, having regard to: the particular significance of the asset; settings contribution to that significance; the proposed design and use(s); and the broader planning considerations taking into account all relevant statutory provision."</i></p> <p><i>Furthermore the following change should be made to paragraph (g) of Policy DS4:</i> <i>" (g) taking the national green belt policy into account, it has been determined that there are currently no exceptional circumstances that warrant the alteration of existing boundaries in order to accommodate development."</i></p>	<p>Propose change to clause e) to make it more consistent with NPPF.</p> <p>The proposed amendments to point (g) are not consistent with the Plan's spatial strategy as there are a number of sites within the Plan where exceptional circumstances have been justified in line with g).</p>	<p>Suggest clause (e) is amended to read "Sites which have a detrimental impact on the significance of heritage assets will be avoided unless the public benefits of development outweigh the harm".</p> <p>No change to clause g)</p>
66266 - Shirley Estates (Mr Harry Goode) [1415]	Object	<p>Policy DS4 does not accord with presumption in favour of development as set out in NPPF.</p> <p>DS4</p> <p>(2) - Add "generally" after "they should be located"</p> <p>(7) - "Exceptional Circumstances" <i>The criteria to be taken into account in considering exceptional circumstances should be widened to reflect NPPF presumption in favour of sustainable development and DS5.</i></p>	<p>Accept amendment to b).</p> <p>The spatial strategy, is consistent with para 17 of the NPPF although propose amendment to clause g) to better reflect national green belt policy .</p>	<p>DS4 (b) amended to read: "where greenfield site are required for housing, they should generally be located on the edge of urban areas..."</p> <p>For amendment to clause g) see response to rep 66134</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64525 - Mr Richard Thwaites [11460]	Object	<p>The local plan claims that public consultation has helped to shape the plan.</p> <p>In Hampton Magna, a petition of 830 people objecting to development was ignored, the overwhelming rejection of the preferred development site was ignored and the overwhelming support for the Maple Lodge site was ignored.</p> <p><i>If the Local Plan is to be shaped by the public consultation, the results of that consultation should be acknowledged and the Maple Lodge site should be made the preferred option for development.</i></p>	<p>Whilst consultation responses are one of the factors which help shape the plan, the key is material planning factors that are raised through the consultation (rather than the number of respondents). Detailed site assessments were undertaken (see site selection matrix). This identified the Arras Close site as the most suitable in Hampton Magna.</p>	No action
66344 - David Wilson Homes [11681]	Object	<p>There are circumstances where the brownfield first approach may not be the most suitable or sustainable. For instance, the site promoted in these representations, Land off Cromwell Lane, Burton Green is in a more sustainable and central position that the Council's preferred Site.</p> <p>Changes to Plan:</p> <p><i>The site promoted in these representations, Land off Cromwell Lane, Burton Green, is in a more sustainable and central position that the Council's preferred Site.</i></p> <p><i>The site does not meet the 5 purposes of Green Belt. The Green Belt boundary should be altered to accommodate this site.</i></p>	<p>The site proposed in Burton Green is considered to be the most sustainable. See site assessment matrix.</p>	No change
65633 - David Pittaway [12800]	Object	<p>If there is a realistic expectation of Warwick having to accommodate known development needs (from Coventry) and the possibility that a joint housing study in the Greater Birmingham and Solihull LEP area also identifies needs which cannot be accommodated in the nine local authority areas covered by that study, Warwick should be taking the opportunity through this current review of the Green Belt within the district to remove and safeguard land to meet longer term development needs.</p> <p>Land south of Westwood Heath Road would be suitable to meet the longer term needs of Coventry.</p> <p><i>The Council should agree with the joint SHMA local authorities on needs that cannot be accommodated within their own boundaries. A further review of the Green Belt in Warwick District should be undertaken to remove and safeguard land to meet long term development needs, or to allocate land to meet known development needs from other local authorities</i></p>	<p>Policy DS20 addresses this issue and any review resulting will be informed by a Joint Green Belt Study undertaken in conjunction with other authorities in Coventry and Warwickshire</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66789 - Gallagher Estates [644]	Object	<p>In broad terms the spatial strategy is inherently sound and positively prepared and consistent with national policy. However in contrast to RDS3 of the RDS it introduces two further aspects to the spatial strategy at parts e (avoiding development that has a detrimental impact on heritage impacts unless mitigation can be put in place) and f (avoiding development in areas assessed as high landscape value). Whilst laudable these are not these are not provisions that are relevant to the broad, strategic spatial strategy of the plan. Suggest these are superfluous and should be deleted .</p> <p><i>Parts e (avoiding development that has a detrimental impact on heritage impacts unless mitigation can be put in place) and f (avoiding development in areas assessed as high landscape value) are superfluous and should be deleted.</i></p>	Protecting heritage assets and the landscape value are important local issues and are given considerable weight within the NPPF. It is therefore considered reasonable to include these within the spatial strategy	No change
66449 - Mr C Wood [6044]	Object	<p>3. The Transport Strategy is ineffective and unsustainable</p> <p>The proposed large-scale use of greenfield sites, outside the urban area and at suburban densities, would make the new housing estates car-dependent. Peak hour congestion would increase from its already unacceptable level, to the detriment of all road users, the urban environment, and town centre economies.</p> <p>The transport strategy is incomplete and inconclusive. It would be irresponsible to approve the Plan at this stage without understanding its full implications for traffic and transport.</p>	The Strategic Transport Assessments demonstrate that the proposed distribution of housing can be accommodated on the transport subject to mitigation	no change
65642 - Mr Barry Stelfox [12803]	Object	Objects to development at Kings Hill.	The Draft plan does not propose any development at Kings Hill	No change
67142 - Mr Ray Steele [5886]	Object	The LP should be for the needs of houses and jobs within the whole of the district. The chosen sites in the south have a good employment record. In contrast, in the north of the district there is a much greater need for homes and jobs. There is currently the Gateway Project that will create many jobs and a need for houses. Logically one would assume houses to be built where there is employment. The LP, unless radically changed, will create a massive need for commuting to jobs and schools	No change	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65650 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>Questions whether part c) of DS4 which proposes that site allocated for employment development should be in close proximity to existing or proposed housing represents effective spatial planning. Not all employment development is compatible with residential development. B1 offices are suitable but considered as a town centre use the location of which should be considered via a sequential approach. There are previously-developed sites on the edge of Leamington town centre, which are being proposed for residential development which should be subject to this sequential approach. B2 and B8 are less suitable for residential areas therefore the strategic approach to residential and employment allocations should recognise this.</p> <p><i>Strategic policy DS4 should include a provision to protect the amenity of existing or proposed residential occupiers from allocated employment sites. Such an approach could be achieved through a change in wording to part c) of strategic policy DS4, as follows [emphasis added]:</i></p> <p><i>"Where greenfield sites are required for employment, they should only be allocated in locations which are suitable for the needs of 21st century businesses, accessible via a choice of transport modes and with good access to existing or proposed housing without compromising residential amenity and only when sequentially preferable sites cannot be delivered".</i></p>	The sequential approach only applies to Town Centre uses (such as B1) and is not therefore appropriate to include in an overall spatial strategy. The point regarding residential amenity is accepted, but the proposed wording is overly restricted	Propose that DS4 Point c) be amended to read: "Where greenfield sites are required for employment, they should only be allocated in locations which are suitable for the needs of 21st century businesses, accessible via a choice of transport modes and are in close proximity to existing or proposed housing subject to ensuring there is no undue impact on residential amenity"
65156 - Mrs Pat Robinson [7802]	Object	<p>The plan for major developments south of Warwick fails on items 2,5 and 6. That development is not sustainable , particularly in terms of transport to work, and there is a threat to the landscape and heritage assets by growing Warwick so Historic Warwick is swamped.</p> <p><i>Remove the major developments south of Warwick, and any development should be based on the County Council and Charities gifting the land to Warwick to enable the infrastructure to be funded.</i></p>	These sites have been thoroughly assessed including the transport and heritage impacts. These assessments indicate that these are sustainable sites	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66227 - Crest Strategic Projects [9115]	Object	<p>We object to this policy which seeks to prioritise allocations to previously developed land before green field sites. We consider that as a basic principle the Local Plan should strive towards the most sustainable strategy that is available. This could entail the use of green field sites or even sites within the green belt, before previously developed land. At present it has not been demonstrated that this is the case as alternative strategies have not been thoroughly tested.</p> <p><i>Object to proposed Spatial Strategy as alternative strategies have not been tested.</i></p>	The Council has appraised a number of spatial strategies and the one arrived at was the most sustainable. The proposed approach is consistent with the para 17 of the NPPF which seeks to promote the vitality of urban areas and protect green belts and recognise the intrinsic beauty of the countryside. It also encourages reuse of previous developed land	No change
64975 - TJE Workman [12143] 65338 - Mr Peter Barclay [12714] 65716 - Mrs E Brown [5142] 65872 - Centaur Homes [9117] 66035 - A C Lloyd Homes Ltd [5958] 66084 - Gleeson Developments [5117] 66157 - Savills (Mr Richard Shaw) [11305] 66261 - Mr H E Johnson [12846] 66452 - Environment Agency (Becky Clarke) [6581] 66480 - Friends of the Earth (John Brightley) [1113] 66605 - Richborough Estates Ltd [5927] 66692 - Old Milverton & Blackdown JPC (Mr Graham Cooper) [1060] 66726 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Object	<p>Support the spatial strategy, including allocating some greenfield land where these sites are sustainable and some green belt sites where exceptional circumstances can be justified</p> <p><i>None</i></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>
66336 - Cllr Ann Blacklock [1090]	Object	<p>The plan is unsound and fails 3 of the 4 tests of compliance because this element - removing a very large area from Green Belt - is not positively prepared in that it is unreasonable to be meeting the unmet employment need of a neighbouring authority when it requires sacrificing Green Belt land and destroying the character of historic villages.</p> <p>Is not consistent with national policy on Green Belt and the 5 criteria for maintain designated Green Belt areas [ NPPF section 9 para 80] and is not consistent with the principle of sustainable development. Is not justified in that there are reasonable alternative available in the sub region.</p> <p>This measure was added to Draft Publication Plan at the 11th hour; there was NO prior consultation: no consultation with neighbouring residents, nor with ward councillors, nor with the Member's Policy Review Group. It therefore fails to meet the requirements of the SCI.</p> <p><i>Policies map no.7 must be redrawn to restore the status quo. The area [Zone A and Zone B of the Gateway site] should remain in the Green Belt i.e. the boundaries of Green Belt south and north -west of Coventry airport should NOT be redrawn; at least not until the Inspector's report and the decision of the Secretary of State on the outcome of the planning application have been published. Thus we will not be pre-judging the decision and once the decision is announced, a full proper consultation process can be instigated.</i></p> <p><i>The application has been extremely controversial and divisive and the outcome is uncertain. Making unwarranted assumptions about the outcome is wrong, and if the application is refused would leave this area and the villages without the protection they have enjoyed for so long.</i></p>	<p>Policy DS19 proposes the removal of an area from the green belt to support Policy DS16 (Sub-regional employment site). Jobs creation provides the exceptional circumstances for this. The alternative sites have been assessed and this work (e.g the Employment Land Review) demonstrates that this site can play a major role in meeting the sub-region's employment needs .</p> <p>Consultation regarding this change to the green belt has taken place under regulation 19 in May/June 2014 (as well as further opportunities to make representations in November/December 2014.</p>	No change
67225 - Bloor Homes Midlands [11532]	Object	<p>The policy approach to conserving and enhancing the historic environment is not in accordance with the NPPF.</p> <p>The Framework recognises that the heritage assets are an irreplaceable resource only permitting substantial harm where this is outweighed by substantial public benefit. Where harm is less than substantial then it should be weighed against public benefit. There is no reference to allowing harm/detrimental impacts where there is possible mitigation.</p> <p>The more relaxed policy approach of the LP is not appropriate, particularly given the importance of the historic environment to Warwick.</p> <p><i>The Council should review its drafting of this policy prior to submission to the Secretary of State.</i></p> <p><i>In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'</i></p>	<p>Policy DS4 is not designed to be used to provide an assessment framework, instead it is written to provide a broad strategy to inform the allocation of sites within the Plan and to inform future strategic developments that may take place within the Plan period. In this context, the Policy does not seek to replace the NPPF, however the Council considers that the DS4 is consistent with the NPPF as clause e) allows for impact on the significance of heritage assets if mitigation can be put in place</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>DS5 Presumption in Favour of Sustainable Development</i>				
64526 - Mr Richard Thwaites [11460]	Object	<p>The government expect the planning system to give local people the opportunity to shape their communities.</p> <p>The residents of Hampton Magna have not had their concerns taken into account and have, therefore, not had the opportunity to shape their community.</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna.</i></p>	The plan has been shaped by a number of consultations. The Maple Lodge site is in a sensitive landscape area and for this reason (amongst others) has not been allocated.	No change
65331 - Mr Carl Stevens [4873]	Object	<p>This presumption is precisely why the re drawing of boundaries in green belt areas should be reviewed. Once approved in the local plan green belt will be easy pickings for developers to get quick planning permission and build.</p> <p><i>Green belt needs taking out of the plan or at least committed not to be used ever unless it is the absolute last resort.</i></p>	The presumption if favour of sustainable development seeks to be consistent with the NPPF which provides for changes to green belt boundaries only where there are exceptional circumstances	No change
65486 - The National Trust (Mr Chris Lambart) [591]	Object	<p>The policy should make it clear that the presumption in favour of sustainable development does not override Green Belt policy. This is confirmed in a letter from the Rt Hon Mr David Cameron MP, the Prime Minister, to Mr Crispin Blunt MP dated 19th March 2013.</p> <p><i>The policy should make it clear that the presumption in favour of sustainable development does not override Green Belt policy.</i></p>	The Policy does not seek to override green belt policy, but it does seeks to ensure the NPPF is applied appropriately including green belt policy	No change
65484 - The Community Group (David G Wintle) [9097]	Object	<p>Policy DS5 largely repeats the NPPF but it misrepresents Government policy in so far as there is a glaring omission. The NPPF explicitly excludes Green Belt land from the presumption in favour of sustainable development but this is not recognised in Policy DS5. It is therefore unsound.</p> <p><i>Delete Policy DS5 or make it clear that there is no presumption in favour of sustainable development in the Green Belt.</i></p>	The Council considers Policy DS5 is necessary ad is consistent with the NPPF. the proposed alternative policy would be contrary to the NPPF where exceptional circumstances exist	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66579 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Policy DS5 appears to add nothing to the NPPF but it misrepresents Government policy. It is therefore unsound. The NPPF explicitly excludes Green Belt land from the presumption in favour of sustainable development but Policy DS5 makes no mention of this important fact. The Council's persistent failure to acknowledge this, also evident during the Coventry and Warwickshire Gateway public inquiry, goes to the heart of its cavalier approach to the Green Belt. The Plan proposes to remove no fewer than thirteen sites from the Green Belt. This is inconsistent with ministerial statements.</p> <p><i>Either delete Policy DS5 or set an appropriate expectation that there is no presumption in favour of sustainable development in the Green Belt.</i></p>	The NPPF does not exclude Green Belt from the presumption is taking planning decisions (only in plan making). Policy DS5 has been written to provide context for the consideration of planning applications and is therefore consistent with the NPPF	No change
65871 - Centaur Homes [9117]	Object	<p>This policy is unnecessary as the presumption is set out in the Framework and this is relevant to all decision taking.</p> <p><i>This policy should be omitted.</i></p>	The policy is consistent with NPPF and is included to acknowledge the importance of "the Presumption" and to underline that WDC will apply this in considering development proposals	No change
65158 - Mrs Pat Robinson [7802]	Object	<p>Nobody has demonstrated how a major development south of Warwick and the river is to be sustainable by the plan's own definition. There are only road connections in the area, and such a concentration of homes with minimal employment will be a car, or perhaps bus using community travelling to Coventry / Birmingham</p> <p><i>Residential and employment developments , plus infrastructure should be worked through as a master plan, then consideration of changing greenbelt status etc should be secondary.</i></p>	Extensive work has been undertaken to assess a range of site options, including transport assessments and assessments of infrastructure. the proposed site allocations are considered to be sustainable locations for development.	No change
66085 - Gleeson Developments [5117] 66262 - Mr H E Johnson [12846] 66606 - Richborough Estates Ltd [5927] 66790 - Gallagher Estates [644]	Support	Support policy DS5	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>DS6 Level of Housing Growth</i>				
65232 - Deeley Group Ltd [11623] 65267 - A C Lloyd Homes Ltd [5958]	Object	<p>Objection to the proposed level of housing growth of 12,860 new homes between 2011 and 2029. The plan period should be 2011 to 2031. The appropriate level of housing should be increased by at least of 1,428 dwellings to provide for the additional 2 years and the plan period should extend to 2031.</p> <p>The approach to meeting the housing requirement for the District does not take into consideration any shortfall of housing within the sub-regional housing market area or within adjoining housing market areas.</p> <p><i>It is considered that the appropriate level of housing should be increased by at least of 1,428 dwellings to provide for the additional 2 years and the plan period should extend to 2031.</i></p> <p><i>The shortfall from other authorities within the Housing Market Area should be accommodated.</i></p>	<p>NPPF recommends a plan period of 15 years from the date of adoption but this is not a requirement. When the shortfall of housing needs from Coventry are identified and distributed, under the Duty to Cooperate obligations, a review of the Plan will take place to consider how to accommodate these needs and at this point the plan period could be extended</p>	No change
66742 - Mr Richard Brookes [1866]	Object	<p>The level of growth is too high. Since the publication of this Draft new ONS projections show that population growth between 2011 and 2029 is 15,300 compared with the joint SHMA figure of 23,800. This error is compounded by the Joint SHMA using a Household Headship Ratio of 1.66 people per dwelling. If the ratios and sizes of affordable and market homes are taken into account this ratio should be 2.12. If this is applied to the new population projection this gives a housing requirement of 7,700. If the ratio of 1.66 is used this gives a requirement of 9,300.</p> <p><i>The housing requirement should be 9,000.</i></p> <p><i>Sites allocated in the Plan should be 2,238.</i></p>	<p>The number of future households is calculated by using Government derived Headship Rates and not by applying household size. The household size figures are a derivative of the household projections exercise. They show that Warwick's household size would fall from 2.35 in 2011 to 2.22 in 2031. The Council has confidence in this exercise which follows an internationally accepted methodology and uses official Government (ONS) statistics to arrive at headship rates which reflect the current and recent patterns of household formation. The headship rates are age specific and take into account recent patterns of household formation.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64947 - Mr Leigh Carter [8277] 64978 - Mr Oliver Aries [12660]	Object	The mid-2012 ONS projections confirm that the housing requirement has been over-estimated.	The Council is required to carry out a Strategic Housing Market Assessment (SHMA) for the Housing Market Area (which is Coventry & Warwickshire). This makes an assessment of the housing need of each authority. Taking into account more recent ONS official population projections the SHMA was updated and the housing needs confirmed at 718 per annum taking into account the District's responsibilities to cooperate with Coventry to help meet its housing needs where they cannot be met within the City.	No change
		<i>Housing requirement should be reduced</i>		
66339 - GM & PR Davison [2056]	Object	We should be providing for the needs of existing families rather than newcomers. The proposed developments will exacerbate traffic problems and will put pressure on infrastructure.	The in- and out-migration of people is constant and must be planned for otherwise there will be a shortage of housing which will affect local people as much as newcomers. The Infrastructure Delivery Plan sets out how infrastructure will be improved to cater for the needs of new developments	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66574 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992] 66586 - Catesby Property Group (Mr David Morris) [7776]	Object	<p>Net in-migration fell from a figure of over 2,000 per annum in the years immediately following the millennium to 400 in 2008-9 and net out-migration of 700 in 2009-10. In view of this dramatic change it is not acceptable, as the 2012 SHMAA did, to take the 460 average and simply project it forward over the plan period. There is a real possibility that there will be net out-migration from rather than in-migration to the district over the plan period. The past rate of growth of population and in-migration is unsustainable. the District Council should be planning for a very much lower level of growth in which housing and employment are balanced against environmental objectives.</p> <p>The SHMAs cannot claim to have been an objective assessment of housing need. The work was commissioned by local authorities and the steering committees were dominated by development interests who have a vested interest in talking up the housing needs figures. Wider interests such as residents' groups and environmental bodies were excluded from the process. WDC have assumed population growth of 17% between 2011 and 2029. This rate of growth would be above that for almost all the SHMA Projection Scenarios, despite the plan period being two years shorter than that of the SHMA. No justification is provided in the Plan for the choice of this figure. Employment forecasts are subject to great uncertainty and cannot be reliably used.</p> <p>The proposal for 12860 houses is not justified in the text. The Plan is therefore unsound in its provision for housing.</p> <p>The Plan does not take account of the latest ONS population projections, which shows a much lower rate of population growth than assumed in the JSHMA. This could suggest a reduction in the housing requirement of about 3700 homes. Further average household has recently stabilised, but the plan assumes continued reductions.</p> <p>Taking all these factors into account, we consider that the Plan is unsound because its housing provision is based on out-of-date information and on an over-optimistic, inflated view of both employment and population growth prospects.</p> <p><i>Amend policy DS6 to read "The Council will provide for approximately 8,000 new homes between 2011 and 2029."</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The Joint SHMA did not include a "Steering Committee" of developers. The local authorities steered the project but a Stakeholder Seminar was held at the end of the project (Draft Report stage) which included those involved in the delivery of housing, adjacent local authority Housing and Planning Officers, and local authority Portfolio Holders (elected members). The seminar discussed the methodology of the process and the findings. Site allocations and land use strategies were not on the agenda.</p> <p>It was felt that the wider stakeholder groups would be more interested in engaging in the process when plans and strategies are being discussed.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66319 - A C Lloyd Homes Ltd and Northern Trust [6105]	Object	The plan period should be extended to 2031 (as Stratford Upon Avon have done), because the plan will not be adopted before the end of 2015, which is less than 15 years from the anticipated year of adoption; it is likely therefore that the choice of an end date of 2029 will artificially restrain the levels of growth.	NPPF recommends a plan period of 15 years from the date of adoption but this is not a requirement. A review of the Plan will take place to consider how to accommodate any needs arising from Coventry and at this point the plan period could be extended	
65184 - Mr Brian Bate [1611] 65320 - Bubbenhall Parish Council (Mrs Jane Fleming) [4485] 65332 - Mr Carl Stevens [4873] 65481 - Keith Wellsted [8636] 65583 - Mr Peter Booty [3970] 65661 - Old Milverton & Blackdown JPC (Mr Graham Cooper) [1060] 65674 - Mr Andy Thompson [9620] 65694 - Mr John Fletcher [8466] 65734 - Mr Michael Kinson OBE [12794] 65736 - Mr Dean Epton [8244] 65885 - Mr E Barley [12797] 65917 - Mr. A. Burrows [2117] 66273 - Matt Western [9379] 66326 - Pauline Neale [1757] 66393 - Cllr Elizabeth Higgins [1080] 66431 - Ms Myra Styles [9988] 66440 - Mr Robert Cochrane [9989] 66474 - Friends of the Earth (John Brightley) [1113] 67131 - Mr Ray Steele [5886]	Object	The housing requirement fails to take account of the latest ONS 2012-based population projections which show a decrease in the level of growth of 29% since the 2011-based projections.	Following the release of the ONS 2012 population projections, an addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.	No change
		<i>The overall requirement for homes in this area needs to be recalculated in line with ONS new figures.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66365 - The Leamington Society (Richard Ashworth) [4687] 66561 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992] 66736 - Warwick County Councillors (J. Holland; A. Warner & J. St John) [11276]	Object	<p>The population projections on which the plan is based are out of date. The 2012 ONS projections show a lower population growth. This is also true for most neighbouring districts with the exception of Coventry. If WDC continue with their plans to build homes, this will mean the homes are built in the wrong place.</p> <p>Projections in population growth in Coventry are uncertain due to volatile inward migration from abroad. The ONS figures for Coventry represent 1.2% increase per year which implausibly large in comparison with national picture and other cities. This should not therefore be used to justify building homes in Warwick.</p> <p>The latest ONS projections provide the best basis for the Local Plan, however these demonstrate that the Plan is unsound as they indicate the population is projected to be over 6000 fewer than those on which the Plan is based.</p> <p>The need for additional homes is sensitive to average household size. The Plan assumes 2.181 by 2029 on the basis that the trend will decrease. However the are conflicting possible trends and this trend is not supported by the 2001 and 2011 census data. 12,860 is therefore an excessive figure and even if the average household size is 2.181 this is 2760 more dwellings than are needed.</p> <p><i>Recognise the ONS population projections and recalibrate housing needs accordingly. The Plan should propose a housing target somewhere between 10,100 and 6,672.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	
66114 - Mr and Mrs Martin [12851]	Object	<p>Although policy DS6 sets out that the council plan to provide 12,860 new homes between 2011 and 2029, which is derived from the joint Coventry and Warwickshire Strategic Housing Market Assessment , this is merely a snapshot in time and may not reflect the objectively assessed housing needs later on in the plan period. It is therefore important that the authority provide a significant buffer within their housing requirement so as to ensure a continuous supply of housing sites over the plan period.</p> <p><i>The authority should increase the overall housing requirement by allocating more sites for housing. It should also write into policy a review mechanism of its own plan and that where an identified shortage occurs the Council will review their plan, the necessary policies and will, if necessary, allocate further land for housing.</i></p>	<p>The Plan allows for a review to address any shortfall arising from neighbouring authorities.</p> <p>The Council does not agree that a significant buffer is required. However the policy will be amended to state that the requirement should be a minimum.</p>	<p>Amend PolicyDS6 as follows:</p> <p>DS6 Level of Housing Growth The Council will provide for a minimum of 12,860 new homes between 2011 and 2029</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65172 - Sundial Group Ltd [12683]	Object	<p>We consider that the plan proposes a lower housing provision than the CWSHMA. The plan period should be extended to 2031, 15 years after adoption, if in 2015. draft policy DS6 should be ammended to provide for 14,400 dwellings.</p> <p><i>Therefore, in order to ensure that the Plan is consistent with national policy we would recommend that the plan period is extended to cover the period 2011 - 2031, and consequently in order to ensure that the Plan is positively prepared and justified the draft Policy DS6 should be ammended to increase the housing requirement to at least 14,400 (720 dwellings per annum).</i></p>	NPPG recommends a plan period of 15 years from the date of adoption. However this is not a requirement. Should there be a need for additional housing to meet the needs of Coventry, the Plan will be reviewed.	No change
65125 - Mr Tony Robinson [12687]	Object	<p>The level of housing set out, of which a large percentage will be south of Warwick, is excessive and not justified by the local need - re para 1.42. It is built on a possible overspill need of Coventry and Birmingham. This fails the sustainability test as there is little provision for employment in the plan in the area where development is focussed.</p> <p><i>The level of housing should be realigned with the needs of the area, not for theoretical migration from other areas. It should not be concentrated to the south of Warwick as this forces people into cars to travel to work in other towns</i></p>	<p>The in- and out-migration of people is constant and must be planned for otherwise there will be a shortage of housing which will affect local people as much as newcomers. The south of Warwick &amp; Leamington is the most sustainable area of the District outside of 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>
65983 - Barwood Development Securities Ltd [12821]	Object	<p>The policy confirms that the Council is planning to provide for 12,860 new homes between 2011 and 2029. Barwood raise strong objection to this policy. In the first instance Barwood object to the Council setting a definitive target for housing growth.</p> <p>Warwick may have to provide housing growth for the wider HMA and until the LPAs have fully assessed whether they are capable of delivering the required growth, Warwick cannot definitively state that they are planning for their full objectively assessed housing needs. Barwood believe that the Publication Local Plan is unsound as it plans for an artificially suppressed level of housing growth in conflict with the objectively assessed housing needs of the Housing Market Area.</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The Council agrees that a definitive target would be unrealistic and will change the wording to refer to "a minimum of" 12,860 dwellings.</p>	<p>Re-word the policy as follows:</p> <p>Policy DS6 Level of Housing Growth The Council will provide for a minimum of 12,860 new homes between 2011 and 2029.</p>
65442 - Sworders (Miss Rachel Padfield) [11530] 65673 - Mr Richard Brookes [1866] 65702 - Mr and Mrs Swindells and Star Pubs and Bars Ltd [12842] 66607 - Richborough Estates Ltd [5927]	Object	<p>The Joint SHMA assessed Warwick's need for housing as 720 homes per annum. Over the plan period of 18 years this should be 12,960 homes</p>	<p>The figure of 720 per annum in the SHLAA is an average across the 20 year plan period. However, an inherent assumption in the 2013 Joint SHMA was that the first 10 years from 2011 to 2021 would have a lower average than the latter 10 years because of the application of headship rates from the 2011 household projections which give a lower rate of household formation (therefore fewer homes). Higher headship rates (from the 2008 household projections) were applied to the period from 2021 onwards giving a higher rate of household formation and therefore more homes. If the plan period extends to 2029 (rather than 2031) there will be a lower overall average across the plan period.</p>	
		<p><i>Increase the requirement to 12,960 new homes per annum.</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>
66194 - Lenco Investments [1165]	Object	<p>The Council's proposals are woefully short on the number of homes required and fail to balance the level of housing and jobs provided within the strategy of the plan, or the core Objectives of it.</p> <p>The proposals and policies in the Plan are not consistent with the approach set out in the preceding strategy. The proposals in the plan fail to provide for the objectively assessed need for housing, but more importantly fail to balance the provision of homes and jobs as advocated by the authority as being a fundamental component of the Plan's strategy and policy framework. It is therefore ineffective and unjustified.</p> <p>In respect of the balance between jobs and homes. There is no assessment of the level of housing that will be needed to support or to balance the Gateway Site (sub-regional employment location). Given that this principle is a fundamental driver of the Plan as part of its Strategy and core Objectives, the plan cannot be found sound if it does not deliver on these.</p>	<p>The 2013 Joint Coventry &amp; 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"> <li>* at District level economic forecasts are not that reliable</li> <li>* the relationship between housing and jobs is complex</li> <li>* economic forecasts do not take into account double-jobbing</li> <li>* commuting patterns and employment rates can change over time</li> </ul> <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

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
			<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> <p>The GL Hearn report "Economic &amp; Demographic Forecasts Study" (Dec 2012) looked at the economic forecasts of Coventry City &amp; Warwick District and the implications for housing provision. A number of scenarios were developed to examine projected housing need, depending on levels of displacement (i.e. existing businesses relocating to Gateway). This showed a requirement for between 726 and 772 dwellings per annum assuming levels of replacement between 50% and 0% respectively.</p>	
66419 - Sharba Homes Group [12779]	Object	<p>The document is based on an estimated requirement for 12,300 dwellings over the plan period. The latest SHMA puts the assessed requirement at 14,400, meaning that the residual need is 8,722 rather than 6,622. the plan does not therefore meet the full and objectively assessed need.</p> <p>The Council appear to have made assumptions and assertions about where they feel it is appropriate to locate housing within the district, as well as the level of housing to be provided, before carrying out the relevant assessments with an open mind to reach such a conclusion. Thus, the process has begun from entirely the wrong premise and is based on evidence that is partial, inaccurate and subjective.</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study used an internationally recognised methodology for projecting population and households and used the most up to date fertility, mortality, migration and household formation rates from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	No change
		<i>The entire plan must be considered materially unsound.</i>		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
65468 - King Henry VIII Endowed Trust (Warwick) [6195]	Object	<p>The housing target in policy DS6 should be clearly identified as a minimum to enable the full objectively assessed needs to be met. We strongly support Strategic Policy DS2 which provides a clear commitment to providing "in full for the Objectively Assessed Housing Need". The Joint SHMA 2013 sets out the basis for establishing the District's objectively assessed affordable housing need. It identifies a need for 268 new affordable homes each year between 2013 and 2031. However this figure of 268 has been calculated based on an assumed period of 18 years over which the backlog of affordable housing need should be met.</p> <p>Following national guidance to reduce the affordable housing reducing the backlog to 5 years, the affordable housing requirement increases from 35 to 127 affordable dwellings per annum. The overall affordable housing need therefore increases from 268 to 360 affordable dwelling per annum.</p> <p>the zero migration scenario used in the 2013 SHMA is likely to have underestimated the need for affordable housing. In addition the 2012 SHMA identified a need for 698 affordable dwellings per annum in the District. This is a significantly higher level of need, identified only the year before the Joint SHMA.</p> <p>As such we would recommend that the overall housing target as set out in policy DS6 is stated as a minimum which could be exceeded.</p> <p>In the light of an average performance of just 14.4% affordable housing delivery over this period the realism of achieving 40% must be seriously questioned. This emphasises that if sufficient numbers of affordable dwellings are to be delivered then correspondingly sufficient numbers of market dwellings must be delivered too.</p> <p>Local Plan provides for 12,860 new homes between 2011 and 2029, which equates to approximately 714 dwellings per annum. This provision figure is over 100 dwellings less than what the Joint SHMA states is the objectively assessed housing target for the District based on an annual housing need of 720 homes over the 20 year period 2011 to 2031.</p> <p><i>We would recommend that the overall housing target as set out in policy DS6 is stated as a minimum which could be exceeded.</i></p> <p><i>Draft Local Plan Policy 'DS6 Level of Housing Growth' should be amended as follows:</i>  <i>The Council will provide for a minimum of 12,680 new homes between 2011 and 2029</i></p>	<p>Agreed that the housing requirement should be a minimum.</p> <p>NPPG does not require the affordable housing backlog to be met within 5 years.</p> <p>The Joint SHMA followed Government guidance in NPPG in calculating the affordable housing need. Delivery of affordable housing in recent years has been suppressed because many of the large sites were sites allocated in the previous Local Plan and these had outline permission requiring 30% affordable housing. Over the plan period there will be a number of strategic housing allocations which will be required to deliver 40% affordable housing. The figure of 720 per annum in the SHLAA is an average across the 20 year plan period. However, an inherent assumption in the 2013 Joint SHMA was that the first 10 years from 2011 to 2021 would have a lower average than the latter 10 years because of the application of headship rates from the 2011 household projections which give a lower rate of household formation (therefore fewer homes). Higher headship rates (from the 2008 household projections) were applied to the period from 2021 onwards giving a higher rate of household formation and therefore more homes. If the plan period extends to 2029 (rather than 2031) there will be a lower overall average across the plan period.</p>	<p>Change Policy DS6 to read:          "The Council will provide for a minimum of 12,680 new homes between 2011 and 2029"</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65695 - Gladman Developments (Peter Dutton) [9149]	Object	<p>Policy sets out requirement for 12,860 homes over Plan period 2011-2029, equating to 720 dwellings per annum.</p> <p>Proposed housing requirements drawn from 2014 Coventry and Warwickshire Joint SHMA. The Joint SHMA covers local authority areas of Rugby, Coventry, Warwick, North Warwickshire, Nuneaton and Bedworth and Stratford-on-Avon and identifies a mid-point of need of 3,750 dpa based on 2011 and 2008 headship rates as representing a reasonable level of provision on which to base the housing needs of the HMA. Preparation of the Joint SHMA comes after the withdrawal of Coventry's Core Strategy in 2012, particularly in light of lack of consistent/joint approach to meeting housing needs of the area and failure to discharge the authority's Duty to Cooperate.</p> <p>Reviewing the housing requirements in the Local Plan and the findings of the joint SHMA, submit that proposed WDLP - Publication Draft Consultation housing requirements set out in Policy DS6 are too low to meet housing needs of the district and are not based on robust evidence. Whilst welcoming the SHMA, we submit that the assessment of the housing needs it provides for the HMA and the district underestimates level of housing required to support future demographic needs and economic potential. Whilst SHMA recognises the need to address market signals, query whether these have been properly factored into future assessment of housing needs, whilst noting proposed housing needs for HMA will be insufficient to meet affordable housing for the area as a whole. Strongly submit that the Council has underestimated future level of housing that must be provided.</p> <p>Aware of independent objective assessment of housing needs for Coventry and Warwickshire HMA. Incorporating critique of Joint SHMA, the Coventry and Warwickshire Sub-Regional Housing Study finds that to meet the full objectively assessed needs of the HMA and Warwick District, an overall housing requirement of at least 5,100 dpa, based on an economic-led modelling scenario linked to economic forecasts used in the Coventry and Warwickshire LEP Strategic Economic Plan. Consultants find this level of housing growth would enable demographic needs to be met, forecasted economic growth to be accommodated, sufficient affordable housing to be supplied and make a significant contribution towards addressing adverse market signals in the area. Translated into requirements for individual authorities in the HMA, this would require a housing requirement of 18,000 dwellings to be provided through the Warwick LP, equating to 900 dpa.</p> <p>To be found sound at Examination the Warwick District LP must be based on effective joint working on cross boundary strategic issues. In this regard the LP and Coventry and Warwickshire SHMA discuss and recognise the issue of cross-boundary housing needs within the</p>	<p>The Council is aware of the Barton Wilmore study which assesses the housing needs of Coventry &amp; Warwickshire.</p> <p>The "starting point" for the projections is not the latest ONS or CLG projections. The study dismisses the ONS international migration estimates as under-estimates and uses a long term past trend instead. However, ONS have an expert panel examining all the latest evidence on international migration which is studied in great detail. These ONS estimates should be used as the starting point as they form an important part of the national jigsaw of population movements.</p> <p>The study makes the assumption that Cambridge Econometrics (CE) forecasts are correct for the HMA and the individual authorities and dismisses Experian forecasts with no robust justification. The LEP uses CE forecasts because these are the most optimistic and provide a maximum level to be aimed at. However they are not necessarily the most realistic and it would be dangerous to plan for housing across the HMA to meet these aspirational levels. The Experian levels of employment are more compatible with past trends and the 2012-based population projections.</p> <p>The study states that market signals indicate a worsening trend in the housing market but, for Warwick District, this is not borne out in the Statistics. Past delivery rates exceeded the RSS requirements necessitating a moratorium. The downturn following the credit crunch was experienced nationally. Median house price increases between 2002 and 2012 in Warwick were below the national average and the proportionate increase in the affordability ratio was well below that for the nation. The proportion of concealed households are slightly lower than the national average.</p> <p>The C &amp; W authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a common methodology. If Coventry City identifies a shortfall in suitable &amp; sustainable housing sites then the Districts and Boroughs will cooperate to identify suitable sites within their own areas. If a need for sites in Warwick District is identified, the Council will</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>HMA and unmet requirements arising from neighbouring authority areas. Policy DS20 specifically describes the work that has taken place between the Council and other authorities within the Coventry and Warwickshire HMA to agree a process for addressing unmet needs from one or more of the HMA authorities should they arise. Outside of the HMA, the LP also identifies that there may be an issue of unmet housing needs arising from the Greater Birmingham area.</p> <p>Whilst welcoming the Council's willingness to work with its neighbouring authorities to address unmet housing needs, submit that the actions proposed by the LP and the Coventry and Warwickshire Joint Committee are not sufficient. There is a long-standing and existing acknowledgement that Coventry will be unable to meet the housing needs in its own administrative area, with a report to the Coventry and Warwickshire Joint Committee on 20th March 2014 clearly stating that "there is a significant risk that Coventry City Council will not be able to accommodate 23,600 dwellings (1,180 dpa) within the City boundary". The submission draft of Birmingham City Council's LDP also identifies an initial shortfall of 29,000 dwellings against its full objectively assessed needs. There is therefore a clear requirement for effective working to be undertaken to address these needs now, and for a positive response through the LP to meet them.</p> <p>In light of the need to provide for a higher housing requirement in the district, submit that Policy DS6 is not positively prepared as it fails to propose a sufficient level of housing to meet Warwick's needs and those of its surrounding neighbours. LP not justified as it is not supported by robust assessment of full objectively assessed needs for the district, and is not effective as it fails to adequately address cross-boundary housing issues. In a number of instances Council's approach is not consistent with the requirements of the Framework. To be considered sound, submit that proposed housing requirements set out in the LP should be increased, at least being consistent with the assessment of the district's housing needs prepared by consultants. To address unmet housing needs already acknowledged to exist in relation to Coventry and Birmingham there is need for action to address these unmet needs now, rather than deferring this to future work or a review of the Local Plan.</p> <p>In light of our concerns over the adequacy of the Council's proposed housing requirement, reserve the right to undertake an independent objective assessment of the authority's housing needs, consistent with the requirements of the Framework and the PPG on Housing and Economic Development Needs Assessments, and submit this to the Local Plan Examination.</p>	review 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>
66475 - Friends of the Earth (John Brightley) [1113]	Object	The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.	The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.	No change
66727 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Object	The number of homes should be increased to meet an extended Local Plan period up to 2031 and to meet the needs arising from adjoining authorities.  <i>The plan period should be extended to 2031. The housing requirement should be increased to include provision for the additional 2 years. It should also be increased to make provision for housing needs arising from adjoining authorities and for other reasons as set out by other objectors.</i>	NPPF recommends a plan period of 15 years from the date of adoption but this is not a requirement. A review of the Plan will take place to consider how to accommodate any needs arising from Coventry and at this point the plan period could be extended	Amend Policy DS6 as follows:  DS6 Level of Housing Growth  The Council will provide for a minimum of 12,860 new homes between 2011 and 2029

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66791 - Gallagher Estates [644]	Object	<p>A key function of the plan is to meet in full the need for housing over the plan period. Policy DS6 does not, in our view, achieve this. It is considered that the requirement figure of 12,860 dwellings 2011 to 2029 is not positively prepared and is unsound. There is concern that the migration assumptions that have fed into the SHMA are not reflective of representative or normal migration patterns which instead have been influenced by the artificial policy constraint arising from the housing moratorium in place in Warwick District between 2005 and February 2009 . There was a period of recession once the moratorium was lifted which also has the effect of constraining supply and influencing migration trends.</p> <p>There is also concern about the household formation rates used in the SHMA which use a blended approach utilising both 2008 and 2011 headship rates. It is considered that the use of 2011 headship rates to 2021 then 2008 headship rates for the following 10 years is far too pessimistic. The SHMA supports growth in labour supply of around 12% for the baseline assessment which falls short of the Experian forecast of 14.3%. It makes reference to unmet need which has not been added to the projections despite planning practice guidance stating it should be. Using the Chelmer model an alternative assessment has been undertaken for Warwick District which concludes the starting point for determining the actual housing requirement for Warwick is a figure of 15,084 dwellings over the plan period 2011 to 2029 based on the most up to date demographic information. To fulfil economic potential and to provide for projected employment growth within the plan period a higher requirement of circa 18,043 should be considered. In light of this it is considered that the delivery of 715 homes per annum would not deliver the full objectively assessed need for housing in the District. It would not assist in delivering economic growth, wouldn't address the serious imbalance in supply and demand and would not deliver the affordable housing needed. In the past the District has delivered rates of 900 + which suggests a rate of 1000 per annum could be achieved.</p>	<p>Migration: ONS estimate in- and out-migration as part of the exercise of producing mid-year estimates. These estimates are based on the most reliable sources of information available at the time. Following the publication of the 2011 Census, some recalibration of the mid-year estimates took place to adjust data to take account of the differences between the 2001 and 2011 Censuses. This showed the population of the sub-region had been over-estimated by some 13,000 people. The differences varied between areas but in Warwick District there was found to be a slight under-estimation. Although the cause of these over or under-estimates is not known, the most likely cause is in the estimation of migration flows. Adjustments were made for these discrepancies in the JSHMA. There is no other evidence to suggest that migration flows should be adjusted further. Sensitivity tests were carried out which showed that if Warwick's 10 year average was applied (+860 per annum) then the needs would be 725 new homes per annum.</p> <p>The moratorium between 2006 and 2009 served to counter-balance the very high levels of housing growth in 2001-2004 when the combination of a number of new allocated sites were being developed in tandem with a number of developments for flats on large windfall sites. There is evidence that during this time completions in Coventry increased suggesting that much house building was redirected towards Coventry, which is within the same Housing Market Area. NPPF states that local authorities should aim to meet the needs of the Housing Market Area and Warwick District accepts that once the shortfall from Coventry is known, it will play its part in cooperating with other local authorities in the HMA to meet this need.</p> <p>Household Formation: Headship Rates are taken from the CLG 2011-based Household Projections. However there is evidence nationally that over the past decade there was some suppression of household formation, largely due to the recession but also due to the lower household formation rates of immigrant households. To allow for a potential increase in household formation following the economic</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>recovery, the 2008 headship rates have been applied post 2021.</p> <p>The later work carried out in the JSHLAA Addendum included a more sophisticated methodology of applying headship rates which took into account the differences between authorities.</p> <p>The application of headship rates which give higher rates of household formation later in the period addresses the issue of unmet need due to issues associated with mortgage finance. Other indicators of unmet need, such as overcrowding, were not significant in Warwick District.</p> <p>Labour Force Growth:</p> <p>The 2013 Joint Coventry &amp; 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"> <li>* at District level economic forecasts are not that reliable</li> <li>* the relationship between housing and jobs is complex</li> <li>* economic forecasts do not take into account double-jobbing</li> <li>* commuting patterns and employment rates can change over time</li> </ul> <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</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65145 - Mrs Pat Robinson [7802]	<p data-bbox="421 871 479 890">Object</p> <p data-bbox="528 871 1167 1038">The numbers of homes does not reflect projected needs under the latest National Statistics-WC should use the most current data which indicates lower numbers. The argument that Warwickshire should absorb housing from Coventry and Birmingham is unfair bearing in mind that some green belt in these areas is much lower quality than green fields south of Warwick. The greenbelt should be revised.</p> <p data-bbox="528 1281 1167 1326"><i>Revise green belt. Build houses nearer workplaces which are likely to be in the West Midlands and north of Warwick.</i></p>	<p data-bbox="1205 272 1697 416">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 data-bbox="1205 424 1697 616">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 development.</p> <p data-bbox="1205 624 1697 687">Chelmer Projections: We are unable to comment on these projections as no details were provided.</p> <p data-bbox="1205 695 1697 839">Achievable Levels of Growth: The level of completions of 1,000 dwellings (gross) has been achieved once since 1996. It was achieved at a time when 2 large allocated sites were being delivered concurrently along with a number of windfall sites (comprising 335 units).</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65321 - Bubbenhall Parish Council (Mrs Jane Fleming) [4485]	Object	<p>The Council's provision of 12,860 new homes between 2011 and 2029 (para 2.20) is based on economic projections for the area including projections of POPULATION numbers through 2029 (SHMA 2013). The Plan projections use out-of-date data on population from the ONS which only covers the period until 2021. The revised ONS data (May 2014) that cover the full period to 2029 and show much slower growth are ignored. The Plan projections are also questionable because in translating population numbers into the number of dwellings required, the consultants have assumed a significant decline in the size of the average Warwick household.</p> <p><i>The housing targets for the period to 2029 as set out in DS 7 must be reduced to no more than 9,130 homes and possibly as low as 7,000 homes to ensure compliance with the NPPF requirements that the latest ONS data are used in making the necessary projections.</i></p> <p><i>The failure to use the latest ONS data has meant that the consultants enlisted to help prepare the projections in the SHMA have needed to make crude and un-defended extrapolations of the population numbers for all years from 2022 through 2029. The new Office of National Statistics (ONS) data as released on May 29th 2014 avoids this problem because it provides projections for all years through 2029 and beyond. Even more significantly those new data show a sharp reduction in the expected size of the population of Warwick by 2029 compared to the projections used in the draft Plan.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The number of future households is calculated by using Government derived Headship Rates and not by applying household size. The household size figures are a derivative of the household projections exercise. They show that Warwick's household size would fall from 2.35 in 2011 to 2.22 in 2031. The Council has confidence in this exercise which follows an internationally accepted methodology and uses official Government (ONS) statistics to arrive at headship rates which reflect the current and recent patterns of household formation.</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>Specifically, they show that population numbers are expected to increase by a figure 29% lower than that used in the Plan document. Applying this percentage adjustment to the numbers of new homes claimed in the plan would reduce the actual need for new homes to only 9,130 from the Plan figure of 12,860.</i></p> <p><i>WDC is required by the NPPF Guidelines to use the latest ONS population projections. Thus it is essential that the target for new housing numbers by 2029 be reduced to take full account of the new ONS data of May 29th.</i></p> <p><i>In addition, a further reduction to a figure below 7,000 homes would be advisable to recognise the likely error in the assumptions made about the decline in the average household size in Warwick - an assumption which is not backed by any credible evidence. In the absence of such evidence a constant household size (given that the Warwick figure for household size is already low) is a safer assumption. This figure used in the SHMA and in the Plan was arrived at by extrapolating DCLG projections that only extend as far as 2021. However, the basis for the extrapolations is not supported by any evidence. Moreover the DCLG's projections are themselves questionable. Although average household size in England fell in every Census between 1911 and 1991, since then it has remained constant and in Warwick it actually rose between the 2001 and 2011 Censuses. So it is equally plausible to assume that average household size will remain constant through 2029.</i></p> <p><i>The population growth from 2011 through 2029 shown by the new ONS data is from 137,735 to 153,049 (an increase of 15,314 or 850 persons per annum). If the 2011 Census density number of 2.294 is applied to this population increase it suggests a need for new homes of only 6,676 compared to the 12,860 of the Plan.</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>
65746 - Jaguar Land Rover [12653]	Object	<p>Given the cross boundary impact of the existing Jaguar Land Rover operations on Warwick Districts' current housing provision and the need for housing requirements to accommodate future Jaguar Land Rover employees, the emerging Local Plan does not adequately plan for housing and services in accordance with the NPPF. Policy DS6 of the Local Plan is not consistent with National Policy, it is not sufficiently 'effective' as it is not based on effective joint working on cross-boundary strategic priorities. It is imperative that the Warwick District Council considers its housing targets in synergy with the need to protect, encourage and facilitate the ability of existing major employers, such as Jaguar Land Rover.</p> <p><i>In light of the above considerations, it is requested that the following text is inserted following paragraph 2.20 of the Local Plan Publication Draft:</i></p> <p><i>"Jaguar Land Rover is a significant and growing employer within the District and region, both directly and indirectly. As a result of growth and expansion, there may be a requirement to review the level of planned housing provision in advance of the end of the plan period. Using the same approach set out within Policy DS20, the Council will keep this under review"</i></p>	The Local Plan allows for new employment development in Policy DS8 and associated housing in DS6.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66825 - Europa Way Consortium [197]	Object	<p>The housing target policy in DS6 should be clearly identified as a minimum delivery requirement, net of demolitions, to enable the full objectively assessed need to be met.</p> <p>The District's overall affordable housing need should be increased to 360 affordable dwellings per annum to deal with past undersupply.</p> <p>The December 2012 Economic and Demographic Forecasts study shows net in migration of 855 persons a year in Warwick, therefore the zero migration scenario used in the 2013 SHMA is likely to have underestimated the need for affordable housing. In addition the 2012 SHMA identified a need for 698 affordable dwellings per annum in the District. This is a significantly higher level of need identified only one year before the joint SHMA.</p> <p>The Council's proposed figure of 12,860 homes between 2011 and 2029 is over 100 dwellings less than what the Joint SHMA states is the objectively assessed housing target.</p> <p><i>The Council agrees that the requirement should be the minimum level.</i></p> <p><i>Affordable housing in the Joint SHMA has been assessed according to national planning guidance. The backlog has been calculated and included into the overall figure. It is rarely possible to meet the full needs for affordable housing. However the Council takes seriously the issue of affordability in the District and will itself build new Council homes and work with a partner Registered Provider to help deliver more homes. In addition, there is a large stock of private rented homes in the District and this will help to meet the needs of some (particularly younger) households who are unable to afford market homes.</i></p>	<p>The figure of 720 per annum in the SHLAA is an average across the 20 year plan period. However, an inherent assumption in the 2013 Joint SHMA was that the first 10 years from 2011 to 2021 would have a lower average than the latter 10 years because of the application of headship rates from the 2011 household projections which give a lower rate of household formation (therefore fewer homes). Higher headship rates (from the 2008 household projections) were applied to the period from 2021 onwards giving a higher rate of household formation and therefore more homes. If the plan period extends to 2029 (rather than 2031) there will be a lower overall average across the plan period.</p>	<p>Amend Policy DS6 as follows:</p> <p>DS6 Level of Housing Growth</p> <p>The Council will provide for a minimum of 12,860 new homes between 2011 and 2029</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65421 - Nurton Developments [12697]	Object	<p>Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p><i>The Local Plan housing provision should be based on the OAN as set out in the SHMA and should also be increased to provide flexibility for meeting need arising in neighbouring districts that cannot be accommodated in those districts. This will require further work under the Duty to Cooperate. The plan period should be extended to 2031.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>NPPF recommends a plan period of 15 years from the date of adoption but this is not a requirement. A review of the Plan will take place to consider how to accommodate any needs arising from Coventry and at this point the plan period could be extended</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66054 - Lenco Investments [1165]	Object	<p>The Council has failed to identify an objective assessment of objectively assessed need for housing. The current proposal is deficient and therefore unjustified and thus unsound.</p> <p>The Council has used the 2011 Interim Population and Household Projections to inform its housing figures, however these projections only extend until 2021, whereas the Council's SHMA seeks to extend these over the period 2011 to 2031.</p> <p>It is understood that the SHMA undertook two sensitivity tests. With regard to scenario PROJ1A - 2008 Headship RPS concurs that the use of the 2008 headship rate over the entire plan period in this sensitivity test is likely to be unrealistic.</p> <p>The second sensitivity test PROJ1A - Midpoint Headship seeks to apply a hybrid of the 2011 headship rate data to 2021 and then 2008 rates post this to 2031. RPS concurs that this is an appropriate scenario to apply within the SHMA, however RPS objects to the manner in which this sensitivity test is applied.</p> <p><i>RPS objects to the Council's demographic approach to OAN for housing on the basis that the evidence is misleading and the level of housing unjustified. To be sound:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>the plan should be consistent in its interpretation of the evidence, at present it is not. The assessments of the economic driven scenarios should be informed by the same hybrid headship rate sensitivity test. To not do so is misleading, inaccurate and unsound; and</i></li> <li><input type="checkbox"/> <i>the headship rate from the 2008 household projections should be applied at an earlier date than 2021. The date at which they should be applied from is 2016.</i></li> </ul>	<p>Headship Rates are taken from the CLG 2008-based and 2011-based Household Projections. There is evidence nationally that over the past decade there was some suppression of household formation, largely due to the recession but also due to the lower household formation rates of immigrant households. To allow for a potential increase in household formation following the economic recovery, the (lower) 2011 headship rates were applied to the population cohorts up to 2021 and the higher 2008 headship rates were applied post 2021. This allows for household formation to gradually increase to pre-2008 levels by 2031. There is no evidence that 2008 levels of household formation will be achieved by 2016. Whilst the rate of growth in UK economic output has picked up over the last year, housing market activity remains below the levels seen since 2007.</p> <p>The C &amp; W authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a common methodology. If Coventry City identifies a shortfall in suitable &amp; sustainable housing sites then the Districts and Boroughs will cooperate to identify suitable sites within their own areas. If a need for sites in Warwick District is identified, the Council will review the Plan</p> <p>The later work carried out in the JSHLAA Addendum included a more sophisticated methodology of applying headship rates which took into account the differences between authorities.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65741 - Barratt & David Wilson Homes;Bloor Homes;Catesby Group;Crest Strategic Projects;Hallam Land Management;Richborough Estates;Taylor Wimpey;William Davis [12832] 66543 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	The independent study from Barton Wilmore "The Coventry Sub-regional Housing Study" provides a more accurate assessment of the housing needs in the sub-region. The Council's assessment fails to take proper account of the economic forecasts and the level of housing will fail to meet the housing needs of the increased number of people in employment.	<p>The Coventry Sub-regional Housing Study is not considered to be in conformity with the guidance in National Planning Practice Guidance.</p> <p>The "starting point" for the projections is not the latest ONS or CLG projections. The study dismisses the ONS international migration estimates as under-estimates and uses a long term past trend instead. However, ONS have an expert panel examining all the latest evidence on international migration which is studied in great detail. These ONS estimates should be used as the starting point as they form an important part of the national jigsaw of population movements.</p> <p>The study makes the assumption that Cambridge Econometrics (CE) forecasts are correct for the HMA and the individual authorities and dismisses Experian forecasts with no robust justification. The LEP uses CE forecasts because these are the most optimistic and provide a maximum level to be aimed at. However they are not necessarily the most realistic and it would be dangerous to plan for housing across the HMA to meet these aspirational levels. The Experian levels of employment are more compatible with past trends and the 2012-based population projections.</p> <p>The study states that market signals indicate a worsening trend in the housing market but, for Warwick District, this is not borne out in the Statistics. Past delivery rates exceeded the RSS requirements necessitating a moratorium. The downturn following the credit crunch was experienced nationally. Median house price increases between 2002 and 2012 in Warwick were below the national average and the proportionate increase in the affordability ratio was well below that for the nation. The proportion of concealed households are slightly lower than the national average.</p> <p>The C &amp; W authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a common methodology. If Coventry City identifies a shortfall in suitable &amp; sustainable housing sites then the Districts and Boroughs will cooperate to identify suitable sites within their own areas. If a need for sites in Warwick District is identified, the Council will</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
			review the Plan	
		<i>Increase the housing requirement to a minimum of 900 dwellings per annum, with appropriate increases across settlements in Warwick District in accordance with the sustainability of the various locations.</i>		
66797 - Mr Ian Lovecy [8036]	Object	It is not possible to estimate housing requirements accurately due to so many uncertainties. It therefore doesn't make sense to set a requirement to the nearest 10 houses and experience shows this is likely to inaccurate in either direction.	The purpose of the exercise of assessing housing need is to ensure that enough homes are delivered to meet needs and achieve a reasonable balance between jobs and homes. There is no right or wrong answer to this, but the Council needs to be able to demonstrate that it has followed the methodology set out in national planning policy guidance. The Council maintains that both the Joint SHMA and the Addendum have followed national planning policy guidance.	No change
66385 - Warwick Town Council (Mr Derek Maudlin) [1059]	Object	<p>The Town Council accepts that development in the town must not only provide for the specific needs of Kenilworth itself but also has to bear in mind that the town is part of the District and must reflect the amount of housing necessary across the District. However the recent ONS forecast of population growth has indicated that the actual needs of the District, which we had accepted, may now have been superseded as it indicates a significantly smaller increase in need for the District as a whole. In these circumstances we feel there is a requirement for those figures to be investigated, and if a lesser figure is indicated then this must lead to a re-evaluation of the needs of the District as a whole, including Kenilworth, which saw an increased share in the latest version of the Plan.</p> <p>We are concerned that the pressure may return for over the border development. However the analysis for the previous RSS showed that even with the revised figures there will be spare capacity within the Coventry boundary and therefore any cross-border pressure should be firmly resisted by the District Council. In particular there must be no development for the benefit of Coventry on Green Belt land in Warwick District, when development on Green Belt land in Coventry is not being considered.</p> <p>The Town Council's view was that the development within the Town at Thickthorn should cease at Rocky Lane and should not include the Crackley Triangle. In the light of the new figures these two areas may need to be revisited.</p> <p><i>None</i></p>	The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a common methodology. This will ensure that authorities can be confident that Coventry will make best use of its own suitable housing land before requesting that neighbouring authorities accommodate some of the need.	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67117 - Mr Ben Orme [12882]	Object	<p>The overall forecast of housing need of 12900 is considered to be exaggerated. The ONS estimates have been revised downwards and suggest only 8,100 houses are needed to meet natural increase and inward migration to Warwick District. The SHMA suggests that occupancy rates of houses will fall significantly from 2.2. Such a decrease is unrealistic and the plan is therefore seeking to justify the provision of more houses than will actually be needed to house the target population.</p> <p>There is already more than a five year supply of land ready for development. As ONS estimates have dropped less houses will be needed to meet the requirement for 5 years supply. Campaign groups have claimed that there is already a five year supply; the revised ONS estimates would appear to reinforce this position. Population projections underpin the plan and are fundamental to it being properly justified/sound. The GL Hearn projections used in the SHMA for Coventry and Warwickshire are used as the basis for the Plan but are now discredited by the may ONS population figures issued in May 2014.</p> <p>The recent ONS figures are much lower than those used in the SHMA 15,313 rather 21,472, a fall of 6,159 persons or a 28.7% reduction. This is very significant in that it changes the numbers of dwellings that will be necessary; the amount of infrastructure needed to support the housing / population and reduces the amount of Greenfield needed to be taken for new allocations.</p> <p>The reduction in population and required housing will also improve the 5 year housing supply position.</p> <p>It is considered that the SHMA underestimates the future housing occupancy rate in the district (see statistics in full submission). This alongside the potential for minor density adjustments can also have an impact on the amount of housing required in Warwick District and could lower the numbers significantly.</p> <p>Research undertaken by local campaign groups (supported by respected University of Warwick economists), shows conclusively that maintaining a housing target of 12900 by 2028 cannot be justified on the basis of the latest figures ( see power point slides in full submission).</p> <p>A decision to continue to work to the Council's current housing target can only be based on the Leadership of Warwick District Council being determined to " go for growth" in the face of the communities wish for a plan that would do no more than meet the needs of natural growth with a modest allowance for inward migration.</p> <p>To conclude / summarise</p> <p>*Warwick's population projection is now 28.7% less than the figures used to formulate the consultation draft local plan. The Plan is therefore unsound based on incorrect/ inadequate data.</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</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>*All the other authorities in the Housing Market area are also showing similar reductions in their population projections, including Coventry.</p> <p>*The method by which population is converted into the numbers of dwellings required needs better determination by calculation, using the known housing type and size to be included in the plan.</p> <p>*The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this will imply brownfield sites being put first and only including Greenfield where essential.</p> <p>*To delay a revision of the 5 year housing supply calculation / requirement in light of the new evidence of a much lower need for housing would be neglectful.</p> <p>*Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.</p>		
	<p><i>The plan does not conform to the NPPF or Planning Practice Guidance in not responding to the changes that have taken effect in the ONS population statistics and the calculations of housing need are erroneous and have led to serious errors in predictions of housing needs and, because of the seriousness of these errors, the plan is unsound.</i></p> <p><i>The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this will imply brownfield sites being put first and only including Greenfield where essential.</i></p> <p><i>To delay a revision of the 5 year housing supply calculation / requirement in light of the new evidence of a much lower need for housing would be neglectful.</i></p> <p><i>Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.</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>
66186 - Mr C Wood [6044]	Object	<p>Housing Need Forecast of 12,900 homes is exaggerated.</p> <p>Forecast based on projections and assumptions, not on evidence. Fewer than 6,000 new homes would meet both natural growth and any likely reduction in household size.</p> <p>The Plan period of 18 years, 2011-29, is longer than the 15 years required by the NPPF. The Office of National Statistics' itself advises against extrapolating them beyond 2021.</p> <p>There is no need to provide in full now for what only may happen in the late 2020s, or never, the consequence of which is the allocation now of huge greenfield sites that may never be needed.</p> <p><i>Fewer than 6,000 new homes would meet both natural growth and any likely reduction in household size.</i></p> <p><i>There is no need to provide in full now for what only may happen in the late 2020s,</i></p>	<p>The Council is required to Take account of migration flows as well as the natural increase in households. Not to do so would result in a serious shortage of homes to meet the needs of the future population. National planning policy recommends that local planning authorities plan for about a 15 year period from the date of adoption not from the start of the plan period.</p> <p>The Strategic Housing Market Assessment used the 2011-based Interim Population Projections because these were the latest available at the time. The projections were not simply extrapolated. The methodology used ONS fertility and mortality rates from the 2010-based projections (the latest full set at the time) with some adjustments to overall levels of migration based on the 2011-based projections. In addition some adjustments were made to take into account the recalibrated ONS mid-year estimates (which were carried out following more information from the 2011 Census).</p> <p>It is necessary to plan over a longer timescale than, say, 10 years in order that developers have some certainty about sites and also so that the Council can plan for the delivery of infrastructure to meet the needs of new developments.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66086 - Gleeson Developments [5117]	Object	<p>The Plan recognises that other authorities in the Housing Market area are at differing stages of the Plan preparation. There may be a need to take unmet need from other planning authority areas, most noticeably from Coventry and Birmingham. Indeed, the earlier versions of the Core Strategy proposed accommodating a significant proportion of housing from Coventry within Warwick District. The Council proposes to deal with this potential unmet need via a possible early review.</p> <p>However Policy DS6 is considered unsound as it fails to acknowledge the need to potentially accommodate an element of unmet need from nearby districts.</p> <p><i>Add an addition sentence to policy DS6 acknowledging the potential to accommodate an element of "unmet need arising from outside of the District..."</i></p>	<p>The C &amp; W authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a common methodology. If Coventry City identifies a shortfall in suitable &amp; sustainable housing sites then the Districts and Boroughs will cooperate to identify suitable sites within their own areas. If a need for sites in Warwick District is identified, the Council will review the Plan. This is set out in Policy DS20.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65688 - Lands Improvement Holdings (LIH) and Kenilworth Golf Club (KGC) (Miss Aoife Conacur ) [12813]	Object	<p>We have a number of concerns about the approach taken in the JSHMA in that it fails to assess the localised housing need of individual settlements within the District.</p> <p>Based on housing need alone, the SHMA identifies that a base total of 12,564 dwellings (698 dwellings per annum) will be required in the District during the plan period 2011 to 2029. This includes 2,070 dwellings in Kenilworth equating to 16.5% of the District-wide requirement.</p> <p>However the SHMA states that forecast employment growth in the District is for 11,860 jobs over the plan period to 2029, it goes on to stipulate that if an adequate number of new homes are to be provided to accommodate the additional employees within the District, then 12,870 new homes would be required to 2029.</p> <p>The District currently has a high level of out-commuting, planning for a higher number of jobs/ employment opportunities in the District, with a higher level of housing growth would go some way to reducing out commuting.</p> <p>In summary, to meet the need identified in the SMHA, between 2,070 and 2,445 new homes should be provided in Kenilworth. This is based on Kenilworth accommodating between 16.5% and 19% of the District's housing need.</p> <p>We consider that to provide a robust housing target, the Local Plan should adopt the higher housing requirement of 772 dwellings per annum in order to meet the objectively assessed need in the District. For the plan period 2011 - 2029 this equates to a housing requirement of 13,896 dwellings.</p> <p>Kenilworth is the third largest town in the District. It is important that the housing need is met and the growth of Kenilworth is supported to ensure that the working age population is retained.</p> <p>Due to the housing pressures in the district, and the additional pressures of housing growth in the wider area, particularly Coventry to the north, Kenilworth is a highly suitable location for additional housing growth.</p> <p><i>In light of the above, we consider that Policy DS6 should be amended as follows: "The Council will provide for at least 13,896 new homes between 2011 and 2029"</i></p>	<p>The Joint SHMA did not identify localised housing needs because housing needs at this level can only realistically be obtained through a Housing Needs Assessment employing a sample questionnaire survey. These are useful for identifying existing needs at a particular point in time but are of less use over a plan period of 18 years. Further, due to the limited availability of suitable sites in sustainable locations, housing is located to the most preferable sites. However, in the case of Kenilworth it is accepted that new development is required to meet the housing and employment needs of the town and this necessitates taking land out of the Green Belt. A total of 1,230 homes are allocated to Kenilworth which equates to nearly 20% of total allocations. This is considered to be sufficient to meet the needs of the town which currently houses about 16% of the District's population.</p> <p>The Addendum to the Joint SHMA considers Warwick's housing needs in the light of the latest ONS 2012-based projections. This is assessed as 606. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA, which is based on 12,860 between 2011 and 2029.</p> <p>The Joint SHMA Addendum gives 2 different forecasts of employment growth in the District of 10,300 and 18,900 jobs between 2011 and 2031. The latter is considered to be an "aspirational" target which could be achieved in a continuing favourable economic climate. However, economic forecasts at local level are notoriously unreliable and the authors of the report recommend against using the forecasts at this level.</p> <p>In Warwick District there is net in-commuting. Given the above, the Council considers that the overall requirement for the District is correct and that the housing allocations for Kenilworth will meet the needs of the town.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Furthermore, the proportion of housing directed towards Kenilworth should also be increased to meet the town's objectively assessed need. The Local Plan should include a new policy that sets a minimum housing requirement for each main settlement within the District to ensure that housing is distributed in a sustainable manner and is provided where it is most needed to meet the population's requirements. On this basis, we consider that a new policy comprising the following should be incorporated into the Local Plan:</p> <p>"The housing requirement will be focused on the District's main settlements, although an allowance is made for the rural parts of the District. The housing requirement of 13,896 dwellings will be distributed as follows:</p> <ul style="list-style-type: none"> <li>* Kenilworth: at least 16.5% / 2,293 new homes.</li> <li>* Leamington / Warwick / Whitnash: at least 75.6% / 10,053 new homes.</li> <li>* Rural: at least 7.9% / 1,098 new homes.</li> </ul>		
65873 - Centaur Homes [9117]	Object	<p>Centaur Homes object to the level of housing growth put forward in the Plan. This objection is based on the fact that whilst the objectively assessed need for the District is broadly in the region of 13,000, the Plan has been prepared in isolation and does not take into account the need for the District to accommodate the needs of adjacent authorities, such as Coventry, as part of the Duty to Co-operate set out in the Framework.</p> <p><i>This policy should be updated so that it is in accordance with the needs of the HMA as set out in the SHMA and the Framework.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The authorities within the sub-region are continuing to work together to assess the Green Belt and to assess their housing land availability according to a common methodology.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66042 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	<p>Policy DS6 : Level of Housing Growth proposes 12,860 new homes (714 dwellings per annum)between 2011 - 2029. However the Coventry &amp; Warwickshire Joint SHMA Final Report states in Paragraph 7.79 that an appropriate level of provision in Warwick District Council would be 720 dwellings per annum equivalent to 12,960 dwellings over the Local Plan period. Therefore the housing requirement figure in Policy DS6 is 100 dwellings below the objective assessment of housing need identified in the SHMA so the Council is not meeting its needs in full.</p> <p>Further, the JSHMA does not take sufficient account of suppressed household formation during the recession years. The Council should consider undertaking further sensitivity testing which may indicate an increase in the objective assessment of housing needs above the proposed housing requirement of 12,860 new homes.</p> <p>The JSHMA does not take sufficient account of the housing affordability issues within the District. An increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes. The Council should reconsidered its approach to affordability given the significant level of need for affordable housing in the District.</p> <p>The housing requirement set out in DS6 does not take account of unmet need arising from outside the District, as required by the NPPF.</p>	<p>The figure of 720 per annum in the SHLAA is an average across the 20 year plan period. However, an inherent assumption in the 2013 Joint SHMA was that the first 10 years from 2011 to 2021 would have a lower average than the latter 10 years because of the application of headship rates from the 2011 household projections which give a lower rate of household formation (therefore fewer homes). Higher headship rates (from the 2008 household projections) were applied to the period from 2021 onwards giving a higher rate of household formation and therefore more homes. If the plan period extends to 2029 (rather than 2031) there will be a lower overall average across the plan period. The Joint SHMA and the Addendum both considered the issue of suppressed household formation. The Addendum considered the issue within the context of the ONS 2012-based population projections. A set of headship rates were applied which assumed that household formation rates would remain below long-term trends over a significant proportion of the decade to 2021 but return to 2008 levels by 2031. This is justified by the fact that although UK economic output had increased over the year to September 2014, housing market activity remained below levels seen in the decade to 2007.</p> <p>Improvement in market activity and the associated increase in household formation will mean an improvement in affordability for young people. The Council is aware of the affordability issues facing the District and aims to commence a programme of building new Council houses. This is now possible with the financial freedoms which are now available to the Council since it bought itself out of the Housing Subsidy System. The Council also has a healthy stock of private rented housing and this will help to meet the needs of those unable to purchase a home on the open market. The Council does not accept that building more homes will necessarily lead to an improvement in affordability. An increase in households and population will lead to a further increase in demand for affordable homes. The C &amp; W authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65495 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	<p>The Town Council accepts that development in the town must not only provide for the specific needs of Kenilworth itself but also has to bear in mind that the town is part of the District and must reflect the amount of housing necessary across the District. However the recent ONS forecast of population growth has indicated that the actual needs of the District, which we had accepted, may now have been superseded as it indicates a significantly smaller increase in need for the District as a whole. In these circumstances we feel there is a requirement for those figures to be investigated, and if a lesser figure is indicated then this must lead to a re-evaluation of the needs of the District as a whole, including Kenilworth, which saw an increased share in the latest version of the Plan.</p> <p>We are concerned that the pressure may return for over the border development. However the analysis for the previous RSS showed that even with the revised figures there will be spare capacity within the Coventry boundary and therefore any cross-border pressure should be firmly resisted by the District Council. In particular there must be no development for the benefit of Coventry on Green Belt land in Warwick District, when development on Green Belt land in Coventry is not being considered.</p> <p>The Town Council's view was that the development within the Town at Thickthorn should cease at Rocky Lane and should not include the Crackley Triangle. In the light of the new figures these two areas may need to be revisited.</p> <p><i>None</i></p>	<p>common methodology. If Coventry City identifies a shortfall in suitable &amp; sustainable housing sites then the Districts and Boroughs will cooperate to identify suitable sites within their own areas. If a need for sites in Warwick District is identified, the Council will review the Plan.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The authorities within the sub-region are working together to assess the Green Belt and to assess their housing land availability according to a common methodology. This will ensure that authorities can be confident that Coventry will make best use of its own suitable housing land before requesting that neighbouring authorities accommodate some of the need.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66412 - Mr Robin Fryer [7457]	Object	<p>The level of housing growth is based on an arbitrary selection of growth predictions which have now been shown to be not justified by the latest ONS projections. The local plan needs to be revised downward to be sound. The statement that the Council may wish to revise the figures upwards to accommodate the overspill from other areas undermines the local plan process. The duty to cooperate across the districts does not stipulate that the area must sacrifice its environment to satisfy its neighbours. The omission of the green belt at Thickthorn must be justified by demonstrating exceptional circumstances. The insensitive zoning approach to this intrusion into the green belt should be revised to a more environmentally sensitive approach.</p> <p><i>Changes to Plan:</i></p> <p>a) Carry out a public consultation exercise on all aspects of the local plan to include elements added to this version as the current exercise is too legalistic and excludes the general public.</p> <p>b) Publish the sub-regional plan, if it exists and carry out a public consultation on the contents because this is a key policy underlying the Warwick District Local Plan that the community has been denied access to</p> <p>c) Delete all references to a sub-regional strategy in the current local plan if b) not carried out.</p> <p>d) Carry out a new objective sustainability assessment that complies with the 3 core principles in the NPPF for all major proposals in the local plan</p> <p>e) to justify the claimed duty to co-operate provide evidence that the adjoining local authorities have a genuine need for land in Warwick District that they are unable to meet in their own area and submit the evidence for public comment</p> <p>f) Revise housing numbers and employment land requirement downwards to comply with current statistical evidence to justify the proposals</p> <p>g) Omit the vague and undefined proposals from the Local Plan or provide revised information proving they are justified and effective.</p> <p>h) Delay submission of the Local Plan until the defects are remedied</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>and put before the local community for a new consultation.</i>		
65343 - Martin Teodorczyk [5004] 65345 - Mrs Laura Teodorczyk [5011] 66376 - Mrs Elaine Kemp [4935]	Object	Evidence shows a need for just 5,500 new homes over the plan period	The Joint SHMA followed Government Guidance at the time and assessed Warwick's housing need as 720 homes per annum between 2011 and 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, warwick District will carry out a further review.	No change
		<i>Review the latest evidence and plan for 5,500 homes</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66698 - Barwood Strategic Land II Limited [9441]	Object	<p>The policy confirms that the Council is planning to provide for 12,860 new homes between 2011 and 2029. Barwood raise strong objection to this policy. In the first instance Barwood object to the Council setting a definitive target for housing growth.</p> <p>Warwick may have to provide housing growth for the wider HMA and until the LPAs have fully assessed whether they are capable of delivering the required growth, Warwick cannot definitively state that they are planning for their full objectively assessed housing needs. Barwood believe that the Publication Local Plan is unsound as it plans for an artificially suppressed level of housing growth in conflict with the objectively assessed housing needs of the Housing Market Area.</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The Council agrees that the Plan should not set a definitive target and will amend the policy wording to describe the requirement as a minimum.</p>	<p>Amend Policy DS5 as follows:</p> <p>DS6 Level of Housing Growth</p> <p>The Council will provide for a minimum of 12,860 new homes between 2011 and 2029</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65692 - Mr Richard Munday [1035]	Object	However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA.	<p>Local planning authorities are required to assess and meet the housing needs of the Housing Market Area in which they are situated. The Coventry &amp; Warwickshire Joint Housing Market Area Assessment, and the Addendum to the study, assessed the housing needs of Warwick and the HMA.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	No change
		<i>None</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66352 - Miss Emma Bromley [3610] 66356 - Mr & Mrs Peter & Linda Bromley [1086]	Object	<p>The proposed level of housing is too high and is based on unreliable evidence. New ONS forecasts suggest a lower level of population growth for the District than is being planned for. WDC have used a very low average household size to ensure a higher housing requirement. The census shows a much higher household size than WDC have used. The publication draft is no longer up to date.</p> <p>All authorities within the HMA are showing similar reductions in projected population growth, including Coventry if you allow for the temporary student bulge. A lower housing target combined with use of brownfield sites would mean greenfield sites would only be included where a essential.</p> <p>A lower housing target would help to resolve the issue with the 5 year supply of housing and infrastructure provision would be easier to resolve</p> <p>There is already a 5 year supply in the District which means application can be resisted until the Local Plan process has run its course.</p> <p><i>A lower housing target to reflect the latest ONS figures combined with use of brownfield sites would mean greenfield sites would only be included where essential. The plan should be modified to remove the majority of houses from the south of the District</i></p> <p><i>A lower housing target would help to resolve the issue with the 5 year supply of housing and infrastructure provision would be easier to resolve.</i></p> <p><i>Land close to the Gateway would be a suitable alternative to building the houses to the south of Warwick and Leamington.</i></p>	<p>The number of future households is calculated by using Government derived Headship Rates and not by applying household size. The household size figures are a derivative of the household projections exercise. They show that Warwick's household size would fall from 2.35 in 2011 to 2.22 in 2031.</p> <p>The Council has confidence in this exercise which follows an internationally accepted methodology and uses official Government (ONS) statistics to arrive at headship rates which reflect the current and recent patterns of household formation.</p> <p>The Council accepts that a lower requirement would help the Council to demonstrate a 5 year land supply but the Council must meet needs and the evidence suggests that the requirement in Policy DS6 will meet the Council's housing needs.</p> <p>The land to the south of Warwick and Leamington is preferable to land south of Coventry because Warwick and Leamington are the most sustainable locations in the District, and it is Warwick District's needs which this Plan aims to meet. Further the land south of Coventry is Green Belt land and it would be difficult to justify meeting the needs of the District on Greenfield land south of Coventry.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66106 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991]	Object	<p>Policy DS6 sets out the level of housing growth for the district and states that the Council will provide 12,860 new homes between 2011 and 2029. This housing requirement is derived from the 2013 joint Coventry and Warwickshire Strategic Housing Market Assessment. However a SHMA is a snapshot in time and may not reflect the objectively assessed housing needs later on in the plan period.</p> <p>It is therefore important that the authority provide a significant buffer within their housing requirement so as to ensure a continuous supply of housing sites over the plan period.</p> <p><i>The housing requirement should be increased so as to ensure a continuous supply of housing sites over the plan period and to meet the needs of the wider West Midlands, notably neighbouring Authorities and Birmingham.</i></p>	<p>The Council accepts that there is no "right answer" when it comes to assessing housing need. The policy will be changed to insert the words "a minimum of" 12,860 homes.</p> <p>The Council is confident that the Joint SHMA and the Addendum are robust pieces of evidence which have identified an adequate level of housing to meet future needs. the housing market in the District is buoyant and the Council is confident that all the sites will come forward.</p>	<p>Amend Policy DS6 as follows:</p> <p>DS6 Level of Housing Growth</p> <p>The Council will provide for a minimum of 12,860 new homes between 2011 and 2029</p>
65953 - Dr Diana Taulbut [12799] 66205 - Protect Lillington Green Belt [Petition] (Diana Taulbut) [12926]	Object	<p>Policy DS7 provides for 12860 homes this is not in line with ONS statistics that show a population growth of 14000 over the plan period to 2029. In accordance with the ONS occupancy rates only 6008 homes are required, however Warwick District is working on a rate that predicts a population rise of 19,290. If 12860 homes are built and the occupancy rate applied by Warwick DC is applied we will endure a population rise of 29,963 (a 21.5% increase) which is unsustainable.</p> <p><i>The Plan should use the latest ONS figures for population growth, and the student population of the District (very high) should also be discounted in growth studies.</i></p> <p><i>The plan needs to delete the 6,800 excess houses from the allocations currently identified.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	<p>No change</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66775 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>Wish to help devise a sound local plan, but the publication draft is not sound for a number of reasons. The overriding reason is that the housing requirement doesn't take account of mid 2012 population projections. This means the plan is based on outdated data. The 2012 projections show population growth 28.7% less than used for the Joint SHMA. this changes the no. of dwellings required and means less infrastructure investment is needed. This in turn changes the selection of housing sites and allows brownfield sites to be committed before green field sites. This in turn enables a realistic achievable plan to be prepared.</p> <p>PPG: 2a-003 "Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur." Ensuring there is a supply of sites is necessary with affordable housing. but the Plan also needs to comply with Para 157 of the NPPF. It is also important to keep a balance between jobs and homes.</p> <p>DTC is also important the JSHMA achieves this, but this needs to be re-examined to address the ONS projections, taking a particular problem with Coventry in to account. The JSHMA indicated a need for 67,536 homes over 18 years across the HMA. The revised projections (based on 2012 ONS) indicate a need for 68,152. However this masks an issue with Coventry's requirement whereby international migration makes up a significant element of the projected increase in Coventry's population. However international students inflow has increased since 2005, but corresponding outflow has not to the same extent (as students are generally resident for 3 years). This indicates that the increase in inflow may be due to international students on courses that are not yet completed. This temporary anomaly is projected forward in the population projections. It does not make sense to provide housing for this population as they won't be there.</p> <p>If adjustments are made to reflect this, then a worst case scenario for Coventry would be an inflow of 40,000 (instead of 74,000) which is still lower than the JSHMA figure. This in turn would lead to a reduction in the HMA's housing requirement from 68,152 to 51,327.</p> <p>with this level of housing Warwick District could justify a lower level of housing at the same time as fulfilling the DTC.</p> <p>The publication draft provides for too many homes and must be revised to reflect the latest projections. Further the JSHMA used an abstract and subjective concept of headship rates. This is critical</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. ONS estimate in- and out-migration as part of the exercise of producing mid-year estimates. These estimates are based on the most reliable sources of information available at the time. Following the publication of the 2011 Census, some recalibration of the mid-year estimates took place to adjust data to take account of the differences between the 2001 and 2011 Censuses. This showed the population of the sub-region had been over-estimated by some 13,000 people. The differences varied between areas but in Warwick District there was found to be a slight under-estimation. Although the cause of these over or under-estimates is not known, the most likely cause is in the estimation of migration flows. Adjustments were made for these discrepancies in the JSHMA. There is no other evidence to suggest that migration flows should be adjusted further. Sensitivity tests were carried out which showed that if Warwick's 10 year average was applied (+860 per annum) then the needs would be 725 new homes per annum.</p> <p>The number of future households is calculated by using Government derived Headship Rates and not by applying household size. The household size figures are a derivative of the household projections exercise. They show that Warwick's household size would fall from 2.35 in 2011 to 2.22 in 2031.</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>because small changes in the average household size can alter homes required significantly. It also bases its average household size on the total population. This gives an incorrect result. ONS calculate the population estimates and projections on the total population less those living in communal establishments adding these back into the total population at the end of any calculation. This gives a true average household size which is different to the SHMA household size and varies the relationship between areas as each has a different communal proportion. If the population growth is going to be less, then the household size to use needs to be addressed. different options produce different outcomes. for instance the 2011 census rate would require 6715 homes for an increase of 15,313 people. However the likelihood is that household size will rise rather than fall.</p> <p>Two other factors will also affect future measures of household size. Over time as affordable homes are reallocated to existing occupants, vacant spaces will become occupied. For owner occupiers, as people find house prices unaffordable, rather than move they tend to stay where they are but extend their properties to accommodate extra children etc. So a calculated outcome can be used to provide the capacity in a lower but acceptable number of homes.</p> <p>As well as being better in terms of providing the right tenure mix, it is also better from a sustainability point of view as it takes less land, avoids loss of agricultural land, is better from a CO2 emissions reduction viewpoint both from energy used in homes and travel from fossil fuel vehicles, reduces costs and makes all homes more affordable and spreads the homes required around the district, reducing the amount of infrastructure needed by the additional population.</p> <p><i>Plan for a lower of houses to reflect population projections and realistic changes to household sizes.</i></p>	<p>The Council has confidence in this exercise which follows an internationally accepted methodology and uses official Government (ONS) statistics to arrive at headship rates which reflect the current and recent patterns of household formation. In planning over the long term it is important to take into account likely future changes in trends rather than assume that the current pattern of household formation will continue.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64920 - Barford, Sherbourne and Wasperton Joint Parish Council (Mr John MURPHY) [566]	Object	The proposed level of growth has never been convincing and is almost universally rejected by the public. The mid-2012 ONS projections confirm this view.	The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.	No change
		<i>Reconsider numbers and allocations in the light of mid-2012 ONS figures.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66282 - Mr H E Johnson [12846]	Object	<p>Welcome increase in housing numbers from the Revised Development Strategy however objects to the level of housing growth identified in the plan for the following reasons: The Council appears to have taken the figures from the 2011 CLG Interim Housing Projections and inserted them into the Local Plan without aligning these figures with other aspirations of the Plan. The objectively assessed need is therefore not provided for and it does not accord with the NPPF. The result of this will be an under delivery of homes against the identified need. The NPPF requires an additional buffer of at least 5% of housing need to ensure choice and competition in the market. Bearing in mind the historic under delivery in the area and the potential requirement to meet identified need in other local authority areas it is clear the council will have to bring forward housing from later plan periods and consequently fall short later on. The Council has ignored the advice of the Joint SHMA which recommends 720 dwellings per annum. Concern that the Council has not sufficiently discharged its duty to cooperate, it is very likely that additional housing will be needed in Warwick District to meet the needs of the HMA. Recent Gallagher Homes case reinforces this point. It is therefore considered that the proposed housing requirement should be increased and further land should be allocated. The proposed extension at Red House Farm could provide a further 150 homes and should be removed from the Green Belt and allocated for housing.</p> <p><i>The proposed extension at Red House Farm could provide a further 150 homes and should be removed from the Green Belt and allocated for housing.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. The Council does not agree that a 5% buffer is required. NPPF refers to a 5% buffer in terms of the 5 year land supply but this is made up of sites brought forward from later in the plan period rather than additional sites. However, the Council does agree that the requirement should be a minimum and that if further sites come forward on sites which accord with Local Plan policies, these will not be refused on the grounds that the target has been met. Further, if it becomes apparent that there is a shortfall of housing from Coventry City's housing need, then this Council will carry out a review and this review will consider sites put forward in a revised SHLAA.</p>	<p>Amend Policy DS5 as follows:</p> <p>DS6 Level of Housing Growth</p> <p>The Council will provide for a minimum of 12,860 new homes between 2011 and 2029</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67222 - Bloor Homes Midlands [11532]	Object	<p>The draft Local Plan has failed to demonstrate:</p> <ul style="list-style-type: none"> <li>* it has proactively driven/supported sustainable economic development, and done everything it can to support sustainable economic growth;</li> <li>* it meets the business needs of the area and delivers homes to support the growth of the local economy;</li> <li>* it is based on the most up-to-date and robust evidence about the economic prospects and needs of the area; and,</li> <li>* it integrates the strategic policies for prosperity (Strategic Policies DS1 and DS8) and housing (Strategic Policies DS2 and DS6).</li> </ul> <p>The level of economic growth to be provided for is not defined within the draft Local Plan.</p> <p>The strategy for prosperity in the draft Local Plan is to provide for the growth of the local and sub-regional economy by ensuring sufficient/appropriate employment land is available to meet the existing/future needs of businesses (Strategic Policy DS1). Policy DS8 provides for a minimum of 66ha of employment land to meet local need (for the period 2011 to 2030). The strategy for housing is to provide in full the objectively assessed need (Strategic Policy DS2). Policies DS6, DS7 and DS10 provides for 12,860 new homes (for the period 2011 to 2029).</p> <p>The evidence base fails to support Paragraph 2.7 of the LP that economic growth has been balanced with housing growth, and that meeting the full objectively assessed need for housing will complement and meet the economic and business needs and ambitions of the District.</p> <p>The evidence can be found within the Economic and Demographic Forecasts Study (EDFS) (December 2012), the Employment Land Review Update (ELR) (May 2013), and its economic ambitions can be found within the Strategic Economic Plan for Coventry &amp; Warwickshire LEP (SEP) (March 2014).</p> <p>The economic strength of Warwick is undeniable, and is summarised in paragraphs 3.1 to 3.6 of the ELR. Its economy has outperformed the West Midlands and UK in terms of its growth and is forecast to continue that trend (both in terms of GVA and employment) into the plan period. Warwick has an economic structure which is aligned to the future growth sectors, such as professional services, healthcare, and IT.</p> <p>Warwick also has a particular strength in the automotive/vehicle manufacturing sector, with several major employers including Jaguar Land Rover (JLR) who have facilities located both within and on the edge of the District. Given the significance of JLR to the national economy, it is no surprise that the Vision for Coventry &amp; Warwickshire in 2025 within the SEP is to be recognised as a global hub and a UK Centre of Excellence in the advanced manufacturing and engineering sector. Many of the SEP's priorities and actions are</p>	<p>The 2013 Joint Coventry &amp; 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"> <li>* at District level economic forecasts are not that reliable</li> <li>* the relationship between housing and jobs is complex</li> <li>* economic forecasts do not take into account double-jobbing</li> <li>* commuting patterns and employment rates can change over time</li> </ul> <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>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66107 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991]	Object	<p>focused around facilitating the growth of this sector, including investment to deliver new/expanded facilities at several employment sites within and bordering Warwick District. The SEP has estimated its actions alone may generate over 50,000 jobs by 2030 across the sub-region.</p> <p>It is very clear from the evidence that the Warwick economy is undoubtedly the 'powerhouse' within the sub-region and West Midlands region. Its future economic performance and continued success is therefore critical to the overall performance of the sub-region and regional economy, and the delivery of the ambitions within SEP.</p> <p>Whilst the availability of suitable employment land is a key factor influencing Warwick's future economic growth and prosperity, it is not the only component that the Local Plan will need to influence. A key challenges is to ensure that the planned growth of Warwick and the sub-region's economy is not frustrated by lack of access to skilled workforce. To deliver a global hub and national centre of excellence, requires businesses to be able to attract the necessary talent. Providing access to available homes of a high quality is an essential component of the offer. SEP recognises that the short...</p> <p><i>The Council should therefore review its objectively assessed housing need figure prior to submission.</i></p> <p><i>In the context of delivering sustainable development, this review should consider economic, social and environmental effects of increasing the level of housing growth in order to balance with the forecast economic growth and economic ambitions of the Council.</i></p> <p><i>Other representations made by Bloor Homes Limited to the draft Local Plan have identified locations where additional housing growth can be accommodated.</i></p> <p><i>In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</i></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> <p>The Council considers that this housing requirement will provide a continuous supply of housing sites over the plan period, as shown in the housing trajectory.</p> <p>Should there be a need to accommodate some housing from neighbouring authorities, the Council will carry out a review before the end of the plan period, as set out in Policy DS20</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66031 - The Warwick Society (James Mackay) [3080]	Object	<p><b>HOUSEHOLD SIZE</b> The JSHMA assumes a rapid decrease in average household size which is not supported by evidence. The base data are questionable and other sources suggest a rise in average household size in Warwick District between 2001 and 2011. If trends are applied household size would fall to 2.30 in 2031. However GLH have applied some sensitivities to take account suppression of household formation, meaning household sizes would fall to 2.22 by 2031 - a much greater fall than past trends indicate and is an abuse of sensitivity testing. For instance factors acting in the opposite direction have been ignored such as the trend towards households which accommodate three generations.</p> <p><b>PROJECTED POPULATION GROWTH</b> THE JSHMA is not based on the most up to date population projections. The latest projections show a 29% reduction in growth to the end of the plan period - 6,200 fewer people. This reduces by some 2,800 the number of new homes needed. Suggestions that this should be balanced by increases in Coventry's population growth are spurious as projected growth in Coventry is an artificial projection as a result of the universities' response to changes in their funding régime - incoming students are repeatedly added to each year's projection, but outgoing students are largely omitted. Without this Coventry's population is projected to grow in line with that of the sub-region as a whole.</p> <p>The impact of this is that housing growth should be in 8100 over the plan period.</p> <p>The knock on effect of the Council's proposals are that the average household size would be much smaller than projected and this is not consistent with the proposed densities of developments on greenfield sites. This inconsistency further contributes to the unsoundness of the housing need calculation.</p> <p>Changes to Plan: The modification necessary to make the Plan sound in respect of the number of new houses required is therefore to reduce the provision from 12,860 to 8,100. The difference of 4,800 is made up of 2,800 fewer new homes because of the lower projected population growth, and 2,000 fewer new homes because of the evidence, as opposed to assumption, on average household size.</p> <p><i>The modification necessary to make the Plan sound in respect of the number of new houses required is therefore to reduce the provision from 12,860 to 8,100. The difference of 4,800 is made up of 2,800 fewer new homes because of the lower projected</i></p>	<p>The number of future households is calculated by applying Government derived Headship Rates to population cohorts and not by applying household size ratios. Thus the household size figures are a derivative of the household projections exercise. They show that Warwick's household size would fall from 2.35 in 2011 to 2.22 in 2031. The Council has confidence in this exercise which follows an internationally accepted methodology and uses official Government (ONS) statistics to arrive at headship rates which reflect the current and recent patterns of household formation.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>population growth, and 2,000 fewer new homes because of the evidence, as opposed to assumption, on average household size.</i>		
66139 - Burman Brothers [9138]	Object	<p>Whilst Warwick has set housing requirement at 12,860 dwellings 2011 - 2029 it has not identified its objectively assessed housing need. Urgent clarification is needed on this point.</p> <p>The JSHMA apparently assessed housing need for each district, however, must be for an individual authority such as Warwick to assess themselves based on criteria and policies appertaining to their area. This does not appear to have happened or to be in accordance with the NPPF Guidance.</p> <p>Need for rebasing plan period to 2031</p> <p>Should be minimum of 2800 to 3300 new dwellings in addition to rebasing element in line with studies of market housing area and Cov and Warks Sub Region.</p> <p>Additional housing requirement will require reassessment of housing numbers and locations and extend to future growth to meet the higher objectively assessed need.</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64688 - Mr Leigh Carter [8277]	Object	Based on the amount of housing that ONS statistics from the last 10 years indicate, we will only need 5,400 new houses. We have a 5 year housing land supply and in addition it can be achieved in the time scale with the minimum infrastructure cost for the local authority.	<p>There is no evidence to suggest that a housing requirement of 5,400 would meet the needs of the District.</p> <p>The Council must take into account national planning guidance in assessing housing needs. The Joint SHMA and the Addendum have completed this exercise.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	
		<p><i>Reduce housing required from 12,800 to 5,400.</i></p> <p><i>Stop development of South Leamington / Whitnash at Harbury Lane boundary.</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>
66228 - Crest Strategic Projects [9115]	Object	<p>Policy DS6 is unsound because it is not based on the most up to date evidence and the housing requirement should be increased.</p> <p>The Joint SHMA indicates that the annual housing needs for the District is between 660 houses per annum to 772 houses per annum. A mid range figure has been arrived at albeit it is unclear what justification exists for this figure.</p> <p>The Council has provided no reasoned justification for selecting 718 dwellings per annum, especially as its housing requirement is considerably higher than this figure i.e. up to 900 dwellings per annum.</p> <p>An increase in the overall housing provision would assist in meeting the high level of affordable housing need identified in the report. G L Hearn consultants recommend the provision of 268 dwellings per annum in supporting the stronger delivery of affordable housing.</p> <p>The SHMA also does not identify un-met need in other housing market areas.</p> <p>It is vitally important to consider inter relationships between neighbouring authorities and HMAs when formulating housing and development policies, in particular the housing needs of Coventry identified in the joint SHMA and that of Birmingham City Council's needs.</p> <p><i>As a neighbouring authority Warwick should give consideration to unmet need arising in Birmingham and Coventry. The Council should be planning for up to 900 dwellings per annum based on the latest evidence presented in the Final Joint SHMA.</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p>	No change
65096 - Nurton Developments & the Forrester Family [12680]	Object	<p>The Publication Local Plan is considered unsound and it does not comply with the Duty to Cooperate since the level of housing growth does not reflect the objectively assessed need for the district; it has not been positively prepared to include unmet need from neighbouring authorities; and it does not make provision for a plan period of suitable time horizon.</p> <p><i>The Local Plan housing provision should be based on the OAN as set out in the SHMA and should also be increased to provide flexibility for meeting need arising in neighbouring districts that cannot be accommodated in those districts. This will require further work under the Duty to Cooperate. The plan period should be extended to 2031.</i></p>	<p>The JSHMA Addendum 2014 estimates that the housing needs of the District are 606 homes per annum. The requirement of 718 per annum takes into account the need to meet some of Coventry City's housing needs which cannot be met within the City's boundaries. The precise extent of these needs are yet to be established so if additional housing is required the Plan will be reviewed.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66715 - Mr Andy Thompson [9620]	Object	WDC has failed to consult properly and failed to take account of local representations and recent figures from ONCS on population growth	The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts & Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.	
		<i>Agree with reps made by the Save Warwick Group on heritage, transport/highways. Council should take account of and implement the Save Warwick recommendations</i>		
66313 - A C Lloyd Homes Ltd [5958]	Object	The plan period should be extended to 2031 (as Stratford Upon Avon have done), because the plan will not be adopted before the end of 2015, which is less than 15 years from the anticipated year of adoption; it is likely therefore that the choice of an end date of 2029 will artificially restrain the levels of growth.	NPPF recommends a plan period of 15 years from the date of adoption but this is not a requirement. A review of the Plan will take place to consider how to accommodate any needs arising from Coventry and at this point the plan period could be extended	
65138 - Sport England (Mr Bob Sharples) [1355]	Support	In principal Sport England supports this, however any allocation should not result in the loss of any sports facilities/playing fields, unless they are either replaced or shown through the emerging playing pitch strategy and sports strategy that they are surplus to requirements.  <i>None</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65507 - Rugby Borough Council (Miss Vicky Chapman ) [12774]	Support	<p>Due to the proposed plan period, it appears that there has been some deviation from Warwick's assessed need of 720 dwellings per annum as set out in the Joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) where the plan will deliver 714 dwellings per annum.</p> <p>It is not transparent within either the Local Plan or any other supporting document how the housing target contained within DS6 for the 2011-29 plan period has been arrived. It is however, understood that a background paper will be produced for the Submission Local Plan which will detail the approach taken. It is acknowledged that through policy DS7 that the authority have identified sufficient sites capable of meeting the assessed need identified (up to 2029), as identified within the Joint SHMA, at table 97.</p> <p>In consideration of the above, in order to meet the full SHMA assessed need (2011 - 31), Warwick District Council must plan for the delivery of their remaining housing need as identified within the SHMA in the final two years of the SHMA period, through any review of the plan.</p> <p><i>None</i></p>	The figure of 720 per annum in the SHLAA is an average across the 20 year plan period. However, an inherent assumption in the 2013 Joint SHMA was that the first 10 years from 2011 to 2021 would have a lower average than the latter 10 years because of the application of headship rates from the 2011 household projections which give a lower rate of household formation (therefore fewer homes). Higher headship rates (from the 2008 household projections) were applied to the period from 2021 onwards giving a higher rate of household formation and therefore more homes. If the plan period extends to 2029 (rather than 2031) there will be a lower overall average across the plan period.	No change
64988 - Solihull MBC (Mr Maurice Barlow) [12664]	Support	The evidence in the Coventry and Warwickshire SHMA suggests that Warwick District has close links with the Coventry housing market area, but that there are modest migration flows only from Birmingham and Solihull. The housing target in the Publication Draft is within 100 dwellings of the appropriate level of provision identified in the Coventry and Warwickshire SHMA.	Noted	No change

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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>
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*DS7 Meeting the Housing Requirement*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66243 - Save Warwick (MR DAVID WILLIAMS) [4506]	Object	<p>The overall forecast of housing need of 12900 is considered to be exaggerated. The ONS estimates have been revised downwards and suggest only 8,100 houses are needed to meet natural increase and inward migration to Warwick District. The SHMA suggests that occupancy rates of houses will fall significantly from 2.2. Such a decrease is unrealistic and the plan is therefore seeking to justify the provision of more houses than will actually be needed to house the target population.</p> <p>There is already more than a five year supply of land ready for development. As ONS estimates have dropped less houses will be needed to meet the requirement for 5 years supply. Campaign groups have claimed that there is already a five year supply; the revised ONS estimates would appear to reinforce this position. Population projections underpin the plan and are fundamental to it being properly justified/sound. The GL Hearn projections used in the SHMA for Coventry and Warwickshire are used as the basis for the Plan but are now discredited by the may ONS population figures issued in May 2014.</p> <p>The recent ONS figures are much lower than those used in the SHMA 15,313 rather 21,472, a fall of 6,159 persons or a 28.7% reduction. This is very significant in that it changes the numbers of dwellings that will be necessary; the amount of infrastructure needed to support the housing / population and reduces the amount of Greenfield needed to be taken for new allocations.</p> <p>The reduction in population and required housing will also improve the 5 year housing supply position.</p> <p>It is considered that the SHMA underestimates the future housing occupancy rate in the district (see statistics in full submission). This alongside the potential for minor density adjustments can also have an impact on the amount of housing required in Warwick District and could lower the numbers significantly.</p> <p>Research undertaken by local campaign groups (supported by respected University of Warwick economists), shows conclusively that maintaining a housing target of 12900 by 2028 cannot be justified on the basis of the latest figures ( see power point slides in full submission).</p> <p>A decision to continue to work to the Council's current housing target can only be based on the Leadership of Warwick District Council being determined to " go for growth" in the face of the communities wish for a plan that would do no more than meet the needs of natural growth with a modest allowance for inward migration.</p> <p>To conclude / summarise</p> <p>*Warwick's population projection is now 28.7% less than the figures used to formulate the consultation draft local plan. The Plan is therefore unsound based on incorrect/ inadequate data.</p>	The Council does not agree that the level of housing growth has been exaggerated. The Council's response to the matter of the level of growth is given against the representation to Policy DS6.	No change

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>*All the other authorities in the Housing Market area are also showing similar reductions in their population projections, including Coventry.</p> <p>*The method by which population is converted into the numbers of dwellings required needs better determination by calculation, using the known housing type and size to be included in the plan.</p> <p>*The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this will imply brownfield sites being put first and only including Greenfield where essential.</p> <p>*To delay a revision of the 5 year housing supply calculation / requirement in light of the new evidence of a much lower need for housing would be neglectful.</p> <p>*Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.</p> <p><i>The plan does not conform to the NPPF or Planning Practice Guidance in not responding to the changes that have taken effect in the ONS population statistics and the calculations of housing need are erroneous and have led to serious errors in predictions of housing needs and, because of the seriousness of these errors, the plan is unsound.</i></p> <p><i>The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this will imply brownfield sites being put first and only including Greenfield where essential.</i></p> <p><i>To delay a revision of the 5 year housing supply calculation / requirement in light of the new evidence of a much lower need for housing would be neglectful.</i></p> <p><i>Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.</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>
66050 - Lenco Investments [1165]	Object	<p>RPS is of the opinion that the Housing Trajectory is unsound.</p> <p>The Housing Trajectory contains substantial over estimations of housing delivery, particularly in the early period of the plan. The rate of development in the early period is insufficient from the sites identified and an over reliance is being placed on a small number of sites delivering high rates of dwellings. This is not going to be experienced as proposed and the only way to maintain high levels of delivery is from a broader range of sites.</p> <p>RPS also objects to the identification of confidential sites in the Housing Trajectory amounting to 207 dwellings. It is not appropriate to identify confidential sites and withhold information on the location of such sites from a public examination of the evidence. If the Council cannot identify those sites publically, it cannot rely on them during scrutiny of the public examination as it does not permit transparency in the evidence. The 207 dwellings should be removed.</p> <p><i>The Housing Trajectory should be realistic in its delivery rates and sites that can come forward for development. It should also remove all confidential sites from supply or identify them for public examination.</i></p>	<p>The Housing Trajectory is based on evidence available at the time and in the case of a number of sites, particularly those which will come forward later in the plan period, the delivery rate is as yet unknown. The Trajectory is meant to give a broad indication of when sites will come forward, and take account of any phasing policies - or deliberate planning intervention to keep sites back until later in the plan period. Warwick District's Local Plan does not include a phasing policy. This is primarily because the southern strategic urban extension sites will naturally take time to come forward over the lifetime of the plan due to the numbers involved. Also the Kenilworth urban extension will not commence until the sports clubs have relocated. The Council has been engaging with the consultants acting for the land owners of the southern urban extension sites since the commencement of the Plan and the indications are that there are no constraints to development and the landowners wish to dispose of the sites as soon as possible. Since the Publication Draft of the Local Plan was published some 1,200 dwellings on allocated sites have been the subject of a planning permission across 5 sites, all of which are expected to commence during 2015. In addition, there are a number of large windfall sites which are expected to be completed in the year 2014/15. The Confidential SHLAA sites are public sector sites which are part of a planned programme of disposal and renewal. they are confidential because although their disposal is certain (and they have been assessed as deliverable or developable) it would be indiscreet to reveal their location until such time as they are no longer occupied. It may be possible to disclose further details of these sites at the Examination if necessary.</p>	<p>Change to Policy DS7 Explanation Add new para 2.24a as follows: The Council will review the Housing Trajectory as new evidence emerges. It is expected that the Council will be able to demonstrate a five year supply of housing land by April 2015. In order to maintain this supply of housing land throughout the plan period, the Council's Implementation Strategy will be to encourage allocated sites to come forward at the earliest opportunity. The Council is actively collaborating with developers of the southern urban extension sites and engages with them through a Developer Forum chaired by the Council's Chief Executive and supported by ATLAS.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65173 - Sundial Group Ltd [12683]	Object	There is a need to identify additional sites for development.  <i>There is a need to identify additional sites, land at Woodside Training Centre, Glasshouse, Reference SHLAA 14 K19 should be included for residential development for circa 200 dwellings and removed from the Greenbelt.</i>	The Plan identifies more than sufficient sites to meet the requirement of 12,860 new homes over the plan period.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66193 - Lenco Investments [1165] Object		<p>RPS is of the opinion that the Housing Trajectory is unsound in respect of windfall allowances. The allowance is clearly overestimated and unrealistic. It makes allowance for student accommodation which is unsound.</p> <p>The NPPG states that student accommodation can be included in the housing requirement "based upon the accommodation it releases from the housing market. Notwithstanding, local authorities should take steps to avoid double-counting". The authority has clearly not understood the nature of the guidance.</p> <p>More fundamentally the authority can only include student accommodation "based upon the accommodation it releases from the housing market". To release a dwelling unit from the housing market it requires the dwelling unit to be firstly occupied by Students, that will then move back to the new student accommodation and thus release the dwelling unit. No evidence is provided that this is the case. In fact, the converse is true in that university accommodation is typically for overseas and first year students, which will not exist in the housing market already. Therefore no release of dwelling units occurs. In fact, the university (para 10.78 of the SHMA) is seeking to expand its use of private rented properties in Warwick, Coventry and Leamington, not reduce it.</p> <p><i>The windfall allowance is clearly too high, not supported by past rates or the evidence used, particularly in relation to student accommodation.</i></p> <p><i>The windfall rate should exclude all reference to student accommodation as it is not supported by the SHMA or recent evidence on how this should be addressed, even in light of the</i></p>	<p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission).</p> <p>The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p> <p>The Council's understanding of NPPG in relation to student accommodation is as follows. A number of students occupy single dwellings as shared houses. In Leamington Spa the area of Old Town contains a high proportion of houses which are shared by students. If purpose built student accommodation is built in the District, this has the potential to release houses which could otherwise be occupied by families. NPPG invites local authorities to estimate the number of houses which could potentially be released where student accommodation is built. In Leamington Spa Old Town the houses occupied by students are largely small to medium Victorian terraced houses accommodating between 3 and 5 students living together. Thus the Council makes an allowance for 1 house being released for every 4 new student bedrooms. Where student accommodation is in the form of cluster flats, the Council counts each cluster flat as a single unit.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>National Planning Practice.</i>		
66728 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Object	The housing requirement and the figure for sites allocated in the plan are too low and will not ensure that the objectively assessed housing needs for the plan period are adequately met. The flexibility referred to in para 2.20 is insufficient to overcome the shortfall.  <i>The number of houses from allocated sites should be increased. The Council should make a further call for sites and then consult on those sites before arriving at their preferred option which will then need to be tested by the Inspector. We propose the allocation of land in Cubbington in the vicinity of Bungalows farm.</i>	The Plan is meeting the needs of the District as well as an additional element of housing to the help meet the shortfall from Coventry. The Council is working with other authorities to ensure that the full needs of the Housing market Area is met and will review the Plan should there be a need for the District to accommodate further housing. At present there is no substantive evidence that the Council needs to meet any further shortfall from the Housing Market Area.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66231 - Crest Strategic Projects [9115]	Object	<p>The objections to this policy should be read in conjunction with our objection to Policy DS6 'Level of Housing Growth'. The objection to Policy DS6 was on the basis that insufficient housing provision had been made to meet the housing needs of the District including adjoining districts. It must therefore follow that objections are made to this policy on the basis that the overall housing provision is too low. Furthermore, in meeting the housing requirement calculation it is important that the advice both in the NPPF and NPPG in respect of identifying the availability and deliverability of sites is followed. Whilst we reserve the right to comment on the detail of the calculation it is apparent that:</p> <ol style="list-style-type: none"> <li>1. No allowance for the shortfall in housing provision pre 2011 is made;</li> <li>2. The windfall allowance is excessive and not justified;</li> <li>3. Potential double counting exists between windfall sites and small urban sites; and</li> <li>4. Ensure that allocated sites are available and deliverable.</li> </ol>	<p>The Council maintains that pre-2011 there was no shortfall of housing in relation to the (then) strategic planning guidance - the adopted Regional Strategy. The policy at the time was not for local authorities to each meet their own needs but for housing to be concentrated in the major urban areas of Birmingham/Solihull/Coventry/Black Country &amp; North Staffs rather than in the shires. However, household formation during the period immediately prior to 2011 was lower than expected due to the credit crunch and the SHMA Addendum does allow for household formation to return to pre-2008 levels by the end of the plan period.</p> <p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission).</p> <p>The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p> <p>There is no double-counting between windfall sites and "small urban sites"</p> <p>Allocated sites that will come forward in the first five years are all deliverable and those that may take longer are all developable.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65233 - Deeley Group Ltd [11623] 65278 - A C Lloyd Homes Ltd [5958]	Object	<p>Deeley Group objects to Policy DS7 and the associated table as the period used for housing provision should extend to 2031.</p> <p>Deeley Group objects to the Table in Policy DS7 as it is considered that it makes an over estimate of the likely delivery from windfalls during the plan period.</p> <p>The amount of housing to be allocated on new sites within the plan should be increased from 6,238 to at least 8,000 both in order to meet the shortfall from the missing 2 year period to 2031 and also to allow for a lower delivery from windfalls.</p> <p><i>The amount of housing to be allocated on new sites within the plan should be increased from 6,238 to at least 8,000 both in order to meet the shortfall from the missing 2 year period to 2031 and also to allow for a lower delivery from windfalls.</i></p>	<p>NPPF recommends a plan period of 15 years from the date of adoption but this is not a requirement. A review of the Plan will take place to consider how to accommodate any needs arising from Coventry and at this point the plan period could be extended. The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>The approach taken is to provide a realistic estimate of sites which are likely to come forward with planning permission each year from the latest monitoring period. Towards the end of the period sites which are unlikely to be completed within the plan period are discounted.</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites.</p>	No change
66767 - Burman Brothers [9138]	Object	<p>Not sufficient allocated units as set out in representation to DS6 and would argue that the table is incorrect and should meet the proper objectively assessed need for the Plan period to 2031</p>	<p>The allocated units are sufficient to meet the requirement when completions, commitments, windfall sites and employment/ canal side sites are taken into account.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65113 - Nurton Developments & the Forrester Family [12680]	Object	The housing provision should be increased to allow for flexibility in the event that some sites fail to come forward or are delivered with reduced capacities than that allowed for in the plan.	<p>The plan makes provision for 12,964 homes which is equivalent to 720 homes per annum. This is higher than the requirement of 714 homes per annum (12,860 in total) and higher than Warwick's identified needs of 606 homes per annum as set out in the Addendum to the Joint SHMA.</p> <p>The Addendum to the Joint SHMA took into account the ONS 2012-based population projections which were the latest available. This showed that the needs of the Housing Market Area and Warwick District amounted to 4,004 and 606 homes per annum respectively. However this Plan will need to play its part in meeting the needs of the whole Housing Market Area and the indications are that Coventry City will be unable to accommodate all of its needs within its own boundaries. The actual requirement for Warwick District over the plan period, therefore, will not become absolutely clear until Coventry City Council completes the analysis of capacity within its own boundaries. At this point the Council will review the housing provision element of the Plan if this is deemed necessary.</p>	No change
		<p><i>The housing provision should be increased in order to allow flexibility in case some sites fail to come forward or are delivered with reduced capacities.</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>
66283 - Mr H E Johnson [12846]	Object	<p>Welcome increase in housing numbers from the Revised Development Strategy. we object to the proposed spread of numbers between different sources of housing delivery, and we object to the limited overall housing numbers proposed. Half of overall housing delivery is identified as being from existing committed sites. This is risky as there are many reasons why windfall sites do not come forward for development. There appears to be a vast over-reliance on assumed delivery from these sources (over 50%). This is unsound as it is not justified or effective: it can be reasonably foreseen that there will be insufficient housing delivery. A buffer should be included for non-delivery and additional allocations should therefore be identified in order to make this policy sound. Within the site allocations currently identified, there is too much reliance on two large sites (HO1 and HO2) which puts successful housing delivery at further risk.</p>	<p>Only 3,629 sites are committed sites (sites completed and with permission/under construction). The Council wishes to make the best use of existing urban brownfield land within the District. This will help to deliver sustainable communities as homes will be built close to good public transport and services. However, Warwick District is a desirable place in which to live and when land and buildings fall into disuse they are seldom vacant for long. Thus there is a limited source of identifiable brownfield land to allocate - most sites come forward as windfall sites as soon as they are vacated. There has in recent years been greater pressure on developing older employment areas for housing. Much of this is located adjacent to the canal. the Council would wish to ensure that these older employment areas are brought forward in a comprehensive manner - and at the same time bring improvements to canalside areas. Small SHLAA sites are sites which have been assessed and identified as deliverable or developable. They are likely to come forward in the plan period. Including these brownfield sites to meet the housing requirement will not only make best use of land but will minimise development on greenfield land, and the loss of farmland and open countryside. Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission). The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014). To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
			period. The Council is confident that the sites at Europa Way (HO1) and South of Harbury Lane (HO2) will come forward.	
65977 - Mr and Mrs Swindells and Star Pubs and Bars Ltd [12842]	Object	<p>Policy DS7 establishes that the housing need identified by Policy DS6 will be met through the provision of 12,964 homes. It is considered that the total number of dwellings should be increased to ensure the Council meets its full Objective Assessed Housing Need.</p> <p>The Burrow Hill site will deliver only 60 dwellings, below the requirement established in the Village Housing Options and Settlement Boundary document. Other Secondary Service Villages which are equally sustainable, such as Barford and Hatton Park, are still expected to deliver 80 dwellings each, within the range identified in the VHOSB document.</p> <p>Therefore the Local Plan Publication Draft is not considered to be positively prepared, nor effective in respect of paragraph 182 of the NPPF.</p> <p><i>The total number of dwellings to be delivered in Burton Green should be increased to 90 dwellings to reflect number of dwellings identified in the Village Housing Options and Settlement Boundaries document, the net loss of dwellings and potential that the site to be allocated in Burton Green at Burrow Hill Nursery is not deliverable until later in the Plan Period, if at all, as discussed in further detailed in our response to emerging Policy DS11</i></p>	<p>The Local Plan requirement will meet the objectively assessed housing need for the District as estimated in the Addendum to the Joint SHMA. The Addendum was carried out to assess the implications of the 2012-based ONS projections which projected a lower population for the Districts and Boroughs in the HMA and a higher population for Coventry City. The Addendum carried out further sensitivity testing and concluded that Warwick's need was for around 606 new dwellings per annum allowing for improved household formation rates. However, through its "duty to co-operate" obligations, the Council has agreed with other Councils in the HMA that the higher needs assessed in the Joint SHMA will be adhered to, thus allowing for some of Coventry's needs to be met by the Districts and Boroughs.</p> <p>The Village Housing Options and Settlement Boundary document did not establish requirements for each settlement. For each settlement, it examined the sustainability criteria and the availability of suitable sites and then identified preferred sites. Following the consultation exercise and further sites analyses (including landscape and Green Belt assessments), the final site selection exercise was completed to arrive at a site, or suite of sites, for each sustainable settlement.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66118 - Mr and Mrs Martin [12851]	Object	The Council should clarify the method for dealing with shortfalls in housing delivery illustrated by the housing trajectory against an annualised housing requirement. The Council should also confirm that 5 years housing land supply is available on adoption of the plan in accordance with para 49 of the NPPF. If the land supply is not demonstrated the Local Plan will be found to be neither effective or consistent with National Policy.	<p>The Housing Trajectory will be reviewed as new evidence emerges. The Council does not claim that the time lines for all sites are 100% accurate but they are based on the best available information at the time.</p> <p>Land at Europa Way (north) and a large element of land south of Harbury Lane already has the benefit of planning permission.</p> <p>At the time of writing (December 2014), the Council could demonstrate a 4.5 year supply of housing land and it is expected that by April 2015 this will increase to 5 years. In order to ensure a continuing 5 year supply the Council will continue to collaborate with developers to encourage them to bring forward sites at the earliest opportunity.</p>	<p>Change to Policy DS7 Explanation</p> <p>Add new para 2.24a as follows: The Council will review the Housing Trajectory as new evidence emerges. It is expected that the Council will be able to demonstrate a five year supply of housing land by April 2015. In order to maintain this supply of housing land throughout the plan period, the Council's Implementation Strategy will be to encourage allocated sites to come forward at the earliest opportunity.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66608 - Richborough Estates Ltd [5927]	Object	<p>As a consequence of the proposed change to Policy DS6 referred to above, the reference in Policy DS7 to a housing requirement of 12,860 needs to be amended to read as a minimum 12,960 new homes between 2011 and 2029 accordingly.</p> <p>Whilst we agree with much of the strategy for the delivery of housing across Warwick District, it is considered that the WDLP does not provide sufficient flexibility for the delivery of the proposed housing, to the extent that this part of the plan is not justified and its effectiveness would be compromised as a result. As noted above, paragraph 14 of the Framework requires the WDLP to have sufficient flexibility to adapt to rapid change. It must therefore be able to robustly demonstrate that it is capable of delivering its housing strategy. The successful delivery of housing is fundamental to the effective implementation of the Plan. Failure to maintain a supply of land to deliver new homes throughout the life of the WDLP compromises its compliance with the national planning policy.</p> <p>The Framework and supporting online Planning Practice Guidance makes clear that Local Plan housing requirements should be informed by a full objective assessment of overall housing need of the housing market area which is to be set out in an up-to-date Strategic Housing Market Assessment ("SHMA"). Recent case law<sup>2</sup> also confirms that the full objectively assessed need should leave aside policy considerations, placing an emphasis on LPAs to ensure that overall housing need is not constrained by development plan policies.</p> <p>The Coventry and Warwickshire SHMA was published November 2013 and its primary purpose was to guide, inform and support the development of planning and housing policies. Its preparation sought to respond to the requirements of the Framework and the Statutory duty to cooperate in progressing strategic planning issues across local authority boundaries (paragraph 1.3). Section 7 considers the future housing needs for the Coventry and Warwickshire sub-region with reference to a number of scenarios. Section 11 of the SHMA concludes that the overall housing requirement for the subregion equates to 3,750 dwellings per annum ("dpa") for the period 2011 to 2029.</p> <p>We are aware that Richborough is part of a consortium of housebuilders and strategic land promoters who commissioned Barton Willmore to carry out an independent objective assessment of housing need across the Coventry Sub-Region. The primary purpose of the study is to determine whether the WDLP is planning for a sufficient quantum of new housing going forward. In summary,</p>	<p>The Council's response to the representation to Policy DS6 covers matters related to the housing requirement and the Barton Willmore independent study into housing need in Coventry &amp; Warwickshire. The Council maintains that the sites in the plan are deliverable and/or developable as required by NPPF. The Council expects to have a 5 year supply of housing by the time of the Examination into the Plan</p> <p>With regard to the Thickthorn site, the Council is actively working with the sports clubs to ensure that a satisfactory relocation takes place as soon as possible.</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>the Study concludes that for the Coventry and Warwickshire sub-region a minimum housing requirement of at least 5,100 dpa is required over the course of the Plan period (2011-2029). In respect of Warwick District, the Study demonstrates a requirement for 900 dpa - 18,000 dwellings between 2011-2031. It is submitted that the level of housing advocated by the Barton Willmore Study is significantly above that identified within the Coventry and Warwickshire SHMA.</p> <p>According to the LPAs evidence base<sup>3</sup>, it cannot demonstrate a five year supply of housing land. The supply as at February 2014 - calculated using the previous WDLP housing figure of 12,300 - was 2.8 years. Adjusting this figure accordingly to reflect the assessed need at 720 dwellings per annum (12,960 dwellings) now being planned for reveals a District housing land supply equivalent to 2.6 years. In the context of being able to demonstrate a five year rolling housing land supply from the point of the Plan's adoption, it is considered that the WDLP is not presently sound. It is considered that an added complication to this existing position is that the strategic allocations in the WDLP are dependent upon major infrastructure. Equally, as explained below, the delivery of the strategic allocation at Thickthorn is not entirely certain. As such, the WDLP must address the consequences of a possible shortfall in housing land supply, including possible contingency arrangements in order to be found sound. This was a strategy that was followed by Rugby Borough Council in its now adopted Core Strategy and given that that Council can no longer demonstrate a five year housing land supply principally due to the delay in bringing forward a major strategic allocation, then similarly the WDLP should incorporate flexibility into the strategy to bring forward additional housing sites if the need arises.</p> <p>The WDLP's current response is for a review or partial review of the Plan if the monitoring evidence indicates that the plan is out of date. It is submitted that critical to any flexible policy to deal with rapid change is the matter of a trigger for when such remedial action would have to be started. The consultation draft Plan makes no such provisions. Moreover, there is no provision within the Plan for a quick and less complex method of dealing with these deliverability problems that may arise. Delays to or even the failure to deliver any of the strategic urban allocations would mean that alternative housing land needs to be provided elsewhere in the District. Given that much of the District is subject to Green Belt policy it is submitted that the WDLP needs to clearly provide for a mechanism to release development sites as and when they are required.</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>Specifically, in the context of Kenilworth a delay in finding a satisfactory new home for Kenilworth Rugby Club ("KRC") will prevent Thickthorn from being planned and developed comprehensively. It is submitted that no prudent developer or strategic land promoter would be willing to progress the site, even to outline application stage, without certainty surrounding vacant possession for the land controlled by KRC.</p> <p>It is clear that the LPA has done a considerable amount of work analysing windfall and has placed a heavy reliance upon it. As such, there is some flexibility in the Plan for additional housing development if slippage were to occur to the anticipated delivery rates for the strategic sites. However, it is submitted that as currently drafted the Plan accounts for 12,964 homes to meet the identified housing requirement of 12,960 homes. An overprovision of housing - 4 homes - suggests that the LPA is not planning positively. Accordingly, it is submitted that the Plan requires further flexibility.</p> <p><i>The most appropriate manner in which to factor in greater flexibility would be to allocate additional land for housing. Though the allocation of additional land Policy DS7 can be made sound.</i></p>		
66324 - A C Lloyd Homes Ltd and Northern Trust [6105]	Object	It is considered that the windfall allowance is excessive and unjustified, and in the absence of a clear and robust evidence base from the Council the proposed windfall allowance is rejected.	<p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission).</p> <p>The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66307 - Patricia Hollis [6286] 66901 - Colin Sharp [1913] 66909 - Ms Alison Cox [588] 66917 - Alison Kelly [9014] 66925 - Andrew Cliffe [6235] 66933 - Angelo Cugini [12883] 66941 - Barbara Groves [8940] 66949 - Professor Bob Ireland [7882] 66957 - Christopher Paden [8844] 66965 - Elizabeth Cliffe [6234] 66973 - Mrs Kay Cugini [1743] 66981 - Mr David Ramsbottom [2030] 66989 - Mr David Drinkhall [12839] 66997 - Ian Frost [2024] 67005 - Mr Geoff Reynolds [8107] 67013 - John Griffiths [8071] 67021 - Justin Richards [8806] 67029 - Louise Kalus [8998] 67037 - Paul Kalus [8995] 67045 - Mr Bernard Hollis [1810] 67053 - Mr R Komarasinha [6306] 67061 - Caroline Komarasinha [12793] 67069 - Matthew Drinkhall [8910] 67077 - Oliver Lane [8814] 67085 - Ms Helen Maclagan [12783] 67093 - Mr and Mrs J Pennington [600] 67101 - Mr Peter Lamb [3491] 67109 - Sarah Hunt [7309]	Object	<p>The overall forecast of housing need of 12900 is considered to be exaggerated. The ONS estimates have been revised downwards and suggest only 8,100 houses are needed to meet natural increase and inward migration to Warwick District. The SHMA suggests that occupancy rates of houses will fall significantly from 2.2. Such a decrease is unrealistic and the plan is therefore seeking to justify the provision of more houses than will actually be needed to house the target population.</p> <p>There is already more than a five year supply of land ready for development. As ONS estimates have dropped less houses will be needed to meet the requirement for 5 years supply. Campaign groups have claimed that there is already a five year supply; the revised ONS estimates would appear to reinforce this position.</p> <p>Population projections underpin the plan and are fundamental to it being properly justified/sound. The GL Hearn projections used in the SHMA for Coventry and Warwickshire are used as the basis for the Plan but are now discredited by the may ONS population figures issued in May 2014.</p> <p>The recent ONS figures are much lower than those used in the SHMA 15,313 rather 21,472, a fall of 6,159 persons or a 28.7% reduction. This is very significant in that it changes the numbers of dwellings that will be necessary; the amount of infrastructure needed to support the housing / population and reduces the amount of Greenfield needed to be taken for new allocations.</p> <p>The reduction in population and required housing will also improve the 5 year housing supply position.</p> <p>It is considered that the SHMA underestimates the future housing occupancy rate in the district (see statistics in full submission). This alongside the potential for minor density adjustments can also have an impact on the amount of housing required in Warwick District and could lower the numbers significantly.</p> <p>Research undertaken by local campaign groups (supported by respected University of Warwick economists), shows conclusively that maintaining a housing target of 12900 by 2028 cannot be justified on the basis of the latest figures ( see power point slides in full submission).</p> <p>A decision to continue to work to the Council's current housing target can only be based on the Leadership of Warwick District Council being determined to " go for growth" in the face of the communities wish for a plan that would do no more than meet the needs of natural growth with a modest allowance for inward migration.</p> <p>To conclude / summarise</p> <p>*Warwick's population projection is now 28.7% less than the figures used to formulate the consultation draft local plan. The Plan is therefore unsound based on incorrect/ inadequate data.</p>		

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>*All the other authorities in the Housing Market area are also showing similar reductions in their population projections, including Coventry.</p> <p>*The method by which population is converted into the numbers of dwellings required needs better determination by calculation, using the known housing type and size to be included in the plan.</p> <p>*The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this will imply brownfield sites being put first and only including Greenfield where essential.</p> <p>*To delay a revision of the 5 year housing supply calculation / requirement in light of the new evidence of a much lower need for housing would be neglectful.</p> <p>*Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.</p> <p><i>The plan does not conform to the NPPF or Planning Practice Guidance in not responding to the changes that have taken effect in the ONS population statistics and the calculations of housing need are erroneous and have led to serious errors in predictions of housing needs and, because of the seriousness of these errors, the plan is unsound.</i></p> <p><i>The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this will imply brownfield sites being put first and only including Greenfield where essential.</i></p> <p><i>To delay a revision of the 5 year housing supply calculation / requirement in light of the new evidence of a much lower need for housing would be neglectful.</i></p> <p><i>Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.</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>
66777 - Trustees of the Haseley Settlement [7411]	Object	<p>RPS is of the opinion that the Housing Trajectory is unsound. The Housing Trajectory contains substantial over estimations of housing delivery, particularly in the early period of the plan. The rate of development in the early period is insufficient from the sites identified and an over reliance is being placed on a small number of sites delivering high rates of dwellings. This is not going to be experienced as proposed and the only way to maintain high levels of delivery is from a broader range of sites. RPS also objects to the identification of confidential sites in the Housing Trajectory amounting to 207 dwellings. It is not appropriate to identify confidential sites and withhold information on the location of such sites from a public examination of the evidence. If the Council cannot identify those sites publically, if cannot rely on them during scrutiny of the public examination as it does not permit transparency in the evidence. The 207 dwellings should be removed.</p> <p><i>The Housing Trajectory should be realistic in its delivery rates and sites that can come forward for development. It should also remove all confidential sites from supply or identify them for public examination.</i></p>	<p>A Housing Trajectory can only ever be based on broad estimates of the rates of delivery of housing sites - particularly those which are expected to come forward later in the plan period. However, the Council has consulted with developers over the expected timetables for delivery of the strategic sites and considers that the information in the Trajectory was a reasonable estimate at the time. The Housing Trajectory will be reviewed and as time advances, more reliable information will be available about site delivery. The Council is working collaboratively with the developers/agents of the urban extension sites, some of which now have planning permission, and the indications are that the sites will come forward as suggested. There is evidence of a very strong market in the District and past experience with strategic sites indicates strong build rates e.g. South West Warwick (100 p.a.) and Warwick Gates (200 p.a.)</p> <p>The confidential sites consist of public sector sites which are part of a programme of reorganisation of public sector assets. Some are currently occupied and it would not be appropriate to disclose the identity of the sites. The Council will take advice at the Examination stage as to whether the location of the sites can be disclosed.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66794 - Gallagher Estates [644]	Object	<p>Raises concerns over the composition of the Council's 12,600 housing requirement. Of those sites with planning permission not all will be developed, it is suggested that a 10% non implementation discount is applied. In relation to windfalls the NPPF only refers to them being included in the 5 yr. supply where there is compelling evidence that such sites have become available in the area and will continue to provide a reliable supply. There is no reference to windfalls being allowed within a local plan. If all sites are identified as part of the SHLAA there should be a limited amount of windfalls arising as part of the supply. If undertaken correctly the SHLAA should reduce uncertainty of unknown sites coming forward during the plan period. The Council's windfall paper fails to acknowledge that the number of windfall sites has been greater than plan allocations due to the existence of a policy vacuum with few allocated site remaining. The lack of a five year housing supply is likely to have encouraged sites of a windfall nature to come forward. The level of windfalls going forward is likely to reduce. In terms of the analysis of different windfall types it is unclear why sites in and on the edge of rural villages have not been assessed as part of the SHLAA process. The Council has attempted to estimate future trends for this category and added 40%. There is no justification for this. In terms of conversions and changes of use, it is accepted that development arising from this source can be unexpected and reactive to socio economic changes. There is a finite supply of such sources (such as public buildings) and it should not be assumed trends will continue. Known vacant sites should be assessed in the SHLAA. For the category relating to redevelopment/ new build sites with a capacity of 5 or more dwellings, these should all be identified within the SHLAA and accordingly if deliverable it should be categorised as an identified SHLAA site as being suitable within the plan. The inclusion of a windfall allowance is not encouraged by government policy. The correct approach is to undertake a comprehensive review of all land supply in order to get a true understanding of the land likely to come forward. The only category worthy of inclusion as windfall within the Local Plan is redevelopment/ new builds fewer than 5 dwellings. It would then total 144 dwellings over the whole plan period for windfalls.</p>	<p>Discounts for non-implementation: Sites with planning permission in this District rarely fail to be implemented. NPPF paragraph 47 (footnote 11) suggests that sites with permission should be considered deliverable unless there is clear evidence that a site will not be deliverable within 5 years. Analysis of past rates of non-delivery (expired permissions) show that on average, 4.6% of annual permissions do not proceed to implementation. Of these, many come back for permission and implementation at a later stage.</p> <p>Windfall Estimate: Windfall estimates are based on completions rather than permissions and are discounted at the end of the plan period. The Council is not assuming that historic rate of delivery will continue. It has carried out a robust analysis of the historic rate and the likely future trends, by type of site, and adopted a cautious approach to estimating future levels and types of windfall sites. Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission). The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014). To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, an allowance is made for sites which are completed outside the plan period. NPPF allows for estimates of development on windfall sites for assessments of the five year supply. However the five year supply assessments are rolling estimates which eventually cover the plan</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>period. Hence it must follow that a windfall allowance for the plan period is acceptable. The Council considers that it is essential to make a realistic allowance for windfall sites because there is robust evidence to show that they consistently come forward. Not to include them would lead to over-provision of housing without the necessary infrastructure to support it and a potentially damaging impact on neighbouring Councils with weaker housing markets.</p> <p>Evidence from the years 1998-2006, when there were a number of large allocated sites coming forward, showed that there were also a large number of windfall sites coming forward. Further, there is evidence that windfall sites are brought forward by smaller (often more local) builders and that they deliver a different type of home such as flats from converted properties, small terraced homes and so on. There does not appear to be a link between the availability of greenfield sites and windfall development.</p> <p>Sites within or on the edge of villages were included as part of the SHLAA process (in that such sites were invited for inclusion). A large number of sites on the edge of villages were submitted but not many within villages. The Council considers that once the Plan is adopted and the new planning policy (which will probably be less restricted) becomes widely known, then more sites will come forward. An increase of 40% on a very low number is not a large increase numerically.</p> <p>Known vacant sites are dealt with in the SHLAA. However, in this District when sites become vacant they do not stand idle for long and quickly become subject to a planning application. Thus there are few vacant sites in the SHLAA and the only way to properly take account of such sites is within a windfall allowance.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66575 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Given past rates of completions, even when the housing market was at its highest, the proposed rates of completion are highly ambitious and between 2014/15 to 2019/20 these are implausible. In practice, completion rates are likely to be held back by a combination of lack of demand, rising interest rates, limited capacity within the building industry and shortage of public sector resources.</p> <p>In our view, the 'front-loading' of the house building figures in the trajectory is misguided and will prove unachievable. It would be far more realistic to plan for a steady increase in provision over the next few years, as compared with the very low levels of recent years.</p> <p><i>Revise housing trajectory to a realistic level and take account of proposed revision to Policy DS6 bringing proposed housing numbers for 2011-2029 to approximately 8,000.</i></p>	<p>The Council is required to meet the objectively assessed need for the District and to co-operate with other authorities in Coventry and Warwickshire to meet any shortfall arising from another authority. It is also obliged to "boost significantly" the supply of housing. Decreasing the level of housing is not, therefore, an option.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65516 - Sharba Homes Group [12779]	Object	<p>There is no explanation as to how the figure from the SHMA has been translated from an objectively assessed need ('Policy Off' figure) for Warwick to an overall housing requirement ('Policy On' figure).</p> <p>A two stage process should be carried out: 1) use of SHMA to identify OAN. 2) take account of other considerations to arrive at a final housing figure (e.g DTC, SHLAA). This can then give a sound figure for the Plan.</p> <p>The Plan has only looked at stage one and is therefore a "policy off" figure and is unsound.</p> <p>The plan proposes a high level of windfall housing (19.3% or 138 dpa). Whilst a degree of windfalls are allowed, this should only be if there is compelling evidence.</p> <p>The 2014 report on 5 year supply has not been published and the 2013 report makes no allowance for non-implementation.</p> <p>There is therefore not enough evidence to demonstrate how this approach can be achieved, and the reliance on windfall sites in this way risks a serious undersupply of housing.</p> <p><i>Please see the attached representation submitted by PJ Planning on behalf of Sharba Homes Group</i></p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review. Thus the OAN for Warwick District of 606 new homes per annum has been translated back to 720 per annum for the period 2011-2031. This takes into account the needs of the Housing Market Area and the fact that Coventry is unlikely to be able to meet all of its needs. Its capacity is yet to be determined but if there is evidence that Coventry's neighbours would need to provide for an additional amount, then the Plan allows for a Local Plan Review to take place.</p> <p>Windfall sites make up a large proportion of new housing in the District. Since 1996, dwellings on windfall sites have comprised 58% of total completions.</p> <p>The Windfalls Paper (Estimating a Windfall Allowance: Publication Stage. April 2014) sets out the Council's robust evidence for the windfall allowance.</p> <p>The 5 Year Housing Land Position is available on the Council's web site. A 5% deduction on the supply is made for non-implementation.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66314 - A C Lloyd Homes Ltd [5958]	Object	It is considered that the windfall allowance is excessive and unjustified, and in the absence of a clear and robust evidence base from the Council the proposed windfall allowance is rejected.	<p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission).</p> <p>The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66166 - Hallam Land Management and William Davis [8278]	Object	<p>William Davis and Hallam Land Management have a number of concerns about the various components of the supply and how the overall level of provision is to be met.</p> <p>The allowance for windfall sites is expressed in the policy as being "over the plan period". It should be more accurately described as relating to the period beyond April 2013. Furthermore it is considered that the contribution from windfall sites has been overstated.</p> <p>On the basis of the advice set out in paragraph 48 the NPPF and the subsequent "on-line" Planning Practice Guidance, it is accepted that, in principle, an allowance for windfall sites could be included within any assessment of the supply of housing land over the plan period. However such a significant reliance on windfall sites is contrary to that expectation and gives rise to a level of uncertainty as to the delivery of the housing requirement over the plan period. The issue is the scale of such an allowance. As proposed, it is not considered that this is justified and hence the Plan is not sound.</p> <p><i>It is considered that the windfall allowance should be reduced to, at the most, a level of no more than 20% of the overall requirement for new homes. The plan should therefore identify across the District additional sites to be allocated for new housing, including land to the south of Gallows Hill.</i></p> <p><i>The windfall allowance in Policy DS7 should amount to no more than 1,600 dwellings. This represents about 17.3% of the housing requirement to be met from the policies and proposals in the plan, which is more realistic and properly justified.</i></p> <p><i>Line 5 should therefore be amended as follows:</i></p> <p><i>"An allowance for windfall sites coming forward from December 2013 to March 2029"</i></p>	<p>Agree the suggested change to the policy relating to the period over which the windfall allowance is applied.</p> <p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 19% of the sites identified in the table. The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p>	<p>Amend Policy DS7 as follows:</p> <p>"An allowance for windfall sites coming forward from December 2013 to March 2029"</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65875 - Centaur Homes [9117]	Object	<p>Centaur Homes object to the excessive number of units within the windfall allowance and the separate inclusion of SHLAA sites. Paragraph 48 of the Framework states that any allowance for windfall sites should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery and any future trends. The production of the Local Plan is the opportune time to proactively plan for new development rather than leaving it to windfall and speculative sites being brought forward</p> <p><i>The policy needs considerable reworking in order for it to comply with national policy</i></p>	<p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission). The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014). The approach taken is to provide a realistic estimate of sites which are likely to come forward with planning permission each year from the latest monitoring period. This involves looking at past trends and likely future trends and ensuring that no double-counting takes place with existing permissions and SHLAA sites. Towards the end of the period sites which are unlikely to be completed within the plan period are discounted. The Council maintains that this level of windfall development is a cautious estimate which is very likely to be exceeded.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67223 - Bloor Homes Midlands [11532]	Object	<p>The draft Local Plan has failed to demonstrate:</p> <ul style="list-style-type: none"> <li>* it has proactively driven/supported sustainable economic development, and done everything it can to support sustainable economic growth;</li> <li>* it meets the business needs of the area and delivers homes to support the growth of the local economy;</li> <li>* it is based on the most up-to-date and robust evidence about the economic prospects and needs of the area; and,</li> <li>* it integrates the strategic policies for prosperity (Strategic Policies DS1 and DS8) and housing (Strategic Policies DS2 and DS6).</li> </ul> <p>The level of economic growth to be provided for is not defined within the draft Local Plan.</p> <p>The strategy for prosperity in the draft Local Plan is to provide for the growth of the local and sub-regional economy by ensuring sufficient/appropriate employment land is available to meet the existing/future needs of businesses (Strategic Policy DS1). Policy DS8 provides for a minimum of 66ha of employment land to meet local need (for the period 2011 to 2030). The strategy for housing is to provide in full the objectively assessed need (Strategic Policy DS2). Policies DS6, DS7 and DS10 provides for 12,860 new homes (for the period 2011 to 2029).</p> <p>The evidence base fails to support Paragraph 2.7 of the LP that economic growth has been balanced with housing growth, and that meeting the full objectively assessed need for housing will complement and meet the economic and business needs and ambitions of the District.</p> <p>The evidence can be found within the Economic and Demographic Forecasts Study (EDFS) (December 2012), the Employment Land Review Update (ELR) (May 2013), and its economic ambitions can be found within the Strategic Economic Plan for Coventry &amp; Warwickshire LEP (SEP) (March 2014).</p> <p>The economic strength of Warwick is undeniable, and is summarised in paragraphs 3.1 to 3.6 of the ELR. Its economy has outperformed the West Midlands and UK in terms of its growth and is forecast to continue that trend (both in terms of GVA and employment) into the plan period. Warwick has an economic structure which is aligned to the future growth sectors, such as professional services, healthcare, and IT.</p> <p>Warwick also has a particular strength in the automotive/vehicle manufacturing sector, with several major employers including Jaguar Land Rover (JLR) who have facilities located both within and on the edge of the District. Given the significance of JLR to the national economy, it is no surprise that the Vision for Coventry &amp; Warwickshire in 2025 within the SEP is to be recognised as a global hub and a UK Centre of Excellence in the advanced manufacturing and engineering sector. Many of the SEP's priorities and actions are</p>	<p>Responses to the issue of the level of economic growth which the Local Plan aims to meet is also set out in responses to the Objector's representations to Policies DS8 and DS9.</p> <p>In addition, the Council would make the following comments.</p> <p>The 2013 Joint Coventry &amp; 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"> <li>* at District level economic forecasts are not that reliable</li> <li>* the relationship between housing and jobs is complex</li> <li>* economic forecasts do not take into account double-jobbing</li> <li>* commuting patterns and employment rates can change over time</li> </ul> <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</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>focused around facilitating the growth of this sector, including investment to deliver new/expanded facilities at several employment sites within and bordering Warwick District. The SEP has estimated its actions alone may generate over 50,000 jobs by 2030 across the sub-region.</p> <p>It is very clear from the evidence that the Warwick economy is undoubtedly the 'powerhouse' within the sub-region and West Midlands region. Its future economic performance and continued success is therefore critical to the overall performance of the sub-region and regional economy, and the delivery of the ambitions within SEP.</p> <p>Whilst the availability of suitable employment land is a key factor influencing Warwick's future economic growth and prosperity, it is not the only component that the Local Plan will need to influence. A key challenge is to ensure that the planned growth of Warwick and the sub-region's economy is not frustrated by lack of access to skilled workforce. To deliver a global hub and national centre of excellence, requires businesses to be able to attract the necessary talent. Providing access to available homes of a high quality is an essential component of the offer. SEP recognises that the short...</p> <p>Changes to Plan: The Council should therefore review its objectively assessed housing need figure prior to submission. In the context of delivering sustainable development, this review should consider economic, social and environmental effects of increasing the level of housing growth in order to balance with the forecast economic growth and economic ambitions of the Council. Other representations made by Bloor Homes Limited to the draft Local Plan have identified locations where additional housing growth can be accommodated. In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</p> <p><i>The Council should therefore review its objectively assessed housing need figure prior to submission. In the context of delivering sustainable development, this review should consider economic, social and environmental effects of increasing the level of housing growth in order to balance with the forecast economic growth and economic ambitions of the Council. Other representations made by Bloor Homes Limited to the draft Local Plan have identified locations where additional housing growth can be accommodated. In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</i></p>	<p>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 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>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66783 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>DS7 shows how the housing requirement will be met. The requirement needs to be revised to comply with the reduction in the population growth now known.</p> <p>The completion between 2011 and 2013 are not consistent with the figure published in June 2013.</p> <p>DS7 makes no provision to account for 687 over-supply form previous years (see PPG 3-036), nor does it account for 450 completions during 13/14. It does not include completions since 1/4/14 nor does it include an up to date assessment of site under construction. Finally it does not take account of vacant dwellings.</p> <p>DS7 includes a balance to be provided on allocated sites. NE5 conflicts with DS11 where the Local Plan includes a significant number of sites as a first call for the housing required, before brownfield and urban regeneration sites have been fully examined.</p> <p>The housing trajectory is unexplained and shows annual targets that are unlikely to be met. For a trajectory to be achieved, it should be site related so that as sites are approved they can be included in the trajectory correctly and confidently. 2014/15 is supposed to deliver over 1,000 homes but as yet none of the large sites have commenced.</p> <p>DS4 is not be observed in other policies indicating inconsistencies. In the first instance, allocations will be directed to previously developed land within urban areas - if this is the case why have 5 major sites been approved in advance of previously developed land within the urban areas? greenfield sites will not need to be identified for housing because the revised population projection shows that the number of homes have either already been built, permission granted, allocated without involving greenfield or green belt for up to 10,100 homes, more than is now known to be required.</p>	<p>The evidence on housing needs has been updated to take into account the ONS 2012 population projections.</p> <p>The Council does not think that it is appropriate to take into account oversupply prior to 2011. This is because the housing needs assessment in the SHMA has 2011 as a starting point and only examines housing needs from this date onwards. The housing statistics are based on information up until December 2013. However it only identifies completions up until the monitoring date at 1st April 2013.</p> <p>However these are still counted within the categories of sites with planning permission.</p> <p>The SHMA properly converts housing need into requirements for additional dwellings by applying a 3% rate for vacancies and second homes (Joint SHMA Page 217).</p> <p>Brownfield and urban regeneration sites are included in the form of a Windfall Allowance and "Consolidation of Existing Employment Areas and Canal-side Regeneration".</p> <p>The Trajectory is site-related and this background information is included alongside other Evidence on the Council's web site.</p> <p>The sites expected to be completed in 2014/15 include sites with planning permission - these include large sites at Chase Meadow and at Queensway.</p> <p>Sites allocated on greenfield sites are necessary to make up the shortfall once completions, committed sites, windfalls and regeneration sites have been taken into account. Where possible, greenfield sites are located outside of the Green Belt.</p>	No Change
66741 - Mr Edward Walpole-Brown [7504]	Object	<p>The number is insufficient. The allocation and distribution is inappropriate. Windfall sites should not be part of the 12,860, they should be in addition and the plan should properly provide policies and allocate sites which will deliver. What has happened in the past is immaterial as it reflects that the plan did not adequately cater for housing growth.</p>	<p>The housing requirement meets the needs of the District as well as an element of housing to meet any shortfall within the Housing Market Area. A review of the Plan will take place if there is evidence that Coventry cannot meet its own housing needs. the NPPF allows for the "Five Year Supply" to include an estimate of windfall sites. As the five year supply is a rolling calculation over the plan period, it follows that windfall sites can be taken into account across the plan period.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66603 - The Trustees of the F S Johnson 78NEL Settlement [7206]	Object	<p>Since the Revised Development Strategy the number of dwellings proposed on brownfield land has increased by 950. Despite this presumably being taken from the SHLAA the capacity of small urban sites as suitable for residential development has also risen from 300 to 393 in the Publication Draft. There is concern that the SHLAA sites are not necessarily deliverable given that they do not have planning permission. Also concern that many of the proposed allocated sites have not been subject to earlier consultation which is not in the spirit of a front loaded plan, particularly as representations at this stage must be confined to soundness and legal compliance. Do not dispute that the number of dwellings allocated to within the Growth villages may need to be decreased since the January 14 consultation. However strongly objects to distribution of these allocations between the settlements, the lack of safeguarded sites for longer term development and the site selection in Kingswood. It would be appropriate and in accordance with national planning policy that the largest proportion of development be directed towards the larger, most sustainable settlements. Kingswood (Lapworth) settlement was classified in the 'Draft Settlement Hierarchy Report' as one of five largest villages referred to as Primary Service Villages and only 4 points short of the most sustainable village but has been allocated the least amount of housing. Given the sustainability of Kingswood it is unsound that it is allocated fewer dwellings when there are suitable sustainable options available, such as land at Station Lane. The scale of development and growth should broadly reflect the sustainability of the statement. Objects to the division of housing between the growth villages because it does not fully accord with the NPPF's requirement to direct development towards the most sustainable settlements. The evidence produced in respect of Kingswood in so far as it relates to their site is unsound. It would be unreasonable to rely on this as justification for deviating from the sustainability hierarchy. Outstanding housing need is an exceptional circumstance to justify review of a green belt boundary at Kingswood and the authority should safeguard land to meet longer term development requirements including: the Joint Strategic Housing Market Assessment, cross boundary requirement under duty to cooperate. It is unclear whether the required 5 - 20% buffer has been allowed when calculating the 5 year housing supply. Given the importance of an evidenced deliverable 5 year housing land supply to any Local Plan, it is unsound for the Council not to have calculated and provided as part of the background evidence, updated information on the five year housing land supply. Warwick District had a significant annual housing shortfall in delivery, following cessation of the housing moratorium at the end of 2009. This we believe is a 'persistent' annual under delivery when measured against the</p>	<p>Sites in the SHLAA have been assessed for deliverability and developability. NPPF states that sites for years 6-10, and where possible 11-15, should be developable. therefore, sites without planning permission, which have been assessed for developability can form part of the housing supply in the Local Plan.</p> <p>The methodology for allocating sites in the rural area included, firstly, an assessment of the sustainability of settlements and, secondly, an assessment of sites put forward in the SHLAA (including evidence from assessments of landscape quality, flood risk and Green Belt). In the case of Kingswood, the final capacity figures were constrained largely because of landscape quality and flood risk.</p> <p>The Council consulted on sites in the "Village Housing Options and Settlement Boundaries" consultation.</p> <p>The sites in the Local Plan are expected to provide sufficient housing for the foreseeable future. The Council does not consider that sustainable settlements should continue to grow beyond the plan period. To continue to grow incrementally would soon render the settlement unsustainable. Safeguarded land is not considered to be appropriate for small rural settlements.</p> <p>The Council has met its housing requirements in the recent past - so much so that a housing moratorium was necessary to restrain housing development in order to ensure that the Local Plan of September 2007 was in conformity with higher level plans.</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>annual housing requirement. Once a 'persistent under delivery' has been proven, which we contend it has, the 5 year housing land requirement would rise by a 20% buffer rather than a 5% buffer. Recent advice by the Inspector at the Independent Examination of the Staffordshire Moorlands Core Strategy indicated it is reasonable to suggest that 'persistent' means at least two accounting years before the current one and 'under delivery' would be where fewer than the projected annual housing unit requirement are completed. The Plan is unsound because it fails to address this and there is a shortfall in the deliverable housing land supply.</p> <p>There is a strong case that the Plan is not sound because it fails to: provide sound, factually correct evidence on which to base decisions; satisfy the requirements of the Framework in plan making; provide guidance and certainty over the long term; identify sufficient developable, deliverable land which has been subject to public scrutiny and consultation to meet the housing requirement over the plan period; include a 20% buffer in the 5 year housing land supply; ensure all land included in the housing land supply calculation is deliverable; offer developers housing land allocation choices to ensure a rolling 5 year housing land supply is maintained; alter Green Belt boundaries to meet the latest identified growth requirement, including to meet any cross-boundary housing land shortfall under the Duty to Cooperate; ensure that Green Belt boundaries are capable of enduring beyond the plan period through the identification of 'safeguarded land'; identify a quantum of housing land allocations appropriate to the scale and sustainability of settlements; and remove our client's land, and other similarly 'deliverable' sites, from the Green Belt and allocate them for residential development.</p> <p><i>Land at Station Lane should be allocated for development</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>
66264 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	<p>Policy DS7 sets out the means of achieving the housing requirement from past completions, existing planning permissions, windfall sites, SHLAA sites, use of employment land, canal-side regeneration and Local Plan site allocations.</p> <p>The Council should clarify the method for dealing with shortfalls in housing delivery illustrated by the housing trajectory against an annualised housing requirement and if a 5% or 20% buffer is applicable. The Council should also confirm that 5 years housing land supply is available on adoption of the plan.</p>	<p>The Housing Trajectory will be reviewed as new evidence emerges. The Council does not claim that the time lines for all sites are 100% accurate but they are based on the best available information at the time.</p> <p>Land at Europa Way (north) and a large element of land south of Harbury Lane already has the benefit of planning permission.</p> <p>At the time of writing (December 2014), the Council could demonstrate a 4.5 year supply of housing land and it is expected that by April 2015 this will increase to 5 years. In order to ensure a continuing 5 year supply the Council will continue to collaborate with developers to encourage them to bring forward sites at the earliest opportunity.</p>	<p>Change to Policy DS7 Explanation</p> <p>Add new para 2.24a as follows:</p> <p>The Council will review the Housing Trajectory as new evidence emerges. It is expected that the Council will be able to demonstrate a five year supply of housing land by April 2015. In order to maintain this supply of housing land throughout the plan period, the Council's Implementation Strategy will be to encourage allocated sites to come forward at the earliest opportunity. The Council is actively collaborating with developers of the southern urban extension sites and engages with them through a Developer Forum chaired by the Council's Chief Executive and supported by ATLAS.</p>
65422 - Nurton Developments [12697]	Object	<p>The housing provision should be increased to allow for flexibility in the event that some sites fail to come forward or are delivered with reduced capacities than that allowed for in the plan.</p> <p><i>The housing provision should be increased in order to allow flexibility in case some sites fail to come forward or are delivered with reduced capacities.</i></p>	<p>The Council is recommending a change to Policy DS6 to set the requirement as a minimum. This will allow for sites over and above the requirement if they meet the policies in the Plan.</p> <p>The Council is confident that all the allocated sites will come forward. there is strong demand within the District and the housing market is generally buoyant. In terms of the urban extension sites, the Council has collaborated with the developers since 2009 and there is a strong willingness across the board to bring sites forward. windfall sites have consistently formed a large proportion of completions within the District, averaging 58% of the total since 1996.</p> <p>Further, Policy DS20 allows for a review of the Plan if there is evidence to demonstrate that significant housing needs arising outside the District should be met within the District and could not be accommodated without a review.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66465 - Gladman Developments (Peter Dutton) [9149]	Object	<p>Alongside dwellings already completed and committed 393 dwellings are expected to come forward from small urban sites and 269 homes from the consolidation of existing employment areas. Significant proportion of future housing needs are proposed to be met through sites allocated through the LP, whilst a windfall allowance of 2,485 dwellings for Plan period is also identified. Submit that there is need to identify further housing sites in Warwick, over and above those already identified through LP, consistent with need to meet a higher housing requirement to meet the authority's full objectively assessed needs. If Council cannot demonstrate sufficient supply of deliverable/developable housing sites to meet authority's housing needs over the Plan period, the LP cannot be considered effective.</p> <p>Council cannot currently demonstrate five year housing land supply. As shown in the Council's most recent Five Year Housing Land Supply Assessment report published in July 2013, the Council could only demonstrate a 2.8 year supply against previous emerging LP target of 683 dpa. Whilst LP Housing Trajectory paper shows that more commitments have since come forward, based on making up the delivery that has already occurred since the start of the LP period over the next five years and factoring in a 20% buffer for persistent under-delivery, question whether Council will not be able to demonstrate a five-year supply against its proposed requirement going forward. If sites proposed to be allocated through the LP are taken into consideration, this is still likely to be the case.</p> <p>Council's strategy heavily reliant on delivery of three large SUEs on Land West of Europa Way, Land South of Harbury Lane and East of Kenilworth. Collectively these are anticipated to deliver 3,395 dwellings, representing 54% of the sites to be allocated through the LP. Whilst supporting general principle of SUEs and their sustainability benefits, submit that sites can often be slow coming forward, delivering housing at slower rate than anticipated and failing to deliver level of home envisaged. Council should ensure that it has allowed for sufficient contingency in LP housing supply, providing flexibility for sites that do not come forward as planned. Whilst recognising ability for local authorities to make allowance for windfall sites in their housing land supply, we remind the Council that it must ensure that its windfall assumptions are appropriately justified and based on a robust understanding of how windfall sites are likely to continue to come forward, alongside other identified commitments and housing allocations.</p> <p>Conclusions on Soundness Submit that in its current form the LP is not effective, as it fails to identify sufficient deliverable/developable housing sites that can come forward over the Plan period to meet the authority's full objectively assessed needs. Council cannot currently demonstrate</p>	<p>The Council maintains that the Plan does meet its objectively assessed needs as well as other needs arising in the Housing Market Area.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>As at November 2014 the Council was able to demonstrate a 4.5 year supply of housing land. It is expected that a 5 year supply will be demonstrable at 1st April 2015. This is because the southern urban extension sites have started to come forward for planning permission and it is expected that the first homes will start to be delivered in 2015/16. The Council collaborates closely with the landowners/ house builders and their agents and has every confidence that the sites will be brought forward swiftly. A change will be suggested in the Explanation to the policy to explain the Trajectory and the 5 year housing land position.</p> <p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission).</p> <p>The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions)</p>	<p>Change to Policy DS7 Explanation Add new para 2.24a as follows: The Council will review the Housing Trajectory as new evidence emerges. It is expected that the Council will be able to demonstrate a five year supply of housing land by April 2015. In order to maintain this supply of housing land throughout the plan period, the Council's Implementation Strategy will be to encourage allocated sites to come forward at the earliest opportunity.</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>five-year housing land supply. Whilst recognising that further commitments have come forward since publication of latest Five Year Housing Land Supply Assessment report and envisaged supply of housing provided through the LP, submit that this is likely to continue to be the case. Whilst recognising that the LP already provides an element of flexibility in its proposed housing supply, submit that this will not be sufficient to meet the authority's housing needs.</p> <p>To be found sound at Examination submit that there is need to identify further deliverable/developable sites, in particular that can come forward in the short term in sustainable locations. Remind Council that if it is not able to demonstrate a five year housing land supply at the time of the LPs adoption, its policies for the supply of housing will be out-of-date as soon as they are intended to come into effect.</p>	<p>because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66587 - Catesby Property Group (Mr David Morris) [7776]	Object	<p>Quer, whether any discount has been applied to this figure or whether there is an assumption that all of the sites with planning permission will be delivered in full within the plan period . It would be normal practice to apply a 10% reduction to committed sites for non-implementation and to ensure robustness.</p> <p>We note that there is a substantial allowance for deliveries from windfalls, small urban sites assessed in the SHLAA and a consolidation of existing employment areas. We would query whether there is any 'double-counting' of sites and how robust including a windfall allowance is if allowances are being included for small SHLAA sites and the consolidation of existing employment sites, given that these categories are likely to make up a large proportion of what would normally be regarded as windfall sites.</p> <p>In this respect, we are concerned that the Plan may not be effective in that it does not ensure the delivery of the full housing requirement within the Plan period .</p>	<p>Sites with planning permission in this District rarely fail to be implemented. NPPF paragraph 47 (footnote 11) suggests that sites with permission should be considered deliverable unless there is clear evidence that a site will not be deliverable within 5 years.</p> <p>Windfall estimates are based on completions rather than permissions and are discounted at the end of the plan period.</p> <p>SHLAA sites have already been assessed for developability and deliverability.</p> <p>The total for the consolidation of existing employment areas is an estimate of delivery only. Allocated sites will be expected to come forward. Any slippage in the number of homes in one site would probably be balanced by an increase in the expected number of homes on another.</p> <p>The Plan is required to put forward "deliverable" and "developable" sites thus there is no need for a discount for non-implementation</p> <p>Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission).</p> <p>The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014).</p> <p>To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, sites are discounted to allow for those sites which will be completed outside the plan period.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66780 - Trustees of the Haseley Settlement [7411]	Object	<p>Housing trajectory is unsound in respect of its reference to windfall allowances. The allowance is overestimated and unrealistic in respect of windfall developments particularly in the rural area where the settlement limits proposed are overly restrictive. The allowance makes provision for student accommodation and therefore will not meet the identified housing needs of the district. The authority should only include student accommodation based on accommodation it realises from the housing market. This requires the dwelling unit to have first been occupied by students then alternative accommodation be provided to release the dwelling unit back.</p> <p><i>The windfall allowance is clearly too high when taking into account the opportunities for site development within Warwick, is not supported by past rates or the evidence used, particularly in relation to student accommodation. To respond to this, additional sites should be identified within rural settlements or the boundaries of rural settlements should be reconsidered so that they allow for future windfall opportunities. The windfall rate should exclude all reference to student accommodation as it is not supported by the SHMA or recent evidence on how this should be addressed, even in light of the National Planning Practice.</i></p>	<p>The windfall allowance is based on robust evidence as set out in the paper "Estimating a Windfall Allowance: Publication Stage". This analyses past trends and how these are currently changing and how they will change in the future. Windfall development has always played a strong role in the delivery of housing in the District - between 1996 and 2013, 58% of new homes were provided on windfall sites. To ignore the significance of this type of development would lead to a significant unplanned, over-provision of housing (with consequent impacts on infrastructure provision) and an unnecessary loss of greenfield land. The existing rural area in the northern two thirds of the District is mostly washed over by Green Belt with only a few settlement boundaries. The emerging policy introduces more settlement boundaries and takes more villages out of the Green Belt. There will, therefore, be much greater scope for infill development than at present. NPPG does not expect local planning authorities to track the movement of students to ensure houses are released onto the market as students move into purpose built accommodation. This would be over-bureaucratic and intrusive.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66188 - Mrs Elizabeth Holroyde [5734]	Object	<p>Has WDC consulted and agreed strategies to deal with massive population expansion south of the river;  Hospital, Railway, WCC, car parking, bus companies, retail and other service providers, post 16 colleges, statutory undertakers, entertainment and sporting facility providers, employers.  WDC and WCC could have opportunity to provide creative proposal; e.g.  Wide boulevards including pedestrian and cycle ways and green space  abundant safe car parking  parks and recreation spaces  theatre, concert and meeting hall, cinema, hospital, church, school and shopping mall  Variety of houses with basement parking and tree planted spaces  Third community would be welcomed if it added facilities/beauty to the area.  Must not let cost dictate as developers will pay for the space.  Council tax revenue will be hugely increased</p>	<p>The Council has consulted on the Preferred Options and a Revised Development Strategy. This has included a Draft Infrastructure Delivery Plan.  The most up-to-date Infrastructure Delivery Plan sets out the infrastructure that will be delivered to support new development.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65984 - Barwood Development Securities Ltd [12821]	Object	<p>As new allocations have been provided to deliver the needs of the Borough, the Council cannot assume that the historic rate of windfall development will continue. In addition to this Barwood suggests that a non implementation allowance is included to allow for any slippage in planning permissions not being built out.</p> <p>The Employment Land Review identified a number of sites which have employment suitability issues and where future redevelopment for alternative uses may be appropriate. However the identified employment sites may not come forward for residential development exclusively, which will have an impact on the number of dwellings that can be delivered on these sites.</p>	<p>Discounts for non-implementation: Sites with planning permission in this District rarely fail to be implemented. NPPF paragraph 47 (footnote 11) suggests that sites with permission should be considered deliverable unless there is clear evidence that a site will not be deliverable within 5 years. SHLAA sites have already been assessed for deliverability. The total for the consolidation of existing employment areas is an estimate of delivery only. Allocated sites will be expected to come forward. The Council continues to collaborate with developers to bring sites forward and developers are keen to start on site as soon as possible. Any slippage in the number of homes in one site would probably be balanced by an increase in the expected number of homes on another. Windfall Estimate: Windfall estimates are based on completions rather than permissions and are discounted at the end of the plan period. The Council is not assuming that historic rate of delivery will continue. It has carried out a robust analysis of the historic rate and the likely future trends, by type of site, and adopted a cautious approach to estimating future levels and types of windfall sites. Since 1996, dwellings on windfall sites have comprised 58% of all homes completed in the District. The Council's estimate of windfall sites comprises just 27% of the sites identified in the table (excluding completed sites or sites with planning permission). The windfall allowance is fully justified in the paper "Estimating a Windfall Allowance: Publication Stage" (April 2014). To estimate these sites an analysis is made of past completed windfall sites (rather than permissions) because this gives a better indication of sites which will be delivered. The historic pattern of different types of windfalls is examined and likely future changes are identified. Care is taken to avoid double-counting with sites with permission at the last monitoring date and SHLAA sites. Towards the end of the plan period, an allowance is made for sites</p>	No change

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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>
			which are completed outside the plan period. Cautious estimates of capacity have been made in respect of employment regeneration areas. As the site is a cautious estimate only, there would be no reason to discount it.	

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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>
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*DS8 Employment Land*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65860 - Jaguar Land Rover [12653]	Object	<p>General support is expressed for providing employment land to meet the needs of the district, in accordance with the NPPF. However, given the employment benefits of the Jaguar Land Rover business as one of the largest employers in the region, it is imperative that Jaguar Land Rover's existing operations within Warwick District and the wider region, including neighbouring Stratford on Avon District, are formally recognised. It is key that Jaguar Land Rover's aspirations for further expansion, over the plan period, to facilitate their continued growth in the region are acknowledged.</p> <p>To safeguard and facilitate continued investment, it is important that Warwick District Council's Local Plan complements the allocation for Jaguar Land Rover's existing Gaydon site and strategic growth and expansion plans at Gaydon.</p> <p>Support for Jaguar Land Rover and specifically their proposals at Gaydon, and also existing and future locations within Warwick District, would be in accordance with the CWLEP and the SEP. The district-wide support from the CWLEP to Jaguar Land Rover's expansion plans should be mirrored by Warwick District Council in the Local Plan.</p> <p>Currently the plan is not 'effective' and not 'positively prepared' as it is not based upon effective joint working on cross-boundary strategic priorities.</p> <p><i>The emerging Warwick Local Plan should acknowledge the economic role of the existing Jaguar Land Rover employment sites and support the expansion proposals to safeguard the growth of the Jaguar Land Rover business as a major employer in Warwick District and facilitate future substantial investment.</i></p> <p><i>The district-wide support from the CWLEP (Coventry and Warwickshire Local Enterprise Partnership) to Jaguar Land Rover's expansion plans should be mirrored by Warwick District Council in the Local Plan.</i></p> <p><i>It is considered necessary that the following supporting text is included immediately after paragraph 2.30 of the Local Plan:</i>  <i>"Jaguar Land Rover is a major international business with significance presence in the West Midlands. It is also one of the region's largest employers. Jaguar Land Rover creates a substantial contribution to the local and regional economy, providing direct and indirect employment, and is an integral part of the manufacturing future of the area and the UK as a whole, as a significant exporter. Having regard to the strategic significance of Jaguar Land Rover within both the District and region, and the economic benefits that Jaguar Land Rover provides to Warwick District, the Council will support the existing operations and activities and expansion of</i></p>	<p>The plan includes references to the Districts role in supporting the sub regional economy of which it is recognised Jaguar Land Rover plays an important role. The plan has been prepared through joint working on sub regional employment land requirements and reflects the intention of the LEP. It is not however considered necessary to refer specifically to the operations of Jaguar Land Rover in the Warwick District Plan.</p> <p>Furthermore the intention of policy DS8 is to set out the strategic employment land requirement for the District and therefore does not refer to any employment sites. It would not be appropriate to add the text proposed.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>Jaguar Land Rover's established employment land sites within Warwick District and the wider region, as well as appropriately located land and sites for future growth."</i>		
66159 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	Questions whether the plan makes adequate provision for employment land in terms of quantum, location and choice. DS8 states there is a need to allocate 19 to 29 hectares of new employment land however policy DS9 only allocates 19.7 hectares plus an allowance of 6.5 hectares for local needs at the sub regional site. Furthermore both Policy DS8 and DS9 are framed to meet 'local needs' whereas an objective of the SEP is to also encourage and support inward investment. The policies need to be flexible to be responsive to meeting business needs. The CWLEP would advise that strong consideration should be given to the joint employment land study.	The Council considers it's approach to providing for local and sub regional employment needs is sound. The employment land requirement includes an amount equivalent to five years past supply for flexibility and also includes an amount to allow for the redevelopment of certain underutilised employment sites to refresh the existing supply in addition to the projected requirement for the plan period in relation to Cambridge econometric forecasts. Whilst policies DS8 and DS9 are framed in terms of providing for local needs DS8 does state that the 66 hectares requirement is a minimum. The plan has made a commitment to providing for a sub regional site in the District as identified in the joint sub regional employment land study. The Council is also supportive of the development of the Former Honiley Airfield in line with the SEP and the City Deal.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65677 - Baginton Parish Council (Mr Steve Williams) [726]	Object	<p>A. Insufficient consideration of alternatives and no consultation of latest proposals. Policies DS 8 Employment land &amp; DS16 Sub-Regional Employment Site are unsound as there has been insufficient sub regional consultation. There is reference within the Local Plan to a Joint Employment Land Review. However, it is understood that this has not been published and that it does not adequately consider alternative proposals. BPC believes that exceptional reasons do not exist for proposing that the land shown on the policy Map 8 is removed from the Green Belt. As such BPC believes that the lack of adequate consideration of the proposals renders the Local Plan unsound. Furthermore, the Local Plan is unsound as the Sub-Regional Employment Site is not the most appropriate strategy when considered against reasonable alternatives, which have not been given adequate consideration. Some alternatives have been proposed in previous BPC correspondence opposing the Gateway. Furthermore BPC and others have no visibility of the review and have not been consulted on its proposals. BPC believes this lack of transparency, consultation and lack of alternatives renders the Local Plan unsound.</p> <p>B. No account of desires of local communities. In previous draft report section 5.5.5 it states:- "In the 2012 Preferred Options the Council committed to exploring the case for land at the Coventry and Warwickshire Gateway to be identified to provide a major employment site that could meet these needs. Since then, a planning application has been submitted. Although this application has yet to be formally determined by the Council, the evidence would support the identification of land in this area for a major employment use of sub-regional significance." You have our letter L090 response to that consultation dated 18.7.12. Many of the points made in that letter remain applicable. Your policy DS16 Sub Regional Employment Site ignores our previous requests therefore is unsound.</p> <p>C. No consultation with local communities on removal of Green Belt. The previous Revised Development Strategy specifically maintained the Gateway development area in the Green Belt. BPC have received previous assurance that this remained the intention of WDC. However, there has been a volte-face with the Local Plan as now presented, with the area suddenly removed from the Green Belt. Post public consultation. Yet there has been no consultation with our and other Parish Councils, our and other local communities and other stakeholders concerning the removal of this land from Green Belt. We believe that it is unsound, unreasonable and possibly illegal for</p>	The Council considers that there is a sound and justified evidence base to allocate sub regional employment land within the District. A more detailed response to this representation is provided in the response to policy DS16.	No change

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>WDC to change their mind on such a fundamental issue without adequately consulting the local community. The Local Plan policies DS8, DS16 and DS19 are therefore unsound.</p> <p>D. Contrary to the NPPF.</p> <p>BPC remain wholly opposed to the Sub-Regional Employment Site (Gateway Development) for all the legitimate planning reasons given in our extensive correspondence objecting to the development and lodged on the WDC website along with over 800 other objectors against planning application W12/1143.</p> <p>In summary, the Sub-Regional Employment Site Gateway is unsustainable and inappropriate development of the Green Belt with no very special circumstances and is ruinous to the openness and rural character of our Parish. The open fields also act as a vital barrier against urban sprawl. The proposal will not support regeneration within the Coventry &amp; Nuneaton Regeneration Zone, as it would directly compete with established underutilized sites with extant planning permission such as that at Ansty. There are many suitable alternative sites outside the Green Belt and no preferential sites within the Green Belt. Development can and should be carried out on existing sites with hundreds of acres of already available land.</p> <p><i>Please amend your proposals by withdrawing the Local Plan as it stands, omitting the Sub-Regional Employment Site (Gateway development) and retaining the Green Belt throughout this Baginton Parish.</i></p> <p><i>Should you continue to ignore our reasonable requests and maintain the Local Plan in its current form we understand that the PI will be Examining the Local Plan before adoption. It is our intention to make representations at a hearing during the Examination to demonstrate that the Local Plan is all of the below:-</i></p> <p><i>A. Unsound.</i></p> <p><i>B. Unjustified.</i></p> <p><i>C. Not based on robust and credible evidence.</i></p> <p><i>D. Not in accordance with the NPPF hence contrary to national policy.</i></p> <p><i>E. Resulting from a consultation process that has not allowed for effective engagement of all interested parties to the proposals as they stand.</i></p> <p><i>F. Resulting from a lack of WDC's duty to cooperate.</i></p> <p><i>G. Not legally compliant</i></p> <p><i>H. Supported by assumptions made in the preparation of the Local Plan which are not reasonable and justified.</i></p> <p><i>I. Devoid of reasonable alternatives that have been adequately considered and with no clear audit</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>
		<p>trail showing how and why these decisions have been made.</p> <p>J. Is not the most appropriate strategy when considered against all the alternatives, all as previously presented?</p> <p>K. Resulting from a flawed consultation process with last minute fundamental changes of policy not previously consulted upon</p> <p>L. The result of last minute changes made due to the proceedings of the Gateway Public Inquiry, which was ongoing at the time, the outcome of which remains unknown.</p> <p>M. Fails to bring together and integrate policies for the development of other land in the sub-region.</p> <p>N. Has failed to protect valued rural landscapes.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67224 - Bloor Homes Midlands [11532]	Object	<p>The draft Local Plan has failed to demonstrate:</p> <ul style="list-style-type: none"> <li>* it has proactively driven/supported sustainable economic development, and done everything it can to support sustainable economic growth;</li> <li>* it meets the business needs of the area and delivers homes to support the growth of the local economy;</li> <li>* it is based on the most up-to-date and robust evidence about the economic prospects and needs of the area; and,</li> <li>* it integrates the strategic policies for prosperity (Strategic Policies DS1 and DS8) and housing (Strategic Policies DS2 and DS6).</li> </ul> <p>The level of economic growth to be provided for is not defined within the draft Local Plan.</p> <p>The strategy for prosperity in the draft Local Plan is to provide for the growth of the local and sub-regional economy by ensuring sufficient/appropriate employment land is available to meet the existing/future needs of businesses (Strategic Policy DS1). Policy DS8 provides for a minimum of 66ha of employment land to meet local need (for the period 2011 to 2030). The strategy for housing is to provide in full the objectively assessed need (Strategic Policy DS2). Policies DS6, DS7 and DS10 provides for 12,860 new homes (for the period 2011 to 2029).</p> <p>The evidence base fails to support Paragraph 2.7 of the LP that economic growth has been balanced with housing growth, and that meeting the full objectively assessed need for housing will complement and meet the economic and business needs and ambitions of the District.</p> <p>The evidence can be found within the Economic and Demographic Forecasts Study (EDFS) (December 2012), the Employment Land Review Update (ELR) (May 2013), and its economic ambitions can be found within the Strategic Economic Plan for Coventry &amp; Warwickshire LEP (SEP) (March 2014).</p> <p>The economic strength of Warwick is undeniable, and is summarised in paragraphs 3.1 to 3.6 of the ELR. Its economy has outperformed the West Midlands and UK in terms of its growth and is forecast to continue that trend (both in terms of GVA and employment) into the plan period. Warwick has an economic structure which is aligned to the future growth sectors, such as professional services, healthcare, and IT.</p> <p>Warwick also has a particular strength in the automotive/vehicle manufacturing sector, with several major employers including Jaguar Land Rover (JLR) who have facilities located both within and on the edge of the District. Given the significance of JLR to the national economy, it is no surprise that the Vision for Coventry &amp; Warwickshire in 2025 within the SEP is to be recognised as a global hub and a UK Centre of Excellence in the advanced manufacturing and engineering sector. Many of the SEP's priorities and actions are</p>	<p>The Council considers it is making adequate provision for employment land to support the economy during the plan period and that it has taken into account the objectives of the CWLEP. The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this is response to representations made to DS2.</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>focused around facilitating the growth of this sector, including investment to deliver new/expanded facilities at several employment sites within and bordering Warwick District. The SEP has estimated its actions alone may generate over 50,000 jobs by 2030 across the sub-region.</p> <p>It is very clear from the evidence that the Warwick economy is undoubtedly the 'powerhouse' within the sub-region and West Midlands region. Its future economic performance and continued success is therefore critical to the overall performance of the sub-region and regional economy, and the delivery of the ambitions within SEP.</p> <p>Whilst the availability of suitable employment land is a key factor influencing Warwick's future economic growth and prosperity, it is not the only component that the Local Plan will need to influence. A key challenge is to ensure that the planned growth of Warwick and the sub-region's economy is not frustrated by lack of access to skilled workforce. To deliver a global hub and national centre of excellence, requires businesses to be able to attract the necessary talent. Providing access to available homes of a high quality is an essential component of the offer. SEP recognises that the shortage of new homes can be a significant barrier to sustainable economic growth.</p> <p>In this context, it is of concern that the objectively assessed housing need figure chosen by the Council fails to support a growth in labour supply that meets the forecasts for employment growth. The chosen housing figure only supports labour supply growth of 8,996 for the period 2011 to 2031 leaving a shortfall against the forecast of between 1,304 and 1,904 jobs.</p> <p>This shortfall is likely to be under-estimated as the employment forecasts preceded the publication of the SEP and have not taken account of its potential influence in accelerating the rate of growth of growing sectors within Warwick. Mindful of the growth in housing supply not keeping pace with the economic ambitions for the area, it is noted that the SEP prioritises a review of additional future housing numbers across the sub-region by the end of March 2015 (page 8). The draft Local Plan does state that it has taken account of the SEP, although there is no reference to a review of its housing numbers within the draft Local Plan.</p> <p>Whilst it is recognised that the shortfall in labour supply growth might be mitigated through people holding down more than one job, or increased in-commuting from outside of the District (as suggested within paragraph 7.28 of the SHMA), it is noted that when recommending the chosen housing figure, the SHMA advised the Council to consider its alignment with forecast economic growth, and how employment growth will be supported.</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>It is not clear whether the Council has undertaken this exercise as the draft Local Plan does not explain how the shortfall between growth in labour supply and growth in jobs will be addressed, or what the implications may be. In commuting from outside the District is one possible consequence.</p> <p>In this context, it is considered that the strategy has not been positively prepared as it has not proactively driven and supported sustainable economic development, or done everything it can to support sustainable economic growth. It does not meet the objectively assessed development requirements as set out in the evidence base, and therefore is not in accordance with the Framework.</p> <p><i>The Council should therefore review its objectively assessed housing need figure prior to submission.</i></p> <p><i>In the context of delivering sustainable development, this review should consider economic, social and environmental effects of increasing the level of housing growth in order to balance with the forecast economic growth and economic ambitions of the Council.</i></p> <p><i>Other representations made by Bloor Homes Limited to the draft Local Plan have identified locations where additional housing growth can be accommodated.</i></p> <p><i>In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</i></p>		
66627 - Mr Chris Walkingshaw [12824]	Object	<p>Objects to policy. The Employment Land Review Update (2013) identifies the site as providing 10 hectares of existing employment land but it is not identified as a site available for future employment uses. Also in addition to automotive and motorsport research the extant permission provides for ancillary office and low volume development production. It is considered that there could be greater growth over the plan period and beyond if more of the site was utilised. The site is an important part of the sub-regions plan for economic growth and has a number of investment initiatives to bring this forward as demonstrated by the inclusion of it in the Economic Plan for Coventry and Warwickshire and City Deal funding secured. The site can contribute significantly to the District employment levels by providing high skilled local jobs</p>	<p>The role of the Former Honiley Airfield in the sub regional economy is recognised in the plan most notably in policy MS2 and the Council is supportive of the sites growth aspirations in line with the SEP and City Deal. The Plan identifies the land currently with planning permission as part of the committed supply but does not preclude further proposals from being brought forward. MS2 allows for such circumstances in the context of the sites green belt setting.</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>
65490 - The Community Group (David G Wintle) [9097] 66580 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Policy DS8 is unsound in so far as it does not satisfy the requirement to meet objectively assessed development requirements.</p> <p>Despite previous objections, the proposed plan persists with the approach on employment land that leads to an excessive allocation of employment land. The figures on employment land make it very clear that the Plan proposes redevelopment of existing employment land and this leads to the excessive amount of new employment land to be allocated. This makes both the proposed Plan and the associated Sustainability Appraisal unsound.</p>	<p>The Council considers it's approach to setting the Districts employment land requirement is based on a sound evidence base. The Employment Land Update 2013 has established the quantitative and qualitative need for employment land over the plan period the starting point being Cambridge econometric forecasts. It is reasonable to allow additional flexibility on top of the net projections as significant variation can occur in Cambridge Econometric projections year on year both in terms of individual sector change and overall GVA and employment numbers. It is reasonable practice to allow for an amount equating to a 5 year supply of employment land based on past trends. This allows for loss of some committed sites to other uses but also a range in the choice, type and location of employment land available.</p> <p>In relation to the redevelopment of certain existing employment land sites, in line with the NPPF it is important to ensure the supply of employment land and buildings is capable of meeting current and future needs. The proposed policy approach to older industrial estates reflects an assessment of the projected requirements over the plan period and as a consequence the need to refresh the Districts stock. These industrial estates arose to accommodate small scale local manufacturing and are characterised by building stock which now does not reflect the requirements of many businesses. It is anticipated that due to increased virtual working, the further decline in manufacturing and the fact that modern manufacturing processes have resulted in the need for smaller footprint buildings levels of vacancy on these sites will increase over time. In addition these industrial estates do not have easy access to the strategic road network and being located within or adjacent to residential areas do not offer the most suitable environment for certain employment uses. This has led to a range of environmental health odour and noise complaints. Whilst every opportunity has been made to maximise the use of brownfield land it is considered that these sites are better suited to residential uses in this context.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Correct the calculation leading to the misleading claim that 66ha of employment land is needed. An estimated requirement of approximately 40ha of employment land may be justified.</p>		
		<p><i>Reason</i>  The margin "to provide flexibility of supply" (16.5ha) is excessive. The additional of a further 13.5ha for "potential replacement for redevelopment of existing employment areas" is also unjustified. This approach conflicts with the 'brownfield first' approach of policies DS4 (Spatial Strategy) and EC3 (Protecting Employment Land). There is no valid justification for releasing existing employment land in urban areas rather than regeneration as employment land, improving effective use of existing urban employment sites. The established employment land requirement is 39.6ha. The Plan shows that there are 47.55ha of available employment land, confirming that there is an excess supply of employment land.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65657 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>Concern the council is not meeting the objectively assessed need for employment land through an up to date evidence base. Employment land calculations include assumptions relating to housing requirements. The Employment Land Review Update (May 2013) evidence base document or employment forecasting have not been updated following the publication of the higher housing figures in the Joint SHMA. The ELR update does not state how the Economic and Demographic Forecasts study has been used to inform the demographic-based assumptions underlying the employment forecasting. It is therefore not clear in the ELR Update whether the land being provided for is still appropriate.</p> <p>Market assessment questions the majority market demand identified by the ELR update for B1a/b on the basis market signals indicate a strong demand for B2/B8 uses and identifies a preference for sites in or on the edge of the town centres. The evidence base informing the Local Plan does not appear to be responding to the needs of the market, which raises questions over the employment assumptions being carried forward into the employment figure set out in Local Plan Publication Draft policy DS8 and explained in supporting paragraphs 2.24-2.29</p> <p>ELR update makes assumptions about the redevelopment of existing employment areas which WCC considers are ineffective.</p> <p><i>WDC needs to produce an updated and robust employment evidence base to justify the employment figures used in the Local Plan and the policy should reflect more accurately the nature and locational preferences of demand.</i></p>	<p>It is accepted that there may be stronger B2 and B8 demand than indicated in the projections. It is reasonable to expect some supplier chain demand related to Jaguar Land Rover and the LEPs ambitions for advanced manufacturing. However the focus of this may be more mixed in terms of research and development and high technology operations. The potential relocation of some businesses as part of the consolidation of existing industrial areas is more likely to involve B2 users. To increase flexibility it is proposed that the new allocation at Land at Stratford Road is allocated for B Class uses. The other allocation at Land at Thickthorn is proposed for B1 and B2 uses.</p> <p>In relation to the redevelopment of certain existing employment land sites, in line with the NPPF it is important to ensure the supply of employment land and buildings is capable of meeting current and future needs. The proposed policy approach to older industrial estates reflects an assessment of the projected requirements over the plan period and as a consequence the need to refresh the Districts stock. These industrial estates arose to accommodate small scale local manufacturing and are characterised by building stock which now does not reflect the requirements of many businesses. It is anticipated that due to increased virtual working, the further decline in manufacturing and the fact that modern manufacturing processes have resulted in the need for smaller footprint buildings levels of vacancy on these sites will increase over time. In addition these industrial estates do not have easy access to the strategic road network and being located within or adjacent to residential areas do not offer the most suitable environment for certain employment uses. This has led to a range of environmental health odour and noise complaints. Whilst every opportunity has been made to maximise the use of brownfield land it is considered that these sites are better suited to residential uses in this context.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65137 - Sport England (Mr Bob Sharples) [1355]	Support	In principal Sport England supports this, however any allocation should not result in the loss of any sports facilities/playing fields, unless they are either replaced or shown through the emerging playing pitch strategy and sports strategy that they are surplus to requirements.	Noted, there are other policies in the plan which protect playing fields and the loss of sports facilities	No change needed
66481 - Friends of the Earth (John Brightley) [1113]	Support	Support	Noted	No change
<i>DS9 Employment Sites to be Allocated</i>				
65491 - The Community Group (David G Wintle) [9097] 66583 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Policy DS9 is unsound - it does not satisfy the requirement to meet objectively assessed development requirements.</p> <p>Policy DS9 is predicated on the erroneous claim that an additional 19.7ha of employment land is needed. If the calculation is corrected as outlined in the previous section, WDC has an excess of employment land. There is no justification for the proposal to allocate green-field land for employment use and in particular, there are no exceptional circumstances for allocating 8ha of Green Belt land at Thickthorn.</p> <p><i>Delete the proposed policy - there is no need for further employment sites to be allocated</i></p>	<p>The Council considers it's approach to setting the Districts employment land requirement is based on a sound evidence base. A full response has been given to this representation in the section relating to DS8.</p> <p>The Council feels there are exceptional circumstances to justify the Thickthorn allocation, there are limited opportunities for business expansion within the town centre. Kenilworth has a shortage of employment land and some existing areas which are not capable of meeting modern business needs.</p>	No change required.
65333 - Mr Carl Stevens [4873]	Object	<p>Development of the Opus 40 site is particularly relevant to the soundness of infrastructure plan in the West Warwick area. The area will not be able to cope and the Budbrooke Community particularly affected</p> <p><i>More work required on infrastructure sustainability and reconsider whether using Green Belt land in the Budbrooke area is appropriate in addition to the Opus 40 development</i></p>	Additional information submitted since the Publication Draft was published indicates that the site has been actively marketed and would not be viable for employment uses. It is now proposed for residential development, any application brought forward for such a use will need to meet the infrastructure requirements set out in the plan.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65668 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>Considers the allocation of 8ha of employment land north of Gallows Hill is not justified.</p> <p>Market assessment identifies there is good demand for B1 office space across regional markets, existing out of town offices continue to see poor demand and landowners are seeking to diversify. This has been evidenced by WDC recently granting permission for residential development on the committed employment land at Warwick Gates which benefited from planning permission for B1. The focus of demand is for high quality accommodation within or adjacent to the town centres.</p> <p>There is a severe shortage of land to serve the needs of the distribution sector nationally and regionally and in Warwick District there are very few existing sites which are available for industrial and distribution uses to meet local needs. Industrial and distribution uses should be located with good accessibility to the national and regional road network. In relation to B2 whilst traditional manufacturing is declining there is renaissance in the advanced manufacturing sector. Warwick District will see good demand from local advanced manufacturing companies given the District's links with the automotive sector. Occupiers prefer sites which are not adjacent to other uses such as offices and residential. Sites which are adjacent to these uses see much lower levels of demand and are often not deliverable. Land North of Gallows Hill does not meet the current market requirements. This is evidenced by slow take up on Warwick Technology Park and lack of interest at Warwick Gates. Market assessment also disagrees with the ELR update that the majority of demand will be for B1a/b with some demand for storage and distribution. Market signals show very strong demand for B2 / B8. Whilst demand for office accommodation will also be significant, this will be focused on or adjacent to town centres.</p> <p>To meet the demands of the office market delivery should be focused on the town centres and informed by a sequential approach. It is not clear why WDC has chosen to allocate Riverside House, an existing office location on the edge of Leamington town centre, for residential development. The market assessment shows there would be good demand there and the ELR update identifies as a good office location. Redevelopment densities would be higher than what could be achieved on an out of town site.</p> <p>No reasonable justification is provided for the 8ha North of Gallows Hill. No detailed assessment of potential sites which would meet market requirements is provided. Land to the north of Gallows Hill would not support the long term future of the Warwick Technology Park, would not be deliverable or viable for office development and</p>	<p>Since the Publication Draft Local Plan was prepared and in response to representations received the Council has considered alternative options for providing employment land in the District, in particular land at Stratford Road. It is proposed to allocate this site for B Class employment uses in replacement of the Gallows Hill allocation. It is accepted that there may be stronger B2 and B8 demand than indicated in the projections particularly in relation to supplier chain demand. The committed employment land supply includes a range of locations suitable for meeting this need and to add flexibility it is proposed that the new allocation at Stratford Road is allocated for the full range of B class uses. In addition the allocation at Thickthorn is proposed for B1 and B2 uses.</p> <p>In determining the application for residential development on the Warwick Gates employment land the Council considered the site in the context of identifying the best location for employment land across the southern sites. Whilst it was acknowledged that the site had the potential to provide good quality employment land the evidence at that time indicated that the need would primarily be for B1 land and in particular to provide for an extension of the Technology Park. 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> <p>Riverside House is located in an edge of town centre location in an area predominantly in residential use, it has been marketed for B1 offices over several years without success. The Council considers residential uses would be better located on the site in terms of its relationship to the surrounding uses and marketability to employment</p>	<p>Amend the plan subject to the November 2014 Focused Changes consultation to allocate land at Stratford Road for B Class employment uses.</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>is not a suitable location for B2 development. Previous Local Plan consultation documents note that the relationship of the land with Warwick Technology Park is dependant on this area being accessed directly from the existing Technology Park road. WCC has submitted objections detailing that this link cannot be achieved without loss of existing parking and the use of third party land to overcome the difference in levels. The concept of the Technology Park being a specialist area was diluted by the planning approval for unrestricted B1 use in 1991. Questions allocation in relation to deliverability, spatial planning and overall master planning in terms of the ability to deliver a spine road through the Land West of Europa Way urban extension if it is not delivered due to poor market demand. Would create an unattractive gap in development form whilst waiting for market interest. Amenity considerations arising from the juxtaposition of B2 with residential uses. Impact on Grade II listed Heathcote Hill Farmhouse</p>		
	<p><i>The employment allocation proposed for inclusion within the residential-led urban extension to the West of Europa Way, as identified on Policies Map 2 under reference E1, should be removed unless WDC is able to produce a robust updated evidence base to demonstrate: why this is the most suitable location to the south of Warwick, Leamington and Whitnash for employment development and why 8ha of land for B1 and B2 development is required. Land to the West of Europa Way can accordingly be identified as being able to accommodate a greater quantum of much-needed residential development in this sustainable residential location.</i></p>		
	<p><i>Riverside House should retain in office use and allocated accordingly to protect existing suitable office uses in appropriate, sequentially preferable office locations, unless WDC is able to produce a robust, updated evidence base to demonstrate why this should not be the case. The Local Plan should also include provision for B2/B8 uses, in response to the market signals, in appropriate locations, following a robust assessment of potential employment sites, which WDC needs to undertake to accompany the preparation of the Local Plan.</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>
66127 - Severn Trent Water [1180]	Object	Land east of Stratford Road (adjacent to Severn Trent Sewage Works) should be allocated for employment generating uses, not restricted to within Class B. Other uses may be appropriate on this land for example motorcar showrooms or Class C2 uses. The policy should encourage new employment opportunities from a wide range of uses.	The Council has undertaken further work assessing land at Stratford Road as an alternative employment site. Subject to the outcome of the November 2014 Focused Changes consultation it is proposed to allocate this site for B Class employment uses to replace the Gallows Hill allocation. Whilst it is possible additional uses may come forward as part of the delivery of this employment land the Council must ensure sufficient B Class employment land has been allocated to meet the overall requirement across the plan period.	Amend the plan subject to the November 2014 Focused Changes consultation to allocate land at Stratford Road for B Class employment uses.
66482 - Friends of the Earth (John Brightley) [1113]	Support	Support	Noted	

#### *E1 Land North of Gallows Hill, Warwick*

66401 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	We are concerned at Employment allocation 1, adjacent to the Technology Park. The technology park was originally promised to be low rise, although this was breached by the former Conoco building. It does now intrude somewhat into the rural approach to Warwick, but that should not be a reason for making a bad case worse, as is implied in the evaluation reports. E1 lies on rising ground and will consequently be much more visually intrusive.	The Council has undertaken further work assessing land at Stratford Road as an alternative employment site. Subject to the outcome of the November 2014 Focused Changes consultation it is proposed to allocate this site for B Class employment uses to replace the Gallows Hill allocation.	Amend the plan subject to the November 2014 Focused Changes consultation to allocate land at Stratford Road for B Class employment uses.
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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>
66828 - Europa Way Consortium [197]	Object	<p>The allocation of B1 and B2 employment uses would be detrimental to the successful delivery of a sustainable residential-led urban extension at this location; the existing evidence base does not provide sufficient justification for the proposal nor is the employment allocation in accordance with the NPPF, which requires a sequential approach for the selection of sites for offices with priority for town centres.</p> <p>There are already employment opportunities surrounding the site, and having regard to existing supply, there is not a market for additional employment land in this area. The Council has allowed employment land to go for housing nearby, e.g. Gallagher Business Park for 220 dwellings (W/13/0607).</p> <p>Land south of Gallows Hill would be a better site for the extension of Warwick Technology Park.</p> <p>Residential rather than employment use would be beneficial to the delivery of the urban extension with regard to amenity, and creating appropriate links between Warwick Gates and Myton School.</p> <p><i>Omit Policy E1 and the allocation of 8 ha of land for B1 and B2 use at 'Land North of Gallows Hill, Warwick; with the result that Policy DS9 allows for a total of 19.7 ha of employment land for B class uses.</i></p>	<p>The Council has undertaken further work assessing land at Stratford Road as an alternative employment site. Subject to the outcome of the November 2014 Focused Changes consultation it is proposed to allocate this site for B Class employment uses to replace the Gallows Hill allocation. 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> <p>In determining the application for residential development on the Warwick Gates employment land the Council considered the site in the context of identifying the best location for employment land across the southern sites. Whilst it was acknowledged that the site had the potential to provide good quality employment land the evidence at that time indicated that the need would primarily be for B1 land and in particular to provide for an extension of the Technology Park.</p>	Amend the plan subject to the November 2014 Focused Changes consultation to allocate land at Stratford Road for B Class employment uses.
<i>E2 Land at Thickthorn, Kenilworth</i>				
65223 - Mr Kim Matthews [1898]	Object	<p>The land allocated at Thickthorn is for mixed use - employment and housing. It is a relatively small area adjacent to existing housing. It is inappropriate for this area to include class B2 employment (B1 is in keeping with the nature of the area).</p> <p><i>Remove B2 use from the Thickthorn development</i></p>	<p>It is agreed that the site is predominantly suitable for B1 use classes. However it is considered necessary to allow some degree of flexibility to allow for certain instances where B2 uses may be appropriate where it can be demonstrated that these could be integrated into the overall design of the development without impact on neighbouring uses. This will be determined through the detailed master planning of the site.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>E3 Opus 40, Birmingham Road, Warwick</i>				
66014 - Taylor Wimpey UK Ltd (Andrew Taylor) [269]	Object	<p>The assumptions made in the employment land review in relation to the site are flawed in its understanding of the use class for which planning permission was granted. WDC imposed a condition to restrict office floor space to 5,000 sq. metres in order to resist out of centre office development. Para 22 of the NPPF states that local authorities should regularly review land allocations avoid the long term protection of sites. There is no reasonable prospect of the Opus 40 site being used for B1 purposes. The site has been marketed over a lengthy period of time. The allocation of the site is at odds with Paragraph 173 of the NPPF. The allocation of the site for a town centre site on an edge of town location is unrealistic. This frustrates the early delivery of new homes on the site which could contribute towards achieving a 5 year supply of housing.</p> <p><i>Opus 40 should be removed from DS9 and allocated for housing as an urban brownfield site within policy DS11.</i></p>	<p>Since the preparation of the Publication Draft Local Plan additional marketing and viability evidence has been submitted which has been independently assessed. This indicates that the site has been adequately marketed and that employment development is unlikely to be viable in the current market. The Council therefore accepts that it is appropriate to reallocate the site for residential development. The Council remains of the view that the employment land requirement set out in the 2013 ELR is still valid and therefore intends to compensate for the loss of this land.</p>	<p>Amend the plan subject to the November 2014 Focused Changes consultation to allocate land at Stratford Road for B Class employment uses. Allocate Opus 40 for residential development.</p>
<i>DS10 Broad Location of Allocated Sites for Housing</i>				
66272 - Matt Western [9379]	Object	<p>The Plan is not justified, as the over-development of the greenfield sites on the edge of south Leamington and Warwick will result in air pollution which the Strategic Transport Assessments cannot mitigate. This will affect both the health of residents and the structure of our multiple historic buildings, which are so important to our sense of place and culture.</p> <p>The 1993 Local Plan and the Inspector's Report in 1994 required measures to reduce the impact of traffic on our town centre. And yet, over two decades on, we have been unable to mitigate the traffic effect of this development, despite funding from the developer. I do not believe further development should be approved without first meeting our previous obligations.</p> <p>The location of the proposed development does not allow sustainable transport to be taken forward. Distances will be too great for pedestrians. Viable public transport will not be possible.</p> <p><i>The removal of a substantial number of development sites south of Leamington and Warwick to prevent an increase of air pollution, and comply with the NPPF.</i></p>	<p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65756 - Miss Emma Bromley [3610]	Object	<p>The location of so much development in the south of the District will encourage car use. Jobs and schools to support this development do not exist.</p> <p>The proposals are not consistent with the NPPF and appear to be financially motivated.</p> <p>The loss of so much greenfield land is unsustainable. The greenfield areas to the south of the District play an important part in separating communities and are limited in extent. The Local could lead to communities being joined together by development. It is not necessary to develop greenfield sites. The proposals will lead to a large funding gap in infrastructure provision, particularly in mitigating traffic movements across the towns. Additional traffic signals have already been required for new developments. The allocations are to the south of the towns, will encourage more movements across the towns including crossing the river, canal and railway. The proposals do not provide for a bypass or other means to avoid the town centre. This additional traffic will make pollution worse and increase health risks.</p> <p>The result of allowing houses to be built on every single green space between housing is that sites cannot be integrated and cannot deliver the infrastructure required.</p> <p>The proposals will damage important heritage assets in Whitnash by building on every remaining greenfield space.</p> <p><i>A lower housing target to reflect the latest ONS figures combined with use of brownfield sites would mean greenfield sites would only be included where essential. The plan should be modified to remove the majority of houses from the south of the District</i></p> <p><i>A lower housing target would help to resolve the issue with the 5 year supply of housing and infrastructure provision would be easier to resolve.</i></p> <p><i>Land close to the Gateway would be a suitable alternative to building the houses to the south of Warwick and Leamington.</i></p>	<p>For response on the housing requirement please see responses to Policy DS6. The plan allocates all suitable and available brownfield sites. The Council contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66420 - Sharba Homes Group [12779]	Object	<p>The Council appear to have made assumptions and assertions about where they feel it is appropriate to locate housing within the district, as well as the level of housing to be provided, before carrying out the relevant assessments with an open mind to reach such a conclusion. Thus, the process has begun from entirely the wrong premise and is based on evidence that is partial, inaccurate and subjective. It also shows little regard for the evidence base for the new Local Plan. Following the cessation of work on the 2010 Core Strategy the Council did not start the process anew, and instead merely attempted to rehash pre-determined strategies and development patterns.</p> <p>The green belt allocations are not sufficiently justified as there are suitable sites outside the green belt. Exceptional circumstances pertaining to the 'need' for land are not proven. See reps relating to policies DS11 and DS19 as well.</p> <p>A number of sites proposed in the Plan have previously been refused planning permission and cannot therefore be considered deliverable. Further the significant amount of development in one location on land to the south of Leamington Spa, will mean there is not enough choice to provide the level of competition required. The plan is not considered sufficiently robust to adapt to market conditions due to under-allocation of sites and little overall headroom.</p> <p><i>To be a great number of suitable allocated sites, to take into account the possibility that the level of windfall housing proposed will not consistently be achieved. This will therefore offer the required level of headroom to enable the continued provision of housing land within the District.</i></p> <p><i>As a result the plan does not achieve net gains in each of the three arms of sustainable development outlined in Paragraph 7 of NPPF.</i></p>	<p>The Council has updated the vast majority of the evidence base since 2010 and as a result the proposed development strategy has some significant differences. Green belt allocations have only been made (Red House Farm; Kenilworth; villages) where exceptional circumstances can be justified.</p> <p>All these sites allocated in the Plan have been tested for deliverability in conjunction with the development community. Whilst the sites to the south of Warwick and Leamington are a significant allocation, they are sufficiently spread to offer choice and are not so substantial to be unrealistic within 15 years, particularly given the development interest in the area.</p> <p>The estimated level of windfall provision has been justified and has been set at a cautious level in comparison with previous performance (see DS7 for further information).</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66724 - Stephen Trinder [311]	Object	<p>Vehemently object to a proposal which is not as yet part of the Draft Plan but which has been proposed with just days to spare by Lynnette Kelly, prospective Parliamentary Labour MP for Leamington Spa and Warwick at the next general election. Not sure that I'm able to object to something that's not yet officially - and I believe deserves never to be - part of the Draft Plan. Objections to the soundness of Kelly's proposals are summarised below:</p> <p>Positively Prepared</p> <p>"This means that the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development."</p> <p>"Objectively Assessed Development"</p> <p>Any possible amendment from Lynnette Kelly to the WDC Local Plan 2029 i.e.5000 houses on King's Hill on the WDC-Coventry boundary could not, as of June 2014, be positively prepared because:</p> <p>There appear to be no current objectively assessed development and infrastructure requirement figures behind Kelly's proposals at the time she made them (late June 2014), and nor could there be. With new ONS figures still under scrutiny, initially appearing to show lower figures for population increase in the WDC area than forecast, then Kelly's housebuilding proposals of 5000 houses for King's Hill could not possibly be based on a sound basis of need. The figures were still in flux.</p> <p>No figures for infrastructure requirements and how they impact on her proposals appear to have been made.</p> <p>Kelly's proposals also appear not to meet a neighbouring authority's unmet requirements, i.e. Coventry's. No suggestion that the boundary of Coventry be extended to include the new houses - indeed, Coventry's intervention in the whole affair was to offer to sell the land at King's Hill (currently owned by Coventry) to Warwick. At no time was Kelly's call to move the 5000 Warwick houses to King's Hill presented as assisting a neighbouring authority. These would be Warwick houses.</p> <p>WDC Plan, on the other hand, is sound and has been positively prepared, based as it is on has been objectively assessed development and infrastructure requirements. New ONS figures appear to show lower figures for population increase in the WDC area than were initially forecast if anything suggest a need for fewer dwellings needed to be built in the WDC area over the Plan period. No objective justification whatsoever for a wholesale unloading of 5000 housing units onto the edge of a neighbouring authority. Achieving Sustainable Development"</p>	Points noted. It is not proposed to allocate development Kings Hill.	

<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 Kelly 5000-house to King's Hill transfer also makes a mockery of sustainable development because:</p> <p>The proposed site, sits within yards of one of the thinnest greenbelts in the West Midlands and this whole area already faces massive turmoil and destruction from HS2. Construction traffic for King's Hill would, unbelievably, share narrow roads with that for HS2.</p> <p>Traffic to and from the regionally vital University of Warwick, which injects £222 million-a-year into the local economy, already snarls up the same B-rated Stoneleigh Road that 4000-odd cars would disburse onto from Lynnette's proposed King's Hill mega-estate.</p> <p>Construction of a new, dedicated A46 access point for the site would entail colossal delays and expense, on top of the Kenilworth Bypass closures already scheduled during HS2 construction.</p> <p>Over 4000 local people (from 1931 households canvassed) signed a petition against just 3500 houses on this exact location when they were proposed in 2009. Resistance remains extremely strong.</p> <p>Justified</p> <p>"The Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence."</p> <p>The Kelly proposal is not based on proportionate evidence, and is not the most appropriate strategy</p>		
66708 - Barwood Strategic Land II Limited [9441]	Object	<p>Notwithstanding this support, Barwood reiterate paragraph 17 of the Framework which states that Local Planning Authorities should actively manage patterns of growth and focus significant development in locations which are or can be made sustainable. Additionally, the Framework states the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages, which follow principles of Garden Cities.</p> <p>Allocation of The Asps site would be consistent with the Council's spatial strategy, furthermore The Asps offers the potential to deliver a Sustainable Urban Extension.</p>	The Asps has been assessed (see site selection methodology) and has not been allocated for number of reasons, including in particular landscape and heritage issues.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66740 - Mr Edward Walpole-Brown [7504] 66745 - Mr Edward Walpole-Brown [7504]	Object	In site selection the required overall quantum of housing has not been adequately taken into account, in particular the relationship between sites at Hatton Green and Hatton Park	For details on the proposed level of housing growth, see responses to DS6. With regard to allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66268 - Mr. Paul Hodge [7249]	Object	<p>The New Local Plan disregards green belt yet does not pursue with sufficient vigor brown field sites. Obviously, brown field sites are preferable yet appropriate greenbelt would be a far better option to distribute the development, rather than inappropriate green field sites. The area between Myton Road and Europa Way is high grade agricultural land, full of wildlife, ancient trees and hedgrows, it should not be developed in favour of brownfield alternatives.</p> <p>The plan is not justified because it crams so much of the new development into the already congested south part of the district, due to development pressure.</p> <p>The plan is not justified because it is creating more car-dependent suburbs and consequently thousands more car journeys each day.</p> <p>The plan is unsound because it will contribute to the already illegal air quality in central Warwick.</p> <p>This problem has been in existence long before the Preferred Options were set out and remains in breach of these regulations today. I object to the increased public health risk which adding more cars to the centre of Warwick at peak times will certainly contribute to.</p> <p><i>Changes to Plan:</i>  <i>There needs to be a better and more balanced spread of new housing allocations included in the Plan through an alternative approach to locational distribution of housing in order to avoid some 52% (or 3245) of the 'new' sites (6188) being located South of Warwick town, by:</i></p> <ol style="list-style-type: none"> <li><i>1. Increased provision on the northern side of the main settlements, i.e., on the Birmingham and Coventry sides, where a significant proportion of the car borne workers travel daily, and especially the northern side of Warwick town.</i></li> <li><i>2. Such locations should include: Budbrooke which is close to the park and Ride facility and the A46 corridor; Hatton, with similar advantages; and areas adjoining Coventry (airport and Gateway,) where very large scale employment proposals of a regional scale are becoming available.</i></li> </ol>	<p>National Policy (para 83 of the NPPF) requires that Green Belt boundaries should only be amended in exceptional circumstances. The location of growth proposed by WDC is consistent with this. Further green belt allocations will only be considered if, in the future, it is demonstrated that further housing provision is needed in Warwick District and exceptional circumstances exist to provide some or all of this within the green belt.</p> <p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development.</p> <p>The plan allocates all suitable and available brownfield sites.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66392 - Cllr Elizabeth Higgins [1080]	Object	<p>The enormous impact of so many houses, to the south of Warwick, around Bishops Tachbrook, and Whitnash, as well as SDC's plans to build maybe as many as 3,800 houses in Gaydon/Lighthorne Heath, just to the south of Warwick; is really worrying many Warwick residents.</p> <p>Loss of Greenfield and agricultural land is unsustainable.</p> <p>Greenfield allocations, unnecessary, densities, too low.</p> <p>Transport strategy ineffective and unsustainable. Air Quality, already at danger levels.</p> <p>Failed to give enough emphasis to protecting our assets from the onslaught of modern traffic.</p> <p>The effect of so many houses, to the south of Warwick, BT and Whitnash, Gaydon/L/H and their vehicles will increase traffic in our three town centres to an unacceptable level. These 8000 houses, if built, will bring cars with families seeking schools, doctors, libraries, and medical/dental services.</p> <p>The independent assessment of STS(4) by WCC has now been formalised and it castigates WCC with its "mitigation" plans which actually means accommodating more vehicular traffic along our narrow streets to the detriment of the built environment and the health of people who live, work or visit our towns.</p> <p>Save Warwick and Warwick Deserves Better have produced magnificent representation to you on heritage and the effect of traffic, both poor air quality and the effect of vibration on historic buildings.</p>	<p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development. These studies have included air quality, robust strategic transport assessments and impacts on heritage.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66680 - Save Warwick (MR DAVID WILLIAMS) [4506]	Object	<p>The loss of Greenfield land is unsustainable. As only 8100 houses are needed over the plan period this can be met from permissions already granted together with the brown field sites identified in the plan. Greenfield sites are remote from schools, shops and other services and it has not been demonstrated that proposals for transport are going to be practicable/ effective. Much of this land (south of Warwick and Leamington in particular) is high grade agricultural which we cannot afford to lose.</p> <p>The Plans Greenfield allocations are excessive and unnecessary as higher densities (using less land) will be attainable on previously developed/ brownfield land. The garden suburbs are extravagant; their low densities mean more land than what is necessary is being allocated for development.</p> <p><i>The Plans housing numbers should be reduced and also the number of greenfield allocations.</i></p>	<p>For details on the proposed level of housing growth, see responses to DS6.</p> <p>The plan allocates all suitable and available brownfield sites.</p> <p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development.</p> <p>The Council's approach to housing density is to let the market decide as long as</p> <ul style="list-style-type: none"> <li>a) densities are not lower than 30dph on average (see policy BE1)</li> <li>b) strategic developments are brought forward in line with the Garden Towns Prospectus (this is part of the Council's aspirations for high quality development)</li> <li>c) the mix of housing accords with policy H4.</li> </ul> <p>To assess site capacity, the Council has used a simple and widely used methodology which is consistent with typical levels of delivery</p>	
66743 - Mr Richard Brookes [1866]	Object	<p>The level of growth is too high. Since the publication of this Draft new ONS projections show that population growth between 2011 and 2029 is 15,300 compared with the joint SHMA figure of 23,800. This error is compounded by the Joint SHMA using a Household Headship Ratio of 1.66 people per dwelling. If the ratios and sizes of affordable and market homes are taken into account this ratio should be 2.12. If this is applied to the new population projection this gives a housing requirement of 7,700. If the ratio of 1.66 is used this gives a requirement of 9,300.</p> <p><i>Replace Greenfield Site allocations with "Greenfield sites on edge of Warwick, Leamington, Whitnash &amp; Kenilworth 145"</i></p>	<p>For details on the proposed level of housing growth, see responses to DS6.</p> <p>The level of growth suggested for greenfield sites in the rep would be insufficient to meet the District's housing requirement</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65725 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>Considers that the approach taken through DS10 for appropriate redevelopment of previously developed sites and focusing development on greenfield sites south of Warwick, Leamington and Whitnash is justified and in accordance with the principles of sustainable development.</p> <p>The balance of allocated sites in the Plan between urban brownfield sites and other sites is affected by the proposed distribution of employment land. Allocating B1 offices on the fringe of the urban area reducing land available for housing is contrary to the NPPF 'town centres first' approach in paragraph 23.</p> <p>WDC has not undertaken a sequential assessment for town centre offices and full justification for the release of more sequentially preferable sites.</p> <p><i>The Local Plan needs to be supported by an up to date objectively assessed evidence base, including a sequential assessment for town centre uses. If this is not shown to be the most appropriate strategy and Riverside House is shown to be more suitable as an allocation for offices then housing figures need to be adjusted and changes made to DS8, DS9 and DS11</i></p>	Support for overall location of growth is noted. The allocation of employment land is being consulted on and subject to the outcomes of the consultation will be moved from north of Gallows Hill to Stratford Road. For office uses a sequential approach is appropriate. However, the employment allocations in this Plan seek to provide for B class uses in general, for which the sequential approach is not relevant	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66213 - The Club Company UK Ltd [477]	Object	<p>The number of dwellings allocated to the rural areas have reduced since the Revised Development Strategy therefore the strategy is overwhelmingly urban focused and takes insufficient account of rural housing needs. There is no robust reason for a lower level of housing provision in Leek Wootton compared with similar villages. It appears to be based on the conclusions of the Landscape Study. In relation to land at The Warwickshire the December 2013 report indicated that small scale development in the vicinity of the entrance of the club may be acceptable. This reference was removed without explanation from the April 2014 update. Consideration of potential development is far too broad brush to assess the site specific landscape impact of small scale development. The conclusion that the whole site is of high landscape value has fed into other reports. The SA only considers the larger parcel of land previously put forward in the SHLAA. The Council has therefore not provided any written evidence that it has considered in proportionate detail the reasonable alternatives to the proposed strategy. It has not analysed what is considered to be the advantages of developing a small part of LW07: access to the site is easy and safe via the internal club drive,</p> <p>15 dwellings could be set back to ensure The Warwickshire's undeveloped frontage is retained, could be accommodated on the lowest lying part of the site, selective tree planting could enhance the landscape, land is well related to the A46, frontage already benefits from street lighting, bus services pass directly outside the site, is well related to the village school. In contrast the proposed allocations highway improvements, visibility at the Warwick road junction is poor requiring the need for improved safety. Concerns are exacerbated by the uncertainty over the future of the Police HQ. Does express strong support for the development of the proposed housing site H37 Car Park East of The Hayes</p> <p><i>Identification of additional land at The Warwickshire, Leek Wootton for modest residential development</i></p>	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages.</p> <p>For Leek Wootton, environmental constraints have limited the capacity of the village growth. For details see DS11 - Leek Wootton</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65127 - Mr Tony Robinson [12687]	Object	The level of housing proposed south of Warwick is out of proportion with the rest of the area. There is little provision for employment, so people will have to travel to work - hence failing the sustainability policy. It will afflict the historic approaches to Warwick with high traffic volumes and more pollution	The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development - including reports on traffic flows and air quality	
		<i>Review the location of the homes around the district, including looking at greenbelt. Look at the need for homes in the Warwick area -not Coventry and Birmingham who claim to be constrained by Green belt</i>	Sites to the south of Warwick and Leamington are well located to existing employment areas in the south of Warwick.	
			Green Belt sites have only been allocated where exceptional circumstances can be justified.	
65505 - Ms Lynnette Kelly [12778]	Object	There is an additional site that should be included as a potential development site. Coventry City Council has agreed that the area known as Kings Hill, which is in Warwick District but lies adjacent to Coventry, can be included as a potential site but Warwick have not included it in the Local Plan.	National Policy (para 83 of the NPPF) requires that Green Belt boundaries should only be amended in exceptional circumstances. The location of growth proposed by WDC is consistent with this. The District's housing requirement can be met without the allocation of Kings Hill and no exceptional circumstances therefore exist	
		<i>The site known as Kings Hill should be included as a development site for housing, and the number of houses allocated for sites South of Warwick should be reduced by a commensurate amount. Under the Duty to Co-operate WDC should include this site in their housing plans</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65678 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	<p>Remain strongly opposed to placing about half of the proposed green field allocation on land south of Warwick because of its impact on:</p> <p>Warwick Castle Park, Grade 1 listed park and a site of considerable sensitivity and historic importance. Study appended to this representation examining the historical evolution and the importance of the road as par of the design of Castle Park. Furthermore, the management of land beyond the park was considered integral to the design.</p> <p>In relation to proposed strategic transport improvements the effects on Castle Park and Banbury Road approach, the setting of the Castle and the whole historic town centre.</p> <p>These sites are both a profligate use of land and will generate a concentration of traffic where it will be most harmful. The proposed "mitigation" measures in the Arup report in fact are a demonstration that these large developments south of the river should not happen.</p> <p>Changes to road layout will still be visually damaging to the setting of the park, castle and town, as will the additional traffic.</p>	<p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure (including transport) and environmental studies (including impact on heritage assets) have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66405 - The Warwick Society (James Mackay) [3080]	Object	<p>The tabulation in policy DS7 shows that 3,600 new homes have been completed since 2011 or had planning permission by 31 December 2013, that a further 3,100 sites will become available as windfalls, as Small Urban sites in the SHLAA and through the consolidation of existing employment areas and canal side regeneration; urban brownfield sites allocated in policy DS10 provide 1,300 new homes. The total without any use of greenfield land provides for 8,000 new homes.</p> <p>The requirement for substantial expenditure on healthcare and education infrastructure would be very much reduced, and the needs of the growing population met by incremental expansion of existing facilities within the existing built up area.</p> <p>The transport infrastructure requirement would be heavily reduced. The need to accommodate traffic growth, especially from greenfield developments south of Warwick, would disappear. Development sites within the existing built up areas would create much less demand for transport: local educational, healthcare, retail and leisure facilities would be largely within walking or cycling distance of the new homes.</p> <p><i>This necessary change in the plan could be achieved very quickly: removing from the plan the greenfield allocations almost in their entirety would be a very quick task, much quicker than proposing new greenfield sites.</i></p> <p><i>The consequence of correcting them is not just to remove from the development allocations the greenfield land but to remove the consequences of greenfield development which make the plan in many other respects undeliverable and unsustainable.</i></p>	<p>For response on the housing requirement please see responses to Policy DS6.</p> <p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65234 - Deeley Group Ltd [11623] 65279 - A C Lloyd Homes Ltd [5958]	Object	Deeley Group object to Policy DS10 as the overall housing numbers being provided for are too low, and specifically, the allocation of numbers to the Growth Villages is too low. It is considered that the shortfall in numbers should be met (at least in part) through an increase in the number of homes being provided for within the Growth Villages and the rural area, and should be more in line with the numbers proposed in the earlier versions of the Local Plan which were double that now proposed.		
		<i>In order to meet the higher housing provision advocated in the objection to Policy DS6 and DS7, Deeley Group advocates a higher number of housing (at least 1,500) is allocated towards the Growth Villages and Rural Area.</i>		
66502 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	Majority of the houses (+4655) are situated south of the River Leam. Not an appropriate distribution, and is unfair. Population projection out of date, which substantially affects dwelling requirements. Mid 2012 projections show 28.7% reduction in population expected by 2029 and this is a significant material change. Plan is unsound and does not meet NPPF requirements. Address issues before submitting for examination		For response on the housing requirement please see responses to Policy DS6.  The Council contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies.
		<i>Address issues before submitting for examination</i>		
65641 - Mr Ian Evans [8933]	Object	The area around Warwick has undergone significant development over the past 20 years with various large Housing estates (Chase Meadow, Hatton Park and Warwick Gates), Retail, industrial & Business Parks. This is already placing an overburden on the local area. Further development increases the urban sprawl into the surrounding countryside and increases the local population (permanent and transient). Warwick was designed to deal with 17 and 18th century traffic and is already choked by traffic congestion and grid locked at rush hours.  Many of the existing local large employers for example on the Technology Park do not employ the local population, but people from further afield, which adds to the local congestion in/out and around the town. Some do relocate, but this only creates a demand for further housing, more school places etc, etc. The ongoing development in and around Warwick is not sustainable.		The Council contends that urban areas and edge of urban areas generally provide more sustainable locations for development. The broad location of growth has therefore included a focus on sites within and around the urban areas of Warwick and Leamington. Infrastructure studies show this growth can reasonably be accommodated.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65471 - Sarah Palmer [12871]	Object	<p>The broad location of allocated housing sites is supported, insofar as it includes provision for housing outside of the principal urban areas i.e. within the Growth Villages/rural areas. However, it is considered that the Growth Villages should, generally, have a higher housing figure and that this should specifically apply to Burton Green. Greater housing numbers in the GV's would reinforce their sustainability and allow them to better fulfil their role in the settlement hierarchy. In Burton Green specifically, an increase would serve both these purposes and help in providing a counter-balance to the impact of HS2</p> <p><i>Increased in overall housing allocation for Growth Villages and Burton Green specifically</i></p>	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. The specific issues relating to allocations in Burton Green are covered in responses to DS11.</p>	
65146 - Mrs Pat Robinson [7802]	Object	<p>The location of housing is unfairly distributed. Too much is south of Warwick and Leamington.</p> <p><i>Build north of the county where Coventry have indicated they will sell land.</i></p>	<p>The Council contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies.</p> <p>Sites close to Coventry have been considered. This area is green belt and at present, no exceptional circumstances have been demonstrated to justify the release of green belt in these locations</p>	
66369 - The Leamington Society (Richard Ashworth) [4687]	Object	<p>This policy is based on a housing target that is not justified. Much of the allocation is on land to the south of Warwick and Leamington. The implications for transport and other infrastructure are severe, damaging and expensive. If fewer houses were planned for the a large proportion of the need could be provided for on brownfield sites as required by the NPPF.</p> <p><i>Review the planned allocations based on lower housing numbers,. As much of the population and employment growth is predicted to arise in Coventry it would be more sustainable to build houses near the new employment centres. This would mean:</i></p> <ul style="list-style-type: none"> <li><i>-most houses could be built on urban brownfield sites</i></li> <li><i>-affordable housing could be prioritised</i></li> <li><i>-meet the 5 year supply</i></li> <li><i>-expensive infrastructure requirements would be avoided</i></li> </ul>	<p>For response on the housing requirement please see responses to Policy DS6.</p> <p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development. The plan allocates all suitable and available brownfield sites.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67218 - Bloor Homes Midlands [11532]	Object	<p>Framework requires Plans to allocate land with least environmental/amenity value, and the evidence base would suggest that the selection of proposed allocations at Leek Wootton has not adhered this principle. Accordingly, the Plan does not contain the most appropriate strategy for Leek Wootton when considered against the reasonable alternatives.</p> <p><i>Council should therefore review its evidence base and strategy for housing growth within Leek Wootton, and reconsider its proposed allocation of sites within the more sensitive historic parts of the village. At present, the draft Local Plan cannot be considered sound and consistent with national policy in its approach to the village.</i></p> <p><i>This conclusion must also be seen in the context of the representation made by Bloor Homes Limited in relation to the draft Local Plan Strategy and Strategic Policies DS1, DS2, DS6, DS7, DS8 and DS10. In summary, this representation identifies that the draft Local Plan has not been positively prepared and is not consistent with national policy as it fails to make provision for sufficient housing growth to meet the economic needs and aspirations of the area. Furthermore, it fails to identify sufficient specific developable sites or broad locations to meet the housing requirement.</i></p> <p><i>Any adverse impacts of the development of the land to the north of Hill Wootton Road in terms of landscape or amenity cannot be regarded as significantly and demonstrably outweighing the benefits in terms of increasing housing supply. Given the failure to make sufficient specific provision for housing growth, the draft Local Plan has not been positively prepared in that it fails to identify 'developable' land at Leek Wootton as shown on the plan attached.</i></p> <p><i>In the context of its review of housing growth, and when assessing the effects of increasing housing delivery within the draft Local Plan, the Council should also therefore have regard to the potential of allocating further land at Leek Wootton as shown on the plan attached for around 35 dwellings within Policy DS11.</i></p> <p><i>In the absence of these exercises being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</i></p>	<p>Policy DS10 identifies a number of growth villages including Leek Wootton. This policy does not specifically address the distribution of sites for growth within the village (covered in DS11). There is therefore no need to amend this policy in light of this representation</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66331 - Mr Richard Munday [1035]	Object	<p>The effect of 1000 new homes in Kenilworth, particularly Eastern Kenilworth, will be devastating.</p> <p>Over 1000 more cars causing congestion.</p> <p>The present leafy, semi rural feel of Kenilworth will be lost with the proposed over development here and elsewhere in the Warwick and Leamington, the area will become like a giant conurbation.</p> <p><i>The whole of Warwick District should be designated an area of restraint to counter the massive West Midlands conurbation.</i></p>	<p>This approach would not comply with the NPPF's requirement to boost housing supply and would not meet the Council's objectives to support the economy and meet the needs of the District.</p> <p>However, the Plan's policies and proposals seek to bring forward development in a way which balances environmental concerns with the need for growth</p>	
66236 - Crest Strategic Projects [9115]	Object	<p>There is a recognised and identified need for additional housing within the District not just to meet the District's housing needs but probably also those of adjoining Districts such as Coventry.</p> <p>The Local Plan should and must provide the necessary certainty that those needs will be met. This can only be achieved if additional land is identified for housing development.</p> <p>It is considered that in meeting the actual housing needs for the District (and perhaps those of adjoining Districts) that land currently within the green belt and particularly to the south of Coventry needs to be released.</p> <p><i>A further Broad location for development should be identified namely 'land to the south of Coventry'.</i></p>	<p>National Policy (para 83 of the NPPF) requires that Green Belt boundaries should only be amended in exceptional circumstances. The location of growth proposed by WDC is consistent with this. Further green belt allocations will only be considered if, in the future, it is demonstrated that further housing provision is needed in Warwick District and exceptional circumstances exist to provide some or all of this within the green belt. At present these exceptional circumstances have not been justified.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66055 - Lenco Investments [1165]	Object	<p>RPS objects to this policy as it is not positively prepared as it does not meet the housing needs within Growth Villages. Additional local growth is required at Baginton to support the growth status of the village.</p> <p>RPS has identified a strategic site on the edge of Coventry to meet the needs of Warwick arising from the Gateway Site and that of Coventry City. However, RPS is also promoting a part of the site as a phase 1 development to deliver much needed local housing within the village and objection is raised to the level of development currently identified to Baginton as a 'Growth Village'.</p> <p>RPS supports the need for expansion at Baginton, but considers 35 dwellings unrepresentative of the level of housing need in the village. The identified housing need is considered out of date and not robust, the housing requirement is considered closer to that identified in the Revised Development Strategy of between 70 and 90 dwellings.</p> <p><i>Baginton is identified as a 'Growth', in this context it should be allowed to grow in accordance with its needs. This is identified as being 70-90 dwellings and not 35. Aside from the location requiring to be identified as a strategic site, the village alone should be identified as having a need of at least 90 dwellings over the plan period and a suitable location identified adjacent to the existing allocation.</i></p>	<p>The number of houses allocated to growth villages is based on site suitability rather meeting an exact amount. Baginton is identified as a growth village. However the capacity of suitable sites in and around the village is limited. For this reason allocations for Baginton are below that for many growth villages. For further details regarding the site being promoted through this representation, please see responses to representation 66195.</p> <p>With regard to meeting the needs of the Gateway and Coventry, the 2012 Demographic and economic Projections Study showed that the vast majority of the housing need arising from the Gateway is not directly related to Warwick District. The Joint SHMA (2013) allowed flexibility in its job forecasts which means the proposed level of housing growth is in line with the jobs growth associated with the Gateway. At present, it has not been demonstrated that there is a need to meet any further housing requirement arising in Coventry. However, the DTC agreements and Policy DS20 ensure that this can be addressed effectively should the need arise.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66435 - Mrs Luisa Hodge [206]	Object	<p>The Local Plan after emotive pressure from North Leamington protestors disregards green belt yet does not pursue with sufficient vigour preferable brownfield sites. The area of restraint between Myton Road and Europa Way is a case in point. It is high grade agricultural land full of wildlife, ancient trees and hedgerows. Since 2000 Warwick has undergone a large increase in population (12%) which is approximately twice the rate of Warwickshire and the national average and three times the increase for West Midlands. The plan is not justified as it crams so much of the new development into the already congested south part of the district. This is because of pressure from developers who wish to build in the areas which afford them most profit. Roads and schools in this area are already under pressure.</p> <p>The plan is creating more car dependant suburbs. Recent development at Warwick Gates has not justified bus services. It will also contribute to the already illegal air quality in central Warwick.</p> <p><i>There needs to be better and more balanced spread of new housing allocations included in the plan through an alternative approach to locational distribution of housing in order to avoid some 52% of the new sites by:</i></p> <p><i>Increased provision on the northern side of the main settlements - on the Birmingham and Coventry sides where a significant proportion of the car borne workers travel daily.</i></p> <p><i>Such locations should include Budbrooke which is close to the Park and Ride facility and A46 corridor, Hatton with similar advantages and areas adjoining Coventry (airport and Gateway).</i></p>	<p>National Policy (para 83 of the NPPF) requires that Green Belt boundaries should only be amended in exceptional circumstances. The location of growth proposed by WDC is consistent with this. The plan allocates all suitable and available brownfield sites. Development is proposed at Budbroke and the level of development proposed here is consistent with the village hierarchy report.</p> <p>The Council contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies (this has included ecology and landscape studies</p>	
66448 - Mr C Wood [6044]	Object	<p>The loss of Greenfield land is unsustainable.</p> <p>The greenfield land that is planned to be destroyed is important both environmentally and agriculturally.</p> <p>Impacts on Air Quality and on Health have not been satisfactorily assessed.</p> <p>Existing poor air quality areas in the town centres will continue to suffer dangerous levels of pollution, and the suggestion that this will in time be eliminated by changes in technology is, as the air quality report itself states, dubious.</p>	<p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies (including the Air Quality Report) have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66387 - Warwick Town Council (Mr Derek Maudlin) [1059]	Object	<p>The plan ignores:</p> <p>The importance of retaining greenfield sites free from development as recommended by the residents of Bishops Tachbrook, Warwick and Whitnash. Dismissed, even though such allocations are unnecessary.</p> <p>The impact of air quality and the health of residents as development will generate greater number of vehicles, with more congestion and even more dangerous levels of air pollution in Warwick.</p> <p>The damage to the environment and heritage assets of Warwick and fails to promote Warwick as an attractive place to live in, work or visit. All of which would have a serious impact on the visitor economy.</p> <p>The transport strategy upon which the plan is based is flawed.</p>	<p>The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development - these studies include an assessment of heritage impacts, air quality, and landscape.</p> <p>The Council contends that the transport mitigation proposed to support the proposed allocations is robustly evidenced and soundly based.</p>	
66609 - Richborough Estates Ltd [5927]	Object	<p>The identification of 850 new homes on Greenfield sites on the edge of Kenilworth within Policy DS10 is not considered sound when considering the need to allocate additional land to ensure sufficient flexibility in housing delivery and the proposed amendments advocated by the representation to Policy DS11 outlined below. Policy DS10 could be made sound by increasing the number of new homes to be provided on the edge of Kenilworth through the allocation of the land controlled by Richborough at Warwick Road.</p>	<p>The Plan has allocated land at Kenilworth, although as the Town is surrounded by Green Belt, this has been limited to a scale where exceptional circumstances can be justified. The sites allocated are considered to be the most sustainable locations (see site selection methodology). The site proposed in this representation is high quality green belt and has not therefore been allocated.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66161 - Warwick County Councillors (J. Holland; A. Warner & J. St John) [11276]	Object	<p>The over-development of the greenfield sites on the edge of south Warwick will result in air pollution which the Strategic Transport Assessments cannot mitigate. This will affect both the health of residents and the structure of our multiple historic buildings, which are so important to our sense of place and culture. Warwick already suffers from pollution levels above European guidelines on safety. The plan is not consistent with national policy on conserving and enhancing the natural environment. The latest ONS figures predict 29% fewer residents through the life of the plan therefore there should be a reduction in the number of homes required in the District, removal of a substantial number of development sites south of Warwick to prevent increased air pollution and comply with the NPPF.</p> <p><i>The latest ONS figures predict 29% fewer residents through the life of the plan therefore there should be a reduction in the number of homes required in the District, removal of a substantial number of development sites south of Warwick to prevent increased air pollution and comply with the NPPF.</i></p>	For response on the housing requirement please see responses to Policy DS6. The Council contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies.	
65489 - Keith Wellsted [8636]	Object	<p>The Greenfield sites allocated in the plan place a disproportionate impact on the edge of Warwick, Whitnash and Leamington. Furthermore there is no mention of the much better placed site on land near Kings Hill Lane</p> <p><i>Consider the site at Kings Hill Lane even if this means encroaching on the Green Belt - you are using this as an excuse</i></p>	The broad location of growth takes account of the green belt in the northern part of the District. Sites have only been allocated in the green belt where exceptional circumstances have been justified. There are no exceptional circumstances for allocating Kings Hill	
66505 - Friends of the Earth (John Brightley) [1113]	Object	<p>Review numbers as they are clearly linked to proposed policy DS6. We still believe that the average housing densities on new development sites can be increased significantly without a reduction in design quality. Paragraph 47 of the NPPF clearly says 'local planning authorities should... set their own approach to housing density to reflect local circumstances'. In our view, Warwick District Council has not yet explained their 'approach to housing density'.</p>	<p>For response on the housing requirement please see responses to Policy DS6.</p> <p>The Council's approach to housing density is to let the market decide as long as</p> <ul style="list-style-type: none"> <li>a) densities are not lower than 30dph on average (see policy BE1)</li> <li>b) strategic developments are brought forward in line with the Garden Towns Prospectus (this is part of the Council's aspirations for high quality development)</li> <li>c) the mix of housing accords with policy H4.</li> </ul> <p>To assess site capacity, the Council has used a simple and widely used methodology which is consistent with typical levels of delivery</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65706 - Hatton Estate (Mr Johnnie Arkwright) [12822]	Object	<p>Hatton Estates are the co-promoters with Bloor Homes of the land at Hatton Hill (south of Birmingham Road). Objection is made to the allocation of land north of Birmingham Road (H28) which should be deleted and replaced by the land at Hatton Hill for the following reasons:-</p> <ul style="list-style-type: none"> <li>*Hatton Park residents access/ use the school, church and pub in the locality. The Hatton Hill site is better located to these facilities. It is illogical to prefer a site that is further away.</li> <li>*The Hatton Hill Site promoted by this representation could encompass an extension to the Hatton Locks car park (currently with insufficient capacity and being used intensively by visitors to the locks/canal). This would resolve a current local issue with better/ safer access thus bringing real benefits to the local community</li> <li>*A new roundabout access to the Hatton Hill Site would provide a safe point of access as well as reducing traffic speed on the busy A4177 Birmingham Road. The site currently in the Local Plan would be accessed opposite the dangerous Ugly Bridge road in the most dangerous and congested section of the Birmingham Road.</li> <li>*There have been 85 objections to the site currently in the Local Plan, this is a measure of the local concern and an indicator of the significant adverse impact it will have on a large number of properties/ families adjacent to it.</li> <li>*The intended alternative at Hatton Hill would be well screened by an intended tree/ landscape buffer and would not impact on surrounding properties and the wider landscape.</li> <li>*The Hatton Hill site is currently arable land and is sheltered by trees and hedges and has minimal ecological or landscape merit. The careful integration of SUDS and the protection of existing edges of the field will enhance ecology and landscape.</li> <li>*The site is hidden/ protected from the nearby canal by trees, a further belt of trees and landscaping is intended</li> <li>*The Hatton Hill site is 'self-contained' and could not be extended if further houses were required in the future. The current allocation is causing alarm with the local community as it is perceived as being ripe for extension into the open countryside for future requirements.</li> <li>*To conclude the current allocation in the plan is considered unsound and not justified based on the evidence available and given that there is a more suitable alternative at Hatton Hill.</li> </ul> <p><i>The current housing allocation (H28- land north of Birmingham Road, Hatton Park should be deleted from policies DS10 and DS11.</i></p> <p><i>A new replacement allocation should be made at the land south of</i></p>	See response to DS11 (H28) (rep. 66380)	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>Birmingham Road , Hatton Hill (80 dwellings) as part of policies DS10 and DS11</i></p> <p><i>The Policy Map will have to be amended accordingly to reflect the above</i></p>		
66781 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>This does not take account of previous years oversupply; completions to date; sites under construction; vacant dwellings already returned; permissions not started; further permission between April and December 2013; offices to residences approved; windfall sites for the plan period; small urban sites on SHLAA sites and consolidation of existing employment areas and canal side development. This means that if the housing numbers identified as needed by a revised approach on population numbers and the conversion method to number of dwellings then no further applications need to be granted to meet the plan as there is already a surplus provision.</p> <p>If the maximum figure for the reduced population projection figure of 9,217 is considered to be necessary, then to this list can be added allocated urban brownfield sites definites only; 2 greenfield sites in urban locations; 4 sites accepted in villages and 6 sites granted since January 2014 can be added giving 9,601 dwelling sites.</p> <p>The reduced population projection and the related reduction in the number of houses required now means that the use of any further greenfield sites cannot be demonstrated to be necessary and those should be removed from DS11.</p> <p>Grove Farm at 200 dwellings, future vacant dwellings return and a list of 543 C2 homes for the elderly can also be counted in the supply. With these it would not be necessary to keep the sensitive urban brownfield and sensitive greenfield in DS11.</p> <p><i>Further greenfield site allocations should be removed from the Plan including</i>  <i>Land west of Europa Way</i>  <i>East of Whitnash/south of Sydenham</i>  <i>Campion hills</i>  <i>East of Kenilworth (Thickthorn)</i>  <i>Both Kenilworth School sites</i>  <i>All villages except Bishops Tachbrook, Barford and Radford Semele</i>  <i>Land south of Harbury Lane, (including the former sewage works which is wrongly classified under Urban Brownfield sites).</i></p>	<p>Oversupply from previous years is not relevant in considering future housing requirements. Completions since 2011, permissions and site under construction have been included.</p> <p>the implications of offices to residential, windfalls and small urban SHLAA sites have all be taken to in to account.</p> <p>For details on the proposed level of housing growth, see responses to DS6.</p> <p>The sites listed for removing from the Plan have all been assessed and with the exception of Campion Hills have been assessed as sustainable sites that can contribute to the District's housing requirement.</p> <p>With regard to whether the former Sewage Works should be classified as greenfield or brownfield, this is dependent on whether it is considered that the structure have blended in to the landscape. Whilst these structure are not readily visible from across the Tachbrook valley, the remain a substantial feature and impact on the nature of the site. The Council therefore considers that the brownfield designation is appropriate.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66275 - Gladman Developments (Peter Dutton) [9149]	Object	<p>District Council has not made adequate provision to meet full and objectively assessed needs for market and affordable housing (para 47 of NPPF). Quantum of housing development needs to be substantially increased and the distribution of provision needs to be amended to release more housing in sustainable rural locations such as Growth Villages to achieve core planning principles set down in NPPF (paragraph 17) and requirement to deliver wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities (NPPF, paragraph 50). Even if quantum of housing not increased, distribution of housing growth needs to be reconsidered to allow more housing growth to take place within sustainable rural locations such as Growth Villages</p> <p>RDS (June 2013) recognised (Policy RDS3) desirability of distributing growth across District, including within and/or on edge of some villages, and allowed for a hierarchy of growth in rural area to include higher level of growth in larger, more sustainable villages with services. RDS provided for circa 1,000 dwellings to be provided in the then designated Primary/Secondary Service Villages and subsequent appraisal work does not remove need to provide for more housing across the District, in order to meet requirements of NPPF/Council's own objectives. Appraisal work does not justify reducing amount of housing to be directed to larger, more sustainable villages.</p> <p><i>In order to meet the requirements of the NPPF and the Council's own objectives with regard to the provision of housing, the overall quantum of development needs to be increased in accordance with other separate representations made to the Plan, and more of the housing growth increased or otherwise, needs to be directed to sites within the Growth Villages and the rural area in order to help make the Plan sound.</i></p> <p><i>It is considered that the amount of housing to be directed to sites within the Growth Villages and the rural areas should not be less than 1,000 dwellings</i></p>	<p>For response on the housing requirement please see responses to Policy DS6. The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. However, the assessment of specific site capacity for some villages has constrained the potential for growth in some village locations.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66167 - Hallam Land Management and William Davis [8278]	Object	<p>Hallam Land Management and William Davis consider that the policy working to DS10 should be changed to meet the changes to Policy DS11, which they outline in separate submissions.</p> <p><i>The following changes should be made to the wording of the policy.</i></p> <p><i>Line 2. Greenfield sites on the edge of Kenilworth 90</i>  <i>Line 3. Greenfield sites on the edge of Warwick, Leamington Spa and Whitnash 4,000</i></p>	<p>The proposed changes to Policy DS10 are dependent on the site to the south of Gallows Hill being allocated. These sites have been omitted from the plan due their impact on heritage assets and their landscape sensitivity</p>	
65737 - GM & PR Davison [2056]	Object	<p>Then proposals for the areas to the south of Warwick will lead to large characterless suburbs in areas that are currently attractive countryside. Previous undertaking to protect the area to the west of Europa have now been abandoned. There has been extensive development along Myton Road in recent years. Just because the area is attractive does not mean we should accommodate housing for newcomers. The priority should be for local families.</p> <p>The proposals will undermine the attractiveness of the two towns.</p> <p><i>Use more redundant brownfield sites</i></p>	<p>The Plan allocates all appropriate available brownfield sites. The Council contends that the proposed sites to the south of Warwick are sustainable locations for development</p>	
65128 - Mr Tony Robinson [12687]	Object	<p>A large proportion of the homes are scheduled for south of Warwick. This is driven by the unwillingness of Birmingham and Coventry to examine options for building on green belt. The land south of Warwick is away from significant employment areas and will fail the sustainability test for reducing car usage</p> <p><i>The overall numbers of homes should be reviewed, and building in a non sustainable area should be seen as negative, Significant development here should only be considered when Birmingham / Coventry have no suitable areas nearer to employment and transport - green belt should not be a reason not to consider</i></p>	<p>For response on the housing requirement please see responses to Policy DS6.</p> <p>There are significant employment areas to the south of Warwick. These are therefore considered to be sustainable locations. National Policy (para 83 of the NPPF) requires that Green Belt boundaries should only be amended in exceptional circumstances. The location of growth proposed by WDC is consistent with this. Further green belt allocations will only be considered if, in the future, it is demonstrated that further housing provision is needed in Warwick District and exceptional circumstances exist to provide some or all of this within 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>
66338 - GM & PR Davison [2056]	Object	Despite recent improvements at Greys Mallory and Ford Foundry, there is still congestion along Europa Way. the transport mitigation for Europa Way would not work as it would lead to a bottleneck as would routes in to Warwick. New development will make this worse.	The Council contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies, including the Strategic Transport Assessments.	
66357 - Mr & Mrs Peter & Linda Bromley [1086]	Object	<p>The location of so much development in the south of the District will encourage car use. Jobs and schools to support this development do not exist.</p> <p>The proposals are not consistent with the NPPF and appear to be financially motivated.</p> <p>The loss of so much greenfield land is unsustainable. The greenfield areas to the south of the District play an important part in separating communities and are limited in extent. The Local could lead to communities being joined together by development. It is not necessary to develop greenfield sites. The proposals will lead to a large funding gap in infrastructure provision, particularly in mitigating traffic movements across the towns. Additional traffic signals have already been required for new developments. The allocations are to the south of the towns, will encourage more movements across the towns including crossing the river, canal and railway. The proposals do not provide for a bypass or other means to avoid the town centre. This additional traffic will make pollution worse and increase health risks.</p> <p>The result of allowing houses to be built on every single green space between housing is that sites cannot be integrated and cannot deliver the infrastructure required.</p> <p>The proposals will damage important heritage assets in Whitnash by building on every remaining greenfield space.</p> <p><i>A lower housing target to reflect the latest ONS figures combined with use of brownfield sites would mean greenfield sites would only be included where essential. The plan should be modified to remove the majority of houses from the south of the District</i></p> <p><i>A lower housing target would help to resolve the issue with the 5 year supply of housing and infrastructure provision would be easier to resolve.</i></p> <p><i>Land close to the Gateway would be a suitable alternative to building the houses to the south of Warwick and Leamington</i></p>	<p>For response on the housing requirement please see responses to Policy DS6.</p> <p>The plan allocates all suitable and available brownfield sites and contends that the allocated sites to the south of Warwick are sustainable locations for development and that this is backed up by infrastructure and environmental capacity studies.</p> <p>The area around the Gateway is green belt and no exceptional circumstances have been justified for providing additional housing in that location, particularly as the 2012 Demographics and Economic study showed that only a small portion of the housing need associated with the Gateway falls within Warwick District.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65986 - Barwood Development Securities Ltd [12821]	Object	<p>Notwithstanding this support, Barwood reiterate paragraph 17 of the Framework which states that Local Planning Authorities should actively manage patterns of growth and focus significant development in locations which are or can be made sustainable. Additionally, the Framework states the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages, which follow principles of Garden Cities.</p> <p>Land South of Mallory Road is consistent with the Council's spatial strategy. The site offers the potential to deliver highly sustainable development as a sustainable extension to an existing village.</p>	<p>Since the Publication Draft was prepared, the site south of Mallory Road has been subject to a planning appeal. The Inspector dismissed the appeal, agreeing that the area is of important landscape value</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66842 - Patricia Hollis [6286] 66906 - Colin Sharp [1913] 66914 - Ms Alison Cox [588] 66922 - Alison Kelly [9014] 66930 - Andrew Cliffe [6235] 66938 - Angelo Cugini [12883] 66946 - Barbara Groves [8940] 66954 - Professor Bob Ireland [7882] 66962 - Christopher Paden [8844] 66970 - Elizabeth Cliffe [6234] 66978 - Mrs Kay Cugini [1743] 66986 - Mr David Ramsbottom [2030] 66994 - Mr David Drinkhall [12839] 67002 - Ian Frost [2024] 67010 - Mr Geoff Reynolds [8107] 67018 - John Griffiths [8071] 67026 - Justin Richards [8806] 67034 - Louise Kalus [8998] 67042 - Paul Kalus [8995] 67050 - Mr Bernard Hollis [1810] 67058 - Mr R Komarasinha [6306] 67066 - Caroline Komarasinha [12793] 67074 - Matthew Drinkhall [8910] 67082 - Oliver Lane [8814] 67090 - Ms Helen Maclagan [12783] 67098 - Mr and Mrs J Pennington [600] 67106 - Mr Peter Lamb [3491] 67114 - Sarah Hunt [7309] 67122 - Mr Ben Orme [12882]	Object	The loss of Greenfield land is unsustainable. As only 8100 houses are needed over the plan period this can be met from permissions already granted together with the brown field sites identified in the plan. Greenfield sites are remote from schools, shops and other services and it has not been demonstrated that proposals for transport are going to be practicable/ effective. Much of this land (south of Warwick and Leamington in particular) is high grade agricultural which we cannot afford to lose. The Plans Greenfield allocations are excessive and unnecessary as higher densities (using less land) will be attainable on previously developed/ brownfield land. The garden suburbs are extravagant; their low densities mean more land than what is necessary is being allocated for development.	For details on the proposed level of housing growth, see responses to DS6. The plan allocates all suitable and available brownfield sites. The Council contends that sites within and on the edge of urban areas are generally the most sustainable locations for development. The broad location for growth therefore has a focus on sites within and adjacent to Warwick and Leamington. Infrastructure and environmental studies have demonstrated that the proposed sites can reasonably be brought forward in a way that delivers sustainable development. The Council's approach to housing density is to let the market decide as long as a) densities are not lower than 30dph on average (see policy BE1) b) strategic developments are brought forward in line with the Garden Towns Prospectus (this is part of the Council's aspirations for high quality development) c) the mix of housing accords with policy H4.  To assess site capacity, the Council has used a simple and widely used methodology which is consistent with typical levels of delivery	
		<i>The Plans housing numbers should be reduced and also the number of greenfield allocations.</i>		
66694 - Mr Michael Kelsey [5671]	Support	Support the retention of green belt to the north of Leamington and the focus on development to the south of the towns thereby supporting business and making best use of existing infrastructure.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65470 - King Henry VIII Endowed Trust (Warwick) [6195]	Support	The Trust supports the Council's decision to direct most new development to sites within, or to the edge, of the main towns within Warwick District namely Leamington, Warwick, Whitnash and Kenilworth. Having regard to existing development constraints within the district, including the extent of designated Green Belt land, we also support the Council's decision to direct some development to named 'Growth Villages'	Noted	
66087 - Gleeson Developments [5117]	Support	The distribution of housing across the District and especially to Kenilworth on both urban Brownfield sites and Greenfield sites on the edge of the town reflects the identified need/demand findings of the SHMA. It also accords with the "golden thread" of sustainable development set out in the NPPF.	Noted	
65667 - Stephen Trinder [311]	Support	Support the distribution of proposed new housing as set out for Leamington Spa, Warwick, Kenilworth and the various growth-point villages in Warwickshire in the Draft Warwick District Local Plan up to 2029. Proposals contained in the Draft Local Plan to 2029 satisfy Warwick planning authority's legal requirements in respect of the plan, including its duty to cooperate, and the plan meets all the requirements of soundness. Also support construction of fewer dwellings at these locations if new ONS data downgrades projected population figures for Warwick District and then leads to a reduction in the numbers of dwellings proposed for construction.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66466 - Gladman Developments (Peter Dutton) [9149]	Support	<p>Policy directs 1,330 dwellings to brownfield sites within the urban areas of the district's settlements, 850 dwellings to greenfield sites on the edge of Kenilworth, 3,245 dwellings to greenfield locations on the edge of Warwick, Leamington and Whitnash, and 763 dwellings to sites within the districts Growth Villages and rural area. LP explains proposed spatial strategy aims to meet housing needs by allocating sites across towns and in more sustainable villages. Seeks to maximise use of brownfield land by directing allocations to pd sites in urban areas first, bring forward greenfield sites where these are in sustainable locations, and avoid coalescence between settlements. Sets out that Green Belt sites will be limited to locations where exceptional circumstances can be justified.</p> <p>Policy Analysis</p> <p>Generally supportive of distribution strategy. Growth should be directed to key towns and villages with established services/facilities, ensuring creation of sustainable communities that have good access to range of jobs, community facilities, key services and infrastructure. However should not overlook need for further development in lower order sustainable settlements that could help to sustain existing services/facilities. Submit that further growth should be directed to identified Growth Villages, particularly in light of need to provide for a higher level of homes than currently proposed through LP.</p> <p>Support identification of Radford Semele as location for further sustainable growth. As one of the Growth Villages, Radford Semele is one of the larger villages in the authority area with a population of nearly 2,000 and just over 800 dwellings. Village benefits from good range of local services/facilities, and from good public transport links to both Leamington Spa and Southam, where a wider range of employment opportunities and facilities are available.</p> <p>Whilst supporting the decision to identify Radford Semele as a Rural Service Village, object to level of development proposed to be directed to the settlement. Previous LP Village Housing Options and Settlement Boundaries Consultation identified the village as an appropriate location to receive an allocation of 100-150 dwellings, but this has now been reduced to 50 dwellings consistent with proposed allocation North of Southam Road. Strongly submit there is no robust justification for this change in policy stance. The Council's May 2013 Draft Settlement Hierarchy Report identified Radford Semele as appropriate location to receive 100-150 dwellings. There is no basis for this figure to now be reduced based on the capacity of the North of Southam Road Allocation.</p> <p>Radford Semele is not washed over by Green Belt or any other landscape designations. Although its development is constrained by an Area of Restraint that seeks to prevent the coalescence of the village with neighbouring urban areas, it is less constrained than</p>	<p>Support for the overall strategy is noted. With regard to allocating sites in "lower order" settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. This impacted significantly on the final allocations for Radford Semele.</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>other settlements and has ability to support further development. Although aware that further work has been undertaken to assess sensitivity of the landscape around the village to further development, submit that there are no justifiable reasons that would preclude Radford Semele from accommodating further sustainable development that could come forward in the short term to meet the district's housing needs. Submit that development targets for the village should be increased to at least 180 dwellings. Would be opposed to re-use of previously developed land if this would preclude development from coming forward on sustainable greenfield sites. Whilst §111 of the Framework states that planning policies should encourage effective use of land by re-using land that has previously been developed, it does not state that brownfield development should be prioritised.</p>		
65876 - Centaur Homes [9117]	Support	<p>(Support) DS10 Broad Location of Allocated Sites for Housing - Publication Draft Agent: McLoughlin Planning (Mr Nathan McLoughlin) [12827] (unconfirmed) Respondent: Centaur Homes [9117] Received: 27/6/2014 via Email</p> <p>Centaur Homes support the strategy of allocating sites in the most sustainable towns and villages. Hampton Magna has been identified as a Growth Village and development here will provide an opportunity to rebalance the local housing market and provide much needed affordable housing and local market for local residents. In light of other representations, further additional development should be directed to the village to meet the aims and objectives of paragraph 55 of the Framework.</p>	Noted	
66829 - Europa Way Consortium [197]	Support	<p>The Consortium supports the Council's decision to direct most new development to sites within, or to the edge, of main towns within the District, namely Leamington, Warwick, Whitnash and Kenilworth.</p>	Noted	
66036 - A C Lloyd Homes Ltd [5958]	Support	<p>Policy DS10 sets out the amount of housing to be allocated to the main urban areas and the more sustainable villages. The Council is right to recognise that a proportion of the development should be directed to locations beyond the four major settlements of Kenilworth, Warwick, Leamington and Whitnash. Without this recognition some of the other settlements are likely to struggle to meet their own needs, and to retain the younger generations. The result of this would be a continuing spiral of decline to the detriment of the local economy and of local communities.</p>	Noted	

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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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>
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*DS11 Allocated Housing Sites*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66026 - Barratt Homes [12867]	Object	<p>Whilst the approach chosen by Warwick District Council to allocating development by disbursing housing growth across the district is considered justified. The process of apportioning housing allocations to the villages in the Green Belt is not considered justified given the lack of a robust evidence base.</p> <p>The identification of Hampton Magna as the highest scoring village in the District in the Settlement Hierarchy Report (Draft) is considered to be justified on account of the range of services and facilities within the village, the proximity of the village to Warwick and the connectivity of the village to good local, regional and national public transport links.</p> <p>Currently the growth of some of the District's villages, such as Hampton Magna, are constrained by the location of these villages in the Green Belt.</p> <p>The apportionment of housing between the villages, as listed in the Local Plan Publication Draft consultation document at Policy DS11, is not considered to either represent the most appropriate strategy or be justified by a robust evidence base or achieve the spirit of NPPF paragraph 109 with respect to the protection and enhancement of the most valued landscapes.</p> <p>With respect to housing numbers, there does not appear to be a consistent and transparent approach taken to deriving the apportionment of housing numbers to the villages. It is certainly not clear whether the 100 dwelling housing allocation for Hampton Magna shown in policy DS11 has been robustly derived.</p> <p>Barratt Homes queries why WDC has chosen to restrict the housing apportionment for Hampton Magna to 100 dwellings. The evidence base calculations do not appear to justify this restriction.</p> <p>The rejection of land west of Stanks Farm, based purely on the connectivity of the site with the settlement is not considered justified. Whilst the land west of Stanks Farm is not as directly accessible to the majority of key facilities as the proposed site, there is not a significant difference in accessibility and indeed the land west of Stanks Farm achieves better accessibility to public transport than is achieved by the proposed allocation site (H27).</p> <p>Notwithstanding this, the evidence base does not even test the potential for the land west of Stanks Farm to be developed in addition to another site at Hampton Magna (eg H27) in order for the full development potential of the very sustainable Hampton Magna</p>	<p>Identifying the appropriate numbers and sites in villages has a number of elements. The approach taken starts by looking at a settlement hierarchy which is based on an analysis of a range of data regarding the population and facilities in each village. Parallel to this the sites in and around each village have been assessed and the capacity of these sites provide constraints to the quantum of housing allocated to each village. The site assessment has involved a wide range of factors, including detailed and up to date assessments of green belt parcels and landscape quality.</p> <p>The Council considers that this is a robust approach to justify the allocations to each village, including Hampton Magna. The land west of Stanks Farm was considered. However it was considered that this was not well located to main settlement.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>to be optimised, realised and expanded beyond the dwelling capacity constraint of 100 dwellings imposed on Hampton Magna by the single proposed allocation H27. There is no justification for the restriction to 100 dwellings and we therefore consider this level of housing to be arbitrary.</p> <p>The Green Belt allocations, particularly around Hampton Magna should accordingly be reviewed, for the Local Plan to be found 'sound'.</p> <p><i>WDC needs to review the robustness of its landscape and Green Belt evidence base and the basis for apportionment of development to the highly sustainable Hampton Magna and include land west of Stanks Farm, Hampton Magna, as a proposed housing allocation in the Local Plan, based on landscape value and Green Belt considerations.</i></p>		
66618 - Mr Michael Kinson OBE [12794]	Object	<p>The land north of Kenilworth and South of Coventry (Kings Hill) should be allocated to meet the housing needs of both Warwick and Coventry. Especially as the recent studies suggest that Coventry require a significantly higher housing figure. This housing would be located nearer to employment opportunities are and will be in the future.</p> <p><i>The land south of Coventry in the Kings Hill locality should be allocated to meet future needs and take the pressure off Warwick.</i></p>	<p>The proposed spatial strategy is considered to be sound and allocates sustainable greenfield sites in preference to green belt sites unless there are exceptional circumstances. There are no exceptional circumstances to justify the release of the Kings Hill area from the Green Belt.</p>	
66744 - Mr Richard Brookes [1866]	Object	<p>The level of growth is too high. Since the publication of this Draft new ONS projections show that population growth between 2011 and 2029 is 15,300 compared with the joint SHMA figure of 23,800. This error is compounded by the Joint SHMA using a Household Headship Ratio of 1.66 people per dwelling. If the ratios and sizes of affordable and market homes are taken into account this ratio should be 2.12. If this is applied to the new population projection this gives a housing requirement of 7,700. If the ratio of 1.66 is used this gives a requirement of 9,300.</p> <p><i>Remove all Greenfield Sites except Red House farm, Lillington</i></p>	<p>The Council believes that the proposed level of growth is sound and that spatial strategy and proposed site allocations are soundly based (see site selection methodology)</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66610 - Richborough Estates Ltd [5927]	Object	<p>The allocation of 760 new homes on land east of Kenilworth as set out in Policy DS11 (Greenfield Site Ref. H06) is supported in principle. However, as submitted through these representations, there is a significant degree of uncertainty associated with the comprehensive delivery of the site. This is because a major landowner - KRC who control approximately 20% of the overall allocation site area, one third (255 dwellings) of the total housing proposed (760 dwellings) - will need to be relocated.</p> <p><i>Section 5 to this representation sets out the case on behalf of Richborough for the allocation of land at Warwick Road, Kenilworth.</i></p> <p><i>It is submitted that Policy DS11 can be made sound by the allocation of this land</i></p>	<p>The objector's land is within the green belt and no exceptional circumstances exist. The relocation of the Rugby Club can be achieved without allocating this land. In any event the allocation of this land does not enable the relocation of the Rugby Club.</p>	
66239 - Crest Strategic Projects [9115]	Object	<p>Crest object to this policy which does not allocate land within their control at Lodge farm , Westward Heath Road, Coventry. These representations should be read in conjunction with those on duty to Co-operate and Policy DS6- Level of Housing Growth, Policy DS7 - Meeting Housing Requirements and DS10 Broad Location for Development. As stated in our objection to the level of proposed development (Policy DS6) as well as Duty to Co-operate) there is a recognised and identified need for additional housing within the District not just to meet the District's housing needs but probably also those of adjoining districts such as Coventry. The Local Plan should and must provide the necessary certainty that those needs will be met. This can only be achieved if additional land is identified for housing development.</p> <p>The Joint Green BElt Study (2009) concluded that the land is one of the least constrained parcels to the south of Coventry and potentially suitable to be released from the green belt.</p> <p>The suitability of the site for development was identified within the SHLAA (May 2013). The site is available, suitable and deliverable.</p> <p>It has been demonstrated that both the existing road network and schools have capacity to cope with the proposed development.</p> <p><i>The proposed strategy should recognise that land currently in the green belt can represent the most sustainable option to accommodate future housing needs on land at Lodge Farm should be released from the green belt and allocated for a housing led development of up to 880 dwellings within the Local Plan.</i></p>	<p>The site is within the Green Belt and there are no exceptional circumstances to support its allocation. Further, the site is an area of high landscape value.</p> <p>The Council is working closely with Coventry City Council and other authorities within the HMA to ensure the OAN for the HMA is met in full. The Council is accepting a redistribution of need from Coventry as part of its proposed housing requirement. Should a further redistribution be necessary, then the Council has committed to a process (along with others in the HMA) to ensure this is dealt with effectively and in a way that ensures the most suitable sites) are allocated to meet this need.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66737 - The Rosconn Group [9057]	Object	Objects to the omission of Hatton Station as a Growth Village. Hatton Station has a railway station which offers an alternative means of transport but has been overlooked for development whereas villages with no choice of transportation but having a couple of shops have been given greater weight.	Hatton Station was assessed within the Village Hierarchy Report. This showed that the settlement does not have the population or range of facilities to support it being a growth village. The Local Plan does not therefore propose any housing allocations within the village.	
65740 - Gregory Weston [11412]	Object	Already far too much traffic in Bremridge Close to point it is dangerous. Disabled find it worryingly unsafe to cross. Significant shortage of parking with people using pavements causing safety issues	The site at Bremridge Close has been subject to detailed site assessment (see SHLAA and Village Site Matrix), including WCC highways, who did not raise any objections to the development of this site. The Council still considers the site to be suitable.	
		<i>No more houses in the Close. Cannot cope with any extra cars/traffic</i>		
66144 - Mr Daryl Hunter [12861]	Object	The Council recognises that meeting the development needs of the District cannot be fulfilled without releasing some land from the greenbelt. It is submitted that land at Bamburgh Grove (edged red in the accompanying plan) is released from the green belt to provide for in the region of 35 to 40 dwellings. This would not affect the fundamental purpose of the green belt. The site is not reliant upon adjoining land for access and services, it can be accessed via Bamburgh Grove and is not of high environmental value. It is enclosed by substantial hedgerows.  <i>The Urban Area Boundary should be amended to extend the boundary around the land at Banburgh Grove (hatched red on the accompanying plan) and this land should be included in the plan for 35 to 40 dwellings.</i>	This land is within the green belt and no exceptional circumstances exist to allow the site to be allocated. Green belt sites on the edge of the urban area have only been allocated where there are exceptional circumstances for doing so.	No change
65174 - Sundial Group Ltd [12683]	Object	There is a need to identify additional sites for development.  <i>Include land at Woodside Training Centre SHLAA 4 Reference K19 as an allocated housing site under policy DC11 and remove this site from the Greenbelt.</i>	The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65199 - Nurton Developments [12697]	Object	<p>The level of growth proposed at Kingswood (Lapworth) is considered unlikely to achieve the objectives set out in the Local Plan in terms of re-balancing the local housing market to provide much needed affordable housing and market homes for local residents and helping support and sustain local services, facilities and businesses. Allocation of land north of Rising Lane, Kingswood for 100 dwellings would provide growth and benefits as envisaged in the sustainability appraisal work underpinning the Local Plan.</p> <p><i>Policy DS11 should be amended to include the allocation of land north of Rising Lane, Lapworth for 100 dwellings.</i></p>	<p>The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period, including affordable housing. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated. Regular site flooding linked to nearby brook.</p> <p>With regard to the specific site being promoted through the representation, this has not previously been submitted and has not therefore been fully assessed. However the northern part of the site is an area of high landscape value (2013 Assessment) and parts of the site are subject to regular flooding linked to nearby brook.</p>	
65877 - Centaur Homes [9117]	Object	<p>Object to this policy, in particular the allocated sites as follows primarily on the grounds of size and suitability:-</p> <ul style="list-style-type: none"> <li>- H20 Barford Land south of Barford House.</li> <li>- H24 Burton Green Burrow Hill Nursery</li> <li>- H27 Hampton Magna south of Arras Boulevard</li> <li>- H29 Kingswood Meadow House</li> <li>- H31 South of the Stables</li> <li>- H33 Kingswood West off Mill Lane</li> <li>- H34, H35 &amp; H36 Leek Wootton - should be one allocation</li> <li>- H37 Car Park East of Hayes</li> <li>- H27 Hampton Magna South of Arras Boulevard will contribute to coalescence of Hampton Magna with Warwick.</li> </ul> <p><i>Other sites need to be released from the Green Belt.</i></p>	<p>All of these sites have been carefully assessed (see Site Appraisal Matrix). The Council remains of the view that all these sites are suitable and deliverable and can play a part in meeting both local and district housing needs. The site H27 does not lead to coalescence as a significant gap is retained between the village and the town.</p>	No change
67128 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Critical that the Council can demonstrate the ability of the housing market to deliver the required housing on the large sites south of Warwick and Leamington. Land to the north of Leamington at Old Milverton provides an appropriate and sustainable opportunity to deliver an urban extension to assist in providing choice and meeting housing needs. The development of the site could include a mix of uses, including employment land, a care village a local centre, a primary school and significant open space.</p> <p><i>Allocate land north of Leamington at Old Milverton for housing.</i></p>	<p>No exceptional circumstances have been justified to support the allocation of this green belt site</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66152 - Hatton Estate [3196]	Object	<p>We consider that Hatton Station should be moved into Growth Village category on the basis of the station, which makes the settlement highly accessible to higher order services and facilities in the main towns, and accordingly there should be an allocation for residential development within the settlement. In the Local Plan it is currently designated as a Limited Infill Village. On this basis, we believe that Policies DS11 and H1 of the Local Plan are unsound as they fail the tests in respect to being positively prepared, justified, effective and consistent with national policy.</p> <p><i>We recommend, firstly that Hatton Station moved into Growth Village category (largely on the basis of the station, which provides significant accessibility benefits), and land west of Station Road should be an allocation for residential development within the settlement (as set out in the previous representations of Linden Homes and Hatton Estate).</i></p>	Hatton Station was assessed within the village hierarchy report. It does not have the facilities or population to be categorised as a growth village and was assessed as a "Very Small Village" within the Settlement Hierarchy report.	No change
65464 - Kenilworth School & Sports College (Mr Hayden Abbott) [5766]	Object	<p>The Kenilworth Education Trust wants to ensure that the Local Plan properly accommodates and integrates the future needs of Kenilworth School and Sixth Form through policies and allocations which will allow for the growth and consolidation of the school on one site.</p> <p>The only way of ensuring that a new and better school can be provided to serve Kenilworth and the wider catchment area is to identify a viable and deliverable solution for redevelopment on either one of the existing school sites or potentially on a new site. A comprehensive feasibility study has been commissioned to identify a preferred approach.</p> <p><i>The Kenilworth Education Trust is to confirm in September:</i></p> <ol style="list-style-type: none"> <li><i>1. Whether sites HO9 and H12 will be surplus to requirements and available for housing</i></li> <li><i>2. The feasibility and viability of either site HO9, H12 or ED2 or potentially another site for a new secondary school and 6th form college.</i></li> </ol>	The Council is working with the trust to ensure the educational needs of Kenilworth are met. The Council believes that the most appropriate way of achieving this is through the policies set out in DS11 and DS12. Ongoing discussions with the Trust indicate that the Trust also share this view.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66253 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>The Plan and its evidence base suggest that as a consequence of these developments significant additional traffic will be generated and pass through the historic town of Warwick.</p> <p>Phase 4 Strategic Transport Assessment suggests few traffic management measures are required to accommodate such an increase in traffic and would conserve the significance of the historic environment as a consequence.</p> <p>It remains unclear, a) how the historic environment was considered, as STA4 makes little or no reference to the historic environment, and b) what are the implications of the additional traffic on levels of congestion and as a consequence the character and setting of the town.</p> <p>An increasing demand to travel through the town provides an opportunity to enhance the public realm and streets in the town consistent with NPPF para 137, 156 and part of the Plans positive strategy for the conservation of the historic environment (NPPF para 126).</p> <p><i>Can the local authority assure English Heritage that :-</i>  <i>-The direct, indirect and cumulative effects of proposals on the historic environment have been appreciated?</i>  <i>-That there has been an assessment in accordance with the Transport Analysis Guidance (DOT May 2014) including the methodology for assessing townscape, landscape and the historic environment?</i>  <i>-That the principles of good practice in Manual for Streets, and the Design Manual for Roads and Bridges have been applied?</i>  <i>If not the evidence base should be complimented to ensure that the local plan is based upon adequate, up-to-date evidence; without which, the local authority will not be able to assert that the objectives for sustainable development have been understood nor as a consequence that the objectively-assessed development needs of the area can be met in a manner which will accord with the presumption in favour of sustainable development (NPPF para 14). One of the core dimensions of sustainable development being the protection and enhancement of the historic environment (NPPF para 7).</i>  <i>The evidence base will help to inform what the local plan needs to do in order to deliver a positive strategy for the conservation and enhancement of the historic environment.</i></p>	<p>Since the publication Draft Local Plan was prepared a number of actions have been taken</p> <p>a) Heritage Settings Assessment for the proposals for Banbury Rd/Myton Rd</p> <p>b) Review of some of the outline junction proposals to scale these back in the most sensitive areas (eg Castle Hill)</p> <p>c) Demand Management Transport study, which may provide the opportunity to further reduce the impact of some junctions</p> <p>It should be noted that the junction schemes are indicative only and the STA and Local Plan are strategic documents. Some of the issues raised in this representation will be addressed when detailed junction design is undertaken. However the points are noted and a paper will be prepared to demonstrate how WDC and WCC have worked together and will continue to work together to ensure the impacts on heritage assets that may be affected by the junctions are understood and mitigated and that opportunities for enhancements are also considered. This can inform future detailed scheme design.</p>	<p>No change to the proposals in DS11. However, a paper will be prepared to demonstrate how WDC and WCC have worked together and will continue to work together to ensure the impacts on heritage assets that may be affected by the junctions are understood and mitigated and that opportunities for enhancements are also considered. This can inform future detailed scheme design.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>A failure to address such concerns may cause the Plan to be considered unsound.</i>		
66269 - Mr. Paul Hodge [7249] 66439 - Mrs Luisa Hodge [206]	Object	<p>The housing provision proposed to the south of Warwick is excessive. The New Local Plan disregards green belt yet does not pursue with sufficient vigour brownfield sites. Brownfield sites are preferable yet appropriate Green belt would be a far better option to distribute the development, rather than inappropriate green field sites.</p> <p>The plan is not justified because it crams so much of the new development into the already congested south part of the district. The pressure on schools and the road system is already immense. The road network between Myton Road and Europa Way will not cope with the development and then the massive associated increase in school traffic.</p> <p>The plan is not justified because it is creating more car-dependent suburbs, with thousands more car journeys each day.</p> <p>The plan is unsound because it will contribute to the already illegal air quality in central Warwick. This problem has been in existence long before the Preferred Options were set out and remains in breach of these regulations today. I object to the increased public health risk which adding more cars to the centre of Warwick at peak times will certainly contribute to.</p> <p><i>There needs to be a better and more balanced spread of new housing allocations included in the Plan through an alternative approach to locational distribution of housing in order to avoid some 52% (or 3245) of the 'new' sites (6188) being located South of Warwick town, by:</i></p> <ol style="list-style-type: none"> <li><i>1. Increased provision on the northern side of the main settlements, i.e., on the Birmingham and Coventry sides, where a significant proportion of the car borne workers travel daily, and especially the northern side of Warwick town.</i></li> <li><i>2. Such locations should include: Budbrooke which is close to the park nad Ride facility and the A46 corridor; Hatton, with similar advantages; and areas adjoining Coventry (airport and Gateway,) where very large scale employment proposals of a regional scale are becoming available.</i></li> </ol>	<p>The STAs show that the impact of the proposed allocations can be accommodated on the transport network subject to mitigation.</p> <p>The spatial strategy and the site assessments indicate that the Council's approach is soundly based.</p> <p>the air quality study shows that air quality will improve significantly during the Plan period.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65727 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>Considers inclusion of Land West of Europa Way as a strategic growth area for residential development is justified. The principle of including a mix of uses to the West of Europa Way is deemed appropriate including provision of a medical centre, primary school, local centre and the principle for the expansion of Myton School. However the Local Plan approach to the development of Community Facilities is not considered to be positively prepared, justified, effective or in accordance with national policy and WCC has concerns about the uncertainty as to the amount of land required for the expansion of Myton School. The inclusion of 8ha of employment land to the West of Europa Way is not deemed appropriate in market, quantum and location terms.</p> <p><i>If a suitable evidence base cannot be produced to justify allocating an alternative use for this existing office location, with subsequent need to allocate additional land on the edge of the urban area for office uses, then the appropriate modification to the Local Plan would be to retain the site in or even safeguard the site for office use. The employment land allocation proposed for the Land West of Europa Way should be removed and the inclusion of other community facilities should be reviewed and justified.</i></p>	<p>The Council consider that there is evidence that additional employment is required and that predominantly the medium to long term need is for B1 uses (as evidenced by the Employment Land Review 2013). Further the Council considers that the land north of Gallows Hill is suitable for employment given its proximity to new housing, its access to transport network and its synergies with other employment sites in the area. However, since the Publication Draft was produced, land at Stratford Road, Warwick has been made available for employment land. Subject to the outcomes of the consultation, the Council is proposing that this would be an appropriate site for employment and could replace the employment allocation north of Gallows Hill. This in turn can release the land at Gallows Hill for housing and other uses.</p>	<p>Amend the Plan (subject to the outcomes of the November 2014 focused changes consultation) to allocate land north of Gallows Hill for Housing and Community Sports Facilities/Stadium</p>
65519 - Sharba Homes Group [12779]	Object	<p>Green Belt sites have been chosen before non-greenbelt sites have been exhausted. It is clear that there is a vast disproportion of distribution throughout the District's villages. Larger, more sustainable villages, with boundaries outside of Green Belt are proposed to accommodate far less housing when compared to smaller, less sustainable villages tightly constrained by Green Belt. 64% of the total requirement is expected to be achieved from villages currently within Green Belt, despite Barford and Radford Semele being capable of accommodating far higher levels of housing than proposed. As there are additional sites within these two non Green Belt villages that can accommodate housing without the need for incursions into Green Belt the approach to is unsound and does not comply with national policy.</p> <p><i>Radford Semele and Barford should take more housing as they are large villages which lie outside the green belt</i></p>	<p>The settlement hierarchy indicated that Radford Semele is a Growth village and that it is therefore a sustainable location for some additional development. However the detailed site assessment work undertaken for the village (particularly relating to landscape) showed that many of the sites around the village were unsuitable due to landscape issues. This meant that options for allocating sites were limited. Barford was also an identified growth village and like Radford Semele, a range of sites were assessed. Those allocated were considered to be the only ones suitable for development.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65987 - Barwood Development Securities Ltd [12821]	Object	<p>The assumption that all the urban brownfield sites, along with the small SHLAA sites, will yield 1,330 units with no allowance for non-implementation or slippage is questionable.</p> <p>To reflect the uncertainties connected to the deliverability of a number of the urban brownfield sites, Barwood recommends that a 10% reduction is applied to the number of dwellings which could be delivered on urban brownfield sites.</p> <p>The identification of Bishop's Tachbrook as a 'Growth Village' is supported, as it is truly capable of accommodating growth.</p> <p>It is considered however the Plan is currently unsound as it identifies some 20 villages within this category some of which will only bring forward 10 or fewer units.</p> <p>Barwood strongly disagrees with the identification of only a single allocated site in Bishop's Tachbrook, when the location is capable of accommodating greater levels of growth than those currently proposed.</p> <p>Land to the South of Mallory Road is a site which is better placed to accommodate residential development than the site to the south of the Primary School. Barwood strongly disagrees with the decision not to allocate this land for residential development.</p> <p>Barwood consider that the approach taken by the Council in allocating housing sites within Growth Villages is not sound as it is not consistent with the Framework. The policy approach does not allow for a sufficient choice and range of dwellings.</p>	<p>Market demand is very strong in the District and the Council has a very strong record of implementation with a much lower rate of non-implementation than many parts of the Country, this includes brownfield sites. Each of the brownfield sites has been carefully assessed and there is a high probability that these can be delivered. Further discounting in the way proposed is only really relevant for the first 5 years when sites are required to be deliverable. Beyond that, the test is that sites should be developable and in this context a 10% reduction is not appropriate. The Local Plan makes a further allowance in two ways:</p> <p>a) by allocating some additional land over and above the minimum requirement (12,964 allocated to meet a need of 12,860) - see para 2.21</p> <p>b) taking cautious assumptions about windfalls whereby on average 191 windfall dwellings per annum have been achieved between 2002 and 2013 (even with a 3.5 years housing moratorium), whilst the draft Local Plan allows for 165 per annum. The Council will of course continue to monitor permissions and delivery and is committed to reviewing the Plan should the annual monitoring demonstrate that the development strategy is not delivering (see Delivery and Monitoring Activities).</p> <p>The Council has prepared a village hierarchy and has used this to indicate the appropriate level of growth for each village subject to capacity. Through this, the Council has identified 10 Growth Villages where sites have been allocated. For Bishops Tachbrook the site south of the School has been assessed as the most suitable and has local support. The land South of Mallory Road was considered to be inappropriate on landscape grounds. Since the Publication Draft was prepared, the land South of the School has been given planning permission whilst an appeal for land South of Mallory Road has been dismissed primarily landscape grounds.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65480 - Sarah Palmer [12871] 65487 - Sarah Palmer [12871]	Object	<p>The objection is to the omission of land on the north-east side of Red Lane (i.e. opposite allocated site H24 and immediately south-east of the houses on Red Lane that form part of the main built-up area of the village) as a housing allocation.</p> <p><i>The land should be positively allocated for housing - excepting (only if HS2 proceeds) that part within the Safeguarding Direction. The allocation should include an appropriate proportion of affordable housing and the provision of open space and structural landscaping</i></p>	<p>The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. Although the SHLAA indicates that the site could be suitable, the site is currently identified in proposals for HS2 which runs along the north eastern boundary. It is not considered that availability within the plan period could be relied upon.</p>	
6576 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>The greenfield and in some cases Green Belt allocations in Policy DS11 are not justified and the Green Belt locations would be contrary to national policy. A housing requirement of approximately 8,000 dwellings would not require any significant greenfield land to be used, and housing in Green Belt could be limited to 1-2 houses on sites within washed-over villages (Policy H11).</p> <p><i>The following housing locations should be deleted from the table in Policy DS11:</i></p> <p><i>Locations HO1 (Land W of Europa Way, HO2 (South of Harbury Lane), HO4 (SE of Lillington), HO6, ED2, H19, H20, H23, H24, H26, H27, H29 to H33 (5 sites at Kingswood), H34-37 (four sites at Leek Wootton), H38, H18 (Aylesbury House).</i></p>	<p>the Council considers the Local Plan housing requirement is robustly supported by evidence. Greenbelt has only been released where exceptional circumstances have been justified and all sites have been assessed for suitability - see Site Selection Methodology - April 2014 .</p>	No change
66256 - Taylor Wimpey UK Ltd (Andrew Taylor) [269]	Object	<p>There is no reasonable prospect of land at Opus 40 being used for employment within B1. The assumptions made in the 2013 Employment Land Review are flawed. Market signals and relative need for residential land in sustainable locations which is readily deliverable cries out for this site to be allocated for residential purposes.</p> <p><i>Opus 40 should be allocated as an urban brownfield site for housing in Policy DS11</i></p>	<p>The Council accepts that there is evidence that "there is no reasonable prospect of land at Opus 40 being used for employment within B1" and therefore accepts the proposed amendment. However the Council remains of the view that the 2013 ELR is valid and has therefore proposed to compensate for the loss of employment land at Opus 40 by allocating land at Stratford Road, Warwick</p>	See focused changes proposals: allocate Opus 40 for housing

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65703 - Lioncourt Homes [11870]	Object	The site at King's Hill, Finham has not been properly assessed as was recommended in the Green Belt Review 2009. There is no justified reason as to why this site should be discounted from Green belt release and not included as an allocated housing site. It proves to be less sensitive than Oak Lee Farm, Baginton and some of the village sites and does not meet all of the purposes of the Green Belt set out in the NPPF. This site could deliver some of the housing requirements in Warwick which are potentially undeliverable. In this regard, as a minimum the site could be identified as ADR.	<p>The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated.</p> <p>This site lies within the green belt and given the availability of land outside the green belt, there are no exceptional circumstances for releasing this area from the green belt.</p>	
<i>Inclusion of King's Hill, Finham in DS11 Allocated Housing Sites</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66178 - Hallam Land Management and William Davis [8278]	Object	<p>This representation relates to the omission from Policy DS11 of the site, on land south of Gallows Hill from the list of sites allocated in the policy for residential development.</p> <p>Application W/13/1434 was prepared and submitted on the basis of the Council's clear indication in the RDS of 2013 that the site formed an integral and necessary component of the strategic development proposals south of Warwick, Leamington Spa and Whitnash.</p> <p>The land to the south of Gallows Hill no longer forms a part of the proposals set out in the Publication Draft Plan, due to matters of heritage concerns.</p> <p>Our clients conclude that subject to the heritage concerns being "resolved" there are no technical or other sustainable development reasons that would inhibit the allocation of this site in the Local Plan.</p> <p><i>It is considered that Policy DS11 should be modified to include a housing allocation at Gallows Hill as follows.</i></p> <p><i>Greenfield sites edge of Warwick, Whitnash and Leamington</i></p> <p><i>H01A. Land south of Gallows Hill 700 dwellings</i></p> <p><i>The effect of this proposed modification to the plan is to "reinstate" the allocation as described in the RDS without the option for employment land.</i></p> <p><i>The allocation of land to the south of Gallows Hill is required to "replace" the Green Belt land allocation at Kenilworth, to which my clients object and which, in thier view, is an unsound allocation not supported by an appropriate level of evidence. The allocation is also required in order to secure sufficient land to meet the objectively assessed need for housing to be met in the District.</i></p> <p><i>It is further considered that the proposed allocation represents a suitable site for housing that would not cause any material harm to the setting of Warwick Castle Park or to the wider experience of other historic assets within the Warwick Conservation Area. Any potential harm, as may arise from the development, can be</i></p>	<p>The land allocated at Thickthorn, Kenilworth and the amendments to green belt boundary to accommodate that location has been justified to ensure the specific housing needs of Kenilworth are met. The town is tightly surrounded by Green Belt and Thickthorn represents the most sustainable green belt location to provide for the Town's needs.</p> <p>The site at 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 by development.</p>	No change

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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>
		<i>overcome by suitable mitigation measures.</i>		

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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>
66467 - Gladman Developments (Peter Dutton) [9149]	Object	<p>Consistent with the proposed spatial strategy policy, identifies sites within and on the edge of the main urban areas of Warwick, Leamington Spa, Whitnash and Kenilworth and allocations for the district's identified Growth Villages. The Policy also makes provision for a site to be allocated on the edge of Coventry.</p> <p>Council previously consulted on its proposed site allocations in the district's Growth Villages through the LP: Village Housing Options and Settlement Boundaries Consultation in November 2013. Through this consultation and with particular regard to Radford Semele, Council identified Land to the East of Church Lane as their preferred option to provide a housing site in the village. However, citing comments received to the LP: Village Housing Options and Settlement Boundaries Consultation and further work that has now been undertaken on landscape quality and sensitivity, the preferred allocation in the village has been amended to Land North of Southam Road.</p> <p>Policy Analysis</p> <p>Previously made clear strong support for the Council's decision to promote Land to the East of Church Lane, Radford Semele, as preferred locations for a future allocation within the village. Alongside site-specific representations prepared, we submitted that this represented a wholly sustainable and suitable location for further residential development to accommodate a proposal of up to 130 homes. Highlighted that there were no significant constraints to bringing site forward that could not be overcome through an appropriately planned scheme.</p> <p>In light of our previous representations therefore strongly object to decision to withdraw Land to the East of Church Lane as preferred location for further development in the village. Whilst we are aware of the further work undertaken to assess landscape quality/sensitivity around Radford Semele, we object to the results of this assessment in relation to development on Land to the East of Church Lane, which indicates only a small portion could be developed. Clearly demonstrated through a number of technical studies prepared for our recent planning application for the site, a scheme of up to 130 dwellings can come forward in this location whilst still respecting the setting and views of St Nicholas Church and the landscape character of the site. Submit that Land to the East of Church Lane, Radford Semele, should now be reallocated for a development of up to 130 dwellings, to meet the authority's housing needs.</p> <p>Site represents wholly sustainable location and is available/achievable now. Submit there are no justifiable reasons why could not contribute to district's housing needs. Further details for this site have been prepared. These representations further demonstrate the suitability of site for</p>	The site has been assessed as high landscape quality and the Council therefore remains of the view that it should not be allocated	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>residential development and should be read alongside this submission.</p> <p>Conclusions on Soundness</p> <p>Object to Council's decision to withdraw Land to the East of Church Lane as their preferred location for an allocation in Radford Semele. Demonstrated this site represents a wholly sustainable and suitable location for further development to meet the authority's housing needs. In the process of preparing a planning application for the site, have prepared number of technical studies which clearly demonstrate that there are no significant constraints that would preclude a development of up to 130 dwellings on the site. Strongly question findings of Council's landscape quality and sensitivity assessments for the site.</p>		
65281 - A C Lloyd Homes Ltd [5958]	Object	<p>A C Lloyd Homes object to Policy DS11 as the overall housing numbers being provided for are too low. It is considered that additional sites should be included to make up the shortfall, and greater flexibility should be built into development within the Growth Villages.</p> <p>The current approach of allocating a small number of sites with very tightly drawn settlement envelopes is inflexible and there is a very real danger that limited choice is being provided. Two sites that could assist in this shortfall at Spring Lane, Radford Semele and Seven Acre Close Bishop's Tachbrook.</p> <p><i>It is considered that the Council should alter Policy DS11 to provide an overall figure for the Growth Villages, allocate known suitable sites, and then provide a criteria based policy for additional sites to come forward in the plan period. There are two sites that could assist in this shortfall at Spring Lane Radford Semele and Seven Acre Close Bishop's Tachbrook</i></p>	<p>The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated.</p> <p>The Council considers that it is important to keep village settlement boundaries relatively tightly drawn to ensure development is focused on the most suitable sites within the more sustainable village locations. Further Policy H1 allows for a flexible approach within the village boundaries.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66117 - Mr and Mrs Martin [12851]	Object	<p>The 2009 Green Belt review is considered dated and in need of review to properly inform the Council's Local Plan. It fails to consider sustainable sites in well placed locations such as the land west of Old Budbrooke Road. The review methodology is considered flawed and has resulted in sustainable sites that should have been considered for release being missed.</p> <p>The 2012 review which although followed the NPPF, only focused on several sites and did not seek to remedy the issues outlined above. Without an up to date and thorough review, the evidence base relating to the Green Belt is considered flawed.</p> <p>The land west of Old Budbrooke Road, has good transport links and is served by a number of nearby amenities. With regard to the quality of the environment, the land is not open as one would expect the Green Belt to be, it has become urbanised through developments including housing, employment and transport infrastructure. Therefore the Green Belt in this location no longer serves the purpose of the Green Belt, as set out in the NPPF, and its protection in this area is no longer considered critical when assessed against those objectives. Furthermore initial technical work has been undertaken which indicates that there are no environmental or physical constraints to development.</p> <p>The site should be considered for allocation now and within this plan-period. Its proximity to the strategic and local highway network and its connections to Birmingham and Coventry are such that the site can make a significant positive contribution in assisting Warwick District Council in satisfying its duty to cooperate.</p> <p><i>At the very least the site should be allocated within the plan as a 'safeguarded site' such that should a review take place and a housing need be identified, the site can swiftly come forward to address that need.</i></p>	<p>The 2009 Green Belt Review was effective in assessing sites on the edge of the main urban areas and has been used to inform allocations in these locations. The 2013 Green Belt Study explored the value of green belt parcels around all the Districts main villages, including Budbrooke. Land west of Old Budbrooke Road was assessed within Parcel HP7. This parcel was assessed as high value green belt: "Strategically significant Green Belt parcel which fulfils a very valuable role in maintaining the open space between settlements - also contains a number of areas of environmental importance".</p> <p>The site was not allocated due to the importance this area plays in maintaining open space between settlements.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65366 - John Bausor [981]	Object	<p>The Plan is not justified in that the inclusion of these sites at Crew Lane for housing and their exclusion from the Green Belt is, in part, a reasonable alternative to the provision of housing in Kenilworth on a very limited number of large sites.</p> <p><i>Adjustment to the Green Belt boundary in the area north of Crew Lane and east of Glasshouse lane to bring two smaller parcels of land into the equation. It is considered that these are well related to the schools and Leyes Lane shops (Local centre) and should be brought into consideration as they can be delivered relatively quickly/ easily.</i></p>	<p>This site has been assessed (see sustainability appraisal and site selection methodology) and is not supported in preference to Thickthorn for a variety of reason (green belt, employment options, access to transport network etc). For this reason, exceptional circumstances to justify its release do not exist.</p>	
65235 - Deeley Group Ltd [11623]	Object	<p>Deeley Group object to Policy DS11 as the overall housing numbers being provided for are too low. It is considered that additional sites should be included to make up the shortfall, and greater flexibility should be built into development within the Growth Villages. The current approach of allocating a small number of sites with very tightly drawn settlement envelopes is inflexible and there is a very real danger that limited choice being provided. Two sites that could assist this shortfall at Home Farm, Leek Wootton and Friends Close Baginton.</p> <p><i>It is considered that the Council should alter Policy DS11 to provide an overall figure for the Growth Villages, allocate known suitable sites, incorporate flexibility in the settlement boundaries and then provide a criteria based policy for additional sites to come forward in the plan period. There are two sites that could assist in this shortfall at Home Farm, Leek Wootton and Friends Close, Baginton.</i></p>	<p>The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated.</p> <p>The Council considers that it is important to keep village settlement boundaries relatively tightly drawn to ensure development is focused on the most suitable sites within the more sustainable village locations.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66271 - Lands Improvement Holdings (LIH) and Kenilworth Golf Club (KGC) (Miss Aoife Conacur ) [12813]	Object	<p>Based on our assessment in Section 2, we consider that a proportion of the District wide housing requirement should be directed to Kenilworth. As a minimum, the Local Plan should direct 2,122 new dwellings to Kenilworth.</p> <p>The level of housing growth for Kenilworth falls significantly short of the minimum 2,122 dwellings that we consider to be required to meet local housing need in the town. This is a shortfall of 892 dwellings. However, applying a more robust District-wide total (13,896) the shortfall will be 1,063 dwellings.</p> <p>This creates a clear requirement to identify additional suitable locations for housing development in Kenilworth. In accordance with the NPPF requirement to plan positively and to meet for the needs of the area, WDC should aim to accommodate higher levels of housing growth in Kenilworth.</p> <p>There are limited housing sites within the built up area of Kenilworth, other suitable sites need to be allocated in or around the town.</p> <p>Kenilworth Golf Club (KGC) has already been identified by WDC as a potentially suitable site to accommodate housing growth in the town. In order to address the shortfall in housing provision in Kenilworth, KGC should be allocated for housing. The site can accommodate 700 - 1,000 new dwellings, together with a mix of supporting community uses and high-quality formal and informal open space.</p> <p>It should be noted that the Green Belt function of the site will be eroded by the route of HS2 as it will no longer form a cohesive part of the wider Green Belt or the countryside area. The site, therefore, offers an opportunity to accommodate significant housing growth in addition to the sites already identified to meet the housing needs of Kenilworth.</p> <p><i>On this basis, the KGC site should be released from the Green Belt and allocated for housing.</i></p>	<p>Whilst it is accepted that Kenilworth requires new housing, the town is surrounded by green belt and a purely proportionate approach is not appropriate in these circumstances.</p> <p>The site was assessed (see site selection methodology) as high value landscape, amongst other things, and was not considered to be as sustainable a location as the Thickthorn site. It was therefore not allocated.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65350 - Martin Teodorczyk [5004] 65357 - Mrs Laura Teodorczyk [5011]	Object	<p>A sequential test focussing on brownfield and in-town sites has not been completed.</p> <p>No 'exceptional circumstances', as required by the NPPF to justify development in the Green Belt are identified, nor indeed exist.</p> <p><i>Adopt a meaningful sequential test that prioritises brownfield development.</i></p> <p><i>Adopt Planning Briefs for major previously-developed sites to provide clear policy support for principle of mixed use and residential development in key future sites (e.g. area around Leamington station).</i></p>	<p>The Council's approach is to consider brownfield sites for development ahead of green field sites and to only release greenbelt for development where exceptional circumstances can be justified (see policy DS5). This approach has been applied to the selection of sites. A significant part of the area around Leamington Station is allocated for residential and the remaining areas are being brought forward for alternative uses.</p>	
66108 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991]	Object	<p>Objections are raised to the arbitrary restriction in the amount of development on each allocation. The NPPF seeks to boost significantly the supply of housing and to make good use of land.</p> <p>No evidence has been provided from the Council to reason why the various sites have been restricted to the number they have. The figures should at the very least be expressed as a minimum in order to satisfy the requirements of the NPPF.</p> <p>It is important to make best use of land when developing, particularly in villages which may only see this level of growth within any given plan period.</p>	<p>It is not possible to express the capacity of each site as a minimum as the detailed assessment of each site to establish the impact of all constraints has not been undertaken and is not appropriate for a strategic document such as a local plan. However, the point raised in the representation that the capacity of some of the sites could change (and could be higher) is accepted and therefore the title of the third column in DS11 will be amended to be expressed as an estimate.</p>	<p>Amend title of third column of DS11 to read: "Number of Dwellings (estimated)"</p>
65215 - Nurton Developments & the Forrester Family [12680]	Object	<p>Land at Loes Farm provides a suitable location for development and could make provision for housing in response to needs identified in representations under other policies.</p> <p><i>Land at Loes Farm should be removed from the Green Belt and allocated for residential development, or at the very least safeguarded in order to make provision for housing in response to a review of the Local Plan.</i></p>	<p>The site was not allocated on landscape and heritage grounds (see site landscape assessments). Further the Council considers that sufficient land has been allocated to meet the needs of the District over the plan period and that therefore there are no exceptional circumstances to justify the allocation of further green belt land.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66705 - Barwood Strategic Land II Limited [9441]	Object	<p>The assumption that all the urban brownfield sites, along with the small SHLAA sites, will yield 1,330 units with no allowance for non-implementation or slippage is questionable.</p> <p>To reflect the uncertainties connected to the deliverability of a number of the urban brownfield sites, Barwood recommends that a 10% reduction is applied to the number of dwellings which could be delivered on urban brownfield sites.</p> <p>Further to the removal of both The Asps and Land South of Gallows Hill from the Local Plan, the Council has produced two draft evidence base documents entitled 'The Setting of Heritage Assets', one of which relates to The Asps and one related to Land South of Gallows Hill. Both documents are stated to be in draft and, to our knowledge, have not been subject to consultation or scrutiny.</p> <p>Barwood's consultant team have previously, in our response to the Revised Development Strategy, provided a detailed and thorough response to the RMA work and English Heritage's commentary. The soundly based technical Heritage Setting Assessment prepared by EDP and submitted in support of The Asps planning application demonstrates the suitability of The Asps to accommodate a significant amount of development with (following mitigation) no harmful impacts on the landscape which is adjacent to it, or indeed to the historic setting of the town, the Castle Park and other relevant heritage assets.</p>	<p>Market demand is very strong in the District and the Council has a very strong record of implementation with a much lower rate of non-implementation than many parts of the Country, this includes brownfield sites. Each of the brownfield sites has been carefully assessed and there is a high probability that these can be delivered. Discounting is really only relevant in the first 5 years when sites are required to be deliverable. Beyond that, the test is that sites should be developable and in this context a 10% reduction is not appropriate across the whole plan period. However, the Local Plan makes allowance for non-implementation in two ways:</p> <p>a) by allocating some additional land over and above the minimum requirement (12,964 allocated to meet a need of 12,860) - see para 2.21</p> <p>b) taking cautious assumptions about windfalls whereby on average 191 windfall dwellings per annum have been achieved between 2002 and 2013 (even with a 3.5 years housing moratorium), whilst the draft Local Plan allows for 165 per annum. The Council will of course continue to monitor permissions and delivery and is committed to reviewing the Plan should the annual monitoring demonstrate that the development strategy is not delivering (see Delivery and Monitoring Activities).</p> <p>The Council has assessed the Asps and the land South of Gallows Hill. It has been decided not to allocate these sites due to the significant landscape and heritage impacts of the sites. The heritage settings assessment demonstrated that these sites would have a harmful affect to the heritage assets - notably Castle Park and Warwick Castle.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66782 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>This does not take account of previous years oversupply; completions to date; sites under construction; vacant dwellings already returned; permissions not started; further permission between April and December 2013; offices to residences approved; windfall sites for the plan period; small urban sites on SHLAA sites and consolidation of existing employment areas and canal side development. This means that if the housing numbers identified as needed by a revised approach on population numbers and the conversion method to number of dwellings then no further applications need to be granted to meet the plan as there is already a surplus provision.</p> <p>If the maximum figure for the reduced population projection figure of 9,217 is considered to be necessary, then to this list can be added allocated urban brownfield sites definites only; 2 greenfield sites in urban locations; 4 sites accepted in villages and 6 sites granted since January 2014 can be added giving 9,601 dwelling sites.</p> <p>The reduced population projection and the related reduction in the number of houses required now means that the use of any further greenfield sites cannot be demonstrated to be necessary and those should be removed from DS11.</p> <p>Grove Farm at 200 dwellings, future vacant dwellings return and a list of 543 C2 homes for the elderly can also be counted in the supply. With these it would not be necessary to keep the sensitive urban brownfield and sensitive greenfield in DS11.</p> <p><i>Further greenfield site allocations should be removed from the Plan including</i>  <i>Land west of Europa Way</i>  <i>East of Whitnash/south of Sydenham</i>  <i>Campion hills</i>  <i>East of Kenilworth (Thickthorn)</i>  <i>Both Kenilworth School sites</i>  <i>All villages except Bishops Tachbrook, Barford and Radford Semele</i>  <i>Land south of Harbury Lane, (including the former sewage works which is wrongly classified under Urban Brownfield sites).</i></p>	<p>The Council considers that the proposed level of growth in the publication draft plan is justified. In this context it is unrealistic to remove the allocations suggested in the representation. Further the Council considers that the proposed sites are sustainable locations for development following careful assessment (see site selection methodology and village sites matrix)</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66796 - Gallagher Estates [644]	Object	<p>It is necessary for the authority to allocate additional sites to make up the housing shortfall in order to meet objectively assessed housing need. Land identified as South of Gallows Hill should be allocated for this purpose for 450 dwellings with associated green infrastructure. The site is available now, offers a suitable location for development now and there is every prospect that a number of houses can be delivered within five years. The site has sustainability benefits similar to land South of Harbury lane and the sole reason why the site is not allocated for development is due to the heritage settings assessment. Technical work undertaken by Turley Associates raises concerns regarding the robustness of the Council's evidence base and draws very different conclusions in terms of the acceptability of development on the site. This reaches the conclusion that only a very limited degree of harm would arise from development south of Gallows Hill. In the context of the NPPF, paragraph 134 this constitutes less than substantial harm where the harm is to be weighed against the public benefits of the proposal. Indeed this approach is advocated in proposed Policy HE4 of the Draft Local Plan. It is not the case, as advanced in the Council's evidence base and SA, that because there is harm, no matter how limited that is, that a site should not be developed. Such an interpretation is not consistent with the NPPF, is not justified and is unsound. This would be in the public benefit consistent with paragraph 134, NPPF as it would deliver sustainable development in a location that would not require further incursions into the statutory Green Belt.</p> <p><i>Allocate land South of Gallows Hill for 450 dwellings</i></p>	<p>The Council has undertaken a heritage setting assessment encompassing this site. The Council accepts that the harm to the significance of heritage assets from this is likely to be less than substantial, but that it is at the upper end of less than substantial. This means there needs to be a significant public benefit to outweigh the harm. As the Council is able to meet the housing requirement without allocating this site, the Council has concluded that the public benefit does not outweigh the harm.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64561 - Mr Haydn Rees [7859] 65060 - Mr Donald Asbury [8381] 65073 - Mr N Hemming [7784] 65094 - Mrs Gill Polgreen [7872] 65095 - Mr Jonathan Hull [11508] 65120 - John Lange [8825] 65136 - Mrs Emma Lange [11497] 65151 - Kingswood Residents Group (Professor Leslie Clark) [7676] 65152 - Miss Claire Brown [11625] 65157 - Mrs Helen Clark [8507] 65214 - Mr Leslie Roxborough [12698] 65230 - Lapworth Parish Council (Mrs Elaine Priestly) [1334] 65365 - MR DAVID EVANS [12725] 65367 - Andy Copland [12728] 65368 - Mrs Amanda Dyhouse [8448] 65473 - Mr Rhoderic Nicol [6827]	Support	Support the current sites proposed for the Kingswood area. The views of local residents have been listened to and the consultations have been fair. The sites chosen for development around Kingswood are sympathetic to the existing village whilst still contributing to the additional housing requirements.	Noted	
65760 - Mrs E Brown [5142]	Support	Observe the proposed allocation to be sound and appropriate, it will have the least impact on the wider landscape and the openness of the Green Belt. The site is sustainably located with nearby community facilities and potential highway capacity. The site has no constraints in terms of access, flooding and protected species, with a limited impact from noise. Overall the site is sustainable and can be developed without harm to the wider Green Belt.	Noted	
66713 - Gleeson Developments [5117]	Support	Gleeson supports the general allocations set out in Policy DS11 (Allocated Housing Sites), including site H09, Kenilworth School and H12 Kenilworth VI Form College.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66764 - King Henry VIII Endowed Trust (Warwick) [6195]	Support	<p>Throughout previous consultation stages of the Local Plan the settlement of Hampton Magna has been identified as being capable of accommodating between 100 and 150 new homes. Informed by the findings of a green belt review, in 'Village Housing Options and Settlement Boundaries Consultation' (November 2013) the District Council identified land held by the Trust as the preferred site for new housing in the village. We support this recommendation and the Council's decision to allocate the site for development under Policy DS11 in the Draft Local Plan; site reference H27 'Hampton Magna - South of Arras Boulevard'.</p> <p>It is the Trust's considered view that not only is Hampton Magna a suitable location for additional growth, we strongly believe that the village can benefit greatly from well planned development of an appropriate scale. Measuring approximately 6 hectares the allocated site has the capacity to comfortably deliver 100 dwellings in a location which would not undermine the stated purposes of the Green Belt. As equally important, given the site's size, sufficient land is available to accommodate new tree planting to help screen the development and create a well defined edge to the southern part of the village without compromising the overall scheme by forcing up densities.</p> <p>Furthermore from our own Green Belt appraisal and baseline assessment of the site's development potential, we consider that land South of Arras Boulevard is not only a logical location for new development at Hampton Magna but the best site based on the following factors:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Least impact on the Green Belt</li> <li><input type="checkbox"/> Least landscape and visual impact</li> <li><input type="checkbox"/> Physically well connected to the village, with good vehicular access</li> <li><input type="checkbox"/> Physically well located to the primary school and existing local facilities</li> <li><input type="checkbox"/> Physically set back from the A46 and the railway line - sources of visual and noise</li> <li><input type="checkbox"/> impact</li> <li><input type="checkbox"/> No known physical or environmental constraints to development</li> </ul> <p>The Trust can also confirm that not only does the site offer a suitable location for development now, but it is also viable and achievable, with a realistic prospect that housing will be delivered on site within five years.</p> <p>Finally, the King Henry VIII Endowed Trust has well established strong links with the local community and is keen to bring forward development that is built to a high standard of design and environmental performance, which the Charity, Hampton Magna and the District Council can be proud.</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>
66697 - Mrs Ann Kelsey [6495]	Support	The plan distributes development whilst making the best use of existing infrastructure and supporting local businesses. The retention of the green belt to the north of Leamington is supported.	Noted	
65218 - Mr Michael Polgreen [8378]	Support	The overall process has been reasonable and that local concerns have been properly reflected.	Noted	
66823 - A C Lloyd Homes Ltd and Northern Trust [6105]	Support	Support the broad allocation of allocated housing sites particularly urban brownfield site H02 Former Sewage Works, south of Harbury Lane and greenfield site H02 land south of Harbury Lane on the edge of Wariwck and Leamington.	Noted	
66830 - Europa Way Consortium [197]	Support	<p>The Consortium fully supports the allocation of Land West of Europa Way for housing and broadly supports the allocation of associated infrastructure (subject to concerns raised in separate representations).</p> <p>The land is within walking distance of existing schools, employment opportunities, and community services.</p> <p>Development may be delivered within five years.</p> <p>By specifying a specific number of dwellings the Consortium considers Policy DS11 to be too restrictive and should be reworded.</p> <p>The allocation for housing on the Myton School campus should be reclassified as brownfield development, and not be included in the 1,190 dwellings for Land West of Europa Way. The figure of 1,190 dwellings should be increased to 1,235 dwellings given the potential reallocation of the 8 ha of employment to residential.</p> <p><i>Amend the table heading 'Number of Dwellings' to 'Approximate Number of Dwellings'.</i></p> <p><i>Increase Approximate Number of Dwellings against allocation H01 from 1,190 to 1,235.</i></p> <p><i>Reference to 8 ha of employment land to be deleted.</i></p> <p><i>The list of 'Urban Brownfield Sites' should be amended to include Myton School.</i></p>	<p>Supported noted.</p> <p>Amendment to title of third column agreed.</p> <p>The number of dwellings will be reviewed to reflect more recent detailed assessments of these sites.</p> <p>The 8ha of employment will be removed subject to the outcomes of the Focussed changes consultation</p>	<p>Amend the third column of DS11 to read "Number of Dwellings (Estimated)"</p> <p>Amend number of dwellings to read 1300</p> <p>Remove reference to 8ha employment land (subject to outcomes of consultation)</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H09 Kenilworth School Site</i>				
65139 - Sport England (Mr Bob Sharples) [1355]	Object	In principal Sport England objects to this allocation. I would refer to my comments on Policy DS6.  <i>Any allocation should not result in the loss of any sports facilities/playing fields, unless they are either replaced or shown through the emerging playing pitch strategy and sports strategy that they are surplus to requirements</i>	This site being allocated for housing is predicated the replacement of a school and an improvement of facilities, including sport, at the allocation ED2.	
67150 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	The Plan now provides that the possible move of the Kenilworth School makes it's existing sites in Leyes Lane and Rouncil Lane available for development. This however has also not been previously proposed and again no formal consultation has taken place. Whilst the main site in Leyes Lane is within the Town envelope, the Rouncil Lane site falls within the existing Green Belt and therefore again must meet the tests appropriate to sites being taken out of the Green Belt. The Town Council is concerned whether the Plan is sound, having regard to there having been no formal consultation in regard to either sites.	The Publication Draft was an appropriate consultation stage for consultation on these sites and there are exceptional circumstances to justify the alter Green Belt boundaries at Castle Sixth Form, Rouncil Lane.	
65209 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	The Local Planning Authority has not involved the community in the preparation of this part of the Plan. Kenilworth School, Leyes Lane , was not in the list of housing sites in the "Revised Development Strategy" that was published for public consultation in June 2013.  <i>To make Policy DS11 Allocated Housing Sites sound we would expect Site No. H09 to be dropped from the Draft Local Plan and the land retained for education purposes.</i>  <i>Any allocation should not result in the loss of any sports facilities/playing fields, unless they are either replaced or shown through the emerging playing pitch strategy and sports strategy that they are surplus to requirements.</i>	It was a consequence of consultation during the preparation stages of the Local Plan that Kenilworth School was put forward as a potential development site. Furthermore this proposed allocation aligns with the Local Plan Strategy and Objectives, which have previously been consulted upon. It is considered that the Publication Draft stage was an appropriate period upon which to consult on such proposals and is legally compliant.  This site being allocated for housing is predicated the replacement of a school and an improvement of facilities, including sport, at the allocation ED2.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66328 - Richard Evans [852]	Object	Included in the plan without previous consultation. Loss of school playing fields. Extra traffic will worsen air quality and traffic congestion in the local area.	The Publication Draft was an appropriate consultation stage.  School playing fields will be re-provided at the new school site.  A Strategic Transport Assessment has identified that there the highway network can accommodate further development in Kenilworth subject to mitigation.  The appropriate level of green space will be provided commensurate with the development proposal in accordance with policy HS4.	
<i>Should be a considerable amount of green space within the development area in order to balance out this lopsided plan.</i>				
<i>H10 Station Approach, Leamington</i>				
64533 - Mr K Craven [4484]	Object	The site is currently used for car parking, both for town users [visitors and employees] and also train users	The site is only being used temporarily for this use. It is the Council's intention to work with stakeholders to bring forward parking in conjunction with the Station either to the north or south of the track in line with the development brief for the area. The housing allocation is being brought forward in this context.	No change
<i>To continue with adequate car parking provision must be made close by if this land is approved for housing.</i>				
<i>H12 Kenilworth VI Form College</i>				
65210 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	The Planning Authority has not involved the community in the preparation of this part of the Plan. Kenilworth School, Rouncil Lane, was not in the list of areas to be removed from the green belt in the "Revised Development Strategy" that was published for public consultation in June 2013. Nor was it in the Revised Development Strategy's list of housing sites.	See similar response in relation to Kenilworth School (Rep ID 67148).	
<i>To make Policy DS11 Allocated Housing Sites sound we would expect Site No. H12 to be dropped from the Draft Local Plan and the land retained for education purposes. It should also remain within the green belt.</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67149 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	The Plan now provides that the possible move of the Kenilworth School makes it's existing sites in Leyes Lane and Rouncil Lane available for development. This however has also not been previously proposed and again no formal consultation has taken place. Whilst the main site in Leyes Lane is within the Town envelope, the Rouncil Lane site falls within the existing Green Belt and therefore again must meet the tests appropriate to sites being taken out of the Green Belt. The Town Council is concerned whether the Plan is sound, having regard to there having been no formal consultation in regard to either sites.	See response to Kenilworth School	
65140 - Sport England (Mr Bob Sharples) [1355]	Object	In principal Sport England objects to this allocation. I would refer to my comments on Policy DS6.  <i>Any allocation should not result in the loss of any sports facilities/playing fields, unless they are either replaced or shown through the emerging playing pitch strategy and sports strategy that they are surplus to requirements.</i>	This site being allocated for housing is predicated on the replacement of a school and an improvement of facilities, including sport, at the allocation ED2.	
66329 - Richard Evans [852]	Object	Included in the plan without previous consultation. Loss of school playing fields. Extra traffic will worsen air quality and traffic congestion in the local area.  <i>Should be a considerable amount of green space within the development area in order to balance out this lopsided plan.</i>	See response to Kenilworth School (Rep ID 67148)	
<i>H13 Soans Site, Sydenham Drive</i>				
66521 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	H16 H13 require any development at these allocations to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. We would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community	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>H16 Court Street</i>				
66523 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	H16 H13 require any development at these allocations to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. We would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community	Noted	
<i>H01 Land West of Europa Way</i>				
66337 - Mr Philip Batt [3101]	Object	This site provides the separation between Warwick and Leamington  Support the comments of the Save Warwick Group.  Traffic impacts are likely to be unacceptable.  <i>The plan should go back to the drawing board to take account of latest ONS projections and the Gaydon/Lighthorne proposals.</i>  <i>Land north of Gallows Hill should be removed to maintain the space between Warwick and Leamington.</i>	An addendum to the joint Strategic Housing Market Area (SHMA) (produced with the other Warwickshire local authorities and Coventry Council) examined the impact of the ONS 2012-based population projections, and concluded that WDC housing numbers should not be reduced.  Mitigation measures proposed through the Strategic Transport Assessment will ensure the impact on traffic remains reasonable.  Proposals for garden suburbs with a major new country park and public open space may go some way to wards compensating for the loss of open land.	None.
66509 - Friends of the Earth (John Brightley) [1113]	Object	We feel that there should also be a strategic landscape corridor along the route of Europa Way as this will a) to some extent mitigate the loss of green fields in this area, b) secure a wildlife corridor linking the Tach Brook with the River Leam and Grand Union Canal, and c) provide an attractive route into Leamington from the south - a route which will most likely serve as the main road entry point into the town for the foreseeable future.	The idea of creating a strategic landscape corridor along the route of Europa Way might be possible to deliver under the proposal for a new garden suburb and the Council has commissioned Design Guidance with a brief that specifically states development should consider the creation of a 'grand boulevard' along Europa Way; it is expected that tree planting and green verges could be part of this.	Consider including the creation of a grand avenue, with tree planting and green verges, along the route of Europa Way

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65582 - Mrs Suw Mitchell [12785]	Object	<p>The allocation of Myton School Playing fields for housing should is not justified and cannot be described as positive planning. The loss of school playing fields is not consistent with national policy. The School and the Council have been lacking transparency in the promotion of the scheme. The Local Plan is therefore unsound.</p> <p><i>The allocation of Myton School Playing fields for housing should be deleted</i></p>	A significant increase in provision of playing fields at Myton School is proposed, with 7.12 ha being provided by the Europa Way Consortium and 2.06 ha being provided by WCC from adjacent development sites.	None.
65502 - Keith Wellsted [8636] 66397 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	<p>Concerns at the impact of housing allocation, which occupies rising land to the west of Warwick Castle Park (Grade 1 listed) and will intrude into views from the park and from Banbury Road.</p> <p>The council states it has been governed by principles set out in DS3 (protecting areas of significance, including high quality landscape) and DS4 ((b) sustainable locations close to areas of employment; (e) avoiding sites with a detrimental impact on the significance of heritage assets and (f) avoiding areas of high landscape value.) These two allocations fly in the face of that.</p>	The housing allocation to the south of Gallows Hill, upon more exposed land, was omitted because of the potential impact upon views from Warwick Castle Park, but the allocation north of Gallows Hill has been assessed by the Council's Conservation Architect, and it is considered possible to develop the site without causing significant harm.	
65429 - Mrs Jean Drew [5047]	Support	Although I disagree with the number of houses required this development appears sound only if the community services especially education and health are also provided. However the size of the development may cause traffic congestion on the local roads even with the proposed road improvements.	Support noted, appropriate education and health infrastructure will be provided, and mitigation measures will be in place to address the increase in traffic.	None.
<i>H02 Land south of Harbury Lane (excluding former sewage works)</i>				
66399 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	<p>Concerns at the impact of housing allocation, which occupies rising land to the west of Warwick Castle Park (Grade 1 listed) and will intrude into views from the park and from Banbury Road.</p> <p>The council states it has been governed by principles set out in DS3 (protecting areas of significance, including high quality landscape) and DS4 ((b) sustainable locations close to areas of employment; (e) avoiding sites with a detrimental impact on the significance of heritage assets and (f) avoiding areas of high landscape value.) These two allocations fly in the face of that.</p>	English Heritage has not objected specifically to this site and the Council's Conservation Architect has assessed the site and concluded that it will not result in unacceptable harm to views from Warwick Castle Park. Following landscape planning assessment work, the size and position of the new Country Park will ameliorate rural views from the south.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65428 - Mrs Jean Drew [5047] 65492 - Keith Wellsted [8636]	Object	I do not agree that this many houses are needed. Also, as many of the services such as employment, education and hospitals are north of the river this development along with that at H01 will increase traffic flow over the river causing congestion. The proposed road improvements will not solve this problem as there will still be the same number of bridges over the river.	The housing numbers have been justified by the joint Strategic Housing Market Area (SHMA) produced with the other Warwickshire local authorities and Coventry City Council, and the figures have been updated to consider the impact of the Office for National Statistics (ONS) 2012-based population projections, which concluded that WDC housing numbers should not be reduced. The mitigation measures proposed in the Strategic Transport Assessment will ensure the impact on traffic remains manageable. No new river bridges were required in the list of mitigation measures.	None.
		<i>This site should not be used for development.</i>		
64950 - Mr Leigh Carter [8277]	Object	Too much housing is being unfairly concentrated South of Leamington devastating the area. Harbury Lane should be a natural barrier to the further expansion of Leamington / Warwick.	The Kings Hill and Stoneleigh site is within the Green Belt. Exceptional justification would be required to release Green Belt. Given that sustainable housing sites outside of the Green Belt are available, an exceptional justification is not substantiated.  A new Country Park is proposed to the south of Harbury Lane which will serve as a 'natural barrier' to further development.	None.
		<i>Put the Kings Hill / Stoneleigh option for up to 5,000 houses offered by Coventry City Council into the local plan. This would spread the housing more evenly &amp; fairly across the district and reduce the impact on any given community. It would also give people more choice on where to live.</i>		
65451 - Mr. Roy Drew [6106]	Object	This land should be regarded as the buffer between the already built-up areas of Leamington/Whitnash and the village of Bishop's Tachbrook. Any development here not only erodes this buffer, making the eventual absorption of Bishop's Tachbrook into the larger built-up area more likely, but is also at odds with the concept of the Tach Valley Country Park, the size of which will be reduced too far. Traffic congestion will become even worse, and, with so few river bridges, increasing the population to the South with all the Emergency Services to the North is irresponsible.	The Council commissioned a study which justifies the size and location of the proposed Country Park, and ensures it will serve as a reasonable green buffer between Leamington/Whitnash and the village of Bishop's Tachbrook.  Mitigation measures proposed through the Strategic Transport Assessment will ensure the impact on traffic remains manageable; the provision of additional river bridges was not considered to be necessary in this Assessment.	None.
		<i>Do not build on this land so that the Country Park is worthy of the name.</i>		

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66795 - Gallagher Estates [644]	Support	The site is deliverable / developable in the terms identified at footnotes 11 and 12 of paragraph 47 of the NPPF. The site is available now, offers a suitable location for development now and there is every prospect that a number of houses can be delivered on the site within five years. Indeed, the site is very well advanced. A planning application was registered for this site in May 2014. Cognisant of paragraph 14 of the NPPF, there are no adverse impacts in developing this site that significantly and demonstrably outweigh the benefits. There is, therefore, the potential to bring forward the site to contribute significantly to the 5 year supply of housing land. The site is sustainable and is easily accessible to employment opportunities and will have a positive impact on social factors such as improving the availability of sustainable transport, access to local services and facilities.	<p>It is agreed that the site H02 south of Harbury Lane is appropriate for a major housing site and it is allocated accordingly.</p> <p>It should be noted that this representation also includes an objection to the omission of the site south of Gallows Hill as a major housing site. This site is no longer proposed for development following representations from English Heritage in relation to potential harm to heritage assets, namely the impact upon views from the Grade I Listed and AM Warwick Castle / Castle Park.</p>	None.
<hr/>				
<i>H03 East of Whitnash/South of Sydenham</i>				
65126 - Mr Barry Bolland [1811]	Object	<p>The objections relate to the loss of a public right of way, the lack of protection for a vital local amenity, possible air and noise pollution, the loss of the remaining rural views from and of Whitnash and the placing of a new community in Whitnash which has no real links to the rest of the community.</p> <p><i>Changes to Plan:</i>  <i>Whilst accepting the need for new houses in the WDC's area, the effects of a these developments could be mitigated by</i>  <i>a) a broad buffer zone between railway and housing.</i>  <i>b) a similar broad zone on either side of the brook and the existing Whitnash to Radford Semele bridleway.</i>  <i>c) suitable planting of trees in the buffer zones and on the perimeter of the new development.</i>  <i>d) by building to the density required by the NPPF; the provision of so much land for 300 new homes does not seem to meet the NPPF requirements so the land area taken for development should be much reduced.</i>  <i>e) provide proper links between the current Whitnash community and the new part by widening the railway bridge in Fieldgate lane.</i></p>	<p>Some of these are details to be discussed at the time of a planning application, however, the NPPF does not require specific densities for new housing developments.</p> <p>The site area is reduced to accommodate approximately 300 houses to allow sufficient land for a buffer, landscaping and open space.</p> <p>It would be too expensive to widen the railway bridge. This would render the site unviable and affect deliverability.</p> <p>The pedestrian links will be an important part of the site however and this aspect will be considered through a planning application</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>
65580 - Midland Red (South) Ltd. dba Stagecoach Midlands (Dr Nicholas Small) [8352]	Object	<p>Despite evidence previously given that this site cannot, by virtue of its location, be effectively served by public transport owing to its severance from the main bus network and its peripherality, it has nevertheless been included as a draft allocation.</p> <p>The allocation is contrary to NPPF paragraph 14 being a fundamentally unsustainable location that cannot be made sustainable. It can only be wholly dependent on personal car use, with perhaps, soime limited scope for cycling.</p> <p><i>This site should not be allocated for development, and the required housing quantum redirected to a location ideally on or lying within 400m of an existing bus service, running at least every 15 minutes, or which can be augmented cost-effectively to run at a higher frequency.</i></p>	A new access could be formed with a roundabout which would allow buses to turn safely. Public transport could then effectively serve the site. This would form part of a planning application detail	Not required
66316 - A C Lloyd Homes Ltd [5958]	Object	<p>Objection is made to the allocation of 300 dwellings because this underestimates the capacity of the site; masterplanning exercises indicate the capacity is approximately 550 dwellings.</p>	<p>Whilst there is land in addition to that required for the 300 potential houses on this site, a considerable area of landscaping, for a buffer and open space is also required. Additionally there is a need for a new primary school in this area. The remaining area would accommodate approximately 300 new houses</p>	Not required
<i>H04 Red House Farm</i>				
65479 - Mr Paul Want [12775]	Object	<p>Green Belt land such as this should only be built on in exceptional circumstances and will encourage more Urban Sprawl in the area (something Green Belt land is there specifically to protect against.) For a relatively small number of new homes it will cause a blight on the existing landscape that forms such a large part of what makes the area attractive to live in.</p> <p><i>Do not build on this green belt land.</i></p>	<p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p> <p>It is considered that development of the site could be fully integrated into the landscape and that this could be achieved without encouraging further encroachment into the green belt.</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>
64836 - Mr Anthony Preston [12579]	Object	<p>I do not believe that the WDC has taken into account the effect for all the residents on the existing urban fringe. Example, Eden Court, The Crest. Around 39 residents treasured tranquil landscape balcony views will be devastated. This area has an abundance of wild life nesting in hedge rows trees and fields. My quality of life at home will be gone. My back garden is a farm in the country side, if this development is passed all this will be lost</p> <p><i>Do not build on this greenbelt land</i></p>	<p>The Red House Farm allocation is being brought forward alongside a wider regeneration scheme for this part of Lillington. The Council is looking at how a softer urban edge can be developed in the area as part of better integrating the urban and rural fringe.</p>	
65748 - Mrs Sally Bullock [12792]	Object	<p>Warwick District Council has not fully explained why brownfield alternatives cannot be used instead of the land at Red House Farm (H04). It is suggested that some ecological studies have not been undertaken. This breach of the green belt will make further development likely. There is no need to plan for the regeneration of Lillington therefore this allocation is not justified/ necessary.</p> <p><i>this allocation should be deleted to preserve the integrity of the green belt and the housing requirement transferred to a more suitable brownfield location .</i></p>	<p>The Council has identified and allocated all available brownfield sites, including allowing for an allowance of windfall sites to come forward during the plan period before considering green field sites. Only a limited number of green belt sites are proposed. It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p> <p>It is considered that development of the site could be fully integrated into the landscape and that this could be achieved without encouraging further encroachment into the green belt.</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>
66430 - Mr Andrew Adams-Green [12825]	Object	<p>WDC not proven exceptional circumstances for proposal            There is no regeneration plan of Lillington            Policy DS18 is highly inaccurate            Consultation has been patchy and ineffective            Loss of recreational amenity 'riding school'            No explanation of why brownfield sites could not be used.            Ecological and environmental studies have not been carried out.            Represents only 1.5% of total housing needed but has a huge impact on the landscape.</p> <p><i>It is ill conceived with little regard to the impact on the local community, landscape, environmental and ecology. It is profit before needs as it only represents a small proportion of the housing needs and therefore it is ineffective and should not go ahead.</i></p>	<p>The Council considers that all brownfield options have been allocated and taken account of in meeting the housing requirement prior to green field options being considered. It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p> <p>It is considered that development of the site could be fully integrated into the landscape and that this could be achieved without encouraging further encroachment into the green belt.</p>	No change required
66704 - Ms Beth Forster [6585]	Object	<p>Exceptional circumstances for Red House Farm have not be established. This area provide tranquillity and recreation. the riding school, will suffer noise and pollution. the proposals will have a permanent and disastrous impact on the landscape and will lead to urban sprawl and loss of open, natural space.</p> <p>These houses are not required anyway as the latest ONS figures demonstrate that fewer homes are needed than had been projected</p> <p><i>This allocation should be deleted to preserve the integrity of the green belt and the housing requirement transferred to a more suitable brownfield location .</i></p>	<p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p> <p>It is considered that development of the site could be fully integrated into the landscape and that this could be achieved without encouraging further encroachment into 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>
65257 - Dr Nick Kaijaks [12707]	Object	<p>It is specious to describe building on Green Belt land as "assist[ing] in the regeneration of the area" (qv. DS18). DS11/H04 is clearly encroachment, contradicting NPPF for Green Belt land, leaving a weak boundary, easier to breach in future.</p> <p>The Plan does not explain infrastructural sustainability or loss of amenity. DS4 requires that housing should be close to sites of employment, with access to community facilities. DS11/H04 is not consistent with either. Building new houses may allow the Council to say "look, this ward is statistically less deprived than it was", but dilution of deprivation is not the same as regeneration.</p> <p><i>Do not use Green Belt land for housing without adequately qualifying proposals for sustainability and mitigating loss of amenity.</i></p>	<p>It is considered that the site can be developed in such a way to ensure a defensible barrier to future development. The extent of acceptable development on the site is restricted by landscape sensitivity. It is intended that the development of the Red House Farm site is just one element in the regeneration of the wider Lillington area as set out in policy DS18.</p>	
66284 - Mr H E Johnson [12846]	Object	<p>Support allocation of Red House Farm. It will assist in the Council's aim of regenerating Lillington one of the most deprived wards in Warwickshire. However object to proposed number of dwellings on the site - The net developable area of the existing proposed allocation at Red House Farm, excluding the Glebe Farm land which currently forms part of this allocation, is nearer 300. Increasing the number of houses will maximise and enhance the regenerative benefits that can be provided. Excluding the Glebe Farm allocation, which is not necessary or desirable given its more prominent position and extending the Red House Farm allocation can deliver a total of around 450 dwellings. Extended site would enhance regeneration benefits provide additional benefits including good quality open space, a new defensible green belt boundary, increased scope for public transport, more options for walking and cycling together with a bridge over the canal to connect to the Tow Path (all within the ownership of Mr Johnson). Also object to the reliance on two large sites (namely HO1 and HO2) for a significant proportion of the site allocation's housing delivery (around 43.5%)</p>	<p>The Council commissioned a landscape assessment of the extended site as submitted by the promoter. This indicated that a southern extension to would introduce development onto the more prominently visible south facing slopes and that it is likely that significant landscape and visual impacts would result from the development of this area. The Council is currently looking at the regeneration benefits and providing access to good quality open space is one aspect being considered. Glebe Farm has been included in the allocation as it will reduce the current hard urban edge and provide a more defensible green belt boundary.</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>
66170 - Mrs Eleanor Hucklesby [12524]	Object	<p>I object to this part of the plan. For an area which will suffer knock on effects of HS2, use of more greenbelt for development seems unwarranted.</p> <p>I would like to know how WDC has proven that there are exceptional circumstances to justify re defining Greenbelt in this area.</p>	<p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p>	No change required
66327 - Mr Richard Taulbut [12734]	Object	<p>DS19 proposes release of Green Belt land at Red House Farm. Release of such land is only justified in exceptional circumstances. No such circumstances have been given.</p> <p>At DS11 and DS18 it is stated that this land will be used for 250 houses in support of the regeneration of Lillington. However, the same proportion of affordable houses (40%) is proposed as in every other part of the district. Therefore the need cannot be seen as exceptional. Repair and renewal of social housing is the every-day business of local authorities. It is not exceptional and cannot justify release of Greenbelt.</p>	<p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p>	

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
66625 - Dr Diana Taulbut [12799] 66849 - Protect Lillington Green Belt [Petition] (Diana Taulbut) [12926]	Object	<p>The Red House Farm allocation should be revisited as it is unsound . The following matters are all causes of concern relating to its current inclusion in the Plan.</p> <ul style="list-style-type: none"> <li>- Policy DS11 (H04) fails to mention that Red House Farm is actually greenbelt and calls it "green-field". This is highly misleading and would have misled anyone considering this policy in isolation.</li> <li>- H04 is contrary to NPPF para's 73 and 74 as H04 contains the riding schools grazing fields. The riding school is a valuable recreational asset that also provides employment opportunities. The plan makes no provisions for the replacement of this facility.</li> <li>- H04 is contrary to the purposes of including land in the green belt as it will not "safeguard the countryside from encroachment". This land is also of valuable agricultural quality and should be preserved for food security reasons.</li> <li>- H04 is contrary to the NPPF (paragraph 80) as no specific consideration has been given to the use of brownfield sites elsewhere. Sites in Lillington that should be considered include the Old Round Oak school and the URC on the Cubbington Road (both of which are closer to the shops etc. than Red House Farm).</li> <li>- The Council has not demonstrated the "exceptional circumstances" and does not make a coherent or sound argument for the removal of this land from the green belt. The owners willingness to release the land is not "exceptional".</li> <li>- The intended re-location of the green belt boundary is flawed as it has no physical features to reinforce this line. Therefore it could not be considered a permanent boundary. There is no indication that if this new boundary were put in place that it would not be subject to change at the end of the next plan period.</li> <li>- The District Council has not given any consideration or weight to the fact that this proposal will damage the remaining green belt(its openness and permanence would be compromised).</li> <li>- A portion of the area include in allocation H04 was not included in the green belt study.</li> <li>-The area at Red House Farm is in an area of tranquillity and should be defended as such . The Local Plan fails in its obligation to identify and defend such areas.</li> <li>- The consultation on the allocation/ plan has been inadequate, the terminology for the allocation is also mis-leading , it should have been called Champion Hills for local people to recognise it properly.</li> <li>- The allocation is founded on incomplete studies. Full wildlife assessments have not been conducted . Some 'red-list' species are present and have legal protection.</li> <li>- It is stated that this allocation will support the regeneration of Lillington. It is suggested that Lillington is not as badly deprived as argued and that to use this as a justification for the allocation of so many houses is wrong/ unsound. Much of Lillington does not require</li> </ul>	<ol style="list-style-type: none"> <li>1) DS11 characterises the site as greenfield because the intention is that the site will be removed from the greenbelt on adoption of the local plan.</li> <li>2) The land owner promoting the site also owns the land occupied by the riding stable and is committed to ensuring adequate provision is made to mitigate any impacts of the proposal.</li> <li>3) It is considered that the site can be developed and integrated in the landscape without encouraging further encroachment of the green belt. It is anticipated that there will be the opportunity to provide a softer urban edge.</li> <li>4) The Council considers that all brownfield options have been allocated and taken account of in meeting the housing requirement prior to green field options being considered. It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area</li> <li>5) Disagree, Champion Hills is locally known as an area further west. The site was clearly shown on a plan</li> <li>6) Lillington is the most deprived ward in Warwick District and amongst the 20% most deprived wards nationally. There is a clear need to consider how improvements can be made which will benefit residents, one way of doing this is to address physical environment.</li> <li>6) The Warwick District Habitat Assessment assessed Red House Farm as part of the wider parcel of land between Lillington and Cubbington (Map 23). The recommendations in the report were not incompatible with development proposal, including in the Red House Farm area, provided that Hedgerow habitat is maintained, enhanced or replaced and trees protected, amongst other recommendations.</li> </ol>	No changes required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		'regeneration' as it is perfectly acceptable as it already is.  <i>Remove Red House Farm from the Local Plan and retain the original green belt boundary.</i>	7) It is considered that development of the site could be fully integrated into the landscape and that this could be achieved without encouraging further encroachment into the green belt.	
66729 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Support	The inclusion of this Green Belt is fully justified as it will facilitate the regeneration of one of the most deprived neighbourhoods in Warwickshire. The new housing development will bring new life into the area and provide enhanced amenity spaces, improvements to local facilities and support for existing local services and facilities.	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>H06 East of Kenilworth (Thickthorn)</i>				
66172 - Hallam Land Management and William Davis [8278]	Object	<p>It is considered that the allocation at Thickthorn (H06) should be deleted from the plan and the area remain as Green Belt for a number of reasons.</p> <p>In the absence of:</p> <ul style="list-style-type: none"> <li>* a clear demonstration of such exceptional circumstances as necessitate the need for the revision to the Green Belt boundaries;</li> <li>* an assessment of the need for new housing in Kenilworth;</li> <li>* replacement sites for the existing sports facilities at Thickthorn.</li> <li>* an assessment of the transport and traffic impacts of the development of the site on the local highway network.</li> </ul> <p>the plan is not justified and hence is unsound because it has not been shown that the strategy for developing Green Belt land is the most appropriate when considered against the reasonable alternative of developing sites in sustainable locations outside the Green Belt.</p> <p><i>This representation relates to the allocation at Thickthorn for 760 dwellings and not the 470 dwellings to be provided within Kenilworth on land outside the Green Belt. The modification considered necessary to make the Plan sound is the de-allocation of the land at Thickthorn in Policy DS11 and the reinstatement of the allocation for about 600 dwellings on land to the south of Gallows Hill and to the west of Europa Way.</i></p>	<p>The land allocated at Thickthorn, Kenilworth and the amendments to green belt boundary to accommodate that location has been justified to ensure the specific housing needs of Kenilworth are met. The town is tightly surrounded by Green Belt and Thickthorn represents the most sustainable green belt location to provide for the Town's needs.</p> <p>The site at 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 by development.</p>	

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
66075 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>The development affects Thickthorn Manor and the Glasshouse Roman Settlement. There is no evidence to demonstrate a proper assessment has been undertaken to inform the principle of development, nor, without prejudice, the critical design response (mitigation).</p> <p>It should be appreciated that due to the former Roman occupation of the site there also needs to be an assessment of the likelihood that currently unidentified archaeology, potentially of national importance, will be discovered (NPPF para 169).</p> <p>Without such an assessment the local authority is unable to assert that the objectives for sustainable development have been met. There appears to be a failure to demonstrate that great weight has been given to the conservation of the heritage assets (NPPF para 132) nor a recognition of the legislative expectation that special weight is paid to the desirability of preserving the setting of the affected Manor. The Ancient Monument and Archaeological Areas Act gives provision for the protection of the scheduled Roman Settlement.</p> <p>The significance of a heritage asset derives not only from its physical presence but also from its setting - the surroundings in which it is experienced. Consequently English Heritage considers the Plan is inconsistent with the provisions of the NPPF and therefore unsound.</p> <p><i>To accord with NPPF paragraphs 158 and 169, the local authority should gather evidence to assess the significance of the affected heritage assets (including by development affecting the setting of either heritage asset).</i></p> <p><i>I would strongly recommend the methodology in The Setting of Heritage Assets (English Heritage 2011) is used.</i></p> <p><i>The Assessment should also be used to predict the likelihood that currently unidentified archaeology, will be discovered in the future - the Roman settlement is highly likely to be more extensive than the scheduled area.</i></p> <p><i>It should then be applied to inform the principle, location, form and capacity of any strategic allocation.</i></p> <p><i>Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal. Consequently English Heritage recommends that the Plan should not progress until this strategic matter is resolved.</i></p>	<p>Since the issuing of the Local Plan Publication draft the Council has undertaken further work to assess the concerns raised. A report was prepared by Warwickshire Archaeology entitled 'Thickthorn (South-east Kenilworth) Strategic Allocations - HISTORIC ENVIRONMENT APPRAISAL (January 2015)'. This report has been drafted in consultation with English Heritage.</p> <p>The recommendations in the report do not undermine the allocation or delivery of Thickthorn as a housing site. One of its main recommendations is that the area covered by the SAM is either removed from the allocation or used for public open space, this is already accounted for in the SHLAA.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66332 - Mr Richard Munday [1035]	Object	<p>Over 1000 more cars causing congestion.</p> <p>The present leafy, semi rural feel of Kenilworth will be lost with the proposed over development here.</p> <p>There will be a knock on effect due to relocation of the Sports clubs to other areas of the Kenilworth countryside. Losing its rural feel and affecting those who walk in the countryside.</p> <p>Site is in Green Belt, which should be preserved for the enjoyment of future generations. Will change character of the area worse for ever. Noise and pollution from the A46 make living and working there unpleasant. Excessive noise can have terrible adverse effects on children, so it will become a sink estate with all sorts of social problems.</p>	<p>The land allocated at Thickthorn, Kenilworth and the amendments to green belt boundary to accommodate that location has been justified to ensure the specific housing needs of Kenilworth are met. The town is tightly surrounded by Green Belt and Thickthorn represents the most sustainable green belt location to provide for the Town's needs.</p> <p>The Strategic Transport Assessments undertaken identify mitigation measures to address traffic impacts.</p>	
65205 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	<p>The field marked on Local Plan Policies Map 5. Kenilworth as Pavilion/Sports Ground and currently occupied by Kenilworth Wardens Cricket Club</p> <p>The field marked on Local Plan Policies Map 5. Kenilworth as Glasshouse Spinney and Ruby Football Ground, currently occupied by Kenilworth Rugby Football Club.</p> <p>The field marked on Local Plan Policies Map 5. Kenilworth as track and pavilion, currently occupied by Kenilworth Rugby Football Club</p> <p>The Kenilworth Civic Society considers that the allocation of the above sites for housing unsound because they will not be available for this use unless Kenilworth Rugby Football Club and Kenilworth Wardens Cricket Club can be relocated</p> <p><i>To make Site No. H06 of PolicyDS11 Allocated Housing Sites sound we would expect the Local Plan to identify sites for the re-location of Kenilworth Rugby Football Club and Kenilworth Wardens Cricket Club and subject them to a sustainability appraisal. They should also be sent out to public consultation.</i></p>	<p>The Council is actively working with both sports clubs to ensure their relocation, however it is not considered either necessary since it can be undertaken through a planning application process or appropriate to identify relocation sites as there a number of potential options.</p> <p>However the Council considers that in order to provide certainty to the delivery of Thickthorn for housing, and the necessary relocation of the sports clubs it will commit to utilising its Compulsory Purchase powers if required.</p>	<p>Insert the following sentence after the third sentence of para 2.52:</p> <p>In order to ensure the delivery of housing and associated uses in Kenilworth, the Council will consider the use of its Compulsory Purchase Powers.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66714 - Gleeson Developments [5117]	Object	<p>In addition, site H06 - East of Kenilworth (Thickthorn) must also include references to the other infrastructure requirements for the site as set out at paragraph 2.52 of the Plan, namely:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Primary School</li> <li><input type="checkbox"/> GP Surgery</li> <li><input type="checkbox"/> Local Centre</li> <li><input type="checkbox"/> Open Space</li> </ul> <p>It should also be noted that the allocation at Thickthorn is dependant on finding replacement playing fields to offset those that will be lost to the development. Standing advice from Sport England is to object to the loss of such facilities unless suitable and convenient replacement facilities can be provided. Sport England requires Local Plans to be justified with appropriate evidence. This would be in the form of an up-to-date Playing Pitch Strategy. No such strategy exists to inform the loss of the playing fields at Thickthorn. We are aware a Playing Pitch Strategy is currently being prepared. A draft is currently being reviewed internally with a view to publish the Strategy by the end Summer 2014. No informed decision can be taken on whether to include the playing fields until such a Strategy has been prepared and/or replacement facilities are provided in close proximity to meet the Sport England tests.</p> <p>The Publication Draft document and the Garden Suburbs prospectus encourage sports pitches/playing fields as part of a well planned, integrated, mixed use urban extension (Policy BE2). It seems illogical to therefore move established facilities that are both convenient for local residents and ideally located to help plan a sustainable urban extension for Kenilworth. The above stance is contrary to national policy.</p> <p><i>Add additional Infrastructure requirements to Site H06 - primary school, GP Surgery, Local Centre and open space.</i></p>	<p>The Council is actively working with both sports clubs to ensure their relocation and in accordance with para 73 and 74 of the NPPF in locations which are at least as accessible to the community they propose to serve as their existing facilities.</p> <p>Since the Publication Draft was issued the Playing Pitch Strategy (November 2014) which supports the relocation of both sports clubs.</p> <p>Suggested changes noted, amend to ensure consistency with other strategic sites in policy DS11.</p>	<p>In Policy DS11, site H06 East of Kenilworth (Thickthorn) add the following to the column labelled Infrastructure Requirements:</p> <p>Primary School and Local Centre</p> <p>Amend para 2.52 to remove reference to GP surgery.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65409 - Stoneleigh & Ashw Parish Council (Mrs P.A. Maddison) [1055]	Object	<p>As current ONS figures demonstrate, WDC's housing figures are almost 30% higher than current predictions the requirement for urban expansion within the Green Belt is no longer an urgent requirement. The proposed housing site H6 demonstrates no very special circumstances for development in the Green Belt and the removal of this very important section of the A46 Green Corridor.</p> <p><i>The Green Corridor along the A46 should be preserved and housing site H6, Thickthorn should be removed from the local plan. This Green Belt site is situated at the edge of Kenilworth's existing development but the site is also adjacent to a Strategic Road link between the A46 and the A452. This site might present a suitable position for a transport interchange serving Kenilworth and Leamington Spa and might be suitable for inclusion in the Park and Ride search area as it has a strategic location.</i></p>	<p>For response on the housing requirement please see responses to Policy DS6.</p> <p>The land allocated at Thickthorn, Kenilworth and the amendments to green belt boundary to accommodate that location has been justified to ensure the specific housing needs of Kenilworth are met. The town is tightly surrounded by Green Belt and Thickthorn represents the most sustainable green belt location to provide for the Town's needs.</p>	
66573 - Friends of the Earth (John Brightley) [1113]	Object	<p>We are surprised that the access proposed to the Thickthorn development has been moved (in Strategic Transport Assessment 4 - April 2014) from the A46/ A452 roundabout to a point north of this on Leamington Road. There seems to be no reason for this stated in any of the reports. It would appear to be illogical, as at peak hours there is presently a long queue of traffic from the A46/ A452 roundabout back to Kenilworth town centre - the proposed arrangement could conflict with this and potentially make the situation worse. Any new roads should provide for a new quick route for traffic from Glasshouse Lane directly to the A46 roundabout.</p>	<p>Agree that any new road should provide for a new route between Glasshouse Lane and the A46.</p> <p>WCC assessed the Thickthorn Island in the STA4 and considered that it is more appropriate to have a primary access off Leamington Road rather than a fifth arm onto the roundabout itself. Detailed access arrangements will be determined through the planning application process.</p>	
66330 - Richard Evans [852]	Object	<p>Cumulative loss of green space and playing fields on this allocation and existing school playing fields. Extra traffic will worsen air quality and traffic congestion in the local area. It will make the entrance to the town from Leamington very unattractive.</p> <p><i>Should be a considerable amount of green space within the development area in order to balance out this lopsided plan.</i></p>	<p>Green space will be provided in accordance with the Council's open space standards. Existing sports clubs will relocate elsewhere within Kenilworth.</p> <p>The Strategic Transport Assessments undertaken identify mitigation measures to address traffic impacts.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66145 - Kenilworth Rugby Football Club, Jersey Farm Trustees & The McDaid Trustees [12862]	Support	<p>The landowners' intention is to achieve the formal release of the land from the Green Belt through the local plan process prior to the disposal of a land interest with an appropriate party who will secure delivery of the site through the development management process.</p> <p>An initial master plan has been prepared to illustrate the broad concept of the development. A 'high level' Transport Assessment has been prepared by DTA - which accompanies these submissions.</p> <p>The three principal land interests are intent upon bringing their land forward promptly upon the allocation and the release of land from the Green Belt, being confirmed by the local plan process. Discussions have also been held with Kenilworth Wardens Cricket Club whose land has been included within the allocation. The landowners have commissioned the preparation of a more detailed master plan for the allocation. It is anticipated that this master plan will form the basis of a planning application to WDC.</p>	Support and work undertaken to date to progress the allocation noted.	
66588 - Catesby Property Group (Mr David Morris) [7776]	Support	<p>Confirm land at Kenilworth Sports Club is suitable, available and achievable. Kenilworth Wardens Cricket Club Ltd is in advanced discussions in respect of relocating sports facilities to Castle Farm and acquiring further adjacent land. This would remove the principal constraint to development and improve the sports facilities at Castle Farm thus providing additional benefits to the community.</p> <p>3ha (of 5ha gross) net development land at Kenilworth Wardens could be available, taking into account constraints and mitigation proposals, including protecting the integrity of the SAM and Ancient Woodland. This could accommodate between 90 -100 dwellings with associated open space etc.</p> <p>Whilst recognising the expectation of a comprehensive masterplan, the site could come forward for development individually if required.</p> <p>Safe and suitable access to the site can be provided from Glasshouse lane.</p> <p>The site does not make a positive contribution to the Green Belt and the purposes of included land within it and therefore it is appropriate to remove land at Thickthorn from the Green Belt to allocate it for residential development.</p>	Support noted.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66572 - Friends of the Earth (John Brightley) [1113]	Support	<p>We strongly support the notes in the Site Selection Methodology for this site that cycle and footpath links to the town centre will be required. However it is equally as important that provision be given to cycle and footpath links to Leamington and Stoneleigh as these are major employment locations. We suggest that it is entirely appropriate for the developers of the Thickthorn site to contribute section 106 or CIL payments towards provision of the proposed Kenilworth to Leamington cycleway, and the upgrading of Rocky Lane to serve as a link to Stoneleigh.</p> <p>We strongly support the Habitat Assessment notes within the Site Selection Methodology in that 'the ancient woodlands of Glasshouse Wood and Thickthorn Wood would need to be retained, as well as the implementation of a buffer zone of 50m width around the site. All species-rich hedgerows (will be) retained. Mature trees within the parcel should be retained, with each tree having a buffer zone to protect its roots from development'. Thought should also be given to public transport routes through the new development - Leamington Road is served by a good bus service but this may need to be diverted through the new development or a new service provided.</p>	Support and suggestions in relation to transport and habitat noted.	
<i>ED2 East of Kenilworth (Southcrest Farm)</i>				
67148 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	<p>Whilst the Town Council acknowledges that it was likely that Kenilworth School would find it necessary to relocate onto a larger site because of current numbers, coupled with the increase likely to arise as a result of the new developments within the Town, no formal consultation has taken place upon the proposed move, or the site concerned. The site proposed is within the Green Belt and as such requires very careful consideration including enquiry as to the need for relocation, its siting and the deliverability of this relocation, particularly from a financial stand point.</p>	<p>The Publication Draft was an appropriate consultation stage.</p> <p>The Green Belt Boundary would be amended to accommodate the school.</p> <p>Further work on the delivery of school has been undertaken along with design options. Further detailed work will be required as part of any planning application for the site.</p>	
66088 - Gleeson Developments [5117]	Object	<p>Whilst the proposed allocation of site ED02 - Southcrest Farm for a new Secondary School and 6th Form Centre is supported, the site should not appear in the list under Policy DS11 because it is not a Housing Site. It is correctly allocated under policy DS12.</p> <p><i>Remove site ED2 from policy DS11.</i></p>	Support noted and error acknowledged.	Remove site ED2 from policy DS11.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H07 Crackley Triangle</i>				
64334 - Jim Dunlop [7345] 65208 - Kenilworth Society (Mrs Patricia Cain) [5617] 65463 - Crackley Residents Association (Mr Ashley Ball) [3596] 66426 - Roger Warren [56] 67147 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	The Local Planning Authority has not involved the community in the preparation of this part of the Plan.  It was not included in the Revised Development Strategy published for public consultation by Warwick District Council in June 2013.  The sustainability appraisal of this site is inadequate	It is considered that the consultation on the Local Plan Publication Draft has given ample opportunity for people to have their say on this proposal. Furthermore, during the previous preparation stages of the Local Plan this site was identified in the SHLAA, the overall suitability of which was updated in 2014.  Since the consultation on the Publication Draft was undertaken, at the time of writing, this site has been granted planning permission, subject to a Section 106 agreement being signed. The scheme granted satisfactorily mitigates potential traffic impacts.	
<p><i>To make Policy DS11 Allocated Housing Sites, No. H07, sound we would expect, at the very least, the site to be submitted for public consultation, as was done with other housing sites in June and July 2013. It should also be subject to a new sustainability appraisal. Preferably Site No. H07 should be dropped from the list of Allocated Housing sites.</i></p>				
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<i>H08 Oaklea Farm, Finham</i>				
66763 - Coventry City Council (Mr Mark Andrews) [12864]	Support	The Council have reconsidered its position in relation to the land at Howes Lane, East of Finham. We recognise that the decision to allocate this land has not been taken lightly and appreciate that the need to consider existing Green Belt land is reflective of appropriate evidence and assessments that have informed the choice of housing sites.  Notwithstanding, the Council wish to maintain on-going communications in relation to this site to ensure the servicing and overall impacts associated with the new homes do not place undue pressure on Coventry City Council resources. Subject to a satisfactory approach in this regard, the City Council hold no objection to the allocation of this site.	Noted	Not required
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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

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*Baginton*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66719 - Baginton Parish Council (Mr Steve Williams) [726]	Object	<p>2. Housing and Policy DS11 allocated housing sites.. Please refer to our letter L130 of 15th January 2014, much of which has been ignored by the proposals in the Local Plan, which is therefore unsound.</p> <p>We note Green Belt and landscape assessment work has emphasised the need to protect the villages from coalescence with nearby large settlements. This is certainly important as it helps maintain the open setting, identity and character of Baginton and protects it from Urban Sprawl. There must be no removal of any Green Belt to ensure that this protection is maintained in full. BPC believes that this vital requirement will be watered down if there was any release of the Green Belt so objects to removal of any Green Belt.</p> <p>This will protect the area against inappropriate development and infill development, both of which would not be welcomed.</p> <p>We understand that removal of the Green Belt from defined areas would allow for less restrictive development whilst maintaining Green Belt restrictions elsewhere. BPC recognise the need for organic growth in the village to maintain its viability in the future. BPC does not want the village to wither and die.</p> <p>The longstanding recognised need for further housing to support sustainable organic growth is supported by the proposals, so BPC have no objection in principle and we believe there may be very special circumstances for developing the two proposed sites were they to remain within the Green Belt.</p> <p>There is therefore no need for removal of the Green Belt</p> <p>In January 2014 we stated that should WDC insist on removal of Green Belt, which we object to, then the following must be put in place before this happens: -</p> <p>A. Individual consultation between WDC and all householders affected by the change in their land from Green Belt to Non Green Belt. Cllrs are aware of some individuals who do not want their own land declassifying and wish the village to remain wholly in the Green Belt. All previous consultations had retention of the Green Belt and BPC requests retention</p> <p>B. Under no circumstances shall the definition of the line go beyond the boundaries of the individual properties defined in the document. We do not want there to be any ambiguity. We favour the line be drawn to the rear of the dwellings to ensure back gardens are not inappropriately developed, should WDC insist on removal of Green Belt, which we object to.</p> <p>C. A professional consideration of whether the preferred land marked 1 on page 35 can be developed whilst remaining in the Green Belt, given that very special circumstances may exist, as per</p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development in these locations and in each case exceptional circumstances exist to do so.</p> <p>Through the plan preparation process the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, this includes being more flexible in growth villages currently in the Green Belt by insetting them and including housing allocations. The strategy for allocating housing in growth villages has struck the balance between the provision of additional housing to support services, the provision of additional affordable and market housing to boost supply and the environmental and infrastructural capacity of each village and site suitability.</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>the land on page 61. Do very special circumstances exist? Please offer advice on this pivotal point, as Cllrs do not want the Green Belt removed from any area if the preferred option site number 1 on page 35 can proceed on the basis that it fulfils defined local need, hence has very special circumstances. If this was the case BPC would be minded to support such a development given defined needs, retaining the entire village in the Green Belt. D. The village conservation area and other areas remain in the Green Belt, as shown.</p> <p>None of the above recommendations have been undertaken. You have not consulted with either ourselves or the property owners and you have ignored our requests. Warwick District Council has purposefully ignored the wishes of its constituents and ignored the objections from the three Parishes most adversely affected by the proposals.</p> <p>BPC believes that exceptional reasons do not exist for proposing that the land shown on the policy Map 8 is removed from the Green Belt.</p> <p>For all the above reasons the proposals in policy DS11 are therefore unsound, there has been inadequate cooperation and procedures have not been properly followed.</p>		
	<p><i>Please amend your proposals by withdrawing the Local Plan as it stands, omitting the Sub-Regional Employment Site (Gateway development) and retaining the Green Belt throughout this Baginton Parish.</i></p> <p><i>Should you continue to ignore our reasonable requests and maintain the Local Plan in its current form we understand that the PI will be Examining the Local Plan before adoption. It is our intention to make representations at a hearing during the Examination to demonstrate that the Local Plan is all of the below:-</i></p> <p><i>A. Unsound.</i></p> <p><i>B. Unjustified.</i></p> <p><i>C. Not based on robust and credible evidence.</i></p> <p><i>D. Not in accordance with the NPPF hence contrary to national policy.</i></p> <p><i>E. Resulting from a consultation process that has not allowed for effective engagement of all interested parties to the proposals as they stand.</i></p> <p><i>F. Resulting from a lack of WDC's duty to cooperate.</i></p> <p><i>G. Not legally compliant</i></p> <p><i>H. Supported by assumptions made in the preparation of the Local Plan which are not reasonable and justified.</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>
		<p>I. Devoid of reasonable alternatives that have been adequately considered and with no clear audit trail showing how and why these decisions have been made.</p> <p>J. Is not the most appropriate strategy when considered against all the alternatives, all as previously presented?</p> <p>K. Resulting from a flawed consultation process with last minute fundamental changes of policy not previously consulted upon</p> <p>L. The result of last minute changes made due to the proceedings of the Gateway Public Inquiry, which was ongoing at the time, the outcome of which remains unknown.</p> <p>M. Fails to bring together and integrate policies for the development of other land in the sub-region.</p> <p>N. Has failed to protect valued rural landscapes.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66195 - Lenco Investments [1165]	Object	<p>The land at Baginton offers an exceptional opportunity to link housing to the employment growth proposed at the Warwick Gateway site and located on the periphery of Coventry City/CWLEP North South Corridor.</p> <p>The site at Baginton/Coventry Gateway should be recognised by the Council as a sustainable site adjacent to the urban area and large-scale employment. It could accommodate a significant proportion of housing that would contribute towards the growth of Coventry and support the Gateway scheme, ensuring compliance with the NPPF in relation to the duty to cooperate, and should be allocated within the Local Plan.</p> <p>Extensive technical assessments have been undertaken for the site in relation to flood risk, noise, ecology, conservation and heritage and landscape, which have previously been submitted to the Council. These reports demonstrate that the site is suitable for a significant residential-led development either in isolation or in connection with proposals for the wider area.</p> <p>While it is acknowledged that the site is within the Green Belt, the site contains no constraints that preclude development on the site.</p> <p>The 2014 SHLAA maintains that there are noise and odour constraints, however, the Council has never presented RPS with any evidence that these exist. Conversely, RPS has provided evidence that they do not exist.</p> <p>It is therefore concluded that the site is entirely suitable as defined for development in the promotional document appended.</p>	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The future activity at Coventry Airport is likely to increase/change which will exacerbate the noise and air pollution issues in this location. Noise and air pollution issues are also a problem due to the proximity of the A46 and major traffic interchange at Toll Bar island. This junction is currently being improved which will result in more traffic within closer range of Baginton.</p> <p>There are also possible odour issues from the sewage works and landfill land which may require substantial remediation and protection from gas build up.</p> <p>The site is in close proximity to an Ancient Monument, a Grade 1 Listed church and the Conservation Area. Furthermore, this site would not be considered favourably over others in the locality due to poor connectivity. Whilst the site promoter has presented some further information on overcoming these constraints to feed in to the 2014 SHLAA, the Council considers further work is required to demonstrate fully that all the constraints can be overcome satisfactorily and is therefore of view that the site is unsuitable for the reasons</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>RPS represents a significant land owner on the edge of Coventry and has identified that the Council is deficient in identifying and meeting its objectively assessed need. It has also inappropriately and unlawfully discounted a site from the plan preparation process. RPS wishes to have the opportunity to respond on site specific issues in relation to strategic allocations, the choice of those allocations and to present further oral evidence in support of the representations made in respect of the Land South of Coventry</i>	outlined above.	
<i>H19 Baginton - Land north of Rosswood Farm</i>				
66076 - English Heritage (Mr Rohan Torkildsen) [205]	Object	The evidence base considers that development would be acceptable if certain design principles were followed to ensure the setting of the conservation area is protected. Consequently the essential strategic design principles should be considered for inclusion in the Plan.  <i>Consider including the critical design principles for the site in the Plan</i>	This point and has been discussed further with English Heritage and it has been agreed that this point is probably too detailed for the Local Plan. Not that this isn't an important aspect to be looked at, but is perhaps more suitable for a separate document rather than making the Local Plan very long with a lot of detail which can be dealt with effectively elsewhere	Not required
65445 - Sworders (Miss Rachel Padfield) [11530]	Support	The site has been considered against reasonable alternatives and has been demonstrated have the least negative impact with good connectivity with the settlement with suitable access and provides opportunities to enhance the visual appearance of this part of the village, clearly defining an entrance to the village from the south. The site would form a logical boundary to this end of the village with development fronting the highway.  As such, the allocation of site H19 is the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence and is consequently sound.  <i>None required</i>	Not required	Not required

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Barford*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65757 - Mr Roger Braithwaite [11409]	Object	<p>Site H20 unnecessary to meet requirements of growth village. 80 units appropriate, planning permission pending for 72, none of which contentious. Site H22 will deliver over 10 and if elderly flats, potentially over 20.</p> <p>Site is within Conservation Area. Modern housing would neither preserve or enhance.</p> <p>Site recently listed by LPA as locally important historic park and garden.</p> <p>2014 SHLAA describes site (RO9) as: 'Not suitable due to impact on historic parkland/garden and setting of important Listed Building. Impact on area of high landscape sensitivity assessment (2013)'. 2013 Landscape Sensitivity Assessment describes sensitivity to housing development as high. 2014 update still describes it as high. Only change in update is that trees in H20 have been described as 'overgrown' and 'damaging the former estate boundary'. Deliberate neglect of the site has reduced sensitivity to high/medium which has presumably caused allocation without consultation. Modern housing in Conservation Area in highly sensitive landscape is not appropriate way to achieve landscape management. Proposal contrary to NPPF paras:</p> <p>47. Bullet 1 - LPA should use evidence base to ensure LP meets objective needs</p> <p>47. Bullet 3 - Sites should be in suitable location</p> <p>50. Bullet 2 and 54 - LPA should identify housing reflecting local demand/need</p> <p>110. Plans should allocate land with least environmental or amenity value</p> <p>126. LPAs should set out positive strategy for conservation</p> <p>130 Where evidence of deliberate neglect the deteriorated state should not be taken into account</p> <p>132 Significance can be harmed/lost through alteration/destruction of heritage asset or development within its setting. Need for clear convincing justification</p> <p>133. Should be substantial public benefits outweighing harm/loss</p> <p>137. LPAs should look for opportunities for new development within Conservation Areas and within settings of Heritage Assets to enhance/better reveal significance</p> <p>152. Significant adverse impacts should be avoided</p> <p>156. Bullet 5 - Plans should seek to conserve and enhance natural/historic environment</p> <p>157. Bullet 7 - Plans should identify land where development would be inappropriate because of its environmental or historic significance</p> <p>159 Plans should take note of objectively assessed housing need</p>	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and provided the starting point for the allocation of housing to villages .</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing. With regard to allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application. A small area of a much larger overall proposed site</p>	Not required

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>has been allocated in the Local Plan. The proposed site is well related to the existing village and is therefore best placed to benefit from existing services and facilities. The allocated site has been assessed as suitable and is considered to have a lower impact than sites extending beyond the village envelope. A recent planning appeal considering the boundary wall to Barford House supported the view that, because of existing breaches in the wall at the location of H20 and others along its length at this point, a small development such as that proposed in the Local Plan, could be served at this location and would be of less than substantial harm. Any breach in the wall on the Wellesbourne Road frontage however, would have a negative impact on the historic environment and the setting of Barford House itself and should therefore not be considered for development. This further supports the allocation of this land as a residential site in Barford. The Inspector was of a mind that lack of maintenance of the wall, was not deliberate on the part of the landowner. Indeed paragraph 130 of the NPPF states that neglect should not be taken into account in decision making. A sensitive development using suitable materials and design can enhance the Conservation Area whilst benefiting the public and contributing toward the housing need of the district.</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>
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*H20 Barford - Land south of Barford House*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65423 - Mr Alan Roberts [138]	Object	<p>The purpose of the objection is to protect the historic open landscape of this area of Barford Village.</p> <p>This is comes in two parts,</p> <ol style="list-style-type: none"> <li>1, The historic parkland of Barford House and its setting.</li> <li>2, The openness of the area link with the historic character of the built village and the open countryside beyond.</li> </ol> <p>The landscape appraisals combined with the conservation policy for the village formed in 1996 and reviewed in 2002 and the Council own refusals to build on the parkland since 1973 including appeal inspector decisions, shows that this is a very important and sensitivity area.</p> <p>In the first consultation of the Local Plan consultation the land was excluded as unsuitable due to conservation reasons now in the second consultation it is deemed acceptable. Nothing has changed to the area since the consultations.</p> <p>The second consultation says " a small enclosed site with some limited potential for a sensitively designed development." This is miss leading as the land form parts of the larger Parkland area south of Barford House and there is no physical separation. Regardless of the number built it will be an isolated development projecting into the open area within the heart of the village. It will not relate to the built form of the village.</p> <p>It will block the views across the area and to and form Barford House. It will lead to pressure to build similarly on the adjoining allotments.</p> <p>It will lead to the tranquillity of the area being spoilt and the quite enjoyment of the occupants in the retirement flats and Barford House.</p> <p>Until the present owner purchase the land in the 70`s it was used for sheep grazing forming a very rural setting to the house since then it has been left unattended and now forms a wildlife sanctuary due to the enclosed boundaries.</p> <p>Historic Concerns:</p> <p>The actual area of land proposed was the kitchen gardens for Barford House this is clearly shown on plans and aerial photos, also the laundry building for the house were situated along side the boundary wall in this area.</p> <p>The land has always been recognized as part of Barford House estate and its boundary being formally designated by the Council this year.</p> <p>The brick boundary wall and brick gated pier service entrance will be lost and/or their signification lost to the house due to any development.</p>	<p>It is the nature of the Plan making process that changes are made up until the point that the publication draft is agreed. It is therefore accepted that changes have been made. However the regulation 19 consultation provides an opportunity to raise points of soundness and legality with regard to these changes.</p> <p>The strategy of the emerging plan is significantly different to previous plans. This reflects the NPPF and local evidence regarding the need for growth. It is correct that this approach does not align with the views of many residents.</p> <p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages . Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. With regard to</p>	Not required

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>The views from Barford House south across the land part of which formed the original pleasure grounds will be blocked and spoilt with the encroachment of the development. And the tranquillity of the area especially at night will be lost.</p> <p>This "triangular" area of the village bounded by the Wellesbourne Road, Church Street and the allotment public footpath east consist to the greater part of eighteen century buildings the inclusion of modern buildings within this and which will have to be built to current building specifications will harm and devalue the historic uniqueness.</p> <p>Planning History of the Land south of Barford House:</p> <p>In 1975 11 dwellings were refused and upheld on appeal due to lost of open space being an important factor. (T/APP/2462/A/74.3103/09).</p> <p>In 1981 24 dwellings were refused and upheld on appeal "unacceptable effect on the form and character of the village and open setting of Barford House" the inspector also said that the council would find it difficult to resist similar proposals on the other parts of the open area ie the allotments. (T/APP/5399/A/81/11641/G9).</p> <p>In 1986 24 dwellings were refused on lost of visual character and open space. -Within the proposed land area.</p> <p>In 1987 12 dwellings redrawn due new village boundary being adopted. -Within the proposed land area.</p> <p>In 2011 application to build 58 dwellings on the whole parkland refused on conservation issues and upheld at appeal.</p> <p>In 2013 application to build 50 dwellings on the whole parkland refused on conservation issues appeal pending.</p>	<p>allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</p> <p>A small area of a much larger overall proposed site has been allocated in the Local Plan. The proposed site is well related to the existing village and is therefore best placed to benefit from existing services and facilities. The allocated site has been assessed as suitable and is considered to have a lower impact than sites extending beyond the village envelope. A recent planning appeal considering the boundary wall to Barford House supported the view that, because of existing breaches in the wall at the location of H20 and others along its length at this point, a small development such as that proposed in the Local Plan, could be served at this location and would be of less than substantial harm. Any breach in the wall on the Wellesbourne Road frontage however, would have a negative impact on the historic environment and the setting of Barford House itself and should therefore not be considered for development. This further supports the allocation of this land as a residential site in Barford. The Inspector was of a mind that lack of maintenance of the wall, was not deliberate on the part of the landowner. Indeed paragraph 130 of the NPPF states that neglect should not be taken into account in decision making. A sensitive development using suitable materials and design can enhance the Conservation Area whilst benefiting the public and contributing toward the housing need of the district. Further, it is considered that by use of a S106 agreement applied through the planning application decision making process, the money from the sale/development of the smaller area of land could be utilised to repair the boundary wall now in need of attention.</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>
		<i>The allocation south of Barford house is unsound and should be deleted</i>		

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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>
66400 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	We also object to H20, part of the locally listed Barford House site.	<p>It is the nature of the Plan making process that changes are made up until the point to the publication draft is agreed. It is therefore accepted that changes have been made. However the regulation 19 consultation provides an opportunity to raise points of soundness and legality with regard to these changes.</p> <p>The strategy of the emerging plan is significantly different to previous plans. This reflects the NPPF and local evidence regarding the need for growth. It is correct that this approach does not align with the views of many residents.</p> <p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. With regard to</p>	Not required

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</p> <p>A small area of a much larger overall proposed site has been allocated in the Local Plan. The proposed site is well related to the existing village and is therefore best placed to benefit from existing services and facilities. The allocated site has been assessed as suitable and is considered to have a lower impact than sites extending beyond the village envelope. A recent planning appeal considering the boundary wall to Barford House supported the view that, because of existing breaches in the wall at the location of H20 and others along its length at this point, a small development such as that proposed in the Local Plan, could be served at this location and would be of less than substantial harm. Any breach in the wall on the Wellesbourne Road frontage however, would have a negative impact on the historic environment and the setting of Barford House itself and should therefore not be considered for development. This further supports the allocation of this land as a residential site in Barford. The Inspector was of a mind that lack of maintenance of the wall, was not deliberate on the part of the landowner. Indeed paragraph 130 of the NPPF states that neglect should not be taken into account in decision making. A sensitive development using suitable materials and design can enhance the Conservation Area whilst benefiting the public and contributing toward the housing need of the district. Further, it is considered that by use of a S106 agreement applied through the planning application decision making process, the money from the sale/development of the smaller area of land could be utilised to repair the boundary wall now in need of attention.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H22 Barford - Land off Bemridge Close</i>				
65046 - Mr Garry Delday [12666]	Object	I would like to object to the provision of 12 further houses in Bemridge Close Barford on the grounds that it would create an increase in traffic and congestion. On street parking has in the past prevented access to emergency services due to the tightness of the road system. If an emergency vehicle can not negotiate the road what will it be like for construction traffic. There are a number of families in Bemridge Close that have young children and it would be very dangerous to build further houses. The sewage system is also at full capacity	The site at Bemridge Close has been subject to detailed site assessment (see SHLAA and Village Site Matrix), including WCC highways, who did not raise any objections to the development of this site. The Council still considers the site to be suitable. The Local Plan aims to allocate some housing to the growth villages, of which Barford is one, having a range of services and facilities, to provide for the needs of the district. The site itself would be accessed through the existing estate. Trees are restricted to the site boundary and are not expected to be affected greatly. Access through the existing residential area will be looked at in detail at the time of a planning application	Not required
<i>Do not build 12 extra houses on this area, it would be better utilised turning it into a green space that could be used by the community.</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65743 - Mrs Catherine Kime [12791] 65751 - Mrs Kerry Liddington [12795]	Object	This allocation is not sound as there are already problems in this location with traffic congestion and parking / obstruction caused by parking on pavements. The danger caused by the existing situation will be made worse by further pressure caused by the new allocation with children and other pedestrians being put in danger. Access into and out of Bemridge Close onto Wellesbourne Road is already dangerous and will also be made more difficult. There are existing issues caused by the sewage pumping station not being able to cope, additional properties will make this worse. There are also concerns over the future of the Bat house which may be removed to afford access to the allocation. The Bat house should remain.	<p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</p> <p>The site at Bemridge Close has been subject to detailed site assessment (see SHLAA and Village Site Matrix), including WCC highways, who did not raise any objections to the development of this site. The Council still considers the site to be suitable. The Local Plan aims to allocate some housing to the growth villages, of which Barford is one, having a range of services and facilities, to provide for the needs of the district. The site itself would be accessed through the existing estate. Trees are restricted to the site boundary and are not expected to be affected greatly. Access through the existing residential area will be looked at in detail at the time of a planning application</p>	Not required

*The allocation H22 should be deleted from the plan - the nursery site (H21) provides enough housing for Barfords needs*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Bishops Tachbrook</i>				
66595 - A C Lloyd Homes Ltd [5958]	Object	<p>Seven Acre Close, Bishop's Tachbrook</p> <p>Failed to include additional highly suitable site off Seven Acre Close on north west edge of village. Site extends to 2.39 hectares and suitable for up to 60 units.</p> <p>Southern part of site (extending to 0.85 hectares) is currently subject to planning application proposing limited first phase of development to meet short term housing needs whilst the wider site considered suitable for longer term needs over Plan period. Current outline application relates to proposed development of up to 25 houses, including mix of 15 open market dwellings and 10 affordable dwellings. The application was submitted with an illustrative layout and number of technical reports. Site immediately adjoins main part of the settlement and is located between existing houses off Seven Acre Close and individual farm house and small holding known as Knob Hill. Local village facilities are within easy walking distance. Facilities include village store, primary school, sports and social club, recreation ground and play area, church, medical centre and public house.</p> <p>The Landscape and Visual Assessment for the current Site benefits from good level of existing boundary treatment and is well contained. Visual impact and sensitivity of visual receptors are not significant.</p> <p>Situated in accessible location and well connected to existing pedestrian, cycle and public transport networks. Traffic generation associated with the current proposals will be modest and not have material impact upon the operation of adjacent highway network. Satisfactory access can be achieved. Access also has capacity for wider site should it be required.</p> <p>Ecological considerations do not pose material constraint to development of the site and adequate mitigation measures can be provided.</p> <p>No risk of flooding being located in Flood Zone 1. Surface water drainage can be managed. Foul and surface water disposal will be via existing adopted Severn Trent Sewers.</p>	<p>The site was assessed in the SHLAA 2014 where it was concluded that the northern part of site would impact on views from the southern edge of Warwick/Leamington due to the topography of the site which rises to the north. The site was assessed as an area of high landscape sensitivity in the Landscape Assessment 2013. The SHLAA concluded that the southern part of the site may be suitable subject to the ability to mitigate landscape impact.</p> <p>The site was considered as an option for a housing allocation for Bishop's Tachbrook in the consultation on Village Housing Options and Settlement Boundaries in November 2013. However it was not carried forward as a preferred option due to the fact that:</p> <ul style="list-style-type: none"> <li>- the site lies within an area of high landscape sensitivity (2013 Assessment)</li> <li>- the site was considered to be a significant Green Field parcel which plays a major role in preserving the setting of Bishop's Tachbrook and Leamington Spa (Green Belt &amp; Green Field Review 2013)</li> <li>- the area was considered to be highly visible from the north and west</li> <li>- there was an area of young trees along the boundary of the site, which were important in establishing the boundary of the settlement; and</li> <li>- the existing open land to the west of the settlement was considered to have more of a rural character to that of the east and south</li> </ul> <p>The site south of the school was considered to have greater sustainability credentials than other sites in terms of access to services and landscape impact</p>	No change

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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>
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*H23 Bishops Tachbrook - Land south of the school*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65494 - Keith Wellsted [8636]	Object	150 houses is 10 times the amount residents suggested in consultation for the Bishops Tachbrook Neighbourhood plan. The site also ignores the gas pipeline problem. This number of houses radically alters the nature of the village.	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. With regard to allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</p> <p>The gas pipeline and the consultation zones</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>Reduce to a maximum of 75 houses</i>	associated with it are located beyond the southern boundary of the proposed development area and will therefore not be affected.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64948 - Mr Leigh Carter [8277]	Object	<p>The villagers have made it clear they do not support any more than 90 new homes.</p> <p>The building of 150 is too much and against the overwhelming wishes of the people who actually live here.</p>	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. With regard to allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</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>Reduce housing to no more than 90 in line with the latest ONS population growth figures which are 29% less than those contained in the local plan.</i>		
66733 - Keith Wellsted [8636]	Object	As part of the Bishop's Tachbrook Community Speed Watch Group, the objector knows what levels of traffic go through the village at peak times and the speeds they do. Not sure how effective mitigation proposals can alleviate the harm of additional significant traffic movements	<p>It is noted that the B4087 experiences a significant increase in traffic flows, however the current traffic flows on the B4087 are much lower than the theoretical capacity of the route.</p> <p>The lack of specific strategic mitigation on this corridor is intentional, in order to prevent an even greater increase in traffic flows. When additional growth is allocated in the area, traffic will naturally find its least cost route (i.e. where there is capacity and lack of congestion). The WCC traffic model has assigned an increase in flows to this route which is balanced against the costs of using other parallel routes. The road network on Europa Way has been enhanced in the model with the surrounding network to provide a viable alternative which would be perceived as a lower cost route. If strategic mitigation solutions were provided on the B4087, this would induce additional demand to use the route rather than using alternatives.</p> <p>Issues relating to speeding/traffic calming were not considered in the strategic assessment. These are local/area specific issues. If related to development, these concerns would have to be addressed during the planning process.</p> <p>The increase on the B4087 is larger in percentage terms, however the increase is from a much lower base compared to other arterial routes. The overall predicted flows are not out of scale with the capacity of the route.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65456 - Mr. Roy Drew [6106]	Object	The land South of the school seems not too bad an option as a site for development, but the number of dwellings proposed is far too large, about 10 times that identified in a survey conducted in the parish; such an influx of people will swamp the local amenities such as medical and education, and exacerbate traffic problems. Also, careful planning is essential to ensure that the new houses are properly integrated with the main village and don't become "Bishop's Tachbrook South".	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. With regard to allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</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>
		<i>Reduce the size of the development in line with the Parish's Housing needs Survey.</i>		

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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>
65432 - Mrs Jean Drew [5047]	Object	This site is ideal for development. However, as a local housing needs survey only found a need for around 20 houses, I believe 150 houses are too many and the number should be reduced to less than 100.	<p>The capacity for villages to provide sustainable locations for development is limited by a number of factors, including access to services and facilities. The village hierarchy has assessed this and this provided the starting point for the allocation of housing to villages. Village sites will help to support services, increase the choice of housing and meet local needs for affordable housing.</p> <p>The Joint SHMA identified a housing need for Warwick of 720 homes per annum over the period 2011 to 2031. The study utilises an internationally recognised methodology for projecting population and households and uses the latest information on fertility, mortality, migration and household formation from ONS. Following the release of the ONS 2012 population projections, an Addendum to the JSHMA was commissioned to consider the implications of the new projections. This study concluded that, compared with the initial JSHMA, the latest projections showed a greater increase in households in Coventry but lower increases in the Warwickshire Districts &amp; Boroughs. Warwick's housing need was assessed as 606 dwellings per annum. However, given the obligation on authorities to co-operate to ensure that the needs of the whole Housing Market Area are delivered, and the inability of Coventry City to meet all of its needs, the Warwickshire Districts have agreed to initially plan for the levels in the SHMA. If there are additional needs beyond this to be met in the Housing Market Area, Warwick District will carry out a further review.</p> <p>The village sites allocated in the Local Plan are therefore not only to meet the needs of the village itself, but also the district as a whole. With regard to allocating sites in rural settlements, the Council has undertaken substantial work to explore the capacity of all rural settlements - see the Settlement Hierarchy Report 2013. This report informed villages allocations, but the final numbers allocated to each settlement was further adjusted to take account of sites constraints and capacity. Site capacity is estimated and based on the land area, any constraints and landscaping and open space requirements. The final number will be decided at the time of a planning application.</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>, I believe 150 houses are too many and the number should be reduced to less than 100.</i>		
65509 - Mr Andrew Day [314]	Support	The proposed site for further development will offer significant benefits to the whole community.	Not required	Not required

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Burton Green*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65978 - Mr and Mrs Swindells and Star Pubs and Bars Ltd [12842]	Object	<p>Within Warwick District, HS2 will primarily impact the village of Burton Green, to the south, in the vicinity of the proposed housing allocation at Burrow Hill Nursery. HS2 is likely to impact the deliverability of the Burrow Hill Nursery site and ultimately render the site undeliverable within the Plan Period of 2011-2029.</p> <p>Notwithstanding the deliverability of the Burrow Hill Nursery site, there is also concern that the Local Plan does not address the potential net loss of dwellings resulting from the construction of HS2.</p> <p>Given the above issues outlined in respect of Policy DS11 and the deliverability of the Burrow Hill Nursery site, it is our view that the Local Plan is not effective.</p> <p>In assessing the ability for Land Covered Parcels (LCP) within the Green Belt to accommodate residential development as part of the Evidence Base for the Local Plan, the first version of the Study failed to assess LCP BG_10, which the site at and to the rear of the Peeping Tom Public House sits within.</p> <p>Given the discrepancy between the Study and Barton Willmore's Green Belt and Landscape and Visual Report, and the lack of a focused consideration of the site at and to the rear of the Peeping Tom Public House, it is our view that emerging Policy DS.11 is not justified as it is not based on proportionate evidence.</p> <p>Following the error an update to the Study was published in April 2014 including an appraisal of LCP BG_10. However the LCP covers a much wider area than just the Site and is predominantly rural in nature, except where it bounds the settlement edge of Burton Green. As such the LCP is considered to be too large to appropriately assess the Site and its location adjacent to the urban edge of Burton Green.</p>	<p>Due to further mitigation measures proposed by HS2 since the publication Draft was issued noise impacts are further reduced. The construction of HS2 will not affect the delivery of the site within the plan period.</p> <p>The Burrow Hill Nursery site provides enough homes to meet identified local needs, accommodate additional market and affordable housing and loss resulting from HS2 (only 3 properties are earmarked for demolition).</p> <p>The Landscape Sensitivity Assessment applied a standard and consistent methodology in relation to land parcels and their definition. The study identified that the site forms part of an area of higher landscape value and indeed is characteristic of exactly the type of landscape features, which have eroded over the years in this area and need protection and enhancement, not development.</p> <p>Overall, it is considered that the proposed allocation is the most suitable and sustainable in planning terms, compared to other sites promoted, to meet the needs of Burton Green and provide enhanced community facilities.</p> <p>It was only considered necessary for the Critical Friend Analysis of the Partial Green Belt Review (2013) to examine sites which were potential preferred options following the relative analysis of all other planning merits and constraints. If a site was not considered suitable overall for other reasons it was not considered necessary to undertake a detailed review of its Green Belt function. This is considered to be a proportionate approach to preparing the evidence base.</p> <p>The Council has prepared a village hierarchy and has used this to indicate the appropriate level of growth for each village subject to capacity. The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites. Further work</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>As discussed in our response to emerging Policy DS7, it is considered that the requirement for Burton Green should be increased to 90, at the top end of the range identified in the VHOSB. This is considered sufficient to meet the loss of dwellings and potential abandonment of housing resulting from HS2, as well as making a contribution to meeting the shortfall in Warwick's objectively assessed housing need, as outlined above in relation to Policies DS2 and DS6. This would ensure that the Local Plan is positively prepared, meeting its objectively assessed need for housing and addressing the impacts of HS2.</i></p> <p><i>It is considered that a further Green Belt Review is undertaken in the first instance to examine each potential development site put forward as options in the VHOSB document, as opposed to only appraising larger parcels of land, to ensure that the Local Plan is based on proportionate evidence and is justified.</i></p> <p><i>Notwithstanding the necessary increase to the housing requirement for Burton Green, there are issues with the deliverability of the proposed allocation at the Burrow Hill Nursery site in Burton Green given its constraints in relation to HS2. In this instance, it would be appropriate to reassess the sites to be allocated within the village and include the allocation of the site at and to the rear of the Peeping Tom Public House given its deliverability and the point that it is not compromised by the construction or residual effects of HS2. This would ensure that the Local Plan is effective.</i></p>	<p>through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65745 - Cllr Ann Blacklock [1090]	Object	<p>Does not comply with the NPPF definition of justified, it not the most appropriate strategy when considered against reasonable alternatives based on proportionate evidence.</p> <p>The section on Growth Villages was completed in a hasty and arbitrary manner, to meet the deadline. The Growth Village of Burton Green has been given one allocated site, which ignores evidence that at least on of the other sites put forward is equally deliverable and developable, would not lead to increase of ribbon development, and would suffer less impact from HS2 in terms of construction disturbance and position within noise contours.</p> <p><i>To comply with the collaborative approach set in policy H10, many of the comments from the Village Housing Options consultation should be taken on board: that new development should not be concentrated on one site.</i></p> <p><i>The preferred site is strongly but not exclusively suitable, as a sustainable location, A pair of small/medium locations eg H24 plus Land off Hodgetts Lane/ Cromwell Lane (site 7 - Shlaa ref: R89) would give balance and integrate far better with the existing pattern of development here.</i></p>	<p>A substantial amount of evidence, consultation and consideration of options was undertaken when considering development options within growth villages.</p> <p>It is not considered that spreading development would be able to deliver the additional community benefits that the proposed allocation can bring, including additional parking for the school and greenway, provision of a village green and space for the community hall.</p> <p>Due to further mitigation measures proposed by HS2 since the publication Draft was issued noise impacts are further reduced. The construction of HS2 will not affect the delivery of the site within the plan period.</p> <p>Overall, it is considered that the proposed allocation is the most suitable and sustainable in planning terms, compared to other sites promoted, to meet the needs of Burton Green and provide enhanced community facilities. The provision of 60 units is more than enough to meet needs identified through the most recent housing needs survey and provide for more additional market and affordable housing in general.</p> <p>Land at Hodgetts lane by comparison is a poor backland development affecting the amenity of neighbouring properties, has no street frontage and can not offer the community benefits that the allocation can.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65699 - Mr Alex Hills [11499]	Object	<p>Duty to co-operate/soundness            Not enough consultation given for Local Plan            Lack of communication and missed/unanswered correspondence            Clarify position on development on different sites in order to allow for greater integration in the community across the spectrum of accommodation types</p> <p><i>A spread of development sites to            -allow for greater integration within the established community            -removal/reduction of present site which will be impacted by HS2 during and after construction</i></p>	<p>The Council has met the consultation requirement set out in the planning regulations and its own statement of community involvement.</p> <p>Spreading development in Burton Green would not deliver the community benefits the village needs.</p> <p>Due to further mitigation measures proposed by HS2 since the publication Draft was issued noise impacts are further reduced. The construction of HS2 will not affect the delivery of the site within the plan period.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66852 - Mr Peter Stanworth [11399]	Object	<p>Previous Village Housing Options and Settlement Boundaries consultation was not widely publicised with most residents of Burton Green only aware of it late in the consultation period. This meant that responses were rushed. At this time the presentation by the site promoter of Burrow Hill Nursery to the Parish Council meant that most residents assumed that the decision had been taken.</p> <p>HS2 bisects the village and has a major impact on its future, due consideration of this has not been given in the preparation of the plan.</p> <p>To place a concentration of 60 houses on one site in the village is totally inappropriate and out of character. This is also the view of others in the village who have signed the attached petition.</p> <p>This site will be affected by the noise and disturbance from HS2 during operation and construction. The construction of HS2 means the housing estate is unlikely to be deliverable in the plan period.</p> <p>The site is not central to the village; Concentrates traffic in the dangerous red lane area; Landscape value is high Accentuates ribbon development Public transport is poor - 1 bus per week and 1.5 miles to Tile Hill station. Fuel pipe runs across part of the land. adjacent to a pond which contains Great Crested Newts adjacent to a listed building, Long Meadow Farm</p> <p>Land off Hodgetts Lane is central to the village and would provide a good heart. It is not affected by noise from HS2 It has good access to Cromwell Lane It has good public transport It does not have a major impact on the landscape Could deliver 30 houses It does not accentuate development Does not consider backland development to be an argument against it.</p> <p>Land at rear of Peeping Tom pub is not affected by noise from HS2 Access through car park is secured. does not have a major impact on the landscape excellent transport links It does not accentuate ribbon development It could deliver 30 houses</p>	<p>Due to concerns raised about local awareness during the Village Housing Options consultation, additional time was given for Burton Green residents to respond.</p> <p>Despite the proposed HS2 line running to the north of the site, through the middle of the village, it is not considered this will have a long term impact in segregating the settlement. The primary school is to the south of HS2 and space for the village hall and green has been allocated at Burrow Hill Nursery.</p> <p>The site at Burrow Hill Nursery is supported by the parish council. The site provides an option to connect two parts of the village together and provide space for a new community hall, village green and car parking for the hall and nearby school.</p> <p>Due to further mitigation measures proposed by HS2 since the publication Draft was issued noise impacts are further reduced. The construction of HS2 will not affect the delivery of the site within the plan period.</p> <p>Mitigation measures include development of the site in part to ensure the protection of landscape character and vegetation.</p> <p>Overall, it is considered that the proposed allocation is the most suitable and sustainable in planning terms, compared to other sites promoted, to meet the needs of Burton Green and provide enhanced community facilities. Land at Hodgetts lane by comparison is a poor backland development affecting the amenity of neighbouring properties, has no street frontage and can not offer the community benefits that the allocation can. Land to the rear of the Peeping Tom is in an area of high landscape value which should be protected from development.</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>Does not consider backland development to be an argument against it.</p> <p>Considers that other options in the area for small development are unlikely to have significant detrimental effects on the landscape.</p> <p><i>Housing development should be spread around the village so as to minimise the alteration in character. It will distribute traffic and reduce congestion and mean that new residents will integrate into the existing community more readily. (NB 10 people have signed a petition attached to this representation stating this approach).</i></p> <p><i>All sites should be reconsidered.</i></p> <p><i>It is difficult to include the Burrow Hill, given its proximity to HS2, however perhaps 10 units could be built opposite the existing homes on in Red Lane to minimise other effects.</i></p> <p><i>The Hodgetts Lane site appears admirably places to supply 20 - 30 houses as does the land to the rear of the Peeping Tom for the same number.</i></p> <p><i>The remaining site options should also be considered even though they will have an effect on the surrounding landscape. The government has insisted on more housing and this means that there will necessarily be erosion of the Green Belt.</i></p>		
65700 - Mrs Marlene Hills [11558] Object	<p>The local plan is not legally compliant and is unsound. In this document the green belt designation does not include all gardens in Cromwell Lane, Hob Lane and most of Hodgetts Lane and all of Red Lane. The exception to this are numbers 36, 34, 32 and 30. The explanation for this was that these houses put their plots forward for development. This is unlawful and unsound</p> <p><i>To ensure lawfulness and soundness and principle of all laws in England and Wales has to satisfy fairness and equitability to all sides. Therefore the local plan has to be amended to either allow all gardens to be within the green belt or all gardens to be excluded from the green belt including houses numbered 36, 34, 32 and 30 Hodgetts Lane.</i></p>	The amendment of the Green Belt boundaries in this location would be a disproportionate incursion into the existing Green Belt given the length of the landholdings and the land to the east continuing to remain in the Green Belt.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66201 - Drs Thornton and Mr & Mrs Vernon et al. [12966]	Object	<p>(1) The Local Plan Village Housing Options and Settlement Boundaries Consultation document published in November 2013 contained some serious factual errors in the information upon which the site selection process was based. As a result of these errors the site selection process was unsound.</p> <p>(2) As a result of the errors contained in the Nov 2013 document, the Public Consultation which followed its publication was flawed to the extent that it should be considered invalid</p> <p>(3) There is no explanation of the method by which WDC took account of the results of the Public Consultation in the formulation of the Publication Draft version of the Plan. Also, the errors relating to Burton Green in the November 2013 document are repeated in the Publication Draft, despite being highlighted in our Consultation submission. This suggests that WDC failed in their duty to consider our Consultation response.</p> <p>(4) WDC have belatedly published a revised site assessment matrix subsequent to the Publication Draft. In respect of our site [Land off Hodgetts Land and Cromwell Lane], some of the errors have been corrected, as a result of which our site now compares favourably with the Preferred Option site. There has been no amendment of the Publication Draft to take account of those now acknowledged factual changes in the evidence base, which should have been recognised much earlier in the process. The Publication Draft is not justified.</p> <p>(5) There is evidence to suggest that some of the information used in the site selection process has been selected or presented in such a way as to favour the Preferred Option Site at the expense of other sites. This casts doubt upon the soundness and justification of the selection process, and further undermines the validity of the Public Consultation.</p> <p>(6) The deliverability of the Preferred Option site is very much in doubt as a consequence of the construction and operation of HS2. WDC have demonstrably failed to examine or properly take account of the evidence relating to the Burton Green area published by HS2 Ltd.</p> <p>(7) Despite Burton Green being classified as a Growth Village, WDC have arbitrarily reduced the Housing Allocation from the original 70-90 dwellings down to 60.</p>	<p>Errors identified in relation the Villages Housing Options and Settlement Boundaries during the consultation process were subsequently rectified in the evidence base. This does not make the Preferred Options consultation process flawed. Following this consultation all representations were read and analysed with the main issues identified and responded to, this can be found in the consultation report published alongside the Publication Draft. Material consultation responses are just one of many factors that have been taken into account.</p> <p>The Site Assessment Matrix - April 2014 was published 10 days after the start of the Publication Draft consultation as a consequence additional time to respond to the consultation was given. Overall, it is considered that the proposed allocation is the most suitable and sustainable in planning terms, compared to other sites promoted, to meet the needs of Burton Green and provide enhanced community facilities.</p> <p>Land at Hodgetts lane by comparison is a poor backland development affecting the amenity of neighbouring properties, has no street frontage and given its size can not offer the community benefits that the allocation can.</p> <p>Due to further mitigation measures proposed by HS2 since the publication Draft was issued noise impacts are further reduced. The construction of HS2 will not affect the delivery of the site within the plan period.</p> <p>The Council has prepared a village hierarchy and has used this to indicate the appropriate level of growth for each village subject to capacity. The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites. Further work through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village.</p>	

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

*In conclusion, we have made a number of criticisms of the Local Plan which we are confident demonstrate that it is neither justified nor effective, and consequently not sound. In making this representation, we must observe that the updated decision matrix was not published until one third of the way through the shortest allowed consultation period. Given the time required to collate this response, this delay has resulted in insufficient time for us to obtain legal advice. This representation may therefore not be framed in terms that make the legal arguments in respect of justification and soundness as clear as might otherwise have been achieved. We shall seek further guidance as to whether or not a further submission would be helpful in that regard. In the interim, we would ask that the council and the inspector recognise our unfamiliarity with the legislation and its application.*

*We look to the Planning Inspector to order a complete re-evaluation of the local plan or, as a minimum, a review in respect of Burton Green. Undertaken equitably, and without prejudice, this should result in the determination of the site we have put forward as a housing development site, possibly in conjunction with one or more of the other sites within the village.*

*Alternatively, the Inspector may feel that the evidence is strong enough for him to order such a determination.*

*We urge WDC to co-operate with us further in reviewing all their documentation in respect of our site and confirming their further corrections to us and to the Inspector. We request that the council revert to us in respect of any matters that would facilitate further consideration of the site in anticipation of their own further submissions to the Inspector. In particular, we remain available to facilitate a site visit by council officers or indeed, by the Inspector.*

*We would welcome the opportunity to assist the Inspector should clarification of any points be required and otherwise we look forward to participating in the oral hearing.*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H24 Burton Green - Burrow Hill Nursery</i>				
66247 - Crest Strategic Projects [9115]	Object	<p>It would appear that the justification for this site is to better connect the village. However, it is unclear how this will be achieved with the proposed HS2 railway line running to the north of this site and thus segregating the settlement. In such circumstances, the justification for this allocation is flawed.</p> <p>It is noted that the Crest site was discounted due to high landscape impact concerns and potential access difficulties (i.e. *-Appendix 6 Site Appraisal matrix). Both of these objections are incorrect. As stated in previous representations: -(see Summary of Findings)</p> <p>i) Access can be achieved to the requisite standard to service the site. Furthermore, the County Council previously assessed the potential traffic impact in their Traffic Flow Model System. That work included that there would be no problems in terms of traffic impact from a residential development of 880 dwellings.</p> <p>ii) With regard landscape impact the SHLAA concluded that with satisfactory mitigation the site could be developed within no adverse impacts.</p> <p>Crest therefore strongly object to the conclusions reached in respect of their land at Lodge Farm which are incorrect and do not take into account the actual evidence.</p> <p><i>It is recommended that the Council reassess the site options for Burton Green and identify land at Lodge Farm for residential development.</i></p>	<p>Despite the proposed HS2 line running to the north of the site, through the middle of the village, it is not considered this will have a long term impact in segregating the settlement. The primary school is to the south of HS2 and space for the village hall and green has been allocated at Burrow Hill Nursery.</p> <p>The Lodge Farm site was considered in the SHLAA (Ref C13) and is not part of the villages site appraisal matrix, therefore the comment regarding highways access is not relevant as it refers to a different site. It is however, considered in the district wide Site Selection Methodology (April 2014). The site was discounted from the village housing options process as being disconnected from the village and not appropriate to meet the needs of Burton Green. The site at Lodge Farm is assessed in the Landscape Assessment as being of high value and has no relationship with the existing settlement.</p> <p>Overall, in comparison to the proposed allocation the site is not as suitable to meet the needs of Burton Green.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67125 - Mr Peter Stanworth [11399]	Object	<p>To place a concentration of 60 houses on one site in the village is totally inappropriate and out of character. This is also the view of others in the village who have signed the attached petition.</p> <p>This site will be affected by the noise and disturbance from HS2 during operation and construction. The construction of HS2 means the housing estate is unlikely to be deliverable in the plan period.</p> <p>The site is not central to the village; Concentrates traffic in the dangerous red lane area; Landscape value is high Accentuates ribbon development Public transport is poor - 1 bus per week and 1.5 miles to Tile Hill station. Fuel pipe runs across part of the land. adjacent to a pond which contains Great Crested Newts adjacent to a listed building, Long Meadow Farm</p> <p><i>Housing development should be spread around the village so as to minimise the alteration in character. It will distribute traffic and reduce congestion and mean that new residents will integrate into the existing community more readily. (NB 10 people have signed a petition attached to this representation stating this approach).</i></p> <p><i>All sites should be reconsidered.</i></p> <p><i>It is difficult to include the Burrow Hill, given its proximity to HS2, however perhaps 10 units could be built opposite the existing homes on in Red Lane to minimise other effects.</i></p> <p><i>The Hodgetts Lane site appears admirably places to supply 20 - 30 houses as does the land to the rear of the Peeping Tom for the same number.</i></p> <p><i>The remaining site options should also be considered even though they will have an effect on the surrounding landscape. The government has insisted on more housing and this means that there will necessarily be erosion of the Green Belt.</i></p>	<p>The Parish Council is supportive of the proposed allocation. The site provides an option to connect two parts of the village together and provide space for a new community hall, village green and car parking for the hall and nearby school.</p> <p>Due to further mitigation measures proposed by HS2 since the publication Draft was issued noise impacts are further reduced. The construction of HS2 will not affect the delivery of the site within the plan period.</p> <p>Mitigation measures include development of the site in part to ensure the protection of landscape character and vegetation.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66345 - David Wilson Homes [11681]	Object	<p>The NPPF does not place an obligation to allocate brownfield sites first. Only part of the site is brownfield. The site is not the most suitable or sustainable site for residential development. Site is located on the southern periphery of the village. Majority of the village and community services located to the north of the village.</p> <p>This allocation is not without its own constraints as identified in the Village Site Appraisal Matrix. Land at Cromwell Lane is more a preferable alternative and does not have the same constraints as Burrow Hill site.</p> <p>HS2 will divide a village which is already linear in composition, leaving any future occupants of properties on the preferred site feeling separated and disassociated with the village.</p> <p><i>Land off Cromwell Lane and Westwood Heath Road, Burton Green is suitable, available and achievable. Access concerns raised in the Council's assessments can be overcome.</i></p> <p><i>The Landscape and Visual Appraisal attached has demonstrated that the overall landscape sensitivity of the site is medium and the landscape has some capacity to change.</i></p> <p><i>The site can accommodate upto 90 homes with space for a relocated village hall and children's play facilities and open space, retention of ecological assets and provision of SUDS.</i></p> <p><i>The majority of residential development is located to the northern end of the village, further residential in this area will continue to promote community cohesion.</i></p> <p><i>The site is in sustainable location and has excellent public transport</i></p>	<p>Whilst the NPPF does not place an obligation on LPAs to allocate brownfield first, the Council's spatial strategy for sustainable development directs allocations to previously developed land in the first instance. It should be noted that this site is described as greenfield in the SHLAA (ref R90), although it is acknowledged that only part of the site is brownfield.</p> <p>Overall, it is considered that the proposed allocation is the most suitable and sustainable in planning terms to meet the needs of Burton Green and provide enhanced community facilities. It is not the case that the majority of community services are to the north when taking into the primary school and provision of land for the community hall to relocate to the Burrow Hill Nursery site to make way for HS2.</p> <p>Despite the proposed HS2 line running to the north of the site, through the middle of the village, due to the mitigation measures proposed, it is not considered this will have a long term impact in segregating the settlement.</p> <p>It is considered that the site promoted by comparison is of high landscape value (Landscape Sensitivity Study 2013), access is very limited and the parcel contributes more to the purposes of Green Belt than the proposed allocation.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>connections, which are within walking distance, and situated further away from the HS2 line.</i>		
66150 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991]	Object	<p>The proposed allocation at Burrow Hill Nurseries, Burton Green and is currently for 60 new homes. The NPPF makes clear that Development Plans should meet the full, objectively assessed open market and affordable needs for housing market areas. Applying this important objective to Burton Green, it is necessary for the plan to provide sufficient housing to make best use of land whilst ensuring the objectives of growing the District's rural villages.</p> <p>An important objective of the plan is to provide for affordable housing. A larger housing allocation, will best meet this objective since it will ensure that affordable housing thresholds are met.</p> <p>A larger site allocation also maximise development viability minimising the risk that affordable housing and other community infrastructure cannot be delivered due to viability concerns.</p> <p>Having assessed the key technical and environmental considerations in respect of the site, it is evident that up to 100 homes could be successfully delivered.</p> <p><i>An allocation of 100 dwellings rather than 60 at Burrow Hill Nursery, Burton Green.</i></p>	The number of units is a minimum and approximate but reflects the space required for community centre, village green and joint-use car parking and protection of landscape character and vegetation.	
<i>Cubbington</i>				
66735 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Object	Land extending from the junction with Queen Street around to the school should be allocated to meet housing need, providing up to 150 dwellings.	<p>This land is in the Green Belt which is strategically important in maintaining the separation of Lillington and Cubbington. There is the potential for a major long-term negative effect on the prudent use of land through the loss of Green Belt Land on the edge of the village.</p> <p>This is an elevated site in a highly visible location with a high landscape impact. Vehicular access issues mean that this site is not achievable. Any development here has the potential to lead to major negative effects on water use.</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>H25 Cubbington - Allotment Land, Rugby Road</i>				
65322 - Sir Thomas White's Charity [12713]	Support	The Trustees wish to make both the land the subject of housing allocations H25 and H26, including the land for which planning permission has already been granted and the alternative allotment land, available as soon as practicable.	Not required	Not required
<i>H26 Cubbington - Opposite Willow Sheet Meadow</i>				
66739 - The Rosconn Group [9057]	Object	<p>Objector disputes the Village Sites Appraisal Matrix with specific reference to sites in Cubbington. The allotment land and adjacent Riding School (sites 3 &amp; 4 in Village Housing Options Consultation) have been disregarded on the basis of access and landscape but additional information has been submitted on both issues and it has been demonstrated that access can be achieved.</p> <p>Sites 3 &amp; 4 are preferable to the allocated sites in Cubbington by way of being better screened and not including any development on open Green Belt land. Further, the allotments would be improved and converted to statutory allotments for the benefit of the community</p>	Regardless of the access issues, the sites are in the Green Belt where special circumstances are required for development which do not apply in this case. There is sufficient land now allocated to serve the district's needs. The sites have a major /strategic role in maintaining the setting of Leamington Spa, Cubbington village and the rural hinterland with a strong environmental value. Any development here would have the effect of extending a ribbon of development into open countryside within an area of high landscape value. There is also the potential for contaminated from the previous nearby land use. In addition, proximity to ancient woodland makes this area unsuitable for development.	Not required
65329 - Sir Thomas White's Charity [12713]	Support	The Trustees wish to make both the land the subject of housing allocations H25 and H26, including the land for which planning permission has already been granted and the alternative allotment land, available as soon as practicable.	Not required	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>Hampton Magna</i>				
64524 - Mr Richard Thwaites [11460] 64534 - Mr Richard Thwaites [11460] 66020 - Centaur Homes [9117]	Object	Previously developed land should be allocated first.  The Maple Lodge site is approx 25% brown field. However, it was excluded due to the requirement for a significant amount of site screening and softening of the development edge. As part of the assessment, all of the sites in Hampton Magna have been noted with the same constraint, including the allocated site. Only one site from this consultation has been carried forward and shown as an allocation within the Local Plan, Land South of Arras Boulevard.	This site has been assessed (see Village Sites Appraisal Matrix). The site is not well integrated with the main village. It is high landscape value and development here is likely to have a major landscape impact. The site plays an important role within the green belt.	
<i>The Maple Lodge site should be the preferred option for development within Hampton Magna</i>				
66446 - Mr William Campbell [11985]	Object	Positively Prepared because it fails to properly assess Transport access to and from Budbrooke village and properly assess electricity, drainage sewerage infrastructure at Hampton Magna.  Not Justified because it does not properly take account evidence Budbrooke School does not have sufficient capacity to cope with additional houses.  Not Effective because it does not deliver sustainable development in respect of transport access to and from Budbrooke village or electricity, drainage and sewerage infrastructure at Hampton Magna.  <i>Reduce number of houses at Hampton Magna and improve infrastructure before building is agreed</i>	The village hierarchy shows that the village has the capacity to accommodate at least 100 dwellings. The infrastructure requirements can be met, for example the educational needs met by amending priority areas and ensuring extra provision within the urban areas; the transport infrastructure can be improved to mitigate development impacts (see STA4). Further Severn Trent Water, Western Power and National Grid have indicated that there are no insurmountable issues in relation to utilities.	

**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action***H27 Hampton Magna - South of Arras Boulevard*

65334 - Mr Carl Stevens [4873]

Object

The village will struggle to sustain the houses proposed - the sewerage system is terrible (well known) and electricity/water systems also have issues. The school will not have the capacity to teach the numbers involved and has had issues recently. Decisions are driven by a closed approach by planners to the residents voices in the consultation process. Wildlife including bats exist on the site. Redrawing the village envelope to the beautiful southern flank of the village is a crime against community our heritage. Importantly as green belt land its against NPPF policy in that exceptional circumstances have not been proven.

Electricity supply: National Grid and Western Power have indicated that investment will be required by the developers to ensure supply to the site, but that there are no other constraints.

Sewage: Severn Trent Water have indicated that there are no particular capacity issues in Hampton Magna. The development will have to manage its impact and avoid adding to local problems and effective surface water management essential to avoid knock on impacts further down the water courses.

The ecology value has been assessed as medium to low with a Potential Local Wildlife Site within a corner of the site.

The Council is seeking to distribute development across the District (see DS4).

Exceptional circumstances for development at Hampton Magna in general are justified for a number of key reasons:

- a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development
- b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report
- c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities.

*Green belt stunning countryside should be protected , destroying green belt for just 100 homes out of 13000 cannot be justified and by basic English cannot be "exceptional circumstances" under NPPF. If so then as a minimum review other site options around the village not properly considered. Question the independence of the decision to use Henry VIII Trust Land being preferred site- they also own an area of land off Europa Way critical to the local plan*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65405 - Lee Jackson-Clarke [8142]	Object	<p>My representation is the same as representation submitted by Hampton Magna Residents association of a copy of which I have seen.</p> <p>Plus we are directly adjacent to the plot of land to be developed hence believe compensation is forth coming due to reduction in property evaluation suggest land allotted equal to our present plot for our self build. Previously stated on earlier submission.</p> <p><i>My representation is the same as representation submitted by Hampton Magna Residents association of a copy of which I have seen.</i></p> <p><i>Plus amend with provision of compensation for properties directly adjacent to the plot of land to be developed due to reduction in property evaluation to allow opportunity of self build.</i></p>	<p>See response to rep 66878 (Hampton Magna Residents Association)</p> <p>There is no provision in the planning system to compensate for lost property values. Provision of self build plots will be at the discretion of the site developer.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65406 - Mr Dene Jackson-Clarke [8125] 66709 - Miss L R Vickers [504] 66854 - Mrs Carol Cross [12881] 66857 - Mr Dene Jackson-Clarke [8125] 66860 - Mr Bob Davis [12802] 66863 - Mrs Jennifer Bickerstaff [8130] 66866 - Mr Stephen Pilkington [12615] 66869 - Mr Robert Sutton [573] 66872 - Miss Louise Wilson [8105] 66875 - Frank Roper [8619] 66878 - Hampton Magna Residents' Association (Mr Frank Roper) [12305] 66881 - mr clive fennell [8364] 66884 - Mrs Pamela J Sutton [796] 66887 - Linda I Pearce [12625] 66890 - Mrs Patricia Anne Pilkington [12619] 66893 - L H Powell [11948] 66896 - Mr Brian Robert Pearce [11949] 66899 - Lee Jackson-Clarke [8142] 67130 - Mr Kevin Olney [11601]	Object	<p>Traffic and Transport: The proposals fails to address the increased traffic and congestion for Hampton Magna. The proposals will have a negative impact on the Stanks Island junction. there is already significant congestion to and from Budbroke at peak times due to the nature of the roads in and out of the village. Old Budbrooke Lane becomes a single lane under the railway bridge and this is controlled by a four way alternating traffic light system. The alternative access is through Hampton on the Hill but this is subject to narrow access points. The overall effect is that at peak times traffic congestion and delays are experienced. The proposals for 100 additional houses will exacerbate this and are likely to lead to gridlock. The plan does not therefore adequately address access to this site. It is therefore likely to have consequential impacts. This will also adversely impact on public transport journeys at peak times. Further, this could impact on emergency vehicle access. Together with increased noise and air pollution this will have a negative impact on health and well being and cannot be considered sustainable development. The Plan has not demonstrated compliance with NPPF para 32 as the transport assessment is not realistic. The Plan recognises congestion as a significant issue. The strategic transport assessment considers the reduction of traffic queues but does not show how this will enable safe and suitable access to and from Budbrooke village at peak times. This means the plan is not positively prepared, effective nor consistent with national policy.</p> <p>Utilities: The Plan does not adequately address the infrastructure requirements of this site in relation to utilities. Issues regarding electricity supply and sewage have been raise previously, but there is no evidence as to how this is being addressed. If assessments have been made, then this should be published and scrutinised before the approval of the Local Plan. The existing drainage, sewerage and electricity systems cannot cope with the proposed housing. The IDP is not fully funded and cannot therefore demonstrate that the proposals are deliverable.</p> <p>Schools: This site is not the most appropriate strategy as proportionate evidence has not been taken in to account as demonstrated by the SA which state that the capacity of existing services is unknown. However previous reps have explained that Budbroke school is struggling with numbers due to rising population. The additional houses will put a further strain on the school. The plan does not recognise this issue or resolve it and the proposals are therefore not sustainable or justified.</p>	<p>Traffic</p> <p>The Strategic Transport Assessment has been prepared on the basis of 100 dwellings on this site. The assessment shows, that with the right mitigation, the development here can be accommodated on the transport work. WCC highways have commented on the proposal and have indicated that access to the site can reasonably be achieved. The impact on the signals under the railway have been assessed as part of the Strategic Transport Assessment. This shows that during the whole morning peak less than 30 additional trips will be generated heading from the new site to Birmingham Road. This represent less than 1 trip every 2 minutes. The modelling shows that the signals can accommodate this level of growth, even if minor improvements are required. The transport mitigation proposes substantial improvements to Stanks Island. Funding for this has been agreed through the SEP. It is expected that this will play a significant role in relieving congestion on Birmingham Road and can provide the capacity to support developments at Hatton Park and Hampton Magna</p> <p>There may be some specific local issues that need to be addressed through the planning application process in line with para 32 of the NPPF and policy TR2.</p> <p>It is accepted that the railway bridge is a constraint and this is one of the reasons why, although Hampton Magna was the highest scoring village within the Settlement Hierarchy report 2013, the number of new homes has been limited to 100.</p> <p>Noise and pollution</p> <p>Additional road traffic may increase noise and pollution. However, there are currently no significant issues relating to these in and around the village and this is not considered by a constraint on development here.</p> <p>Utilities</p> <p>Electricity supply: National Grid and Western Power have indicated that investment will be required by the developers to ensure supply to the site, but that there are no other constraints.</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>Sewage: Severn Trent Water have indicated that there are no particular capacity issues in Hampton Magna. The development will have to manage its impact and avoid adding to local problems and effective surface water management essential to avoid knock on impacts further down the water courses.</p> <p>The IDP does not specifically cover on-site infrastructure provision for utilities. However, it should be noted that in calculating development costs and CIL viability, an allowance of £10,000 per dwelling has been applied for providing utilities</p> <p>Schools WCC education have indicated that provision of extra educational capacity within the urban areas, combined with displacing children out of the priority area means that the proposals for new development can be met within existing village schools such as Budbrooke.</p> <p>It is not possible to compensate for loss of houses values. The Council has no evidence to support a self build policy to require developers to set aside land. Self build plots will be at the discretion of the site developers.</p>	
		<p><i>A specific plan should be prepared showing how safe access and suitable access can be achieved in and out of Hampton Magna. If this cannot be achieved, the site should not be considered sustainable.</i></p> <p><i>A detailed assessment of the electricity system, drainage and sewerage system should be undertaken to remedy existing problems and enable new houses to be added. this needs to demonstrate that the proposals are affordable and the development viable.</i></p>		
65344 - Mr Carl Stevens [4873]	Object	<p>The proposed sight is in an area of particular countryside open aspect beauty to which little or no consideration has been given</p> <p><i>Consider more fully other areas to less open countryside around the East and North of the village. That would also help with traffic issues.</i></p>	<p>The landscape issues associated with the site have been carefully considered. The site has medium/high landscape sensitivity. The need to mitigate landscape impacts has meant that site capacity is limited to 100 dwellings by providing a strong landscape buffer to the south of the site.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65676 - Mr Les Powell [12809]	Object	Objects to site. The road structure in this area was not built for commercial use, all three roads into the site are subject to height and weight restrictions causing access difficulties. Would result in additional cars on these roads. The field in question reaps a regular harvest and the hedgerows are of considerable value to local wildlife	<p>The Strategic Transport Assessment has been prepared on the basis of 100 dwellings on this site. The assessment shows, that with the right mitigation, the development here can be accommodated on the transport work. WCC highways have commented on the proposal and have indicated that access to the site can reasonably be achieved.</p> <p>The transport mitigation proposes substantial improvements to Stanks Island. Funding for this has been agreed through the SEP. It is expected that this will play a significant role in relieving congestion on Birmingham Road and can provide the capacity to support developments at Hatton Park and Hampton Magna</p> <p>There may be some specific local issues that need to be addressed through the planning application process in line with para 32 of the NPPF and policy TR2.</p> <p>The ecological value of the site has been assessed as low/medium.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65324 - Mr Ben Davis [8545]	Object	<p>The land at Hampton Magna is green belt and "exceptional circumstances" need to be justified to allow development. The latest figures from the Office for National Statistics show a population projection for Warwick district which is 29% lower than the estimates used on which the local plan is based and therefore around 3,700 fewer homes are required. The current plan is not based on sound evidence and building on green belt land can not be justified.</p>	<p>For housing requirement, see responses to Policy DS6.</p> <p>The Council is seeking to distribute development across the District (see DS4). Exceptional circumstances for development at Hampton Magna in general are justified for a number of key reasons:</p> <p>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</p> <p>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</p> <p>c) Additional housing in rural settlements provides badly needed affordable homes and also provides opportunities and choice. This enables local communities to thrive and local people to remain within their communities</p>	
		<p><i>The green belt land at Hampton Magna should be removed from the plan as it is not necessary to meet the districts housing needs.</i></p>		
65474 - King Henry VIII Endowed Trust (Warwick) [6195]	Support	<p>We support this recommendation and the Council's decision to allocate the site for development under Policy DS11 in the Draft Local Plan; site reference H27 'Hampton Magna - South of Arras Boulevard'.</p> <p>It is the Trust's considered view that not only is Hampton Magna a suitable location for additional growth, we strongly believe that the village can benefit greatly from well planned development of an appropriate scale.</p> <p>Furthermore from our own Green Belt appraisal and baseline assessment of the site's development potential, we consider that land South of Arras Boulevard is not only a logical location for new development at Hampton Magna but the best site.</p> <p>The Trust can also confirm that not only does the site offer a suitable location for development now, but it is also viable and achievable, with a realistic prospect that housing will be delivered on site within five years.</p>	Support noted	

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Hatton*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65729 - DR Peter Cheetham [11727]	Object	The selection of Hatton Park as a development site and its subsequent designation has never been justified to residents. The ONS projections have reduced the housing need significantly by 29%. There are no plans to improve infrastructure, roads, schools etc to cope with increased demand. There are no exceptional circumstances that justify the use of green belt agricultural land. The effect of proposed G&T site GT19	<p>The Strategic Transport Assessment has been prepared on the basis of 90 dwellings on this site. The assessment shows, that with the right mitigation, the development here can be accommodated on the transport work. WCC highways have commented on the proposal and have indicated that access to the site can reasonably be achieved.</p> <p>The transport mitigation proposes substantial improvements to Stanks Island. Funding for this has been agreed through the SEP. It is expected that this will play a significant role in relieving congestion on Birmingham Road and can provide the capacity to support developments at Hatton Park and Hampton Magna.</p> <p>Exceptional circumstances for development at Hampton Magna in general are justified for a number of key reasons:</p> <p>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</p> <p>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</p> <p>c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities</p> <p>Previous representations have been considered in detail - see reports of public consultation.</p>	
		<p><i>Review decisions and consult with residents on how decisions were made to designate Hatton Park as a proposed development site.</i></p> <p><i>Modify and significantly reduce the number of houses to be built based on the new ONS statistics and predictions.</i></p> <p><i>Improve plans for how to improve the infrastructure consistent with the increases in demand that will result from the proposed housing and G&amp;T site.</i></p> <p><i>Provide exceptional circumstances that justify any development of the green belt.</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>
		<p><i>Include GT19 when considering sites</i>  <i>Demonstrate how feedback from residents has been answered and taken into account to modify and change the plan.</i></p>		
66746 - Mr Edward Walpole-Brown [7504]	Object	Some of the sites are insufficiently tested and their allocation is inappropriate. The distribution between the growth villages is inappropriate when looking at wider district needs. Land at Hatton Green (subject of previous representations) should be allocated either in place of or in addition to H28.	the distribution of development to villages is set out in the Village Hierarchy report. Hatton Green is identified as a small/feeder village and as such is not considered to be a sustainable location for an allocated development site.	

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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>
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*H28 Hatton Park - North of Birmingham Road*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66380 - Hatton Estate (Mr Johnnie Arkwright) [12822]	Object	<p>Hatton Estates are the co-promoters with Bloor Homes of the land at Hatton Hill (south of Birmingham Road). Objection is made to the allocation of land north of Birmingham Road (H28) which should be deleted and replaced by the land at Hatton Hill for the following reasons:-</p> <ul style="list-style-type: none"> <li>*Hatton Park residents access/ use the school, church and pub in the locality. The Hatton Hill site is better located to these facilities. It is illogical to prefer a site that is further away.</li> <li>*The Hatton Hill Site promoted by this representation could encompass an extension to the Hatton Locks car park (currently with insufficient capacity and being used intensively by visitors to the locks/canal). This would resolve a current local issue with better/ safer access thus bringing real benefits to the local community</li> <li>*A new roundabout access to the Hatton Hill Site would provide a safe point of access as well as reducing traffic speed on the busy A4177 Birmingham Road. The site currently in the Local Plan would be accessed opposite the dangerous Ugly Bridge road in the most dangerous and congested section of the Birmingham Road.</li> <li>*There have been 85 objections to the site currently in the Local Plan, this is a measure of the local concern and an indicator of the significant adverse impact it will have on a large number of properties/ families adjacent to it.</li> <li>*The intended alternative at Hatton Hill would be well screened by an intended tree/ landscape buffer and would not impact on surrounding properties and the wider landscape.</li> <li>*The Hatton Hill site is currently arable land and is sheltered by trees and hedges and has minimal ecological or landscape merit. The careful integration of SUDS and the protection of existing edges of the field will enhance ecology and landscape.</li> <li>*The site is hidden/ protected from the nearby canal by trees, a further belt of trees and landscaping is intended</li> <li>*The Hatton Hill site is 'self-contained' and could not be extended if further houses were required in the future. The current allocation is causing alarm with the local community as it is perceived as being ripe for extension into the open countryside for future requirements.</li> <li>*To conclude the current allocation in the plan is considered unsound and not justified based on the evidence available and given that there is a more suitable alternative at Hatton Hill.</li> </ul> <p><i>The current housing allocation (H28- land north of Birmingham Road, Hatton Park should be deleted from policies DS10 and DS11.</i></p> <p><i>A new replacement allocation should be made at the land south of Birmingham Road , Hatton Hill (80 dwellings) as part of policies DS10 and DS11</i></p>	<p>The area to the south of Birmingham Road has been assessed as high landscape value providing an important setting for the flight of locks. It also contains some significant ecological features. It is also separated from the main settlement.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>The Policy Map will have to be amended accordingly to reflect the above</i>		
64911 - Dr Paul and Alison Sutcliffe [4945]	Object	We strongly object to the development of additional housing on land connected to Hatton Park. Main reasons include: Birmingham Road would not cope with the considerable congestion and disruption that this would cause; transport links are already stretched; significant impact on our wildlife that is established on this green belt land - no "exceptional circumstances" not "sustainable"; our local primary schools would not have capacity; impact on drainage; impact of current residents quality of life; impact on child development through added pressure on transportation to schools; impact on Ebrington Drive; and weaknesses in "evidence-based" and synthesis. Please consult residents!	<p>Consultation regarding this site has taken place (November 2013) and the proposals have been amended to take account of this.</p> <p>Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons:</p> <p>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</p> <p>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</p> <p>c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities</p> <p>d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools.</p> <p>The Strategic Transport assessment shows that the proposed growth can be accommodated on the transport network subject to the mitigation. Part of this mitigation involves significant improvements to the Stanks Island A46 junction. The modelling shows that this will provide mitigation for congestion on Birmingham Road. Funding for this is already secured through the Strategic Economic Plan. Care has been taken to ensure the proposed development does not impact on the sensitive ecological area at Smith's Covert. Impacts on schools have been considered.</p>	
		<i>Consult residents and integrate their opinions and views into your plans. Undertake rigorous and transparent research. Understand what is "evidence-based research". Undertaken in-depth qualitative research with residents to incorporate their ideas, feelings, attitudes, satisfaction and dissatisfaction with the current plans.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65929 - Mrs Elaine Kemp [4935] 66362 - Mr Dean Epton [8244]	Object	This site lies in the green belt. No exceptional circumstances have been justified. A local housing needs survey demonstrated the need for 12 dwellings which can be provided on windfall/brownfield sites in the parish. Local people oppose further development and any changes to the green belt.	The Council is seeking to distribute development across the District (see DS4). Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons: a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools	
<i>Define exceptional circumstances to build on green belt.</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65294 - Miss Dawn Elliott [11551]	Object	Damaging to the character of the existing Hatton Park development and negative impact upon the congestion on B'ham road.	See policy DS6 regarding the housing requirement. The IDP sets out infrastructure requirements and shows how essential elements of this will be funded. Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons: a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools, the site appraisal matrix, shows the assessment of each site in the Hatton Area. This information has been used to identify this site for allocation.	
		<ul style="list-style-type: none"> <li>- WDC should reflect the number of houses required accurately as portrayed in the statistics from ONS</li> <li>- Show and prove the proper planning on how to support the infrastructure financially and practicality</li> <li>- Define and show what the "exceptional circumstances" are to build on green belt land</li> <li>- Revisit alternative locations such as Hatton Hill which is far more suitable and likely to be widely supported by local residents</li> </ul>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66384 - Mr Robert Price [11538]	Object	<p>Site H28 lies in the green belt and no exceptional circumstances as required by the NPPF are identified to justify such a development. A housing needs survey for the parish of Hatton carried out in May 2014 demonstrated a need for 12 dwellings for which there is already sufficient windfall and brownfield sites. In a survey for the recently prepared Parish Plan 64% opposed any further development in the Parish and 80% opposed any change to the green belt.</p> <p><i>WDC should use the ONS statistics to accurately reflect the number of homes required. Show and prove the proper planning on how to support the infrastructure financially and practically. Define and show what the exceptional circumstances are to build on green belt</i></p>	<p>See responses to DS6 for housing requirements Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons:</p> <p>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools. Infrastructure requirements are set out in the IDP and include proposals to address roads (significant improvements to the Stanks Island A46 junction), schools (additional provision in urban areas, combined with displacing children who from out of the catchment area) and medical facilities</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65465 - Mr Philip Barton [4956]	Object	<p>The local infrastructure around Hatton Park cannot support another 80 homes, and is supposedly Green Belt Land, the additional homes are not 'exceptional conditions' as required by the National Planning Policy Framework. Local schools are full and cannot accept any increase in the school age population. The traffic on the A4177 during peak periods is already high, making access to the road difficult at times and the road is typically congested down to Shanks Island and the A46. The additional traffic will increase this problem unless additional traffic management is added. The A4177 is prone to flooding and has been the scene of two fatalities recently.</p> <p><i>Any additional housing should only be permitted with suitable upgrades to the transport infrastructure in the area. There are significant delays caused by the volume of traffic on the A4177, the existing south egress point from Hatton Park (Charingworth Drive) can be very busy at peak periods. The Shell garage at Hatton Hill and southbound traffic turning right into Ugly bridge Road cause delays and tailbacks on the A4177. Any egress from additional housing should be located at a new roundabout for the A4177, Ugly Bridge Road and Hatton Hill Shell garage.</i></p>	<p>Infrastructure: The Strategic Transport assessment shows that the proposed growth can be accommodated on the transport network subject to the mitigation. Part of this mitigation involves significant improvements to the Stanks Island A46 junction. The modelling shows that this will provide mitigation for congestion on Birmingham Road. Funding for this is already secured through the Strategic Economic Plan. Other local highways improvements will be subject to consideration as part of the planning application process. WCC education have indicated that school places can be provided by additional provision in urban areas, combined with displacing children who from out of the catchment 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>
66734 - Hatton Parish Council (M C L Le Tocq) [1045]	Object	No exceptional circumstances as required by the NPPF are identified or indeed exist. A housing needs survey for the parish of Hatton carried out in May 2014 demonstrated a need for 12 dwellings of which there is already sufficient windfall and brownfield sites. In a survey for the recently prepared Parish Plan 64% opposed any further development in the Parish, and 80% opposed any change to the Green Belt	The Council is seeking to distribute development across the District (see DS4). Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons: a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65416 - Pauline Neale [1757] 66711 - Miss L R Vickers [504] 66855 - Mrs Carol Cross [12881] 66858 - Mr Dene Jackson-Clarke [8125] 66861 - Mr Bob Davis [12802] 66864 - Mrs Jennifer Bickerstaff [8130] 66867 - Mr Stephen Pilkington [12615] 66870 - Mr Robert Sutton [573] 66873 - Miss Louise Wilson [8105] 66876 - Frank Roper [8619] 66879 - Hampton Magna Residents' Association (Mr Frank Roper) [12305] 66882 - mr clive fennell [8364] 66885 - Mrs Pamela J Sutton [796] 66888 - Linda I Pearce [12625] 66891 - Mrs Patricia Anne Pilkington [12619] 66894 - L H Powell [11948] 66897 - Mr Brian Robert Pearce [11949] 66900 - Lee Jackson-Clarke [8142] 67129 - Mr Kevin Olney [11601]	Object	As this site provides for the housing on a reduced site, the potential exists for further housing in Hatton Park which will add to traffic volumes on Birmingham Road, along with employment related development at Opus 40. there is already significant congestion in and out of Hampton Magna which will be further exacerbated by this development	It is not intended for further housing to be provided on this site. The site boundary has been adjusted to ensure a suitable buffer between new development and the Covert in response to ecological evidence and concerns raised in previous consultation.  The Strategic Transport assessment shows that the proposed growth can be accommodated on the transport network subject to the mitigation. Part of this mitigation involves significant improvements to the Stanks Island A46 junction. The modelling shows that this will provide mitigation for congestion on Birmingham Road. Funding for this is already secured through the Strategic Economic Plan	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65346 - Mr Michael Hinett [7981]	Object	<p>Hatton Park in my view is not suitable for development of 70-90 homes.</p> <p>My concerns fall into two categories: highways and ecology.</p> <p>Highways: As a key consultation theme, the council should be aware that current congestion on Birmingham Road is a very real problem. During 8-9am an extremely long, slow moving queue backs up, some days up as far as the Hatton Arms and beyond. Adding 90 or more extra vehicles will only exacerbate this problem.</p> <p>Ecology: Development of the preferred site will directly impact Local Wildlife in Smith's Covert, by taking away extended habitat and feeding grounds.</p>	<p>Highways The Strategic Transport assessment shows that the proposed growth can be accommodated on the transport network subject to the mitigation. Part of this mitigation involves significant improvements to the Stanks Island A46 junction. The modelling shows that this will provide mitigation for congestion on Birmingham Road. Funding for this is already secured through the Strategic Economic Plan</p> <p>Ecology Smiths Covert potential Local Wildlife Site is to the north of the site and for this reason the site boundary has been adjusted to ensure a suitable buffer between new development and the Covert. There are also some strong features fronting Birmingham Road and within the site. The development proposals will need to take account of these in the layout and design.</p>	
<i>Remove Hatton Park as a preferred site</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65351 - Martin Teodorczyk [5004]	Object	<p>Hatton Park is washed over by the Green Belt and no 'exceptional circumstances' to develop as required by the NPPF exist.</p> <p>The subjective analysis in the Villages Settlement Hierarchy ONLY JUST makes Hatton Park a 'Growth Village' category with a population of "about 2020".</p> <p>A Housing Needs Survey for the Parish of Hatton in May 2014 demonstrated a need for 12 dwellings, for which there is already sufficient land.</p> <p>64% in Hatton opposed any further development in the Parish, and 80% opposed any change to the Green Belt. No meaningful consultation has taken place with the local community by WDC.</p>	<p>It is accepted that Hatton Park has grown very significantly over the last 15 years. However, the facilities provided in Hatton Park have the potential to be better supported and potentially to improve by the provision of additional homes.</p> <p>Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons:</p> <p>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</p> <p>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</p> <p>c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities</p> <p>d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools</p> <p>The village Settlements Hierarchy shows why Hatton Park is considered to be a sustainable location for development and therefore why it has been selected as a growth village.</p>	
		<p><i>Accept that Hatton Park has provided a hugely significant amount of housing un the last 15 years, and that no more is justified.</i></p> <p><i>Accept that steps to increase the supply of housing and encourage a younger population do not apply at Hatton Park.</i></p> <p><i>Create a more robust process to define villages, as the flimsy analysis used could just as easily not place Hatton Park as a Growth Village.</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>
65407 - Miss Rachel Lane [8039]	Object	<p>This is Green belt land which is currently enjoyed by countless wildlife. No exceptional circumstances to Justify the building on this land. The land is also prone to flooding.</p> <p>Congestion: Birmingham Road suffers from extreme congestion in the mornings. Getting off the estate in the morning can take up to 15 minutes. There have also been a number of accidents on this road.</p> <p>Infrastructure: The current schools are over stretched at the moment. Can they cope with extra capacity? Doctors surgery/hospital are stretched. Is there the budget to support increased housing to fund extra health care/schooling?</p>	<p>Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons:</p> <p>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</p> <p>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</p> <p>c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities</p> <p>d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools.</p> <p>Smiths Covert potential Local Wildlife Site is to the north of the site and for this reason the site boundary has been adjusted to ensure a suitable buffer between new development and the Covert. There are also some strong features fronting Birmingham Road and within the site. The development proposals will need to take account of these in the layout and design.</p> <p>The Strategic Transport assessment shows that the proposed growth can be accommodated on the transport network subject to the mitigation. Part of this mitigation involves significant improvements to the Stanks Island A46 junction. The modelling shows that this will provide mitigation for congestion on Birmingham Road. Funding for this is already secured through the Strategic Economic Plan.</p> <p>WCC education have indicated that school places can be provided by additional provision in urban areas, combined with displacing children who from out of the catchment area.</p> <p>Proposals are also in place to provide improved medical facilities across the District (see IDP).</p>	

*There are no changes that can be made.*

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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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>
65348 - Mrs Laura Teodorczyk [5011]	Object	<p>Hatton Park is NOT suitable for further development.</p> <ul style="list-style-type: none"> <li>-It is located within the Green Belt;</li> <li>-There is already significant traffic congestion on the A4177- which will only get worse;</li> <li>-The proposed exit onto the A4177 is an accident blackspot with no safe pedestrian crossing;</li> <li>-Development of this site will ecologically destroy Smith's Covert (ancient woodland, home to many protected animals);</li> <li>-Facilities/amenities within Hatton Park are insufficient for 850 homes;</li> <li>-Public transport within Hatton Park is insufficient;</li> <li>-Flooding on and around this site will be exacerbated by further development;</li> <li>-The local school has already been extended and is close to fullcapacity.</li> </ul>	<p>The Council is seeking to distribute development across the District (see DS4). Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons:</p> <ul style="list-style-type: none"> <li>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</li> <li>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</li> <li>c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities</li> <li>d) In the case of Hatton Park, the village is a relatively large settlement but with relatively limited facilities. The additional housing provides the potential to sustain local shops, community centre, bus services and schools</li> </ul> <p>WCC highways have indicated that a safe access can be achieved from Birmingham Road The Strategic Transport assessment shows that the proposed growth can be accommodated on the transport network subject to the mitigation. Part of this mitigation involves significant improvements to the Stanks Island A46 junction. The modelling shows that this will provide mitigation for congestion on Birmingham Road. Funding for this is already secured through the Strategic Economic Plan Smiths Covert potential Local Wildlife Site is to the north of the site and for this reason the site boundary has been adjusted to ensure a suitable buffer between new development and the Covert. There are also some strong features fronting Birmingham Road and within the site. The development proposals will need to take account of these in the layout and design. The facilities provided in Hatton Park have the potential to be better supported and potentially to</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>Hatton Park is NOT suitable for further development. The amenities are insufficient and local infrastructure within Hatton Parish cannot support further development.</i></p> <p><i>If WDC maintain the need for Hatton Parish to provide 80 new homes, I believe some of the above issues may be resolved or have less impact if site Option 2 - The Hatton Estate and Bloor Homes "Hatton Hill" development become the preferred option.</i></p> <p><i>Option 2 is naturally shielded by the existing tree line and contained on all sides by the Birmingham Road, Canal Road, the canal and the Water works thereby restricting its ability to expand (unlike the preferred option).</i></p> <p><i>It is deliverable and owned by a local resident and business owner (who understands the immediate issues). The site is big enough to house the proposed new homes. The proposed new road layout (new island by Brownley Green Road) will calm and reduce the speed of the traffic on the Birmingham Road. The proposed pedestrian crossing will ensure safe passage between Hatton Park and Hatton Hill/Hatton Locks/the canal etc.</i></p> <p><i>There is also a proposed cycle link.</i></p> <p><i>I believe the development of site 2, unlike the preferred option, will at least provide a benefit to the local residents. It will enhance the use and provide safer accessibility to local amenities - ie the canal, Hatton Locks Cafe and the Hatton Arms pub.</i></p> <p><i>The current preferred option adds absolutely nothing to the local community and does not enhance the accessibility or usability of any of the limited local amenities.</i></p>	<p>improve by the provision of additional homes. WCC education have indicated that school places can be provided by additional provision in urban areas, combined with displacing children who from out of the catchment 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>
65458 - Jennifer and Gary Ingram [7942]	Object	Objection to 80 houses on Hatton Park due to flooding on lower ground, plus the strain on Hatton Park estate.  <i>I appreciate that more houses are required in the area. I would consider the land by the Hatton Arms Pub to be much more suited if it is required in the district so that the burden on traffic , especially at school times, is distributed</i>	The proposed site is better related to the existing village and is therefore better placed to benefit from existing services and facilities. The allocated site has been assessed as suitable and is considered to have a lower impact on the green belt and a less sensitive landscape.	
65216 - Mr Dominic Harrison [5072]	Support	Regarding the Hatton Park development H28, the existing facilities is extremely inadequate for teenagers. If the new extension proceeds consideration has to be given for the provision of leisure facilities for children 12 - 17 - an age group that is overlooked. Even a small area for skateboarding , roller blading etc should be a priority.	Open space provision will be expected in line with the Council Supplementary Planning guidance. the exact nature of this will be determined through a planning application	
66596 - A C Lloyd Homes Ltd [5958]	Support	When site forward it will be critical to ensure new community can integrate with existing community at Hatton Park, which can be secured by bringing access from Ebrington Drive. This will ensure connectivity to the village, existing bus stops and local facilities, whilst also avoiding an unnecessary new access onto the Warwick Road. As owner of the land at the end of Ebrington Drive, A C Lloyd Homes is willing to work with the site owners to ensure this more preferable access solution is delivered.	Support noted. Subject to further highways assessment, there is potential for a secondary access from Ebrington Drive. At the very least a pedestrian and cycle link to Ebrington Drive should be provided	
65078 - Katharine Mary Silvester [5076]	Support	The development of this site for 80 new houses does not fit with the LDP's other proposal to allocate Oaklands Farm as a site Gypsies and travellers. These two initiatives are inconsistent with many of the LDP's strategies to enhance the local environment, communities and local amenities.	At present there are no definite proposals for the allocation of Oaklands Farm for a Gypsy and Traveller site. Should this be proposed, the Gypsy and Traveller DPD will need to take account of the proposals for the land north of Birmingham Road. Oaklands Farm would therefore only be allocated if it can be demonstrated that the proposal is sustainable in this context.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Kingswood</i>				
66224 - Savills (Mr Richard Shaw) [11305]	Object	<p>There is no justification for the reduction in housing capacity in Kingswood from 100 to 150 in the Revised Development Strategy to 43 in the Publication Draft. Part of Site 8 (Land to the south of Kingswood Close) fronting onto Station Lane (as identified in the enclosed plan) should be allocated for 9 - 16 houses.</p> <p><i>Allocation of part of Site 8 (Land to the south of Kingswood Close) fronting onto Station Lane (as identified in the enclosed plan) for 9 - 16 houses.</i></p> <p><i>This site forms a smaller part of SHLAA site R110 which was discounted during the Village Housing Options and Settlement Boundaries consultation process as a result of concerns over the tree frontage and access.</i></p> <p><i>However, this process did not take account of the availability of adjoining land at Kingswood Farm that would allow access to be provided without harm to the tree frontage</i></p>	<p>The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites.</p> <p>Further work through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village. In the case of Kingswood the final figures reflected flood risk and landscape constraints. In relation to the individual capacity of allocated sites it is proposed elsewhere to amend the plan to state that the figure stated is approximate. Discounted site 8 is located in a corridor of high landscape value and with features of ecological importance. It is considered that development in this location would significantly change the character of this very visible and open Green Belt area.</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>
65954 - Mr Stuart Weir [8350]	Object	<p>Plan gives incorrect and flawed descriptions of land eg non separation of parishes/communities No consistency of approach or with NPPF with regard to Green Belt/flooding. Building in flood plain not consistent with national or LP policy. Decisions taken without substantiation or consultation with EA etc. Development not kept within locally known boundaries of Lapworth Initial consultation referred to Kingswood and Lapworth; assumption therefore that Rowington did not fall within proposed development area. Majority of consultation meetings took place in Lapworth not Rowington</p> <p><i>Pre-determination has inhibited the process therefore it should be recommenced or inclusion of Rowington deleted</i></p>	<p>In assessing site options officers have worked with the Council's flood risk engineer, reflected advice contained in the Strategic Flood Risk Assessment which was subject to consultation with the Environment Agency and utilised Environment Agency flood risk maps. The Environment Agency are also statutory consultees at each consultation stage. Careful consideration has also been given to the release of green belt for development options, it has only been proposed where there is no alternative. A green belt review was undertaken for all green belt site options.</p>	No change required
66038 - A C Lloyd Homes Ltd [5958]	Object	<p>Policy DS11 proposes the allocation of Kingswood- Meadow House and Kingswood- Kingswood Farm for residential development. We find the proposed allocations, and the removal of the land from the Green Belt to facilitate that development to be sound and appropriate.</p> <p>Kingswood is a sustainable settlement which provides a good range of local services and facilities to its residents. Moreover the village is served by regular public transport, both bus and train, making access to higher tier settlements feasible without reliance on the private car.</p> <p>We find the proposal to release land from the Green Belt at this point in time necessary to ensure the future success of the settlement. It is only by releasing land that the village will be able to meet its own housing needs, both affordable and market.</p> <p>Land at Meadow House and Kingswood Farm is available and suitable to meet the development needs of the settlement.</p> <p>We find that the proposed allocations, and the removal of the sites from the Green Belt, is appropriate, having been fully justified through the Local Plan preparation process. It is effective in that the development will meet housing needs in a sustainable settlement, and is consistent with national policy.</p> <p><i>Notwithstanding the above comments we propose that the number of dwellings on the two sites combined be increased to approximately 40. A detailed justification for this is provided in a separate representation.</i></p>	<p>Noted. It is acknowledged that on certain sites there may be potential for a greater capacity of residential development than the number allocated in the plan. The Council supports the objective to ensure the best use of land where this can be achieved without comprising the surrounding landscape and ensuring protection against flood risk. However it is considered that detailed work such as that submitted by the respondent should be considered through the planning application process, where it can be subject to consideration by statutory consultees such as the Environment Agency and weighed up against other factors. In order to reflect this in the Plan it is proposed to include text in the reason justification to DS11 to state that the housing numbers for each allocation are indicative and may change subject to detailed design at the planning application stage.</p>	Amend the column relating to the number of dwellings in policy DS11 to read 'approximate number of dwellings'. Add additional sentence to paragraph 2.42 to state: 'A figure for the number of dwellings for each site is shown however it is recognised that this may vary dependant on detailed planning at the application stage. However in most cases this figure will represent the minimum site capacity'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66168 - Parkwood Consultancy Services (Rangit Sagoo) [12875]	Object	Concern that land at Kingswood Farm is not enclosed within the village envelope and remains in the green belt. The land is located off Station Lane and would not affect one of the two distributor roads through the village. The land is within walking distance of the railway station and close to local services. The village envelope would still maintain a strong defined boundary and not affect the green belt. It has the potential to offer future uses (for example housing mix) that would contribute towards sustainability. Other sites do not offer the same sort of integrity in respect of the village structure, and access may be outside the control of the landowners.	This site was assessed as part of the village housing options work and is summarised in the updated site selection matrix April 2014. This concluded that the site is located in a corridor of high landscape value and with features of ecological importance. Development in this location would significantly change the character of this very visible and open Green Belt area. The site is not considered suitable for housing. The landscape assessment work has been re-assessed for this area of Kingswood and the original comments hold.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65857 - Business Flats Ltd (Mr D Smith) [8349]	Object	<p>Plan does not provide for sufficient units within the identified growth villages. Due to the tight village boundary there is little or no opportunity for windfall sites to come forward to assist in meeting this target. It has been acknowledged that growth villages should accommodate at least a 20% increase in dwellings, only 2 of the villages with the others including Kingswood substantially underproviding. Kingswood has a good range and number of local services, including a main line station therefore has the facilities to support a larger number of dwellings. Given how the village has historically developed it is contended that a dispersed strategy would be the most appropriate way forward. In order to achieve this further sites should be considered for allocation and the growth village envelope should be revised to include small parcels removing them from the green belt. This would also allow small windfall sites including those which are less than 5 units and cannot be formally allocated to come forward without impacting on the openness and purposes for including land in the green belt. It is considered that a number of sites including Kingswood site no6 were too readily dismissed.</p> <p>This site was dismissed on the grounds of flooding. Whilst it is acknowledged that the sites western section (including the indicative access) is within flood zones 2 and 3 and remainder of the site is within flood zone 1 and therefore provides sufficient land to accommodate residential units. subject to levels and the need not to raise the ground level the area within flood zone 2 and 3 could be used for car parking and open space. An alternative access point could be the existing eastern vehicle access point which currently serves the 12 adjacent properties. In addition earthworks and re-profiling could provide flood and surface water capacity. It is contended that with appropriate design and layout of the site the construction of properties albeit potentially less the 5 units, would not cause or exacerbate flooding in the area.</p> <p><i>Additional Housing Allocations need to be identified within the Local Plan together with a review of the Kingswood Growth Village Envelope in order to provide for additional residential units either through those sites that are allocated or through windfall developments.</i></p> <p><i>The Council, whilst identifying sites and boundary changes that they initially considered as part of the Village Options and Settlement Boundaries consultation (2013) did not re consult on their findings, thus allowing redress, before formulating the Draft Local Plan, which is now being consulted upon. As such, another round of formal consultation should take place to allow the proper and correct evaluation of sites and the settlement boundaries to take place.</i></p>	<p>It is not certain that appropriate access could safely be achieved through the area within flood zone 2 and 3. Notwithstanding this the respondent points out that the site would accommodate less than 5, which is the threshold for allocating a site. The Council does not consider it is appropriate to amend the village boundary, in the absence of information on whether the site could be brought forward there are no other reasons to justify 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>
66184 - The Trustees of the F S Johnson 78NEL Settlement [7206]	Object	<p>The local plan is not sound because it fails to:</p> <ul style="list-style-type: none"> <li>provide sound, accurate evidence to justify discounting land at Station Lane, Kingswood for housing development, despite assurances that previous misrepresentations would be rectified.</li> <li>does not provide certainty over the long term</li> <li>identify sufficient land within or adjacent to the largest villages proportionate to their sustainability criteria</li> <li>include sufficient sites which are deliverable in the next 5 years to meet the 5 year housing land requirement</li> <li>address the need for a 20% buffer in the 5 year housing land supply arising from the Council's record of persistent under delivery of new housing</li> <li>fully address the implications on Warwick District of the potential housing land shortfall in the Housing Market Area and surrounding local authority areas as required under the Duty to Cooperate</li> <li>offer developers sufficient deliverable housing land choices to ensure a rolling 5 year housing land supply is maintained</li> <li>ensure that Green Belt boundaries are capable of enduring beyond the plan period through the identification of 'areas of development restraint' or 'safeguarded land' including in/adjacent to the most sustainable villages</li> <li>provide sound evidence to demonstrate that highway access could be satisfactorily achieved to enable safe development of the sites allocated for housing in Kingswood; and</li> <li>remove part of the land fronting Station Lane from the Green Belt and include it within the Settlement Boundary and allocate it for residential development</li> <li>it does not comply with the NPPF and its presumption in favour of sustainable development.</li> </ul> <p>Strongly recommends the allocation of land fronting Station Lane. This would include discounted option 9 together with land to the east up to the existing field boundary. The site is in an extremely sustainable location, close to Lapworth railway station and bus stops, the local primary school, shops and surgery. The Council's assessment of the site was distorted by the Council's decision to ignore the existing access opposite 145 Station Lane and assume access would be provided towards the northern end of the road boundary opposite 155 Station Lane. The Council also failed to assess in detail the landscape impact if development was confined to the field fronting Station Lane rather than the larger SHLAA site. Alternative landscape and highways assessments demonstrate inaccuracies with the Council's evidence base. Highways Statement carried out by Savoy Consulting disputes the County Council's conclusions that demonstrating access could be</p>	<p>The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites. Further work through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village. In the case of Kingswood the final figures reflected flood risk and landscape constraints. The Council considers that the sites put forward are the most suitable based on these constraints.</p> <p>The County Council were commissioned to undertake an independent landscape sensitivity assessment for the villages and the Council has applied this evidence when considering the suitability of sites avoiding areas of the highest landscape sensitivity. This site is located in a corridor of high landscape value and with features of ecological importance. Development in this location would significantly change the character of this very visible and open Green Belt area. In response to the additional landscape studies which were submitted, the findings of the original landscape sensitivity and ecology and geology study produced by the County Council on behalf of the Council was revisited. It was considered that the original recommendations remain, the field in question contributes to the strong rural character in the zone it was assessed, it is one of a series of green wedges alongside the road that provides connectivity with the wider countryside and forms part of the rural setting to the listed building</p> <p>The larger site was assessed in the SHLAA and discounted due to the potential loss of trees on the frontage needed to achieve access and due to it being in an area of high landscape sensitivity. The smaller site was not ruled out after the SHLAA unsatisfactory assessment and was considered as part of the village work and identified as discounted site 9.</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>achieved opposite 145 Station Lane. Access into the site would not require the removal of any trees.</p> <p>This highways evidence calls into question many of the Highways conclusions on other sites in Kingswood. It raises serious doubts over the deliverability of H29 and H30 where access would need to be obtained over third party land.</p> <p>Landscape assessment carried out by Barry Chinn concluded overall the landscape and visual impacts for the development are considered to be predominantly localised and contained within a reasonably small area. Despite submitting this information the Council's evidence base remains unchanged. The SHLAA does not relate to the site area being promoted but instead the full extent of the land in the Council's ownership much of which it is agreed would not be suitable for development and would have an acceptable impact on the landscape.</p> <p><i>Land fronting Station Lane should be allocated for housing. This would include discounted option 9 together with land to the east up to the existing field boundary</i></p>		
65651 - Lapworth Parish Council (Mrs Elaine Priestly) [1334]	Support	<p>DS11 Lapworth Parish Council believes that the consultation and review processes carried out by Warwick District Council have been thorough, professional and fair as far as the housing allocations for Kingswood/Lapworth are concerned. Reasonable arguments have been listened to and investigated with site visits. There were considerable problems at the outset about communications with the Parish Council, and even more so with residents. They were very poor and caused some ill-feeling. However in the course of the process it has become clear that reasonable objections were considered and investigated, with the result that the final plan reflects many of the comments made. Whilst not all residents are happy with all the outcomes, we feel that the consultation periods and the meetings at the Village Hall and in Warwick, plus the clear willingness to accept changes where well-justified, are evidence of open-mindedness and good practice. The Parish Council commends the process and the resulting decisions in the Local Plan</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>
<i>H29 Kingswood - Meadow House</i>				
66041 - A C Lloyd Homes Ltd [5958]	Object	<p>Policy DS11 proposes the allocation of land at Kingswood - Meadow House for 10 dwellings and Kingswood - Kingswood Farm for a further 10 dwellings (sites H29 and H30). Combined the sites have a developable area outside of flood zone 2 (1:1000) or 3 (1:100) of approximately 1.9 hectares (excluding The Meadow House), and are capable of accommodating more than the 20 dwellings proposed between them. Failure to propose the allocation of the land for a higher number of units is not justified and is not consistent with national policy.</p> <p>Detailed hydrological flood modelling undertaken by Robert West Consultants confirmed the extent of the flood zone and bearing this in mind outlined the potential for the sites to cater for a total of 39 dwellings.</p> <p>National planning guidance requires the best use to be made of land, to minimise the overall take up of green fields and thus to reduce the impact on the wider landscape. Failure to make best use of the land results in conflict with the NPPF.</p> <p>During the detailed design development stage A C Lloyd will investigate options to further reduce any flood risk issues. These may include:</p> <ol style="list-style-type: none"> <li>1. The possibility of enlarging the culvert under the Warwick Road to improve flows under the main road and thereby remove the shallow surface flooding of the adjacent highway / pedestrian access route. This may mean the emergency access could be avoided and may also provide benefit to the wider area.</li> <li>2. Re-grading and deepening the existing channel back from the canal / rail culvert to approximately 1 in 500 gradient, within the Meadow House site.</li> <li>3. Utilising land to the west of the Meadow House site for compensatory flood storage, which may increase the number of units which could be accommodated on the Kingswood - Meadow House site.</li> </ol> <p><i>The number of dwellings on the two sites combined should be increased to approximately 40 on the Meadow House and Kingswood Farm sites.</i></p>	<p>It is acknowledged that on certain sites there may be potential for a greater capacity of residential development than the number allocated in the plan. The Council supports the objective to ensure the best use of land where this can be achieved without comprising the surrounding landscape and ensuring protection against flood risk. However it is considered that detailed work such as that submitted by the respondent should be considered through the planning application process, where it can be subject to consideration by statutory consultees such as the Environment Agency and weighed up against other factors. In order to reflect this in the Plan it is proposed to include text in the reason justification to DS11 to state that the housing numbers for each allocation are indicative and may change subject to detailed design at the planning application stage.</p>	<p>Amend the column relating to the number of dwellings in policy DS11 to read 'approximate number of dwellings'. Add additional sentence to paragraph 2.42 to state: 'A figure for the number of dwellings for each site is shown however it is recognised that this may vary dependant on detailed planning at the application stage. However in most cases this figure will represent the minimum site capacity'.</p>
65055 - mrs amanda morris [7898]	Support	<p>I believe the final version of the plan fairly represents the views of local people and that processes so far have been fair and thorough.</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>
<i>H30 Kingswood - Kingswood Farm</i>				
65005 - Liz Beaver [11502] 65056 - mrs amanda morris [7898] 65379 - Mr Robert Cousins [8321] 65380 - Mr Robert Cousins [8321]	Support	Happy with the the consultation process used which has given everyone the opportunity to comment. Consider that local concerns have been listened to.	Noted	No change required
<i>H31 Kingswood - South of The Stables</i>				
65057 - mrs amanda morris [7898] 65381 - Mr Robert Cousins [8321]	Support	Believe the process so far has been fair and thorough and that views of local people have been considered.	Noted	No change required
<i>H32 Kingswood - R/O Brome Hall Lane</i>				
65058 - mrs amanda morris [7898] 65382 - Mr Robert Cousins [8321]	Support	Believe that local people's views have been considered and the process so far has been fair.	Noted	No change required
<i>H33 Kingswood - West of Mill Lane</i>				
65059 - mrs amanda morris [7898] 65383 - Mr Robert Cousins [8321]	Support	Believe the views and concerns of local people have been considered and the process has been fair.	Noted	No change required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
<i>Leek Wootton</i>	Object	<p>The Plan under allocates housing to Leek Wootton which is a sustainable location. Does not consider that the methodology on which the proposed residential allocations at Leek Wootton are based is sufficiently detailed and site specific to be considered as proportionate and robust.</p> <p>The number of dwellings allocated to the rural areas have reduced since the Revised Development Strategy therefore the strategy is overwhelmingly urban focused and takes insufficient account of rural housing needs. There is no robust reason for a lower level of housing provision in Leek Wootton compared with similar villages. It appears to be based on the conclusions of the Landscape Study. In relation to land at The Warwickshire the December 2013 report indicated that small scale development in the vicinity of the entrance of the club may be acceptable. This reference was removed without explanation from the April 2014 update. Consideration of potential development is far too broad brush to assess the site specific landscape impact of small scale development. The conclusion that the whole site is of high landscape value has fed into other reports. The SA only considers the larger parcel of land previously put forward in the SHLAA. The Council has therefore not provided any written evidence that it has considered in proportionate detail the reasonable alternatives to the proposed strategy. It has not analysed what is considered to be the advantages of developing a small part of LW07: access to the site is easy and safe via the internal club drive,</p> <p>15 dwellings could be set back to ensure The Warwickshire's undeveloped frontage is retained, could be accommodated on the lowest lying part of the site, selective tree planting could enhance the landscape, land is well related to the A46, frontage already benefits from street lighting , bus services pass directly outside the site, is well related to the village school. In contrast the proposed allocations highway improvements, visibility at the Warwick road junction is poor requiring the need for improved safety. Concerns are exacerbated by the uncertainty over the future of the Police HQ. Does express strong support for the development of the proposed housing site H37 Car Park East of The Hayes.</p> <p><i>Identification of additional land at The Warwickshire, Leek Wootton for modest residential development</i></p>	<p>The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites.</p> <p>Further work through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village. Taking account of the Landscape Sensitivity Study the selection of site sought to avoid the areas of highest landscape value, it is considered in this context that the development of a smaller part of the site would still have a negative impact on the landscape which could not be mitigated.</p> <p>The general procedure when assessing sites in the SHLAA was to assess the site as a whole but where just a part of the site was developable to say that the site was suitable "in part" and estimate the proportion and capacity of that proportion. As stated above the landscape assessment indicated that the open views at this point on the approach to the village were important and the impact of developing the land would be significant.</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>
66143 - Bloor Homes Midlands [11532] 67219 - Bloor Homes Midlands [11532]	Object	<p>Interest in land adjoining Leek Wootton between village boundary to east and A46. Land is not currently allocated in DS11.</p> <p>Historic settlement predominantly to west of village with listed buildings locally designated historic parkland and protected trees; the area being a Conservation Area. This half of the village has greater environmental value than more recently developed area. Surprising therefore that the new housing proposed in historic area. DS11 allocated four sites three of which form part of historic area. Sites fall within setting of Grade II LB, the setting of the Conservation Area and locally listed park and garden.</p> <p>The Landscape Sensitivity and Ecological &amp; Geological Study confirms sites are constrained by Woodcote and Conservation Area, and that there are visual/functional links between sites and heritage assets. The sites would not be suitable for commercial development due to proximity to the Conservation Area and listed building. It is recognised that a commercial use of a building may be different from a residential use in terms of the nature of its use, however, the development itself will have a very similar physical impact on the heritage assets/setting in terms of changing the character/appearance of land, and the loss of important views.</p> <p>The Village Sites Appraisal Matrix casts doubt as to whether these sites are suitable/deliverable, with references to the sites being 'potentially suitable', and 'achievable, subject to overcoming landscape heritage issues'. Evidence base does not support allocation of these sites for new housing. Moreover, having regard to paragraph 129 of the Framework, the Council are required to specifically identify and assess the particular significance of the asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid/minimise conflict between the heritage asset's conservation and the proposal.</p> <p>No such assessment has been published by the Council or therefore taken into account. The available evidence base is inconclusive and there is a lack of an adequate evidence base to justify the allocation. The draft Local Plan has failed to demonstrate that H34, H35 and H36 are justified as most appropriate strategy for Leek Wootton, when considered against alternatives outside the historic environment which is effective in being deliverable without causing harm to the heritage assets and their setting; and, sustainable, consistent with NPPF.</p> <p>The Council's evidence base does support the residential allocation of land north of Hill Wootton Road to which Bloor Homes have an interest, and which is shown on the attached plan.</p> <p>The Landscape Sensitivity and Ecological &amp; Geological Study</p>	<p>The Council's position remains as set out in the Village Site Selection Matrix that the site acts as an important buffer to the village from the A46 corridor and that development would be likely to suffer from substantial noise pollution. If the A46 boundary could be adequately screened for noise it would result in a linear development which would not relate well to the rest of the village.</p> <p>The Council has undertaken a heritage settings assessment to assess the impact of development sites H34, H35 and H36 on Woodcote House, a grade II listed building and Woodcote House grounds a locally listed park and garden. On the basis of this assessment the Council consider that the development of site H34 in its entirety as proposed in the Publication draft would affect the setting of these heritage assets. However it is considered that it would be possible to bring forward a smaller area of the site and preserve the integrity of Woodcote House and its grounds. This would be subject to preserving the formal tree belt along Woodcote Lane and ensuring appropriate landscaping on the boundary of the reduced site. It is considered that to achieve this site H34 and H35 should be brought forward together and be served by one access road. The development would need to be sensitively designed to retain the historic features of the grounds and house in accordance with the Councils settings assessment.</p> <p>It is therefore proposed to amend the boundary of site H34 and reduce the size of the allocation to 11.</p>	Change boundary of site H34 and reduce the size of the allocation to 11.

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>confirms the land is free from environmental constraints/designations, and identified of least environmental value compared to other options around the village. Concludes the site would be suitable for residential development, providing noise impact from adjacent A46 could be reduced. Evidence has been provided to the Council demonstrating that suitable mitigation could be incorporated into any detailed design to achieve satisfactory noise environment, and this evidence has not been challenged. Evidence has been provided to the Council to demonstrate development would be 'deliverable' as defined by the Framework. Council has concluded within the Village Sites Appraisal Matrix that the site acts as an environmental buffer between the A46 and the village, and an attractive landscape break before entering the village. This is not a formal landscape or environmental designation referred to within the evidence base, and is a designation which is not applied by the Council to other settlements alongside the A46. Concern is also raised as to the width of the site, although it will be noted the site is the same width as other proposed allocations within the village and District.</p> <p><i>Council should therefore review its evidence base and strategy for housing growth within Leek Wootton, and reconsider its proposed allocation of sites within the more sensitive historic parts of the village. At present, the draft Local Plan cannot be considered sound and consistent with national policy in its approach to the village.</i></p> <p><i>This conclusion must also be seen in the context of the representation made by Bloor Homes Limited in relation to the draft Local Plan Strategy and Strategic Policies DS1, DS2, DS6, DS7, DS8 and DS10. In summary, this representation identifies that the draft Local Plan has not been positively prepared and is not consistent with national policy as it fails to make provision for sufficient housing growth to meet the economic needs and aspirations of the area. Furthermore, it fails to identify sufficient specific developable sites or broad locations to meet the housing requirement.</i></p> <p><i>Any adverse impacts of the development of the land to the north of Hill Wootton Road in terms of landscape or amenity cannot be regarded as significantly and demonstrably outweighing the benefits in terms of increasing housing supply. Given the failure to make sufficient specific provision for housing growth, the draft Local Plan has not been positively prepared in that it fails to identify 'developable' land at Leek Wootton as shown on the plan attached.</i></p> <p><i>In the context of its review of housing growth, and when assessing the effects of increasing housing delivery within the draft Local Plan,</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>
		<p><i>the Council should also therefore have regard to the potential of allocating further land at Leek Wootton as shown on the plan attached for around 35 dwellings within Policy DS11.</i></p> <p><i>In the absence of these exercises being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.</i></p>		
65653 - Leek Wootton & Guy's Cliffe Parish Council (Mr Colin Smith) [8385]	Support	<p>The reduction in the number of proposed dwellings to 45 from 85 in the 2013 consultation document represents a more realistic expansion of the existing housing stock. The proposed village inset boundary as drawn represents minimal incursion into the Green Belt. The Parish Council is aware of various proposals to include further Green Belt land around Leek Wootton for prospective new housing, but feels that these must be firmly resisted in order to preserve the integrity and separation of the village. The boundary for Hill Wootton is agreed and it is welcomed that the hamlet will continue to be washed over by the Green Belt. Continues to be concerned about the potential future development of the Warwickshire Police Headquarters buildings. This would add significantly the number of new dwellings proposed for the village impacting on infrastructure.</p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H34 Leek Wootton - The Paddock</i>				
65375 - John and Caroline Roberts [11417]	Object	<p>The original Retirement Village option should be reviewed with a rapidly ageing population. Even the original Local Plan booklet mentions "there are particular local challenges around older residents looking to downsize and stay locally". We still maintain that a proper survey would have revealed the Anchor 'T' junction to be a real problem for ANY moderate increase in traffic flows.</p> <p><i>How is the Council going to avoid the situation of the Police Grounds full of houses and the actual Manor House site vacant and empty, OR the apocalyptic prospect of it also being eventually developed, adding the original 20 dwelling allocation (or retirement village) to the 40, resulting in the possibility of say an extra 60 dwellings, ALL in the Police Grounds?</i></p> <p><i>'Woodcote' can take it's share, but has the Council has also considered the prospect that local private land owners in Leek Wootton will be applying for developments as well?</i></p>	<p>The option to develop the Police headquarters for a Care Home is still valid.</p> <p>In relation to transport issues the County Council were of the opinion that the junction has historically witnessed higher levels of vehicle movement due to the Police HQ use than would be generated by the development of 40 dwellings in this location. It is considered this would also be the case if both the housing allocation and police headquarters were developed for a care home. It is recognised that issues exist in the area in relation to high traffic volume and speed along the Warwick Road, which need better addressing.</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>
66077 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>The proposal represents a sizable development within the setting of Woodcote House (Grade II listed). There appears to be no evidence to demonstrate the significance of the heritage assets, or conservation area.</p> <p>The NPPF requires Local Plans, as a whole, to set out a positive strategy for the conservation and enjoyment of the historic environment. This means ensuring that the sites which it is proposing to put forward for development will assist in delivering such a strategy and not contradict it.</p> <p>The selection of sites for development needs to be informed by the evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the plan should consider how that harm might be reduced and any residual harm mitigated (NPPF para 152). Without an historic environment assessment the local authority is unable to assert that the objectives for sustainable development have been understood.</p> <p><i>To accord with NPPF paragraphs 158 and 169, the local authority should gather evidence to assess the significance of the affected heritage assets (including by development affecting the setting of the relevant heritage assets).</i></p> <p><i>I would strongly recommend the methodology in The Setting of Heritage Assets (English Heritage 2011) is used. It should then be applied to inform the principle, location, form and capacity of the strategic allocation. Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal. The Plan should not progress any further until this important matter is resolved.</i></p>	<p>The Council has undertaken a heritage settings assessment to assess the impact of development sites H34, H35 and H36 on Woodcote House, a grade II listed building and Woodcote House grounds a locally listed park and garden. On the basis of this assessment the Council consider that the development of site H34 in its entirety as proposed in the Publication draft would affect the setting of these heritage assets. However it is considered that it would be possible to bring forward a smaller area of the site and preserve the integrity of Woodcote House and its grounds. This would be subject to preserving the formal tree belt along Woodcote Lane and ensuring appropriate landscaping on the boundary of the reduced site. It is considered that to achieve this site H34 and H35 should be brought forward together and be served by one access road. The development would need to be sensitively designed to retain the historic features of the grounds and house in accordance with the Councils settings assessment.</p> <p>It is therefore proposed to amend the boundary of site H34 and reduce the size of the allocation to 11.</p>	Change boundary of site H34 and reduce the size of the allocation to 11.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65258 - Mr Simon Bell [11005]	Object	<p>Woodcote Drive is not suitable for any additional traffic generated by this development. 40 dwellings =240 additional vehicle movements a day. No safe footpath. The development will increase traffic at the Anchor/Warwick Road dangerous junction. Highways and transport issues state no access to this site is possible from Woodcote Lane. SHLAA physical restraints state that access would have to be along Woodcote Drive. Woodcote Drive is a poorly maintained private drive entered through ornate gates which are probably listed as part of the curtilage of Woodcote and stand in the Leek Wootton conservation area. They are 3.2 m wide. Not wide enough for two vehicles to pass. Woodcote Drive narrows towards these gates to 4.2m and on average is less than 4.8m wide past the existing dwellings. There is not a footpath and to establish one would require removal of trees with TPO protection and decimation of the rhododendrons that form an important part of the entrance to the listed gardens of Woodcote (Police HQ). The proposal to build 40 dwelling on the site would generate circa 240 vehicle movements a day, many at peak times. There is no certainty that the Warwickshire police will leave the site but even if they do any reduction of traffic would be minimal as planning consent is granted for a care home complex again with significant vehicle movements. These additional vehicle movements will also have a impact on the very dangerous Anchor junction.</p> <p><i>Other land is available in the village at the Warwickshire golf club that would not have any of these access or safety issues. The main objection to this site was landscape impact which could be resolved by careful screening.</i></p>	<p>Access to this site is proposed off Woodcote Lane, Highways have indicated this to be satisfactory subject to appropriate visibility splays being achieved in both directions. In relation to the capacity of the anchor junction the position of Highways at the time was that the site had historically witnessed high levels of traffic movement (which included a wide variety of vehicles and movements at all times of the day) and that the level of development suggested in this area, would not add significantly to vehicle movement and trips. Indeed it could possibly be argued that traffic movement would be reduced in this area following the change of use from employment to housing. No major concerns were raised about the site access width at Woodcote Drive.</p> <p>However the Council is proposing to amend the boundary of site H34 and reduce the size of the allocation to 11. The Council has undertaken a heritage settings assessment to assess the impact of development sites H34, H35 and H36 on Woodcote House, a grade II listed building and Woodcote House grounds a locally listed park and garden. On the basis of this assessment the Council consider that the development of site H34 in its entirety as proposed in the Publication draft would affect the setting of these heritage assets. However it is considered that it would be possible to bring forward a smaller area of the site and preserve the integrity of Woodcote House and its grounds. This would be subject to preserving the formal tree belt along Woodcote Lane and ensuring appropriate landscaping on the boundary of the reduced site. It is considered that to achieve this site H34 and H35 should be brought forward together and be served by one access road. The development would need to be sensitively designed to retain the historic features of the grounds and house in accordance with the Councils settings assessment.</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>
66640 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Support	<p>Warwickshire Police fully supports the development strategy for housing and the specific allocations identified in the pre-submission version of the LP at Leek Wootton. The identified allocations are in suitable locations and on land which is available now. Development would fulfil the requirements of the emerging Development Plan in terms of layout and design (BE1), without impacting adversely on the Green Belt or detracting from the significance of heritage assets. Warwickshire Police has been pursuing in full consultation with the local and wider communities , a considered, orderly and comprehensive plan for the disposal of the Woodcote estate in so far as this is compatible with policing objectives and public interest. A decision as to whether the existing communications function will be relocated has yet to be made. The allocations identified in the draft LP for the Woodcote estate are an important ingredient in facilitating the necessary realignment of policing assets in Warwickshire and Warwickshire Police wishes the wider public benefit of making these allocations to be noted by the Council and, in due course, when the LP is subject to public examination .</p> <p><i>None required</i></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>
<i>H35 Leek Wootton - East of Broome Close</i>				
65376 - John and Caroline Roberts [11417]	Object	<p>The original Retirement Village option should be reviewed with a rapidly ageing population. Even the original Local Plan booklet mentions "there are particular local challenges around older residents looking to downsize and stay locally". We still maintain that a proper survey would have revealed the Anchor 'T' junction to be a real problem for ANY moderate increase in traffic flows.</p> <p><i>How is the Council going to avoid the situation of the Police Grounds full of houses and the actual Manor House site vacant and empty, OR the apocalyptic prospect of it also being eventually developed, adding the original 20 dwelling allocation (or retirement village) to the 40, resulting in the possibility of say an extra 60 dwellings, ALL in the Police Grounds?</i></p> <p><i>'Woodcote' can take it's share, but has the Council has also considered the prospect that local private land owners in Leek Wootton will be applying for developments as well?</i></p>	<p>The option to develop the Police headquarters for a Care Home is still valid.</p> <p>In relation to transport issues the County Council are of the opinion that the junction has historically witnessed higher levels of vehicle movement due to the Police HQ use than would be generated by the development of 40 dwellings in this location. It is considered this would also be the case if both the housing allocation and police headquarters were developed for a care home. It is recognised that issues exist in the area relating to high traffic volume and speed along the Warwick Road, which need better addressing.</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>
65266 - Mr Simon Bell [11005]	Object	<p>Woodcote Drive is not suitable for any additional traffic generated by this development. 40 dwellings= 240 additional vehicle movements a day. No safe footpath. The development will increase traffic at the Anchor/Warwick Road dangerous junction.</p> <p>Highways and transport issues state no access to this site is possible from Woodcote Lane.</p> <p>SHLAA physical restraints state that access would have to be along Woodcote Drive.</p> <p>Woodcote Drive is a poorly maintained private drive entered through ornate gates which are probably listed as part of the curtilage of Woodcote and stand in the Leek Wootton conservation area. They are 3.2 m wide. Not wide enough for two vehicles to pass.</p> <p>Woodcote Drive narrows towards these gates to 4.2m and on average is less than 4.8m wide past the existing dwellings. There is not a footpath and to establish one would require removal of trees with TPO protection and decimation of the rhododendrons that form an important part of the entrance to the listed gardens of Woodcote (Police HQ).</p> <p>The proposal to build 40 dwelling on the site would generate circa 240 vehicle movements a day, many at peak times. There is no certainty that the Warwickshire police will leave the site but even if they do any reduction of traffic would be minimal as planning consent is granted for a care home complex again with significant vehicle movements.</p> <p>These additional vehicle movements will also have a impact on the very dangerous Anchor junction.</p>	<p>Access to this site is proposed off Woodcote Lane, Highways have indicated this to be satisfactory subject to appropriate visibility splays being achieved in both directions. In relation to the capacity of the anchor junction the position of Highways at the time was that the site had historically witnessed high levels of traffic movement (which included a wide variety of vehicles and movements at all times of the day) and that the level of development suggested in this area, would not add significantly to vehicle movement and trips. Indeed it could possibly be argued that traffic movement would be reduced in this area following the change of use from employment to housing. It is considered this would also be the case if both the housing allocation and police headquarters were developed for a care home. It is recognised that issues exist in the area of high traffic volume and speed along the Warwick Road, which need better addressing. No major concerns were raised about the site access width at Woodcote Drive.</p> <p>However the Council is proposing to amend the boundary of site H34 and reduce the size of the allocation to 11.</p> <p>The Council has undertaken a heritage settings assessment to assess the impact of development sites H34, H35 and H36 on Woodcote House, a grade II listed building and Woodcote House grounds a locally listed park and garden. On the basis of this assessment the Council consider that the development of site H34 in its entirety as proposed in the Publication draft would affect the setting of these heritage assets. However it is considered that it would be possible to bring forward a smaller area of the site and preserve the integrity of Woodcote House and its grounds. This would be subject to preserving the formal tree belt along Woodcote Lane and ensuring appropriate landscaping on the boundary of the reduced site. It is considered that to achieve this site H34 and H35 should be brought forward together and be served by one access road. The development would need to be sensitively designed to retain the historic features of the grounds and house in accordance with the Councils settings assessment.</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>
		<i>Other land is available in the village at the Warwickshire golf club that would not have any of these access or safety issues. The main objection to this site was landscape impact which could be resolved by careful screening.</i>		
66642 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Support	<p>Warwickshire Police fully supports the development strategy for housing and the specific allocations identified in the pre-submission version of the LP at Leek Wootton. The identified allocations are in suitable locations and on land which is available now.</p> <p>Development would fulfil the requirements of the emerging Development Plan in terms of layout and design (BE1), without impacting adversely on the Green Belt or detracting from the significance of heritage assets.</p> <p>Warwickshire Police has been pursuing in full consultation with the local and wider communities, a considered, orderly and comprehensive plan for the disposal of the Woodcote estate in so far as this is compatible with policing objectives and public interest. A decision as to whether the existing communications function will be relocated has yet to be made.</p> <p>The allocations identified in the draft LP for the Woodcote estate are an important ingredient in facilitating the necessary realignment of policing assets in Warwickshire and Warwickshire Police wishes the wider public benefit of making these allocations to be noted by the Council and, in due course, when the LP is subject to public examination.</p> <p><i>None required</i></p>	Noted	No change required
<i>H36 Leek Wootton - Former Tennis Courts</i>				
65141 - Sport England (Mr Bob Sharples) [1355]	Object	<p>In principal Sport England objects to this allocation. I would refer to my comments on Policy DS6.</p> <p><i>The tennis courts should be shown to be surplus to requirements or replaced.</i></p>	This site has not operated as a Tennis Court for a significant period of time (when residential training ended at the Police HQ), its last use was as car parking. The court is not identified in the Playing Pitch Assessment as part of the district's current supply of courts.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65268 - Mr Simon Bell [11005]	Object	Woodcote Drive is not suitable for any additional traffic generated by this development. 40 dwellings= 240 additional vehicle movements a day. No safe footpath. The development will increase traffic at the Anchor/Warwick Road dangerous junction.	<p>Access to this site is proposed off Woodcote Lane, Highways have indicated this to be satisfactory subject to appropriate visibility splays being achieved in both directions. In relation to the capacity of the anchor junction the position of Highways at the time was that the site had historically witnessed high levels of traffic movement (which included a wide variety of vehicles and movements at all times of the day) and that the level of development suggested in this area, would not add significantly to vehicle movement and trips. Indeed it could possibly be argued that traffic movement would be reduced in this area following the change of use from employment to housing. No major concerns were raised about the site access width at Woodcote Drive.</p> <p>However the Council is proposing to amend the boundary of site H34 and reduce the size of the allocation to 11.</p> <p>The Council has undertaken a heritage settings assessment to assess the impact of development sites H34, H35 and H36 on Woodcote House, a grade II listed building and Woodcote House grounds a locally listed park and garden. On the basis of this assessment the Council consider that the development of site H34 in its entirety as proposed in the Publication draft would affect the setting of these heritage assets. However it is considered that it would be possible to bring forward a smaller area of the site and preserve the integrity of Woodcote House and its grounds. This would be subject to preserving the formal tree belt along Woodcote Lane and ensuring appropriate landscaping on the boundary of the reduced site. It is considered that to achieve this site H34 and H35 should be brought forward together and be served by one access road. The development would need to be sensitively designed to retain the historic features of the grounds and house in accordance with the Council's settings assessment.</p>	No change required
		<p><i>Other land is available in the village at the Warwickshire golf club that would not have any of these access or safety issues. The main objection to this site was landscape impact which could be resolved by careful screening.</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>
65377 - John and Caroline Roberts [11417]	Object	<p>The original Retirement Village option should be reviewed with a rapidly ageing population. Even the original Local Plan booklet mentions "there are particular local challenges around older residents looking to downsize and stay locally". We still maintain that a proper survey would have revealed the Anchor 'T' junction to be a real problem for ANY moderate increase in traffic flows.</p> <p><i>How is the Council going to avoid the situation of the Police Grounds full of houses and the actual Manor House site vacant and empty, OR the apocalyptic prospect of it also being eventually developed, adding the original 20 dwelling allocation (or retirement village) to the 40, resulting in the possibility of say an extra 60 dwellings, ALL in the Police Grounds?</i></p> <p><i>'Woodcote' can take it's share, but has the Council has also considered the prospect that local private land owners in Leek Wootton will be applying for developments as well?</i></p>	<p>The option to develop the Police headquarters for a Care Home is still valid.</p> <p>In relation to transport issues the County Council are of the opinion that the junction has historically witnessed higher levels of vehicle movement due to the Police HQ use than would be generated by the development of 40 dwellings in this location. It is considered this would also be the case if both the housing allocation and police headquarters were developed for a care home. It is recognised that issues exist in the area relating to high traffic volume and speed along the Warwick Road, which need better addressing.</p>	No change required
66643 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Support	<p>Warwickshire Police fully supports the development strategy for housing and the specific allocations identified in the pre-submission version of the LP at Leek Wootton. The identified allocations are in suitable locations and on land which is available now. Development would fulfil the requirements of the emerging Development Plan in terms of layout and design (BE1), without impacting adversely on the Green Belt or detracting from the significance of heritage assets. Warwickshire Police has been pursuing in full consultation with the local and wider communities , a considered, orderly and comprehensive plan for the disposal of the Woodcote estate in so far as this is compatible with policing objectives and public interest. A decision as to whether the existing communications function will be relocated has yet to be made. The allocations identified in the draft LP for the Woodcote estate are an important ingredient in facilitating the necessary realignment of policing assets in Warwickshire and Warwickshire Police wishes the wider public benefit of making these allocations to be noted by the Council and, in due course, when the LP is subject to public examination .</p> <p><i>None required</i></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>
<i>H37 Leek Wootton - Car park East of The Hayes</i>				
66212 - The Club Company UK Ltd [477]	Support	Expresses strong support for the development of the proposed housing site H37 Car Park East of The Hayes. Objects to the Councils assessment of other land at The Warwickshire in a separate representation	Noted	No change required
<i>Radford Semele</i>				
65972 - A C Lloyd Homes Ltd [5958]	Object	Spring Lane: The site is in a sustainable location, adjacent to the built up area of the village of Radford Semele. Future residents of the site would have the opportunity to access every day facilities and key destinations by a choice of transport modes. The site is available and achievable and offers a sustainable solution to assist in meeting the housing requirement for the District.	The site is not required as sufficient land has already been allocated in a location which does not lead to a perception of the village moving toward the outer suburbs of Royal Leamington Spa resulting in coalescence The approach to growth in villages is outlined in policy H1	Not required
<i>H38 Radford Semele - North of Southam Road</i>				
64501 - Mrs Helen Machell [5872]	Object	<ol style="list-style-type: none"> <li>1. Ribbon development</li> <li>2. Too remote from village amenities.</li> <li>3. Unsafe crossing the A road</li> <li>4. No footpath possible to existing controlled crossing.</li> <li>5. Access onto a busy main road</li> <li>6. Spoils the village character</li> </ol> <p><i>Build on Spring Lane W/14/0433 instead. Closer to village amenities. Safe pedestrian access to local amenities. Doesn't spoil the village character. Not on a busy main road. Main concern here is school lane at start/finish of school day. Consider school access for vehicles could be moved to Kingshurst as part of this plan. There is a track beside the school, could this be made an entry point, one way, to exit by Kingshurst? This would relieve the present problem of cars parking along the pavement opposite the yellow jagged lines that happens now!</i></p>	This site has already been granted planning permission	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>
64500 - Mr Ian Machell [4750]	Object	<p>This is a ribbon development on a main road. It is too remote from the village centre and amenities.</p> <p>It is unsafe due to need to cross the A road to reach anywhere else in the village. Footpath cannot be extended beyond Lewis Rd due to narrowing. It would need a controlled pedestrian crossing to make it safe to walk anywhere. On the top of a hill so poor position for visibility from all directions.</p> <p>It seems this is the easy option because it neighbours on the fewest existing properties.</p> <p>A ribbon development spoils the village character.</p> <p><i>Build closer to the centre of the village. Eg on spring Lane.</i></p> <p><i>(Application W/14/0433) This solves all the locality, access to the village and road safety issues. Main concern here is school lane at start/finish of school day. However there are two road accesses to this site. (Hatherell Road is an option when School Lane busy). Consider school access for vehicles could be moved to Kingshurst as part of this plan.</i></p> <p><i>(Note: There is a track beside the school (thought to be part of Glebe land) which could be a school entry point, one way, to exit by Kingshurst. This would make an ideal drop off lane. It just needs making into a suitable gravel road and could be done by the developer. What an improvement this would be.</i></p>	This site has already been granted planning permission	Not required
<i>Other rural sites</i>				
65935 - Mr George Cooper [4918]	Object	<p>Promoting site adjacent to Pinley Acres, Pinley Green for housing. The site is hidden from general view and would not therefore have a detrimental impact on the openness of the greenbelt.</p> <p>the site is unsuitable for animals or crops. the clay soil means the site is often waterlogged. Housing here would have no impact on the visual amenity and could enhance the area, with high quality design.</p> <p>With visual splays, suitable access is achievable. the site is in close proximity to services and facilities and is on a bus route.</p> <p><i>Include this site in the Plan</i></p>	The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated. This site lies within the green belt and given the availability of land outside the green belt, there are no exceptional circumstances for releasing this area from the green belt.	Not required

Representations	Nature Summary of Main Issue/Change to Plan	Council's Assessment	Action
<i>H18 Former Aylesbury House, Hockley Heath</i>			
66140 - Mr's & Mrs S &D & G Harrison & Rowe [12860]	<p>Object The current allocation at the Former Aylesbury House Hotel simply reflects the ownership boundary of the former Hotel and does not take account of the wider potential opportunity available. The allocated site does not physically connect with the built area of Hockley Heath and leaves a parcel of land at Aylesbury House Farm which would be enclosed on three sides by residential development but would be designated as Green Belt. It is suggested that an opportunity exists to provide a more significant area for additional housing development extending westward without significant impact on the fundamental aims of the greenbelt in this area.</p> <p><i>In allocating the site at the Former Aylesbury House Hotel the Council have not fully followed guidance in the NPPF on Green Belts in that it should be more related to the village of Hockley Heath and not create a pocket of land designated as green belt between this allocation and the built boundary of Hockley Heath</i></p>	<p>The site has not been removed from the green belt in the Local Plan. It is considered that the site could be developed for housing alongside the demolition of some of the existing buildings without compromising the openness of the green belt. It has been identified as a development site for housing in the Local plan to allow the site to come forward through a comprehensive master plan to address heritage and green belt issues and ensuring adequate screening is included in any proposal.</p>	No change required
<i>DS12 Allocation of Land for Education</i>			
65221 - Mrs Trudi Wheat [8032]	<p>Object Land at Southcrest Farm Kenilworth as a site for the new Kenilworth school. This decision has appeared from nowhere; it was not mentioned in the consultation document. Once again it is on green field/belt land and is along a busy narrow lane. The Lane will have to be widened to allow coaches along it. This is really going to have an adverse effect on one of the major employers in the town, Woodside and the Sundial Group Hotel and Conference Centre. At the moment these facilities look out over the lovely countryside, but will, if the plan goes ahead be surrounded by houses and a large education complex.</p> <p>How long before they decide to move? Plus more removal of green field/belt land. The use of this site has not been fully explained and other alternatives have not commented on sufficiently.</p> <p><i>The council should take more time to consider the effects of this policy. It appears to have been added as an afterthought as it did not appear in the consultation. Other alternatives do not seem to be considered</i></p> <p><i>Further more the damage done to Kenilworth and Stoneleigh Park's green belt by HS2 and the above development make the loss of green belt land to Kenilworth unacceptable.</i></p>	<p>The alternative options for providing for the educational needs of Kenilworth have been assessed by Kenilworth School, WDC and WCC. The option supported by all parties is as set out in DS12. Without this the secondary education requirements for Kenilworth will be extremely difficult to deliver. Suitable access can be achieved from Glasshouse Lane</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65466 - Kenilworth School & Sports College (Mr Hayden Abbott) [5766]	Object	<p>The Kenilworth Education Trust wants to ensure that the Local Plan properly accommodates and integrates the future needs of Kenilworth School and Sixth Form through policies and allocations which will allow for the growth and consolidation of the school on one site.</p> <p>The only way of ensuring that a new and better school can be provided to serve Kenilworth and the wider catchment area is to identify a viable and deliverable solution for redevelopment on either one of the existing school sites or potentially on a new site. A comprehensive feasibility study has been commissioned to identify a preferred approach.</p> <p><i>The Kenilworth Education Trust is to confirm in September:</i></p> <ol style="list-style-type: none"> <li><i>1. Whether sites HO9 and H12 will be surplus to requirements and available for housing</i></li> <li><i>2. The feasibility and viability of either site HO9, H12 or ED2 or potentially another site for a new secondary school and 6th form college.</i></li> </ol>	<p>The Council is working with the trust to ensure the educational needs of Kenilworth are met. The Council believes that the most appropriate way of achieving this is through the policies set out in DS11 and DS12. Ongoing discussions with the Trust indicate that the Trust also share this view.</p>	
66484 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The expansion of Kenilworth School is the only viable option to provide additional places in the town and WCC supports this proposal in principle. However, doubts also remain to be resolved about the deliverability of the specific project identified in the plan ( the delivery of a new / replacement school at Southcrest farm as shown on policies map 5 - ED2 ).</p> <p><i>There is considerable work to be done to ensure the Southcrest Farm school option is deliverable , the Plan may have to make alternative arrangements / assess/ identify other options.</i></p>	<p>WDC has continued to work in conjunction with WCC and Kenilworth School to assess options. Balancing site assessments and education effectiveness, the option of Southcrest Farm is the only options available that can deliver effective education. This option is expensive, but is justifiable and has the potential to be delivered by harnessing a range of funding streams including CIL.</p>	
65370 - Councillor John Holland [4908]	Object	<p>I write as a Councillor for the County Council. At the time of writing there is no detailed plan agreed for secondary schools. Also there seems to be no possibility of agreement on primary school provision in Warwick.</p> <p><i>Relocate housing development sites so that primary schools can be provided.</i></p>	<p>Primary School provision in Warwick to support the development proposals has been agreed with WCC.</p>	
66506 - Friends of the Earth (John Brightley) [1113] 66831 - Europa Way Consortium [197] 67136 - Mr Ray Steele [5886]	Object	<p>There is not sufficient capacity in local Primary and Junior schools</p>	<p>This is being addressed with the inclusion of three new primary schools in the area south of Warwick, Leamington and Whitnash and improved, extended facilities at Campion and Myton schools in conjunction with the Education Authority</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>
65224 - Mr Kim Matthews [1898]	Object	<p>This site seems reasonable for the secondary school - although its location on the edge of town does mean that students will have to travel across the centre to get there from Western Kenilworth (making an East-West cycle route crossing the railway essential). It is not the best site for the primary school. This should be located within the Thickthorn development to minimise journey distance to the school from the new housing and have the primary school embedded in a local community.</p> <p><i>Move the primary school into the Thickthorn development</i></p>	<p>The option of locating the Primary School at Thickthorn has been retained. However this is dependent on being able to address noise impacts from the A46</p>	
67151 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	<p>In relation to the sites at Thickthorn it has always been the Town's contention that a development of this size must provide for a primary school within the development. The object of siting it within the development is to encourage families to walk to the School and thus decrease the use of transport and also promote a healthy life style. The proposal that this new primary school should be on the Southcrest Farm site is completely contrary to this logic and would lead to additional and unnecessary traffic movements, thus making it unsustainable. It also could result in some of the existing primary schools being closer to the residents of Thickthorn than the one provided by the plan for this development. This would in our view make the Plan in this regard unsustainable in these respects.</p>	<p>The option of the Primary School being located at Thickthorn is still a potential alternative and DS12 does not preclude this, although concerns about noise issues for land at Thickthorn would need to be addressed before the school could reasonably be located there. The points about sustainable location are noted and this will certainly be an important factor in determining the final location of the Primary School.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65732 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>WCC supports the principle of expanding Myton School and the principle of accomodating some of the expansion on land in WCC ownership to the west of Europa Way.</p> <p>WCC as a landowner has submitted an outline application for residential development which includes an area for the expansion of the school informed by consultation with the adjacent landowner and the LEA. There is however uncertainty regarding the nature and scale of any expansion to Myton School which the Policies Map does not resolve. The Local Plan should identify land requirements for schools which are demonstrated to be necessary and reasonable. Until expansion proposals are shown to be deliverable the Local Plan should make alternative fall back provision for secondary school facilities.</p> <p>It is noted that the Strategic Transport Assessment Phase 4 does not appear to consider the impacts of major education development in this location.</p> <p><i>Changes to Plan:</i> <i>Local Plan to make alternative provision in the event that the Myton School expansion proves to not to be deliverable</i></p> <p><i>The evidence base for school expansion needs to justify: the amount of expansion necessary; the location and boundaries for the expansion area; the approach to consultation; the appropriateness of the strategy; what reasonable alternatives were considered and why alternatives were rejected; and clarification on the delivery mechanism, timescales and ability of the highway infrastructure to cope.</i></p>	<p>There have been on-going discussion with WCC, Myton School and developers since the publication of the Draft Local Plan. These discussions have confirmed the support of all parties for the proposals to expand and partially rebuild Myton School.</p> <p>Further, land has been made available to enable this happen - albeit, the configuration is slightly different to that shown on the Policies Map as ED1. These discussion have resolved many of the issues raised in the representation.</p>	<p>Amend policies map to show revised land allocations for expanded Myton School - amend ED1</p>
65211 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	<p>The Local Planning Authority has not involved the community in the preparation of this part of the Plan.</p> <p>It was not included in the Revised Development Strategy published for public consultation by Warwick District Council in June 2013.</p> <p><i>To make Policy DS12 Education sound we would expect Site No. ED2 to be dropped from the Draft Local Plan, and the provision of one form entry primary school at the Thickthorn/Glasshouse site confirmed as per the Revised Strategy Booklet.</i></p>	<p>The alternative options for providing for the educational needs of Kenilworth have been assessed by Kenilworth School, WDC and WCC. The option supported by all parties is as set out in DS12. Without this the secondary education requirements for Kenilworth will be extremely difficult to deliver. The option of the Primary being located at Thickthorn is still possible and DS12 does not preclude 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>
66270 - Mr. Paul Hodge [7249]	Support	Without prejudice to my objections to DS4, 10 and 11, I would support in principle the education proposals at Myton, but only if there is no access, pedestrian or vehicle through Myton Crescent and the Malins. If there is pedestrian access, the congestion on Myton Crescent due to Myton School traffic dropping children off, would be exacerbated. I have photographic evidence of school traffic in Myton Crescent, through which an emergency vehicle would be unable to get through. <i>Not required</i>	Not required	Not required
66471 - Warwickshire County Council (Monica Fogarty) [12790]	Support	In principle, Warwickshire County Council supports the approach based on the expansion of Myton and Campion schools as set out in policy DS12. Warwickshire County Council will continue to work with the District Council and both schools with the aim of bringing this strategy to fruition and hopes that WDC will prioritise educational funding through the Community Infrastructure Levy in due course.  <i>none required</i>	Noted	
66450 - Mrs Luisa Hodge [206]	Support	Supports in principle the education proposals at Myton but only if there is no access pedestrian or vehicle through Myton Crescent and the Malins. If there is pedestrian access the congestion on Myton Crescent due to Myton school dropping off would be exacerbated.  <i>Require clarification of other compatible uses in HS5 and the proposals should be subject to precise definition of the site boundaries of each element of education provision and the location and details of all vehicular and pedestrian access points should be defined.</i>	Access to the new site of Myton school will be possible from both the north and south. However the precise nature and location of this access is not a matter for the Local Plan and will be dealt with through the development management process.	
64438 - Myton School (Mrs Jane Burrows) [12374]	Support	Myton School and Campion School will be providing a 2 secondary school solution for the proposed housing developments contained within the local plan that are located within the current Myton School and Campion School priority areas. In addition, Myton School will look to build a primary school (2 form entry plus nursery) adjacent to its expanded secondary school. To accommodate the expansion in student numbers Myton School will require an extended site of 17 hectares (including 2 hectares for the primary school). Myton School requires 9.18 hectares of additional land donated to the south of its site for education provision  <i>Not required</i>	Not required	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>DS13 Allocation of Land for a Country Park</i>				
66824 - A C Lloyd Homes Ltd and Northern Trust [6105]	Object	The precise dimension of the Country Park should be determined by detailed environmental analysis rather than being pre-determined at this stage in the plan-making process. The evidence base to support the detail of the Country Park is currently unsound.	Following the Local Plan Publication Draft the extent of the Country Park has been reviewed through a design and feasibility study (Tachbrook Country Park - Masterplan, November, 2014). This study has resulted in a revised extent of the Country park to coincide with land that is to be allocated for housing and other uses to ensure the deliverability of the park. The northern extent of the park has been considered extensively through the process of preparing the Masterplan and guided by the RMA Landscape Study 2012; extant planning permissions and pre-application design and master planning documentation.	
<i>The precise dimensions of the Country Park to be determined by detailed environmental analysis.</i>				
65500 - Keith Wellsted [8636] 66185 - Keith Wellsted [8636]	Object	In addition paragraph 2.59 you state: ' The park will be a multifunctional green infrastructure asset to:  Provide a strong 'green buffer' between the North of Bishop's Tachbrook and the southern edge of new development sites off Harbury Lane. This may include minimising the visual impact of development and softening the edge of new housing schemes' The fact that you say, 'This may include minimising the visual impact of development and softening the edge of new housing scheme' proves you are not serious about minimising the impact if you were this would be compulsory.  <i>If the park is to have any use it must be compulsory to minimise the visual impact of development and softening the edge of new housing scheme.</i>	Representation noted.	Amend Para 2.59, criterion a) as follows:  a) Provide a strong 'green buffer' between the North of Bishop's Tachbrook and the southern edge of new development sites off Harbury Lane. This will include minimising the visual impact of development and softening the edge of new housing schemes.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66784 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>DS13 allocates grade 2 and 3a agricultural for the development of a country park as part of the offsetting of the housing development proposed south of Harbury Lane.</p> <p>Now that the 2012 population projections show that land south of Harbury Lane is not necessary for housing development, this area of land should also remain as agricultural land. This is particularly important as it an essential part of the Tachbrook Valley and can be seen from long distances across the valley.</p> <p>We doubt that the £1.5m needed to set up a Country Park, , will be available nor can we see the expensive continual maintenance being affordable from reducing Council budgets. Hence we cannot see the Country Park will materialise.</p> <p><i>As part of the duty to cooperate, the District Council should work with the Parish Council, as we prepare our Neighbourhood Plan and in accordance with Policy NP2 stating that the Council will support communities preparing Neighbourhood Plans.</i></p> <p><i>The developing Neighbourhood plan seeks to retain the agricultural economy of the land between Harbury Lane and the Tach Brook but at the same time open the area up in a limited way with a brookstray walk and habitat improvement for wildlife possibly through an extended Defra/ Natural England Stewardship scheme and a Local Greenspace designation over those stewardship areas.</i></p>	<p>Where possible allocations have sought to avoid the best and most versatile land, however, agricultural land quality is only one factor of many taken into consideration when determining the most sustainable development options.</p> <p>The Council considers the land South of Harbury Lane is necessary to meet the Plan's OAN. See response to DS6 in relation to ONS population projections and the housing requirement.</p> <p>Following the Local Plan Publication Draft the extent of the Country Park has been reviewed through a design and feasibility study (November, 2014). This study has resulted in a revised extent of the Country park to coincide with land that is to be allocated for housing and other uses to ensure the deliverability of the park. The study also included revised costings for the capital and maintenance of the park which the Council forecasts are capable of being secured and delivered.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65859 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	<p>WDC have not fully justified the need for, size of and delivery mechanism for a Country Park to the north side of Tach Brook. WCC questions whether the apparent existing deficiencies in accessibility to natural greenspace sites of over 2ha in the area south of Warwick, Leamington and Whitnash identified in the Green Infrastructure Study 2010 is a sufficient justification for a 62.5ha Country Park. A proportion of existing development in the areas of deficiency is employment and much of the new development being brought forward will provide onsite green space which will be available to existing and new residents. A transparent evidence base is needed to clarify whether a Country Park of this size is necessary or nice to have. Concern is also expressed over the intention to deliver it via Section 106 contributions. Questions whether this approach is able to meet the legal tests for planning obligations set out in the CIL regulations as it is not clear why the delivery of the Country Park is needed to make development acceptable especially as some of the justification is to rectify existing deficiencies. The combined need taking account of all of the proposed housing allocations south of Warwick and Leamington would be 16.6ha, this may be a more appropriate starting point for considering the need for and payment of a country park. Questions why the Park is required for flood alleviation and whether habitat creation and buffering can be achieved via a smaller area. It is unclear how WDC moved from the £1.5million 20 ha peri-urban park. It should be noted that WCC does not object to the principle of providing a Country Park, subject to appropriate justification being provided for a facility of this size through a robust evidence base.</p> <p><i>The evidence base needs to fully justify: the need for, size of, and proposed location of the proposed Tach Brook Country Park; what other options were considered and how the Country Park is proposed to be delivered and funded.</i></p>	<p>Following the Local Plan Publication Draft the extent of the Country Park has been reviewed through a design and feasibility study (Tachbrook Country Park Masterplan, November, 2014). This study has resulted in a revised extent of the Country park to coincide with land that is to be allocated for housing and other uses to ensure the deliverability of the park. The study also included revised costings for the capital and maintenance of the park which the Council forecasts are capable of being secured and delivered.</p> <p>The Green Space Study 2010 specifically identified the central area to the south of Warwick and Leamington as being deficient in accessible natural green space. This will further be exacerbated given the housing allocations in the vicinity will increase the proportion of the population that does not meet the town level ANGst standard. The MAP AN2: Town Sites from the GI Study 2010 clearly shows the majority of the area outside of the ANGst catchments is residential (Heathcote and Whitnash).</p> <p>On site green space is important part of the design and function of new housing developments however, the typologies being met are not typically that which would be comparable to natural green space, nor are they of a critical mass to qualify as a town sized accessible natural green space site.</p>	
66695 - Barwood Development Securities Ltd [12821] 66699 - Barwood Strategic Land II Limited [9441]	Support	Barwood supports the allocation of Tachbrook Country Park (Policy DS13) to ensure Leamington and Bishop's Tachbrook remain separated.	Support noted.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65506 - Mr Andrew Day [314] 66510 - Friends of the Earth (John Brightley) [1113]	Support	I support the creation of a country park, which will provide an important environmental buffer along the Tach brook. To foster good habitats it would make sense for this policy to be extended to both side of the Brook.	Support noted.  Following the Local Plan Publication Draft the extent of the Country Park has been reviewed through a design and feasibility study (November, 2014). This study has resulted in a revised extent of the Country park to coincide with land that is to be allocated for housing and other uses to ensure the deliverability of the park. However, links on the southern side of the brook to enable greater access to the countryside and encourage greater connectivity amongst other things will be encouraged and supported.	
66798 - Gallagher Estates [644]	Support	The NPPG (Design) emphasises the importance of having a system of open and green spaces and that these can make an important contribution to the quality of an area. The allocation of land for a country park adjoining the Tach Brook is commensurate with the NPPG objective and significantly exceeds the open space requirements generated by the development proposals. The Background Document accompanying the representations includes an illustrative development framework plan which shows how the site at Lower Heathcote Farm can contribute to the provision of the country park. A wider strategic development framework Plan is also provided showing how the country park can continue to the east of the Lower Heathcote Farm site as part of the south of Harbury Lane strategic site allocation. The park, as envisaged in paragraph 2.59 of the Plan, can offer an informal recreational area and provide wildlife and biodiversity links to the wider agricultural landscape to the south.	Support 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>DS14 Allocation of Land for Community Hub</i>				
65861 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542] 66832 - Europa Way Consortium [197]	Object	<p>Considers the principle of locating the medical centre on WDC land as appropriate and justified and has included this in the recently submitted planning application in response to pre application discussions with NHS property services. It also considers that the County land may be appropriate for local retail facilities subject to evidence of need, market interest and viability. However WCC considers that the proposal set out in Local Plan Publication Draft policy DS14 for the allocation of land in the location shown on the Policies Map, and explained in the supporting text at paragraphs 2.59-2.64, for four specific community uses as a 'Community Hub' is not positively-prepared, justified, effective or consistent with National Policy. The proposals map does not clearly indicate the proposed area. the publicly-available evidence base documents do not set out a rationale for why all the proposed community uses included in the policy are: a) necessary; b) required to be located to the west of Europa Way; and c) best located within the area marked with a dotted black line on the Policies Map. No justification for floorspace threshold or location of proposed convenience store.</p> <p>No justification for the need for, size for and specific location of the separate community meeting place and community sports complex and complementary uses.</p> <p>WCC is not a willing landowner in relation to suggestions that County land could be used to relocate Leamington Football Club. There is no evidence that consideration has been given to the cost and viability of such a scheme, the IDP does not include costings for a small stadium. The Transport assessment does not consider the impacts of a small stadium.</p> <p><i>The evidence base needs to justify: the need for, size of, and proposed location for the Community Hub; the approach to consultation; the appropriateness of the strategy; what reasonable alternatives were considered and why alternatives were rejected; and clarification on the delivery mechanism, timescales and ability of the highway infrastructure to cope.</i></p>	<p>The proposals for the Community Hub have been reviewed. It is agreed that land for local retail facilities, a community centre and medical facilities should be included within this site and that there is evidence underpinning this. The provision of a stadium/community sports facilities is still supported by the Council, but it is recognised that this will need to be brought forward willingly by the developers. It is proposed that the location of the stadium/sports complex should be amended within the site to be located at the south western corner, adjacent to the technology park. This enable the provision of land for education as well as making most effective use of land for housing.</p>	<p>Amend policies map to show revised location of Community Hub and Sports Facilities (subject to the outcomes of the Focused change consultation)</p>
65142 - Sport England (Mr Bob Sharples) [1355]	Support	<p>I could only support the sports complex element if the proposal is based on robust evidence and shown to be finically independent of any WDC subsidies</p>	Noted.	
66508 - Friends of the Earth (John Brightley) [1113]	Support	<p>With regards to infrastructure requirements for shops/ local centres / community facilities, conditions on any planning consent should ensure this provision is constructed and open at an early stage of any development.</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>DS15 Comprehensive Development of Strategic Sites</i>				
66182 - Hallam Land Management and William Davis [8278]	Object	<p>In a separate objection to Policy DS11 Allocated Housing Sites, we have commented on behalf of our clients, on the site at Thickthorn, Kenilworth. It is considered this site should be deleted from the plan and replaced with land south of Gallows Hill, Warwick. Accordingly, a modification is required to Policy DS15 to delete reference to Thickthorn at sub-paragraph (e) and replace this with land south of Gallows Hill.</p> <p><i>Paragraph (e) of Policy DS15 should read as follows:</i></p> <p><i>(e) South of Gallows Hill</i></p> <p><i>In the table in the final part of the policy, delete reference to Thickthorn.</i></p>	The Council considers Thickthorn to be a sustainable site where exceptional circumstances can be justified. See DS11 for further details in response to this.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66644 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>Policy DS15 makes no mention of the police infrastructure that will be required to support the development of the Strategic Sites. This is surprising and of concern for two reasons.</p> <p>Firstly, the Council's 'Draft Infrastructure Delivery Plan - April 2014' makes reference to the following infrastructure requirements under the heading 'Emergency Services': -</p> <p>*Police: Safer Neighbourhood Team Police Offices - 3 additional offices at Europa Way, Lower Heathcote Farm and Thickthorn</p> <p>*Other police equipment and costs - A range of other "CIL Compliant" costs including vehicles, communications technology and surveillance equipment, training, uniform and personal equipment</p> <p>This confirms that the Council accepts that additional police infrastructure will be required to deliver policing services to the strategic sites.</p> <p>Secondly, at the time of writing strategic site H02 (South of Harbury Lane, including the former sewage works), the H23 site (Bishops Tachbrook - Land south of the school), unallocated sites by Europa Way and Bishop's Tachbrook have all been subject to the following recent planning applications: -</p> <p>*W/14/0300 - The Asps, Warwick - 900 dwellings - Barwood Strategic Land II LLP - Refused - 30 May 2014 (Appendix 1)</p> <p>*W/14/0661 - Land at Lower Heathcote Farm - 785 dwellings - Gallagher Estates (see Appendix 2 of the full submission)</p> <p>*W/14/0681 - Land South of Gallows Hills - 450 dwellings - Gallagher Estate (see full submission Appendix 3)</p> <p>*W/14/0689 - Land off Oakley Wood Road - 150 dwellings - Bloor Homes (see full submission Appendix 4)</p> <p>*W/14/0763 - Land off Seven Acre Close - 25 dwellings - A.C. Lloyd Homes Ltd ( see full submission Appendix 5)</p> <p>To each application we submitted representations in respect of the need for the development concerned to provide police infrastructure. These are enclosed as per the appendices indicated above. At the time of writing, four of the planning applications are still in the process of being determined.</p>	<p>There is an inconsistency between DS15 and the IDP in terms of number of Community Centres required. The distribution of community facilities points towards a need for a community centre to the north of Gallows Hill as indicated in both DS15 and the IDP. To the South of Harbury Lane, it is suggested that community meeting places can be provided within the area set aside for the Local Centre and the primary school without the need for a dedicated community centre.</p> <p>Policy DS15 sets out minimum on site provision for infrastructure and does not exclude the likelihood of further infrastructure provision being justified. The requirement for infrastructure to support policing and community safety activity is clear and recent planning permissions in the area to the south of Warwick and Leamington have had contributions to policing associated with them. This is already recognised in the IDP (ES2)</p>	<p>Amend the IDP to require a community meeting place (though not necessarily a dedicated community centre) to the south of Harbury Lane</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>As planning applications are made in relation to the other strategic sites, we will submit similar representations requesting developer contributions towards police infrastructure.</p> <p>Given all of the above we contend that as presently drafted, Policy DS15 undermines the delivery of the infrastructure necessary to deliver policing services to the strategic sites. It is therefore ineffective and unsound currently.</p> <p><i>To resolve all the concerns raised and to make Policy D15 effective in soundness terms, we request that the following amendments are made to the table on pages 30 and 31 of the plan within policy DS15.</i></p> <p><i>land South of Harbury Lane - (add)- A safer Neighbourhood Team Police Office</i></p> <p><i>land at Myton/ West of Europa Way - (add) Community Hub - with police facilities</i></p> <p><i>Thickthorn (add) -A community meeting place with police facilities.</i></p>		
66799 - Gallagher Estates [644]	Object	<p>Land at Lower Heathcote Farm (part of the South of Harbury Lane proposed allocation) can come forward for development early, delivering housing in a manner consistent with the objective of boosting supply and making a contribution to the 5 year housing land supply. The requirement for either development briefs or master plans to be approved by the Local Authority creates a risk that unnecessary delay will prevail. Clarity is provided to bring forward sites through other policies in the plan therefore the requirement for master plans and briefs is not necessary. There are mechanisms in place to ensure that the necessary infrastructure is delivered through the application process and the proposals map is clear about what infrastructure is required and where without the need for a master plan. Policy DM1 assists this. In summary, there are policies and mechanisms in place to ensure the delivery of infrastructure on the strategic sites and that high quality and integrated development is delivered.</p>	<p>This site now has outline planning permission. The Council is working with the site promoted to ensure a coordinated approach to layout and design and to ensure the infrastructure and services are delivered. This will ensure that Policy DS15 is not an impediment to the deliver of the site.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66285 - Mr H E Johnson [12846]	Object	Support and welcome the opportunity to provide a development brief or masterplan for the proposed development at Red House Farm. However this requirement should not preclude development coming forward in advance of such document being agreed with the Council. As drafted, this policy is unsound as it may cause unnecessary delay to housing delivery and it is therefore not positively prepared. To make it sound the policy should include some flexibility about the timing of the production of a development brief or masterplan. Any development brief or masterplan should be considered acceptable for the Red House Farm site if it excludes the Glebe Farm land.	It is accepted that DS15 should apply only to sites where multiple land ownerships or site complexities mean that proposals need to be brought forward in a coordinated way taking account of proposals on neighbouring or nearby sites. This does not apply to Red House Farm or Whitnash East and these sites will be expected to comply with Policy BE2.	Amend Policy DS15 as follows: Remove c) Red House Farm Remove d) Whitnash East/South of Sydenham Revise Heading of right hand column in table to read "Key Infrastructure and Services"
65862 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542] 66833 - Europa Way Consortium [197]	Object	Warwickshire County Council (WCC) supports the principle of comprehensively developing strategic sites, to ensure the provision of appropriate uses and necessary infrastructure across a number of different land ownerships through good design. However WCC does not consider that the infrastructure requirements for 'Land at Myton / West of Europa Way' listed in Local Plan Publication Draft Policy DS15 are necessary and justified by a robust evidence base and has made separate representations in this respect to Local Plan Publication Draft policies DS12 and DS14.  <i>The infrastructure service requirements for 'Land at Myton / West of Europa Way' should be amended to only include infrastructure and services which are justified by a robust evidenced base, following an clear assessment of reasonable options.</i>	The proposed infrastructure and services required for Land at Myton/West of Europa Way has been reviewed. It will still include schools, health services, small scale retail and a community meeting place. The provision of a community sports complex on the site is still supported by the Council, but is not included as an infrastructure requirement.	
66703 - Barwood Strategic Land II Limited [9441]	Support	The policy approach of Policy DS15 is supported by Barwood. It is important that the masterplans for the strategic urban extensions are approved by the Council to ensure site deliverability. However, Barwood consider that the policy lacks clarification on the process by which the Development Brief or Masterplan will be approved.	Support noted. The exact process for approval beyond the scope of the Local Plan which specifies that it should be approved by the LPA	
66317 - A C Lloyd Homes Ltd [5958] 66322 - A C Lloyd Homes Ltd and Northern Trust [6105] 66507 - Friends of the Earth (John Brightley) [1113]	Support	Support	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65988 - Barwood Development Securities Ltd [12821]	Support	The policy approach of Policy DS15 is supported by Barwood. It is important that the masterplans for the strategic urban extensions are approved by the Council to ensure site deliverability. However, Barwood consider that the policy lacks clarification on the process by which the Development Brief or Masterplan will be approved.	Support noted. The policy states that the Masterplan or Development Brief will need to be approved by the Local Planning Authority. This will need to be done through the appropriate Committee, or if constitutionally possible, through delegated powers. It is not for the Local Plan to specifically define this.	

### *DS16 Sub-Regional Employment Site*

66414 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>As described in our response to Policy DS16, the addition of an exception for Sub-Regional Employment needs is not justified. The justification is based on the SEP, but both the SEP and the WDC draft plan depend on a "Joint Employment Land Review, March 2014" but this report has not been made available. The evidence base is incomplete and there has been no opportunity for consultation or engagement of interested parties on this evidence.</p> <p>There is no evidence to establish the justification for a sub-regional employment site being located within Warwick District. There has been no sustainability appraisal of alternative sites showing why the proposed site should be developed instead of existing or potential alternative sites.</p> <p>Environmental impacts have not been sufficiently taken into account. This is not consistent with the NPPF.</p> <p>There is no evidence of exceptional circumstances for green belt release other than that put forward in the Gateway Inquiry. the Plan is unsound because Policy DS16 is not justified and reasonable alternatives to the Gateway have not been considered.</p> <p>The Policy also conflicts with the rationale for Policy EC1.</p>	<p>The Joint Employment Land Study was published on 31st October and a further six week period of consultation was undertaken to allow comments. Representations received to this will be responded to separately. The Council considers that the site is necessary to provide for sub regional employment needs during the plan period. 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.</p> <p>A full ecological assessment was undertaken in support of the Gateway planning application which is relevant to this allocation. A sustainability appraisal has been undertaken of the allocation which has been subject to a six week period of public consultation as part of the Focused Change consultation.</p> <p>In relation to biodiversity, as part of the Gateway application it was demonstrated 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.</p>	No change required
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*Delete Policy DS16 and remove it from the Policies Map*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65728 - Mr David A Ellwood [7659]	Object	<p>Paragraph 2.69 does not mention that the whole of the site is in the Green Belt and the consequent presumption against development and the need to prove exceptional circumstances. The policies map does not make this clear either because it shows the bulk of the site as not being in the green belt. Paragraphs 2.26 and 2.71 refer to a Joint Employment Land Study carried out for the LEP on behalf of its local authorities. References refer to it being published in March 2014 however on enquiry to the Council reveals it has not been published due to it not being completed. two consequences arise from this - that the consultation is defective and the decision to designate the sub regional site relies on the GL Hearn reports prepared in connection to the planning applications for the site. The applications were subject to Secretary of State call in and Public inquiry and were subject to strong opposition by the three Parish Councils most affected , the community group, CPRE and 1000 others. The G L Hearn reports considered alternative sites but only in the context of the application not the area as a whole. Paragraph 2.75 dismisses local concerns. The strong opposition should have informed the LEP and Council that it would be premature and presumptuous to designate the site in advance of the SofS decision particularly without the Joint employment land review and statements in other local plan evidence documents. The LEP's approach is contrary to the NPPF which makes it clear that Local authorities and the LEP should work together to prepare and maintain a robust evidence base to understand business needs. The SEP identified the Daw Mill Colliery as a future priority sub regional employment site. Lead in time for the Gateway has been estimated at three years due to the extent and nature of remediation needed. The Highways improvements at Toll Bar are already causing major disruption and the Gateway scheme will need to carry out other significant works. Once built Gateway traffic would inevitably mean the junction would be overrun once more. Flood risk modelling was inaccurate. In contrast no reason that the lead in for Daw Mill Colliery would be anywhere near as long. Local plan states that the Gateway is close to areas of some of the most significant economic deprivation. This is misleading as the greater deprivation is to the north and, particularly, the north east of the city. Nuneaton and Bedworth, to the north west of Coventry, also suffers similarly (the SEPs SWOT confirms this). The Gateway is beyond the southern boundary therefore if it is to play a part a large number of employees will have to travel from the far side of the city or beyond. Concerns over the process of allocating the site.</p>	<p>The Local Plan takes the allocation out of the green belt, consequently there is no reference to it currently being within the greenbelt in the plan or on the policies map.</p> <p>The Joint Strategic 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 Joint Strategic Employment Land Study was published on 31st October and a further six week period of consultation was undertaken to allow comments. Representations received to this will be responded to separately. In relation to Daw Mill, the SEP, in March 2014, stated that the site will be considered as a future priority sub-regional employment site. Since that time an outline planning application has been submitted (July 2014) to NWBC for 71,875 sq m of B1/B2/B8 floorspace (plus some further open storage) on 31 ha. This application has generated significant local opposition, mainly in response to the level of traffic growth that the proposal will bring (estimated 300 HGV movements during the peak hour). The site is not well situated as a sub-regional employment site being more than 6 miles from the strategic road network. The applicant has since modified the application to remove the B8 element completely and reduce the overall floorspace to 52,424 sq m (significantly increasing the B2 element in doing so). This will reduce HGV movements in peak hour to 100 vehicles but will increase smaller vehicle movements accordingly. Local opposition to the proposals remains strong. It can be concluded that Daw Mill (31 ha built area) is significantly smaller than Gateway (124 ha). Under the current application it would deliver only about 17% of the Gateway's B1 floorspace. It is unlikely to deliver any B8 uses, which is a significant component of Gateway. It is poorly related to the strategic highway</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>
			network compared to any other major employment site in the sub-region. There is no certainty that NWBC will support the current proposal. The earliest it will be considered is February 2015. The Council considers that the site is well placed to meet the needs of the identified Coventry and Warwickshire regeneration corridor.	
		<i>Objection is fundamental and no modification of it would be acceptable</i>		
66476 - Friends of the Earth (John Brightley) [1113]	Object	We do not support the current proposals for the sub-regional employment site at Coventry Airport.  However the results of a planning inquiry are currently awaited. If the development does go ahead, we support the proposal for a masterplan to be prepared. In particular, we support the proposals in paragraph 2.75.	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>
66340 - Cllr Ann Blacklock [1090]	Object	<p>The plan is unsound and fails 3 of the 4 tests of compliance because this element - removing a very large area from Green Belt - Is not positively prepare in that it is unreasonable to be meeting the unmet employment need of a neighbouring authority when it requires sacrificing Green Belt land and destroying the character of historic villages.</p> <p>Is not consistent with national policy on Green Belt and the 5 criteria for maintain designated Green Belt areas [ NPPF section 9 para 80] and is not consistent with the principle of sustainable development.</p> <p>Is not justified in that there are reasonable alternative available in the sub region.</p> <p>This measure was added to Draft Publication Plan at the 11th hour; there was NO prior consultation: no consultation with neighbouring residents, nor with ward councillors, nor with the Member's Policy Review Group. It therefore fails to meet the requirements of the SCI.</p> <p><i>Policies map no.7 must be redrawn to restore the status quo. The area [Zone A and Zone B of the Gateway site] should remain in the Green Belt i.e. the boundaries of Green Belt south and north -west of Coventry airport should NOT be redrawn; at least not until the Inspector's report and the decision of the Secretary of State on the outcome of the planning application have been published. Thus we will not be pre-judging the decision and once the decision is announced, a full proper consultation process can be instigated.</i></p> <p><i>The application has been extremely controversial and divisive and the outcome is uncertain. Making unwarranted assumptions about the outcome is wrong, and if the application is refused would leave this area and the villages without the protection they have enjoyed for so long.</i></p>	<p>The Council considers that the site is necessary to provide for sub regional employment needs during the plan period. 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 Joint Employment Land Study was published on 31st October and a further six week period of consultation was undertaken to allow comments. Representations received to this will be responded to separately.</p> <p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals, this accords with the requirements of the SCI.</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>
65075 - The Community Group (David G Wintle) [9097] 65404 - Stoneleigh & Ashow Parish Council (Mrs P.A. Maddison) [1055]	Object	<p>Policy DS16 Sub-Regional Employment Site is unsound, it contravenes the NPPF (National Planning Policy Framework); there has been no consultation with the local community and other stakeholders concerning the removal of this land from Green Belt; the Sub-Regional Employment Site is NOT the most appropriate strategy when considered against reasonable alternatives. There is neither objectively assessed need for the policy nor any consideration against reasonable alternatives subject to sustainability appraisals. The policy should be based upon evidence including the production of a sub-regional strategy. The evidence should not be prepared retrospectively in an attempt to justify the plan.</p> <p><i>Policy DS16 should be removed from the plan The Joint Employment Land Review remains incomplete. WDC claim that the review has been done (2.25) but in fact it has not. And it has not been published, nor consulted upon. There is no sub-regional strategy. WDC rely entirely upon the evidence presented at the Gateway Inquiry to justify their proposed allocation of the site and subsequently it's removal from the Green Belt. This evidence has been challenged and remains contrary to the NPPF (National Planning Policy Framework) policies on Green Belt and a significant un-resolved objection at this time. Therefore, that evidence cannot be relied upon to support this policy.</i></p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. The Council considers that the site is necessary to provide for sub regional employment needs during the plan period. 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 Joint Employment Land Study was published on 31st October and a further six week period of consultation was undertaken to allow comments. Representations received to this will be responded to separately.</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>
64487 - Don Thomas [9106]	Object	<p>The Gateway site provides for 236 hectares of employment land. Please explain why this is needed when the required employment land for 2011-30 in Warwickshire is 66 hectares, which in itself is probably overstated.</p> <p><i>Quite obviously the Gateway project is not needed and should be scrapped. It seems to me that decisions are being made which are not in the best interests of the people of Warwickshire but are too influenced by the requirements of outsiders.</i></p>	<p>The Gateway site will provide 118 hectares of employment land, the wider area is for landscaping including the provision of a new Country Park. The site is intended to meet sub regional employment land needs rather than local district wide needs. 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.</p>	No change required
65129 - Mr Tony Robinson [12687]	Object	<p>Land used for employment adjacent to Coventry will be ill served by major homes expansion South of Warwick. This fails the sustainability test</p> <p><i>Land adjacent to the employment land should be considered for housing to build a more sustainable plan</i></p>	<p>The sub regional employment site will provide for employment needs across the Coventry and Warwickshire area. The economic and demographic study was prepared to assess housing need arising from the development of the site. This found that the majority of housing need is likely to be generated within Coventry's boundary the southern edge of which is adjacent to the proposed site. The housing south of Warwick is located near existing employment and the Council has sought to direct new employment allocations in the plan to meet local need in close proximity to promote the use of sustainable modes of transport.</p>	No change needed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65364 - Warwickshire Wildlife Trust (Richard Wheat) [3077]	Object	<p>The Trust believes that there is insufficient evidence to justify the allocation of the Coventry Gateway scheme in the Local Plan. We are concerned that:</p> <p>a) There is limited up-to-date ecological information to determine the environmental impacts of the Coventry Gateway scheme and other alternatives within the Local Plan evidence base</p> <p>b) The provisions of policy DS16 have not been assessed within the 2014 Habitat Regulations Assessment</p> <p>c) The Sustainability Appraisal omits an assessment of the Coventry Gateway scheme against the District's Sustainability Objectives and fails to conclude why the site is promoted in the plan over other reasonable alternatives</p> <p><i>Paragraph 6 of the National Planning Policy Framework states that:</i></p> <p><i>'The purpose of the planning system is to contribute to the achievement of Sustainable Development'</i></p> <p><i>In addition, paragraph 8 further outlines that:</i></p> <p><i>'to achieve sustainable development, economic social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions'</i></p> <p><i>With the absence of the information above, it is not clear how the allocation of Coventry Gateway scheme complies with the aforementioned NPPF principles.</i></p> <p><i>Indeed, from a biodiversity perspective, the Gateway scheme will have a significant environmental impact. The Environmental Statement accompanying the application identified that the scheme could impact on a statutory Site of Special Scientific Interest, a Local Nature Reserve, four Local Wildlife Sites and a potential Local Wildlife Site. Protected species are present on site as are several priority habitats and species for nature conservation as listed in S41 of the NERC Act 2006 and the Local Biodiversity Action Plan. It is without doubt that had the Gateway scheme been assessed against the Sustainability Appraisal, the proposal would have scored</i></p>	<p>The Council considers the case for the sub regional employment site is clearly justified (this is set out in detail in response to other representations in this section). A full ecological assessment was undertaken in support of the Gateway planning application which is relevant to this allocation. A sustainability appraisal has been undertaken of the allocation which has been subject to a six week period of public consultation as part of the Focused Change consultation.</p> <p>The HRA did consider the sub regional employment land site in its assessment of PO8 of the preferred options version of the Local Plan. In relation to biodiversity, as part of the Gateway application it was demonstrated 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.</p>	<p>Take into account the representations received to the Sustainability Appraisal in the Focused Change consultation.</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><i>unfavourably against the biodiversity objective.</i></p> <p><i>With this in mind, we believe that it is necessary for the local authority to provide robust justification for the Coventry Gateway allocation to demonstrate why the proposal was preferred option and how it, and subsequently the local plan, contributes towards sustainable development in accordance with NPPF principles. We therefore recommend that the local authority:</i></p> <p><i>1) Update the Habitat Regulations Assessment to screen the policies in the 2014 Local Plan submission document and summarise the findings in addendum to the current 2014 HRA screening report.</i></p> <p><i>2) Ensure the environmental evidence collated for the Coventry Gateway application is used to evaluate the scheme against the district's Sustainability objectives using the Sustainability Appraisal methodology</i></p> <p><i>3) Work with other authorities in the Coventry and Warwickshire LEP area to review alternative sub-regional employment sites and gather relevant environmental evidence for these options.</i></p> <p><i>4) Demonstrate and conclude if and why the Gateway Scheme is the most appropriate and sustainable option for fulfilling the need for sub-regional employment sites using the Sustainability Appraisal process.</i></p> <p><i>Warwickshire Wildlife Trust is happy to work with the Local Authority to ensure these recommendations are fulfilled.</i></p>		
65981 - Coventry and Warwickshire Development Partnership (Mr David Keir ) [12844]	Object	<p>Supports the allocation of a major employment site of sub-regional importance at land in the vicinity of Coventry Airport. Sets out in detail the reasons why the allocation and its removal from the green belt should be supported. Considers however that the wording of DS16 should be modified to allow the incorporation of ancillary facilities such as a hotel and minor retail space</p> <p><i>DS16 should be modified to allow the incorporation of ancillary facilities such as a hotel and minor retail space required to provide a full range of land uses necessary for this large area of employment to function sustainably.</i></p>	<p>Whilst it is accepted that ancillary uses may come forward as part of the wider development of the site, the appropriateness of these should be considered as part of a planning application in the context of other uses being proposed for the site. It is therefore not considered appropriate to refer to these in the policy.</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>
66056 - Lenco Investments [1165]	Object	<p>RPS has set out objection to the strategy of the plan and the interrelationship between housing and employment, including the Duty to Cooperate, particularly in respect of the sub-regional employment allocation. However, the allocation in DS16 as it stands is soundly based, however, the implications of it and the manner in which it is accommodated in the wider strategy and sub-region is not.</p> <p><i>RPS represents a significant land owner on the edge of Coventry and adjacent to the proposed allocation in DS16 and has significant interest in the manner in which the oral evidence is provided at the examination. RPS request that it is able to provide further oral evidence on the proposed allocation and its correlation with the surrounding environs, strategy and the significant parcel of land which RPS represents adjacent to the allocation.</i></p>	Noted, a more detailed response is provided to these objections elsewhere	No change required
65144 - Sport England (Mr Bob Sharples) [1355]	Object	<p>D2 uses have the potential to create employment and training opportunities and should be viewed along side traditional modes of employment.</p> <p><i>Commercial indoor five aside, commercial indoor cricket, have been growing markets even in the most recent recession, creating employment and training opportunities on business parks. D2 uses therefore should be considered along side B1 uses, just as a number of gyms such as Virgin and Fitness First have been on business parks elsewhere in the country. E.g. Wolverhampton Business Park , Wolverhampton.</i></p> <p><i>Also it should not be overlooked that there is usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First D2 use, than a 100,000m2 B8 use.</i></p> <p><i>In conclusion, Sport England wishes the WDC Planning department to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. And therefore should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this table.</i></p>	The Council recognises the importance of such facilities in generating employment however it is important that the supply of B Class employment land is not compromised. In particular DS16 provides for sub regional B class employment land needs and whilst some ancillary uses may be appropriate to support such uses it is important the focus is on B Class uses. Furthermore the NPPF identifies leisure and certain sport and recreation uses including health and fitness clubs as main town centre uses and directs that they should be located according to the town centre first approach.	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>
66721 - Baginton Parish Council (Mr Steve Williams) [726]	Object	<p>A. Insufficient consideration of alternatives and no consultation of latest proposals.</p> <p>Policies DS 8 Employment land &amp; DS16 Sub-Regional Employment Site are unsound as there has been insufficient sub regional consultation. There is reference within the Local Plan to a Joint Employment Land Review. However, it is understood that this has not been published and that it does not adequately consider alternative proposals.</p> <p>BPC believes that exceptional reasons do not exist for proposing that the land shown on the policy Map 8 is removed from the Green Belt.</p> <p>As such BPC believes that the lack of adequate consideration of the proposals renders the Local Plan unsound.</p> <p>Furthermore, the Local Plan is unsound as the Sub-Regional Employment Site is not the most appropriate strategy when considered against reasonable alternatives, which have not been given adequate consideration. Some alternatives have been proposed in previous BPC correspondence opposing the Gateway.</p> <p>Furthermore BPC and others have no visibility of the review and have not been consulted on its proposals. BPC believes this lack of transparency, consultation and lack of alternatives renders the Local Plan unsound.</p> <p>B. No account of desires of local communities.</p> <p>In previous draft report section 5.5.5 it states:- "In the 2012 Preferred Options the Council committed to exploring the case for land at the Coventry and Warwickshire Gateway to be identified to provide a major employment site that could meet these needs.</p> <p>Since then, a planning application has been submitted. Although this application has yet to be formally determined by the Council, the evidence would support the identification of land in this area for a major employment use of sub-regional significance." You have our letter L090 response to that consultation dated 18.7.12. Many of the points made in that letter remain applicable.</p> <p>Your policy DS16 Sub Regional Employment Site ignores our previous requests therefore is unsound.</p> <p>C. No consultation with local communities on removal of Green Belt.</p> <p>The previous Revised Development Strategy specifically maintained the Gateway development area in the Green Belt. BPC have received previous assurance that this remained the intention of WDC. However, there has been a volte-face with the Local Plan as now presented, with the area suddenly</p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. The Council considers that the site is necessary to provide for sub regional employment needs during the plan period. 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 study considers all available sites over 6 hectares across the sub region. The site would not compete with other sites such as Ansty but instead will be complementary in terms of the uses provided on each site. 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 Joint Employment Land Study was published on 31st October and a further six week period of consultation was undertaken to allow comments. Representations received to this will be responded to separately.</p> <p>It is considered that the link to areas of deprivation should be strengthened therefore additional text should be added to paragraph 2.75.</p>	<p>Add additional text to second bullet point of paragraph 2.75 to state 'including access to communities in deprivation.</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>removed from the Green Belt. Post public consultation. Yet there has been no consultation with our and other Parish Councils, our and other local communities and other stakeholders concerning the removal of this land from Green Belt.</p> <p>We believe that it is unsound, unreasonable and possibly illegal for WDC to change their mind on such a fundamental issue without adequately consulting the local community. The Local Plan policies DS8, DS16 and DS19 are therefore unsound.</p> <p>D. Contrary to the NPPF.</p> <p>BPC remain wholly opposed to the Sub-Regional Employment Site (Gateway Development) for all the legitimate planning reasons given in our extensive correspondence objecting to the development and lodged on the WDC website along with over 800 other objectors against planning application W12/1143.</p> <p>In summary, the Sub-Regional Employment Site Gateway is unsustainable and inappropriate development of the Green Belt with no very special circumstances and is ruinous to the openness and rural character of our Parish. The open fields also act as a vital barrier against urban sprawl. The proposal will not support regeneration within the Coventry &amp; Nuneaton Regeneration Zone, as it would directly compete with established underutilized sites with extant planning permission such as that at Ansty. There are many suitable alternative sites outside the Green Belt and no preferential sites within the Green Belt. Development can and should be carried out on existing sites with hundreds of acres of already available land.</p> <p><i>Please amend your proposals by withdrawing the Local Plan as it stands, omitting the Sub-Regional Employment Site (Gateway development) and retaining the Green Belt throughout this Baginton Parish.</i></p> <p><i>Should you continue to ignore our reasonable requests and maintain the Local Plan in its current form we understand that the PI will be Examining the Local Plan before adoption. It is our intention to make representations at a hearing during the Examination to demonstrate that the Local Plan is all of the below:-</i></p> <p><i>A. Unsound.</i></p> <p><i>B. Unjustified.</i></p> <p><i>C. Not based on robust and credible evidence.</i></p> <p><i>D. Not in accordance with the NPPF hence contrary to national policy.</i></p> <p><i>E. Resulting from a consultation process that has not allowed for effective engagement of all interested parties to the proposals as they stand.</i></p> <p><i>F. Resulting from a lack of WDC's duty to cooperate.</i></p> <p><i>G. Not legally compliant</i></p> <p><i>H. Supported by assumptions made in the preparation of the Local</i></p>		

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>Plan which are not reasonable and justified.</i></p> <p><i>I. Devoid of reasonable alternatives that have been adequately considered and with no clear audit trail showing how and why these decisions have been made.</i></p> <p><i>J. Is not the most appropriate strategy when considered against all the alternatives, all as previously presented?</i></p> <p><i>K. Resulting from a flawed consultation process with last minute fundamental changes of policy not previously consulted upon</i></p> <p><i>L. The result of last minute changes made due to the proceedings of the Gateway Public Inquiry, which was ongoing at the time, the outcome of which remains unknown.</i></p> <p><i>M. Fails to bring together and integrate policies for the development of other land in the sub-region.</i></p> <p><i>N. Has failed to protect valued rural landscapes.</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>
66409 - Mr Robin Fryer [7457]	Object	<p>Proposal to remove area from the green belt is based on a claimed sub regional need and in compliance with sub regional strategy. This strategy has not been published and no public consultation has been undertaken for it. Use of unpublished strategies to circumvent scrutiny is undemocratic. Justification claimed is that it complies with the RSS evidence base. This is false as the evidence directed employment to the adjoining MUA and regeneration zone of Nuneaton and North Coventry. City unemployment is 9.5% compared with Warwick District of 3.5%. provision of a major warehouse development is also against the RSS evidence base that required logistics to be served by a rail link. The health of Baginton residents has been ignored in proposing this location. Development of this size in a rural village with less than 2,000 residents does not constitute sustainable development. The failure of the SA to consider this issue is inadequate. The plan does not provide any of the exceptional circumstances to remove this area from the green belt. While this development is supported by the LEP they are an unelected, undemocratic and unaccountable group and many have financial vested interests which act against community values. Warwick District has not embraced principles of localism.</p>	<p>The sub regional employment land study has been published since the Publication Draft Version of the Local Plan was placed on public consultation. A further six week period public consultation was undertaken in November 2014 to allow comments in relation to this. The Council will consider any further representations received in proposing any modifications when submitting the Local Plan to the Secretary of State. The site has also been the subject of a sustainability appraisal which was published alongside the Focused Changes consultation.</p> <p>It is intended that the site will generate employment for the wider Coventry and Warwickshire area and in particular meet the unemployment needs of Coventry. The Council considers that the site is necessary to provide for sub regional employment needs during the plan period. The Joint Strategic 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.</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 health impacts of any proposal (in particular on Baginton residents) will be considered fully as part of relevant planning applications. The Coventry &amp; Warwickshire Gateway proposal was designed (and appropriate conditions included), to address these</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>a) Carry out a public consultation exercise on all aspects of the local plan to include elements added to this version as the current exercise is too legalistic and excludes the general public.</p> <p>b) Publish the sub-regional plan, if it exists and carry out a public consultation on the contents because this is a key policy underlying the Warwick District Local Plan that the community has been denied access to</p> <p>c) Delete all references to a sub-regional strategy in the current local plan if b) not carried out.</p> <p>d) Carry out a new objective sustainability assessment that complies with the 3 core principles in the NPPF for all major proposals in the local plan</p> <p>e) to justify the claimed duty to co-operate provide evidence that the adjoining local authorities have a genuine need for land in Warwick District that they are unable to meet in their own area and submit the</p>	<p>issues. For example:-</p> <p>That there may be noise issues (especially at night) arising from HGV movements along the access road to zone A. WDC Environmental Health has advised that these queries can be addressed at the detailed design stage when full details of all necessary bunds and acoustic fences will be available. A proposed planning condition requires full details of all noise mitigation measures to be submitted for approval prior to the occupation of any phase of the development.</p> <p>Overall, the council has concluded that that the Environmental Statement, together with the supplementary information that has been submitted, is sufficient to demonstrate that the proposals would not have an unacceptable impact in terms of noise, subject to appropriate conditions.</p> <p>The highways proposals ensure that no traffic to/from the Gateway development will travel through Baginton village. Unrestricted car access along Rowley Road between Baginton village and Middlemarch Business Park would be maintained for all vehicles except those of Gateway employees, who would not be permitted to access the development from Coventry Road/Mill Hill to the west of the site.</p> <p>There will be a country park with improved public access around the development. This will include land adjacent to Baginton village and to the east of the of the Lunt fort.</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><i>evidence for public comment</i></p> <p><i>f) Revise housing numbers and employment land requirement downwards to comply with current statistical evidence to justify the proposals</i></p> <p><i>g) Omit the vague and undefined proposals from the Local Plan or provide revised information proving they are justified and effective.</i></p> <p><i>h) Delay submission of the Local Plan until the defects are remedied and put before the local community for a new consultation</i></p>		
65122 - Bubbenhall Parish Council (Mrs Jane Fleming) [4485]	Object	<p>The employment land required for Warwick District is assessed as 66 hectares (paras 2.26-7) and has been met in the provisions of this draft Local Plan.</p> <p>The Joint Employment Land Review (JELR para 2.71) is NOT in the public domain. There are therefore no means to enable legitimate assessment of the claims made in 2.71.</p> <p>There are existing sustainable alternative sites in the area with infrastructure in place, to satisfy existing and future employment land requirements. There are no very special circumstances to justify development on Green Belt land. The proposal is therefore inconsistent with the National Planning Policy Framework.</p> <p><i>DS 16 should be removed from the Plan and from the Policies map since:</i></p> <p><i>(i) The concept of a Sub-Regional Employment site represents a reversion to the ideas of the now abandoned Regional Spatial Strategy</i></p> <p><i>(ii) The written evidence that the Coventry Gateway project could provide a useful sub-regional employment site was roundly and comprehensively criticised by objectors during the recent Public Enquiry.</i></p> <p><i>No evidence has been presented in the Draft Plan as to why the land in the vicinity of Coventry Airport constitutes a "priority site to fulfil this role" as claimed in 2.72. As recently as December 2013, the draft plan of the CWLEP listed this site merely as one among 19 relevant sites.</i></p>	<p>The Joint Employment Land Study was published on 31st October and a further six week period of consultation was undertaken to allow comments. Representations received to this will be responded to separately.</p> <p>The Council considers that the site is necessary to provide for sub regional employment needs during the plan period. 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.</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>
66761 - Coventry City Council (Mr Mark Andrews) [12864]	Support	CCC and WDC have undertaken significant levels of joint working alongside the C&W LEP to support and promote the current development proposal referred to as the Coventry and Warwickshire Gateway. As such, CCC supports the allocation of this area as a sub-regional employment site in Policy DS16. The proposed development offers an opportunity for significant economic investment in the sub-region, creating new jobs and generating economic growth.	Noted	No change required
<i>DS17 Supporting Canalside Regeneration and Enhancement</i>				
65878 - Centaur Homes [9117]	Object	Centaur Homes object to the inclusion of this policy within the Local Plan. It goes against paragraph 153 of the Framework that states that any additional development plan documents should be clearly justified. The requirement for an additional DPD has not been fully justified within the Local Plan	This is not a proposal put through the Local Plan process this time, but one which was examined and dismissed through the last Local Plan since such facilities should be located in the town centre first and then a sequential test adopted to locate in the most sustainable location. This site is not in the most sustainable location and is out of town centres and cannot therefore be considered for allocation as such through the Local Plan. The Council feels that there is clear justification to set out the framework for the regeneration of these canal side areas as a separate DPD. It would not be appropriate to set out such detailed policies within the Local Plan and it requires a bespoke piece to work for each area to evaluate how the sites might come forward.	No change needed
<i>This policy should be removed from the Plan.</i>				
66325 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	Welcome policy which sets out the requirements of a specific development plan document relating to canalside development. Would be happy to liaise with the Council on production of such a document. The canals can be used as tools in place making and place shaping supporting regeneration.	Noted, the Council will consult with the Canal and River Trust in preparing the forthcoming DPD.	No change
65077 - Katharine Mary Silvester [5076]	Support	Develop a Marina at the Oaklands Farm site.	Check with Lorna	
66678 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	Leamington Town Council welcomes the proposed Canal-side Development Plan and the opportunity to contribute to the development of policies aimed at enhancing and conserving this important resource.  <i>none</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65503 - Keith Wellsted [8636] 66511 - Friends of the Earth (John Brightley) [1113]	Support	Support	Noted	No change
65147 - Sport England (Mr Bob Sharples) [1355]	Support	I support this policy but would remind WDC that sport does play an active role in regeneration. Rowing, canoeing and kayaking take place on canals, and can create opportunities for people who normally only associate sport with big team sports. Consideration should be given to working with these sports governing bodies to investigate if investment could be levered in creating a water sports hub on the canals.	Noted. The Council recognises the importance of ensuring that any canal side regeneration maximises opportunities to use the water for a range of activities sports being one of these.	No change
<i>DS18 Regeneration of Lillington</i>				
65933 - Ms Beth Forster [6585]	Object	Exceptional circumstances for Red House Farm have not be established. This area provide tranquility and recreation. the riding school, will suffer noise and pollution. the proposals will have a permanent and disastrous impact on the landscape and will lead to urban sprawl and loss of open, natural space.	Objections to the allocation of land at Red House Farm are being considered in policy DS11 (site HO4). Although paragraph 2.77 refers to the Red House Farm site as supporting regeneration in Lillington, the focus of policy DS18 itself is on land at the Lillington Local Shopping Centre on Crown Way. The policy seeks to protect the local centre and potentially enhance the range of services in its vicinity. Whether or not the Red House Farm site is developed for housing, these aspirations can still be delivered. The policy is therefore still appropriate.	None required.
<i>Remove this proposal from the plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66850 - Protect Lillington Green Belt [Petition] (Diana Taulbut) [12926]	Object	<p>- It is not clear what is meant by Lillington Local Shopping Centre in the policy, does the policy mean Crown Way Shops??. If it means the demolition of existing perfectly good buildings then the policy should say so clearly and then public opinion can be sought properly.</p> <p>- DS18 contains inaccuracies, it is contended that Lillington is not as deprived as set out in the policy justification.</p> <p>- The proposed regeneration strategy has not been tested to see if it is economically viable / deliverable.</p> <p>- If "reviewing the existing services" means demolishing the current public services / facilities this does not represent good use of funds as many of the assets are perfectly good enough as they are.</p> <p>- policy DS18 may embrace very substantial changes to Lillington that are not justified and have not been tested to ensure that they are viable. This makes the plan uncertain and unsound. To enhance conditions/ opportunities in the area the Council needs to identify and target funding. The demolition and re-building of existing facilities does not represent good value and is unnecessary as most services are already located / represented here.</p> <p>- The policy seems by default to suggest the re-development of Crown Way shops and / or the use of the Mason Avenue public open space for new development. The policy is difficult for the public to understand / interpret and therefore should be made clearer so that meaningful and proper consultation can take place.</p> <p><i>Any regeneration of Lillington East should be developed in close participation with local residents and take account of their views. The allocation H04 and policy DS18 should not be in the plan at this stage.</i></p>	See response to other objections to this policy, including in respect of (1) clarification of what is meant by Lillington Local Shopping Centre, (2) inaccurate descriptions of the deprivation in Lillington, (3) the untested nature of any current proposals and (4) the need for proper consultation on proposals.	See changes identified in response to other objections.
65934 - Mr Andrew Adams-Green [12825]	Object	<p>WDC not proven exceptional circumstances for proposal</p> <p>There is no regeneration plan of Lillington</p> <p>Policy DS18 is highly inaccurate</p> <p>Consultation has been patchy and ineffective</p> <p>Loss of recreational amenity 'riding school'</p> <p>No explanation of why brownfield sites could not be used.</p> <p>Ecological and environmental studies have not been carried out.</p> <p>Represents only 1.5% of total housing needed but has a huge impact on the landscape.</p> <p><i>It is ill conceived with little regard to the impact on the local community, landscape, environmental and ecology. It is profit before needs as it only represents a small proportion of the housing needs and therefore it is ineffective and should not go ahead.</i></p>	See response to other objections to this policy. Objections to the allocation of land at Red House Farm are being considered in policy DS11 (site HO4).	None required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65378 - Mr Richard Taulbut [12734]	Object	<p>The explanation at paragraph 2.77 is factually incorrect and therefore DS18 is not justified. Lillington East Super Output Area is amongst the 20% most deprived areas nationally, not Lillington overall; specifically for Employment, Education, Skills &amp; Training. For Living Environment the area scores above the district average. The proposed housing on Green Belt land at Red House Farm will diminish the Living Environment of the area and will fail to address the specific deprivation issues of employment and education.</p> <p><i>Lillington East Super Output Area is amongst the 20% most deprived areas nationally; specifically for Employment, Education, Skills &amp; Training.</i></p> <p><i>The Council will work with partners to enhance employment and education opportunities in Lillington East, and will protect the successful living environment of the area including protecting the existing Green Belt surrounding the area.</i></p>	<p>The objector is correct that the first sentence of paragraph 2.77 is not completely correct. The text of the Local Plan should be amended accordingly.</p>	<p>DELETE the first sentence of paragraph 2.77 and REPLACE with the following:-</p> <p>"Lillington contains some localised areas of deprivation with Crown ward ranked as the district's second most deprived ward. In particular, the Lillington East Super Output Area is amongst the 20% most deprived such areas nationally and is within the worst 10% for Employment, Education, Skills &amp; Training....."</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66626 - Dr Diana Taulbut [12799]	<p>Object</p> <ul style="list-style-type: none"> <li>- It is not clear what is meant by Lillington Local Shopping Centre in the policy, does the policy mean Crown Way Shops??.If it means the demolition of existing perfectly good buildings then the policy should say so clearly and then public opinion can be sought properly.</li> <li>- DS18 contains inaccuracies, it is contended that Lillington is not as deprived as set out in the policy justification.</li> <li>- The proposed regeneration strategy has not been tested to see if it is economically viable / deliverable.</li> <li>- If "reviewing the existing services" means demolishing the current public services / facilities this does not represent good use of funds as many of the assets are perfectly good enough as they are.</li> <li>- policy DS18 may embrace very substantial changes to Lillington that are not justified and have not been tested to ensure that they are viable. This makes the plan uncertain and unsound. To enhance conditions/ opportunities in the area the Council needs to identify and target funding. The demolition and re-building of existing facilities does not represent good value and is unnecessary as most services are already located / represented here.</li> <li>- The policy seems by default to suggest the re-development of Crown Way shops and / or the use of the Mason Avenue public open space for new development. The policy is difficult for the public to understand / interpret and therefore should be made clearer so that meaningful and proper consultation can take place.</li> </ul> <p style="text-align: center;"><i>Any regeneration of Lillington East should be developed in close participation with local residents and take account of their views. The allocation H04 and policy DS18 should not be in the plan at this stage.</i></p>	<p>As noted in response to another representation, it is recognised that paragraph 2.77 contains inaccuracies in terms of references to deprivation, and amended wording is proposed elsewhere to remedy this.</p> <p>It is also agreed that for the avoidance of doubt (and to agree with the wording used elsewhere in the Local Plan - specifically in policy TC17), it should be made clear that the Lillington local shopping centre is that at Crown Way.</p> <p>As regards the other representations made here, it is quite correct that any "regeneration strategy" has not been tested to see if it is viable, nor has there been any public engagement on it to date. At the present time, there is not firm "regeneration strategy" for the area. There are, however, a number of known deprivation issues in the Lillington area, and a commitment by Warwick District Council and Warwickshire County Council to work with communities to seek to address these. The purpose of this policy is to affirm Warwick District Council's commitment to do so, and to ensure that should any local proposal come forward in the future which seeks to respond to issues in Lillington, these can be considered positively. It is in the nature of regeneration areas that planning policies need to be flexible (within limits and as far as is appropriate), and this policy seeks to do this. Without such a policy, some good proposals which may come forward in Lillington (such as any which create local employment opportunities) would otherwise be contrary to the general policies of the Local Plan. It is recognised, however, that since the policy is, by necessity, a flexible one, there should be a clear commitment by the Council to consult with the public as and when new proposals emerge. Additional wording is proposed to make this clear.</p>	<p>In policy DS18, DELETE the references to "Lillington Local Shopping Centre" and REPLACE with "Crown Way Local Shopping Centre".</p> <p>ADD the following words at the end of paragraph 2.78. "The Council will furthermore ensure that full public and stakeholder consultation takes place as and when new proposals emerge."</p>



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65213 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	<p>The Kenilworth Society considers that the removal of these sites is unsound because:</p> <p>a) The Local Planning Authority has not involved the community in the preparation of this part of the Plan. The "Revised Development Strategy" that was published for public consultation in June 2013 retained all three sites in the green belt.</p> <p>b) There do not appear to be good planning reasons for the removal of these sites from the green belt. In the case of the Coventry Gateway, the reason seems to be the local planning authority's retrospective justification of consent to a planning application. The Draft Local Plan does not provide evidence to support the change. Nor does Sustainability Appraisal Report assess the merits or otherwise of removing the sites from the green belt. It merely states that they are within the green belt.</p> <p><i>To make Policy DS19 Green Belt and the accompanying Policies Map sound we would expect the following sites to be restored to the green belt:-</i>  <i>Kenilworth School Sixth Form, Rouncil Lane, Kenilworth,</i>  <i>Southcrest Farm, Kenilworth</i>  <i>Land in the vicinity of Coventry Airport</i></p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development. In each case exceptional circumstances to justify the proposed amendments can be demonstrated. In brief, these primarily relate to development needs and being the most appropriate strategy.</p> <p>It is not a requirement of the Sustainability Appraisal process to assess the relative merits of parcels of Green Belt.</p>	
64527 - Mr Richard Thwaites [11460] 66613 - Mr's & Mrs S & D & G Harrison & Rowe [12860]	Object	<p>A full review of the Green Belt has not been undertaken and this has resulted in an anomaly where the allocation of Aylesbury House Hotel does not relate to the adjacent village and as a result the adjacent parcel of land would still be designated as green belt but be completely surrounded by development.</p> <p><i>Do not consider that a full and proper review of the Green Belt boundaries has been undertaken and this needs to be done as a priority. Review should consider the opportunity to permit more significant land releases adjacent to Hockley Heath to address the anomalies by current allocation of the Former Aylesbury House.</i></p>	<p>A Green Belt Review (2013) has been undertaken for the parcel surrounding Aylesbury House (HOCK1). The overall value of this parcel was deemed to be high, therefore it is not possible to justify the alteration of Green Belt boundaries in this location. Over and above the allocation of Aylesbury House, which can be developed in accordance with Green Belt policy in the NPPF (See Response to Rep ID 66140 - under DS11), it is not considered that this location is as suitable as others to meet the District's housing needs.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66774 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	Policy is superfluous given that it appears to only state that the Council's approach to the Green Belt will be as per the approach at the national level, as in the NPPF and PPG. Supporting text should refer to Hatton Park and specifically site H28 rather than simply Hatton. Green Belt boundaries should be capable of enduring beyond the plan period. Hatton Park is recognised as a 'Growth Village' which recognises the sustainability of the settlement for future residential growth. The scale of the allocation at Hatton Park (H28) should be increased to take in a wider area, enabling development of approximately 180 dwellings and forming a logical green belt boundary.	<p>The Landscape Sensitivity and Ecological &amp; Geological Study identified assets of landscape and ecological importance to the north and east of the site that require strong buffering in order to protect their setting. Therefore the Green Belt boundary has been amended sufficient to accommodate the allocation. Quotes taken from this study are as follows:</p> <p>"Requires substantial buffering from ancient woodland and sufficient attention to habitat replacement, as well as strong eastern boundary.</p> <p>A buffer of public open space should be retained between this avenue and any new development. It is also imperative that a landscape buffer of native trees, preferably the extent of one field, should be created to maintain a visual link and wildlife corridor between Smith's Covert and the wider countryside to the east. The strong vegetation along the Birmingham Road should also be retained."</p> <p>Whilst this policy may be brief it is considered necessary for a number of reasons: it references national policy without repeating it unnecessarily and it provides a reference to the Green Belt annotation on the policies map. Furthermore, it cross references to other policies in the plan where Green Belt policy has a bearing and finally it makes reference to specific development allocations that are currently in the Green Belt.</p> <p>It is considered that appropriate amendments to Green Belt boundaries have been proposed to meet the development needs of the plan as proposed, including at Hatton Park.</p> <p>See responses to policies DS6 and DS20 in relation to the Council's approach to addressing any potential shortfall. It is not appropriate for this plan to consider the relative merits of additional sites, whether in the Green Belt or not, at this stage. If this happens it will be undertaken in a considered and co-ordinated way in accordance with DS20 and the joint planning approach agreed through the Duty to Cooperate process.</p>	<p>At Para 2.81 replace the following bullet point:</p> <p>Hatton</p> <p>with:</p> <p>Hatton Park</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><i>Amend the allocation area of Site H28 to cover the red line plan attached as an Appendix 1 to these representations, or safeguard the remainder of the Site for future development and include the following policy:</i></p> <p><i>If it is demonstrated that either:</i></p> <ul style="list-style-type: none"> <li><i>* there is a shortfall in the supply of housing sites against housing delivery targets for a consecutive two year period; or</i></li> <li><i>* should a Council within the Coventry HMA demonstrate that it is not feasible for them to accommodate their own housing need.</i></li> </ul> <p><i>The Council will work with the developers to release and phase the delivery of land east of Housing Site H28 at Hatton Park, currently identified on the Key Diagram, to help meet the identified shortfall/housing need.</i></p>	<p>Reference to para. 2.81 being incorrect is noted and will be replaced by Hatton Park.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65710 - Trustees of the Haseley Settlement [7411]	Object	<p>The Council has failed to ensure the permanence of the Green Belt to ensure beyond the Plan period as required by the NPPF. The Council has not provided for its objectively assessed need nor made satisfactory provision for the level of housing generated from the Gateway site. The level to which the Green Belt has been amended is insufficient to meet the needs of the District and Sub-Region. There is no formal commitment to undertake a strategic review of the Green Belt despite committing to reviewing housing numbers by 2015 within the CWLEP Strategic Growth Plan. The SHLAA identifies a number of village sites suitable for development subject to green belt boundaries being amended. However the plan fails to take the SHLAA into account when drawing the settlement boundaries of the villages within the Green Belt. For example despite the SHLAA identifying site R39 at Hatton Green as suitable and available the proposed village boundary excludes the site. No housing sites are identified at Hatton Green despite it being a sustainable location with a primary school, nursery school and community facilities. In direct contrast 80 dwellings are proposed at Hatton Park which has no facilities and is considered to extend the built form beyond clearly identifiable and defensible limits of green belt.</p> <p><i>A further review of the Green Belt is required to provide for additional housing and to adequately meet the needs of rural areas. The village boundary for Hatton Green should be redefined to incorporate SHLAA site R37 and allow for housing to be delivered within the village. As part of this review of Green Belt boundaries the justification for large scale development at Hatton Park and Hatton Station should be reviewed due to the lack of facilities these settlements offer and therefor the contradiction to the NPPF's principal aim of locating development in sustainable locations.</i></p> <p><i>While it is understood that the Hatton Green SHLAA site R39 lies within the Green Belt, the site is entirely suitable, available and achievable for the purposes of the NPPF and should be either allocated for residential or the village boundary revised to incorporate the site and allow its delivery as a rural windfall site.</i></p>	<p>The distribution of development to villages is set out in the Village Hierarchy report. Hatton Green is identified as a small/feeder village and as such is not considered to be a sustainable location for an allocated development site. Therefore exceptional circumstances do not exist to justify amending the green belt boundaries to enable this site to come forward for development.</p> <p>Whilst there are clearly some connections between the two settlements, they are separate and development at Hatton Green is not considered to be a sustainable location in comparison with Hatton Park. However it is recognised that development at Hatton Park, may support services in Hatton Green.</p> <p>The Council considers that the Plan does meet Objectively Assessed Need and makes an allowance for some redistribution of need from Coventry. Policy DS20 supports this approach by committing the Council to an early review should current uncertainties crystalize in such as way as to mean the District is required to take more housing. At the time of writing a new Joint Green Belt Review is being undertaken to inform this process.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66524 - Friends of the Earth (John Brightley) [1113]	Object	<p>We object to the proposals in this policy to remove land from the Green Belt at Southcrest Farm, Kenilworth, and in the vicinity of Coventry Airport.</p> <p>Warwick District Council does still need to determine 'robust criteria' for each site it proposes to remove from the Green Belt.</p> <p>We note that in Appendix 9 -Green Belt Critical Review, the reviewer stresses that the 'fundamental aim and five purposes of Green Belt' are still important (page 19) and 'robust criteria' in the form of 'Sustainable Development Constraints' will need to be established ' to ensure that any land proposed for release from Green Belt status for potential development can be achieved in a way that:</p> <ul style="list-style-type: none"> <li>* does not damage land with important landscape or nature conservation value;</li> <li>* does not damage land which performs an important floodplain function; and</li> <li>* is readily accessible to and from existing, or easily extended, facilities or services'.</li> </ul> <p>Also, the reviewer states (on page 23 )'There should not be a 'call for sites' exercise, as this could imply that the Assessment is 'developer-led', rather than being an appropriate assessment considered against strict Green Belt criteria and based on proportionate evidence.' This is particularly relevant in the case of the Kings Hill site which has been suggested again recently by Coventry City Council. This site was considered early on in the Local Plan review process and rejected when 'considered against strict Green Belt criteria'. It is also relevant to the proposed relocation of Kenilworth School at Southcrest Farm - the proposed site has already been rejected when 'considered against strict Green Belt criteria'.</p>	<p>It is necessary to amend Green Belt boundaries in these locations to enable the development and exceptional circumstances exist to do so.</p> <p>It is considered that the respondent taken the evidence contained within the critical friend analysis of the partial green belt review (2013) out of context, and therefore it is has lead to a misinterpretation of the recommendations.</p> <p>The sustainable development constraints / robust criteria for all site allocations, irrespective of current Green Belt designation have examined through the SHLAA, Site Selection Methodology, and other site appraisal processes in the evidence base.</p> <p>No call for sites exercise was undertaken as part of the Green Belt review process. However, the Council had already gone through a call sites process through the SHLAA process and previous consultations and continued to do so following the publication of this study.</p> <p>Kings Hill has not been allocated as it is within the green belt and there are no exceptional circumstances to allocate this at the moment.</p> <p>The Joint Green Belt Study (2009) identified land at Southcrest farm as part of a wider parcel of green belt land that met the purposes of Green Belt less well compared to other Green Belt parcels in the study.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65631 - Lioncourt Homes [11870]	Object	The Local Plan is not sound as it has not been positively prepared, justified and is not consistent with National Policy. The Green Belt Review 2009 identified Oaklea Farm and Baginton as sensitive sites and as such, retained in the Green Belt. These same sites are now proposed to be released from the Green Belt. The site at Kings Hill, Finham however, was recommended for further detailed study and this has not been carried out. Furthermore, the Green Belt and Green Field Review 2013 does not assess the Kings Hill site, but no reason for this is given	<p>The Joint Green Belt Review was prepared to examine the function and purposes of certain parcels of land within the Green Belt at a strategic level in Warwick District and several other authorities within the sub region.</p> <p>The remit of the Green Belt and Green Field Review 2013 was to examine generally smaller parcels of land around growth villages to inform the site selection process to deliver growth in these villages.</p> <p>The Kings Hill site is within the Green Belt, and it is considered to be a significant strategic site. Exceptional justification would be required to release Green Belt. Given that sustainable housing sites outside of the Green Belt are available, an exceptional justification is not substantiated.</p>	
65493 - Sarah Palmer [12871]	Object	<p>The removal of villages (where currently "washed over") from the Green Belt is logical and is supported. However, specifically in relation to Burton Green, the continuance of Green Belt status for the land at Red Lane, described in our representation under DS11 is objected to.</p> <p><i>The removal of the land in question from the Green Belt.</i></p>	Support noted. In relation to objection see response to Land At Red Lane in DS11.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66346 - David Wilson Homes [11681]	Object	<p>We object to policy DS19 Green Belt which defines the extent of the Green Belt in the District.</p> <p>Whilst the Council has undertaken a review of the Green Belt and commissioned further independent work to critically assess the review we do not consider that the work undertaken has been expressively thorough or unbiased.</p> <p>The Green Belt Critical Review provides an assessment of the preferred option sites, but fails to consider any of the sites that have been dismissed. In contrast to the Council's Green Belt Review, it focuses on the specific sites.</p> <p>This more detailed approach results in very different conclusions. Whilst the Green Belt Review considers Parcel BG3 (within which the preferred option site is located) to be of high Green Belt value the Green Belt Critical Review considers the preferred option site to be of low to medium value.</p> <p>It concludes that given the characteristics of the site, it could be removed from the Green Belt with a modest impact on the fundamental aims, essential characteristics and purposes of the Green Belt.</p> <p>It is worth noting the Inspector's Main Modifications to the Leeds City Council Core Strategy, which recommended that full Green Belt review should be undertaken to accommodate the identified level of housing and employment growth rather than a selective review as the Council originally proposed.</p> <p><i>We recommend that the Council undertake a further Green Belt assessment which assesses each of the sites on a individual basis and not as part of larger Green Belt parcels. We recommend that the review is undertaken immediately and prior to the local plan being submitted to the Secretary of State for independent examination.</i></p> <p><i>Land off Cromwell Lane, Burton Green does not meet the 5 purposes of Green Belt. The Green Belt boundary should be altered to accommodate this site.</i></p>	<p>The Partial Green Belt Review (2013) examined all large parcels of Green Belt around Growth Villages. It was only considered necessary for the Critical Friend Analysis of the Partial Green Belt Review (2013) to examine sites which were potential preferred options following the relative analysis of all other planning merits and constraints. If a site was not considered suitable overall for other reasons it was not considered necessary to undertake a detailed review of its Green Belt function. This is considered to be a proportionate approach to preparing the evidence base.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66551 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>The removal of the land in the vicinity of Coventry airport from the green belt was not included in previous versions of the emerging WDC plan, some of which explicitly argued against such a course of action. There has therefore been no prior (or proper) consultation on this proposed GB change. This makes the proposed policy unsound and unjustified because the consultation process has not allowed effective engagement of interested parties. Lack of adequate consultation renders the plan legally non-compliant.</p> <p>GB boundaries should only be altered in 'exceptional circumstances'. There is no evidence of exceptional circumstances for the proposed change, making the Plan unsound. WDC proposes that it would review its proposed policy on sub-regional employment site if the SoS rejects the Gateway application. However, if the site has been taken out of the GB meanwhile, this approach would be futile. This could be extremely damaging, leaving the area around Coventry Airport open to piecemeal development and urban sprawl.</p> <p>Aside from the land at Coventry airport, Removal of land from the Green Belt has not been shown to be justified by 'exceptional circumstances'. CPRE objects to the removal from the Green Belt of the following locations / sites shown on the proposals map and listed in Policy DS19:</p> <ul style="list-style-type: none"> <li>* Red House Farm, Leamington Spa (SE of Cubbington)</li> <li>* Castle Sixth Form, Rouncil Lane, Kenilworth</li> <li>* Thickthorn and Southcrest Farm, Kenilworth;</li> <li>* Land in the vicinity of Coventry Airport (sub-regional employment site)</li> <li>* University of Warwick; (southern part of area shown)</li> <li>* Baginton;</li> <li>* Burton Green;</li> <li>* Cubbington (H26);</li> <li>* Hampton Magna (SE of settlement);</li> <li>* Leek Wootton (whole village proposed for inseting)</li> <li>* Kingswood (Lapworth).</li> </ul> <p>CPRE also strongly submits that ribbon-development locations which are currently washed-over by Green Belt should not be removed from the Green Belt and 'inset' -Burton Green and Lapworth. Such areas grew up during the 1920s and 1930s and generally have long gardens and are a single street frontage. If removed from the Green Belt, they would be subject to applications for redevelopment at greater density and the conversion.</p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development in these locations and in each case exceptional circumstances exist to do so.</p> <p>Through the plan preparation process the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, this includes being more flexible in growth villages currently in the Green Belt by insetting them and including housing allocations. The strategy for allocating housing in growth villages has struck the balance between the provision of additional housing to support services, the provision of additional affordable and market housing to boost supply and the environmental and infrastructural capacity of each village and site suitability.</p> <p>The Council is seeking to distribute development across the District (see DS4). Exceptional circumstances for development at Growth Villages within the Green Belt in general are justified for a number of key reasons:</p> <ol style="list-style-type: none"> <li>a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development</li> <li>b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report</li> <li>c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities.</li> </ol> <p>The Council believes that the important role of Red</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>House Farm in supporting the wider regeneration of Lillington justify the exceptional circumstances to allow green belt release.</p>	
		<p>It is necessary to amend the Green Belt boundaries at Thickthorn and Castle Farm Sixth Form to accommodate housing allocations in these locations. In brief, the Council considers the exceptional circumstances for amending the Green Belt boundaries in this location to help contribute to the District's identified housing needs and halt the historic housing trends of out migration and contribute to housing affordability in the town.</p>	
		<p>At Southcrest Farm it is necessary to amend Green Belt boundary to bring forward the development of the school which requires a new site due to its two existing sites have been allocated for housing. The provision of the new school will enable the delivery of housing allocations within Kenilworth and accommodate the needs of an expanding school.</p>	
		<p>Concerning land in the vicinity of Coventry Airport, the Council considers that the site is necessary to provide for sub regional employment needs during the plan period. 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.</p>	
		<p>Given the provisions of Green Belt policy in the NPPF and the unique requirements and special position that the University of Warwick holds in the district, and neighbouring Coventry, it is considered necessary to amend the Green Belt boundaries. The Council considers that the University's built campus and that which has granted planning permission</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>through its approved masterplan, not longer adequately serves the purposes Green Belt. Furthermore it is necessary to amend the boundaries to support additional expansion of the University in accordance with policy MS1.</p> <p>It is necessary inset growth villages from the Green Belt to facilitate the proposed housing allocations and allow for other potential growth as part of the spatial strategy of the Local Plan. The Partial Green Belt Review examined the function and purposes of the Green Belt around these villages and allocations have had regard to this study. It is considered by amending the Green Belt boundary to be tightly drawn around the village will maintain the setting of growth villages in the Green Belt.</p>	
		<p><i>Omit those locations / sites listed above from the list of locations to be removed from the Green Belt.</i></p>		
65508 - Keith Wellsted [8636]	Object	<p>Whilst I support the concept of the Green Belt you have already decided to remove some land from it so this is possible. The current Green Belt envisaged Coventry growing towards Leamington and Kenilworth and sought to stop this. The area south of Leamington was seen as safe. This has led you to place to high a burden on this area in the plan.</p> <p><i>Get the status of at least part of some 650 acres of Green Belt land near King's Hill Lane - which is partly owned by Coventry council but all of which falls within the boundaries of Warwick District Council changes to allow for 5000 new homes</i></p>	<p>The Kings Hill site is within the Green Belt. Exceptional justification would be required to release Green Belt. Given that sustainable housing sites outside of the Green Belt are available, an exceptional justification is not substantiated.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66010 - University of Warwick [222]	Object	<p>Removal of what is referred to as "Central Campus West" from the Green Belt has been a longstanding objective of the University. This is in order to establish a secure long-term boundary around the edge of the campus and to allow development to be approved and to proceed without the unnecessary constraints of Green Belt policy which are no longer relevant to the University's circumstances. The University therefore supports the revised Green Belt boundary under policy DS19.</p> <p>However the University considers that Local Plan policy DS19 is not sound because it is inconsistent with para 83 of the NPPF which requires exceptional circumstances to be identified. These should be specifically included in the supporting text.</p> <p><i>The following exceptional circumstances for altering the Green Belt boundary at the University of Warwick should be referenced in the supporting text to Local Plan policy DS19:</i></p> <ul style="list-style-type: none"> <li><i>* The University was established and allowed to develop in the Green Belt at a time when HE institutions "standing in large grounds" were regarded as appropriate uses in the Green Belt.</i></li> <li><i>* The 2007 adopted Local Plan designation as a Major Developed Site was based on PPG2 Annex 2 advice which is no longer extant.</i></li> <li><i>* The NPPF emphasises either the redevelopment of brownfield sites or 'limited infilling' as being acceptable forms of inappropriate development in the Green Belt. Neither is an appropriate way of describing the University's approved 89,000 sq m of development in the Green Belt or any future variation of the masterplan.</i></li> <li><i>* Central Campus West, whilst developed to date at a lower density than Central Campus East, is still an urban development of some scale served by a loop road and infrastructure designed for a major university campus. The addition over the next 5-7 years of a further 89,000 sq m will more than double the amount of development on the University's Warwickshire land.</i></li> <li><i>* The land comprising the University's built campus no longer serves the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open (NPPF para 79). This is because allowing development on the scale permitted to date (both built and approved) has resulted in the land no longer being permanently open. Nor does it contribute to any of the five purposes of Green Belt.</i></li> </ul>	Support noted. Whilst it is possible to concur with the exceptional circumstances raised, it is not considered necessary to reference this in the explanation section of the policy.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65520 - Sharba Homes Group [12779]	Object	<p>Green Belt sites have been closed before non-greenbelt sites have been exhausted. It is clear that there is a vast disproportion of distribution throughout the District's villages. Larger, more sustainable villages, with boundaries outside of Green Belt are proposed to accommodate far less housing when compared to smaller, less sustainable villages tightly constrained by Green Belt. 64% of the total requirement is expected to be achieved from villages currently within Green Belt, despite Barford and Radford Semele being capable of accommodating far higher levels of housing than proposed. As there are additional sites within these two non Green Belt villages that can accommodate housing without the need for incursions into Green Belt the approach to is unsound and does not comply with national policy.</p> <p><i>Please see the attached representation submitted by PJ Planning on behalf of Sharba Homes Group</i></p>	<p>Through the plan preparation process the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, this includes being more flexible in growth villages currently in the Green Belt by insetting them and including housing allocations. The strategy for allocating housing in growth villages has struck the balance between the provision of additional housing to support services, the provision of additional affordable and market housing to boost supply and the environmental and infrastructural capacity of each village and site suitability.</p> <p>The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites. Further work through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village.</p>	
66196 - Mr David A Ellwood [7659]	Object	<p>The Revised Development Strategy RDS8 was clear that "A policy framework for the site will be developed which d) ensures the land is retained within the Green Belt until such time the site is fully developed". It was not proposed to change the greenbelt boundary.</p> <p><i>The removal of the "Land in the vicinity of Coventry Airport (sub-regional employment site)" from the land being removed from the Green Belt.</i></p>	<p>It is necessary to amend Green Belt boundaries to enable the development in this location and exceptional circumstances exist to do so.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65337 - Mr Carl Stevens [4873]	Object	<p>Whilst the council attach much to the removal of green belt areas from the plan. That has been indiscriminate and not applied in a fair and robust way. Basic common sense is that the number of houses proposed on green belt is low in % terms in the plan leading to questions about the soundness of the decision that circumstances are exceptional under NPPF.</p> <p><i>In the light of the Coventry Gateway proposal having been called in by government because of green belt a full analysis should also be made of the ad hoc behaviour of planners under pressure from local councillors to allow some green belt off the plan and others not when the arguments are exactly the same. Its a travesty.</i></p>	<p>The spatial strategy of the plan proposed has been made with due consideration of the sustainable effects of amending Green Belt boundaries. In each case exceptional circumstances to justify the proposed amendments can be demonstrated.</p>	
66630 - Mr Chris Walkingshaw [12824]	Object	<p>Object that the Former Honiley Airfield which has been identified as an important investment site continues to remain largely within the Green Belt. The site was not assessed within the Green Belt Review and it is considered based on our own assessment that the site as a whole together with the planning permission which will be implemented this year does not make a significant contribution to the green belt. Whilst extending the MDS would be welcomed, this would still act as a constraint on the site.</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>	
		<p><i>Remove site from the Green Belt</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>
65123 - Bubbenhall Parish Council (Mrs Jane Fleming) [4485]	Object	<p>The proposal to remove land for a sub-regional employment site in the vicinity of Coventry Airport from the Green Belt has NOT been the subject of appropriate public consultation with the local communities and other stakeholders. The Revised Development Strategy June 2013 identified the site for employment but retained it in Green Belt.</p> <p>This area of Green Belt south of the City of Coventry is crucial to the prevention of urban sprawl as identified in the NPPF. The VERY SPECIAL CIRCUMSTANCES required to remove this land from Green Belt are NOT PROVED.</p> <p><i>Delete "land in the vicinity of Coventry Airport (sub-regional employment site)" from the text supporting Policy DS19 and remove it from the Policies Map.</i></p> <p><i>We propose that the land in the vicinity of Coventry Airport be retained in the Green Belt as was anticipated in both the Preferred Options 2012 and the Revised Development Strategy 2013. This would ensure that if the application for the proposed Coventry and Warwickshire Gateway is refused by the Secretary of State, any subsequent planning applications for the site would have to be examined in full on their own merits, and the VERY SPECIAL CIRCUMSTANCES needed to justify development of Green Belt PROVED.</i></p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development and exceptional circumstances exist to do so.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66631 - Dr Diana Taulbut [12799] 66851 - Protect Lillington Green Belt [Petition] (Diana Taulbut) [12926]	Object	<p>-DS19 says that changes to Green Belt boundaries within the proposed plan are in accordance with the NPPF , in the case of H04 (Red House Farm ) this is not true.</p> <p>-H04 is contrary to NPPF para's 73 and 74 as H04 contains the riding schools grazing fields. The riding school is a valuable recreational asset that also provides employment opportunities. The plan makes no provisions for the replacement of this facility.</p> <p>- H04 is contrary to the purposes of including land in the green belt as it will not "safeguard the countryside from encroachment".</p> <p>- H04 is contrary to the NPPF (paragraph 80) as no specific consideration has been given to the use of brownfield sites elsewhere. Sites in Lillington that should be considered include the Old Round Oak school and the URC on the Cubbington Road (both of which are closer to the shops etc. than Red House Farm).</p> <p>- The Council has not demonstrated the "exceptional circumstances" and does not make a coherent or sound argument for the removal of this land from the green belt. The owners willingness to release the land is not "exceptional".</p> <p>- The intended re-location of the green belt boundary is flawed as it has no physical features to reinforce this line. Therefore it could not be considered a permanent boundary. There is no indication that if this new boundary were put in place that it would not be subject to change at the end of the next plan period.</p> <p>- The District Council has not given any consideration or weight to the fact that this proposal will damage the remaining green belt(its openness and permanence would be compromised).</p> <p>- A portion of the area include in allocation H04 was not included in the green belt study.</p>	<p>Some of the points raised here are addressed in the response to Rep ID 66625 under section H04 Red House Farm of this report.</p> <p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area in addition to the district's identified housing requirement.</p> <p>The land owner promoting the site also owns the land occupied by the riding stable and is committed to ensuring adequate provision is made to mitigate any impacts of the proposal.</p> <p>It is considered that the site can be developed and integrated in the landscape without encouraging further encroachment of the green belt. It is anticipated that there will be the opportunity to provide a softer urban edge.</p> <p>All of the allocation proposed was subject of the Joint Green Belt Review 2009, however a small portion of the site was covered by broad parcel W11 and the majority by broad parcel W10.</p>	
		<i>Remove Red House Farm from the Plan and retain the existing Green belt boundary</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65681 - Stoneleigh & Ashow Parish Council (Mrs P.A. Maddison) [1055]	Object	<p>The list of sites proposed to be removed from the Green Belt includes "land in the vicinity of Coventry Airport (sub-regional employment site)". This change was not included in previous versions of the emerging WDC plan, The RDS explicitly argued against such a course of action. There has therefore been no prior consultation on this proposed GB change. This makes the proposed policy unsound and unjustified because the consultation process has not allowed effective engagement of interested parties.</p> <p><i>Delete "land in the vicinity of Coventry Airport (sub-regional employment site)" from the text supporting Policy DS19 and remove it from the Policies Map</i></p> <p><i>Reason</i></p> <p><i>The National Planning Policy Framework also requires that Green Belt boundaries should only be altered in 'exceptional circumstances', bearing in mind their intended permanence. An earlier draft of the Plan included a statement that 'exceptional reasons do exist' but this statement was removed from the current version of the Plan. There is no evidence of exceptional circumstances for the proposed change, making the Plan unsound. WDC proposes that it would review its proposed policy on sub-regional employment site if the SoS rejects the Gateway application. The situation could arise that the Secretary of State refuses permission for the Gateway on the basis that there are no 'special circumstances' but the Plan claims 'exceptional circumstances' in order to take the Gateway area out of the Green Belt. This would be extremely damaging, leaving the area around Coventry Airport open to undefined development and urban sprawl.</i></p>	Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development and exceptional circumstances exist to do so.	
65426 - Burton Green Parish Council (Mrs Louise Baudet) [6992]	Object	<p>We accept taking the site for housing allocation out of green belt. We do not accept that the existing properties in the village need to be taken out of the green belt.</p> <p><i>Return properties in the village to the green belt, removing only the site for the new housing.</i></p>	<p>Support noted for housing allocation in Burton Green.</p> <p>Through the plan preparation process, and in accordance with para 84 of the NPPF, the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, this includes being more flexible in growth villages currently in the</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65879 - Centaur Homes [9117]	Object	<p>This policy restates national policy and does not provide any further information and as the Framework is a material consideration in the decision taking process this document should already be referred to without the need for this policy to explicitly state it. Therefore, it does not accord with paragraph 154 of the Framework.</p> <p><i>This policy in its current form is unnecessary and should be omitted or revised.</i></p>	<p>Whilst this policy may be brief it is considered necessary for a number of reasons: it references national policy without repeating it unnecessarily and it provides a reference to the Green Belt annotation on the policies map. Furthermore, it cross references to other policies in the plan where Green Belt policy has a bearing and finally it makes reference to specific development allocations that are currently in the Green Belt.</p>	
65175 - Sundial Group Ltd [12683]	Object	<p>Land at Woodside Training Centre SHLAA 14 Reference K19 remains in the draft proposals as a wedge of isolated Green Belt surrounded by built development (allocation ED2 and HO6) and the A46. With this in mind and conscious that the land already includes areas of significant built development and hardstanding, it is our view that this land fails to meet any of the five stated purposes of including land within the Green Belt.</p> <p><i>Remove land at Woodside Training Centre (K19) from the Green Belt.</i></p>	<p>The Joint Green Belt Study 2009 identified that the land in question, as part of a wider parcel met certain purposes of Green Belt to an extent. It is considered that this is still the case with the amendments proposed, which have been drawn along defensible boundaries. Exceptional circumstances do not exist to amend the Green Belt as proposed.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66768 - Burman Brothers [9138]	Object	<p>2.81 - release of green belt in Hatton is wrong and should relate to release of land at Hatton Park</p> <p>It has been necessary for Warwick to consider amendment of Green Belt boundary. Hatton Park is acknowledged sustainable settlement and 'growth village'. Boundary drawn however does not conform to NPPF and guidance and is therefore unacceptable, unsound and irrational. A proper Green Belt boundary runs along a treed and hedged boundary running along length of Clients ownership a short distance from allocation. This is proper GB boundary that exists and should be used and the allocation properly adjusted to take new boundary into account even if it means fewer dwellings.</p> <p><i>Policy needs new heading and suggest adding the word 'release' to the end of it. Content mirrors NPPF and is not required but some of the text below the policy should be taken in as part of new policy explaining that this policy relates to consequential amendment of Green Belt boundaries through exceptional circumstances and through the requirement for additional new housing sites/allocations and possibly employment.</i></p> <p><i>Policy as re-written must be permanent and enduring and not lead to early revisions</i></p>	<p>The Landscape Sensitivity and Ecological &amp; Geological Study identified assets of landscape and ecological importance to the north and east of the site that require strong buffering in order to protect their setting. Therefore the Green Belt boundary has been amended sufficient to accommodate the allocation and minimise impact on these sensitive areas. Quotes taken from this study are as follows:</p> <p>"Requires substantial buffering from ancient woodland and sufficient attention to habitat replacement, as well as strong eastern boundary.</p> <p>A buffer of public open space should be retained between this avenue and any new development. It is also imperative that a landscape buffer of native trees, preferably the extent of one field, should be created to maintain a visual link and wildlife corridor between Smith's Covert and the wider countryside to the east. The strong vegetation along the Birmingham Road should also be retained."</p> <p>Reference to para. 2.81 being incorrect is noted and will be replaced by Hatton Park.</p> <p>It is not considered necessary to revise the policy as suggested.</p>	<p>At Para 2.81 replace the following bullet point:</p> <p>Hatton</p> <p>with:</p> <p>Hatton Park</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66052 - Lenco Investments [1165] Object		<p>The Council has failed to give the Green Belt a degree of permanence as required by the NPPF in that it cannot endure within the current plan period, yet alone beyond it. The Plan is unjustified and thus unsound.</p> <p>The level to which the Green Belt has been amended is therefore insufficient to meet the needs of the District and Sub-Region. There is also clear evidence that Warwick District is severely under providing for housing need, land within the Green Belt offers sustainable options for addressing this.</p> <p>RPS objects to the methodology applied to the land parcel C11a at Baginton, on the basis that the fourth criterion has been misapplied. PPG2 set out very clearly that this purpose was 'to preserve the setting and special character of historic towns'. The assessment applied this purpose to Baginton Village which while it is acknowledged has a conservation area, it is not a town of special character, nor is it of special historic context. Against this misapplication of the Green Belt policy the parcel was discounted.</p> <p>In conclusion the Council's own evidence therefore indicates that the authority was incorrect in its assessment of Green Belt Parcel C11a, as has been clarified by its more recent evidence that would have necessitated the further consideration of the site in the appraisal process. Taken on the whole, it is clear that the Green Belt Parcel C11 should have been appraised more appropriately and the Council must have due regard to significant changing circumstances in reaching its conclusions now.</p> <p><i>The existing Green Belt review already provides sufficient evidence (albeit in need of correction) to identify a sustainable urban extension on the edge of Coventry and the Gateway Site. Notwithstanding RPS's fundamental objection to the lawfulness of the Plan, a review of the strategy and the approach should identify further Green Belt releases on the edge of Coventry adjacent the Gateway Site at Baginton.</i></p>	<p>The Council considers that the Plan does meet Objectively Assessed Need and makes an allowance for some redistribution of need from Coventry.</p> <p>Policy DS20 supports this approach by committing the Council to an early review should current uncertainties crystalize in such a way as to mean the District is required to take more housing. At the time of writing a new Joint Green Belt Review is being undertaken to inform this process.</p> <p>The Joint Green Belt Study (2009) was consistent in its approach to the fourth purpose of Green Belt insofar as it treated all historic villages/settlements as towns. Notwithstanding this it is not considered that Baginton is as suitable a location for an urban extension as those proposed elsewhere in the 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>
65119 - Nurton Developments & the Forrester Family [12680] 65424 - Nurton Developments [12697]	Object	<p>In view of our other representations in respect of Policies DS6, DS7 and DS20, it is considered that the Local Plan needs to make provision for more housing and further land will need to be removed from the Green Belt.</p> <p>Policy DS19 should therefore make provision for further land to be released from the Green Belt and for the Green Belt to be reviewed through the review of the Local Plan.</p> <p><i>The policy should be amended to make provision for removal of land from the Green Belt and for the Green Belt to be reviewed through the review of the Local Plan.</i></p>	<p>It is considered that appropriate amendments to Green Belt boundaries have been proposed to meet the development needs of the plan as proposed. Refer to other policy responses in relation to housing need specifically.</p>	
66364 - Mr Dean Epton [8244] 66693 - Old Milverton & Blackdown JPC (Mr Graham Cooper) [1060]	Object	<p>The Council is pleased that the value of the Green Belt to the North of Leamington has been recognised in the Publication Draft. This narrow area of Green Belt is a vital buffer to prevent Leamington, Kenilworth and Warwick coalescing. It preserves the historic setting of Leamington and Warwick, and has immense recreational value for residents of the nearby towns, who enjoy walking, horse riding, cycle riding, running etc. in the area. The North Leamington Green Belt is under constant attack and there is a real danger that over time it will be eroded by continual creeping development.</p> <p>The planned development of further sports facilities in the area and the possible development of a "park and ride" scheme will result in the increasing urbanisation of the area. In addition construction of HS2 and, if permitted, the Gateway Development at Baginton, will swallow up large tracts of the North Leamington Green Belt.</p>	<p>The NPPF dictates that two of the exceptions to general Green Belt policy, which restricts development, are appropriate facilities for outdoor sport and local transport infrastructure (such as park and ride facilities) which can demonstrate a need for a green belt location, provided that openness is preserved and does not conflict with the purposes of Green Belt.</p> <p>The majority of the district is covered by the Warwickshire Green Belt and this will continue to remain the case following the alterations proposed by the plan.</p>	
65384 - Mr Richard Taulbut [12734]	Object	<p>DS19 proposes release of Green Belt land at Red House Farm. Release of such land is only justified in exceptional circumstances. No such circumstances have been given. At DS11 and DS18 it is stated that this land will be used for 250 houses in support of the regeneration of Lillington. However, the same proportion of affordable houses (40%) is proposed as in every other part of the district. Therefore the need cannot be seen as exceptional. Repair and renewal of social housing is the every-day business of local authorities. It is not exceptional and cannot justify release of Greenbelt.</p> <p><i>Delete land at Red House Farm, Leamington Spa from DS19.</i></p>	<p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area in addition to the district's identified housing requirement.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65989 - Barwood Development Securities Ltd [12821] 66702 - Barwood Strategic Land II Limited [9441]	Object	<p>Local Planning Authorities with Green Belts in their area should only alter the Green Belt boundary in exceptional circumstances, through the preparation or review of the Local Plan. Green Belt boundaries should have permanence in the long term and be capable of enduring beyond the Plan period. The Council has not undertaken a strategic review of the Green Belt and therefore does not have the evidence base to selectively remove sites, such as Red House Farm, from the Green Belt.</p> <p>The Council has identified that it is their intention to undertake a revised evidence base for the wider Housing Market Area which, importantly, includes a review of the Green Belt. This evidence base must inform this Local Plan as changes to Warwick's Green Belt cannot be implemented through a partial review.</p>	<p>The Joint Green Belt Study (2009) along with the Green Belt and Green Field Review (2013) is considered to be sufficiently robust as to be relied upon in considering the most appropriate locations for green belt releases for both strategic and village allocations.</p> <p>Through the plan preparation process the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, and this includes allocating some development, in exceptional circumstances, in existing Green Belt locations to meet housing needs.</p> <p>The Council considers that the Plan does meet Objectively Assessed Need and makes an allowance for some redistribution of need from Coventry.</p> <p>Policy DS20 supports this approach by committing the Council to an early review should current uncertainties crystalize in such as way as to mean the District is required to take more housing. At the time of writing a new Joint Green Belt Review is being undertaken to inform this process.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66240 - Crest Strategic Projects [9115]	Object	<p>We object to this policy which does not remove land at Lodge Farm, Westward Heath Road from the green belt and allocate, the site for a housing led development in accordance with the Garden Towns principles.</p> <p>These objections should be read in conjunction with those made in respect of Policy DS6 Level of Housing Growth and DS7 Meeting the Housing Requirement. As part of the preparation of the Local Plan, the Planning Authority has undertaken a green belt review. The details of this are set out in the Coventry Joint Green belt Review (January 2009). The land in question was identified as site C14C (see attached). It was reviewed in relation to the 5 green belt functions identified in PPG2 'Green Belts' (now paragraph 80 of the NPPF). This assessment concluded that the land is one of the least constrained parcels south of Coventry and potentially suitable to be released from the green belt.</p> <p>Our representations in respect of the Policies identified above have concluded that the housing provision for the district needs to be substantially increased. The Local Plan accepts in Policy DS 19 that land currently located within the green belt needs to be released to assist in meeting the housing requirement. Furthermore, this does not take into account land which needs to be released to meet the housing needs from adjoining Districts e.g. Coventry. We are firmly of the view that as the housing provision needs to be substantially increased and accordingly land within the green belt needs to be released as it is accepted within the Local Plan that there are insufficient brownfield sites or unconstrained green belt sites to meet the housing requirement. Accordingly, this site is ideally placed to be released for green belt. In accordance with our objections to Policy DS 11 that the site is available, suitable and deliverable in line with the SHLAA.</p> <p><i>Release land at Lodge Farm, Westward Heath Road from the green belt and include within Policies DS 10 and DS 11 to include reference to the site and its identification for housing.</i></p>	<p>National Policy (para 83 of the NPPF) requires that Green Belt boundaries should only be amended in exceptional circumstances. The location of growth proposed by WDC is consistent with this. Further green belt allocations will only be considered if, in the future, it is demonstrated that further housing provision is needed in Warwick District and exceptional circumstances exist to provide some or all of this within the green belt. The site is within the Green Belt and there are no exceptional circumstances at present to support its allocation. Further, the site is an area of high landscape value.</p> <p>See also responses to other policies in relation to this site regarding housing need and meeting requirements from outside WDC.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66171 - Mrs Eleanor Hucklesby [12524]	Object	<p>I object to this part of the plan. For an area which will suffer knock on effects of HS2, use of more greenbelt for development seems unwarranted.</p> <p>I would like to know how WDC has proven that there are exceptional circumstances to justify re defining Greenbelt in this area.</p>	<p>It is intended that the Red House Farm site will be brought forward to assist in delivering a wider regeneration scheme for Lillington. A scheme is currently being worked on, the details of which will be published and consulted on in spring 2015. This study will be considering a range of opportunities including the mix and quality of housing, the provision of open space in this area of Lillington and the potential to improve the range of services. It is considered that the greenfield allocation is a key element of this and therefore this justifies the exceptional circumstances for removal of the green belt in this area.</p>	
65363 - John Bausor [981]	Object	<p>The Plan is not justified in that the inclusion of these sites at Crew Lane for housing and their exclusion from the Green Belt is, in part, a reasonable alternative to the provision of housing in Kenilworth on a very limited number of large sites.</p> <p><i>Adjustment to the Green Belt boundary in the area north of Crew Lane and east of Glasshouse lane to bring two smaller parcels of land into the equation. It is considered that these are well related to the schools and Leyes Lane shops (Local centre) and should be brought into consideration as they can be delivered relatively quickly/ easily.</i></p>	<p>This site has been assessed (see sustainability appraisal and site selection methodology) and is not supported in preference to Thickthorn for a variety of reason (green belt, employment options, access to transport network etc). For this reason, exceptional circumstances to justify its release do not exist.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64517 - Mr Daniel Badcock [5752] 65399 - Mr. Robert Taylor [3607]	Object	<p>Baginton and Leek Wootton derive much of their character from being within the setting of green belt land. These settlements are substantially different from others on the list and should retain green belt status.</p> <p>Development around Coventry airport may harm PRoW and the amenity value of surrounding green belt land. Development would be acceptable if balanced with benefits.</p> <p><i>Remove Baginton and Leek Wootton from the list.</i></p> <p><i>Ensure development around Coventry airport must include planning conditions to add new walking / cycling / outdoor recreation amenities and improve existing public rights of way.</i></p>	<p>Baginton and Leek Wootton have been identified as growth villages in the Local Plan. Therefore it is necessary inset these villages from the Green Belt to facilitate the proposed housing allocations and allow for other potential growth as part of the spatial strategy of the Local Plan. The Partial Green Belt Review examined the function and purposes of the Green Belt around these villages and allocations have had regard to this study. It is considered by amending the Green Belt boundary to be tightly drawn around the village will maintain the setting of growth villages in the Green Belt.</p> <p>The Local Planning Authority has granted permission for a scheme around Coventry airport, subject to a final decision by the Secretary of State, that includes enhancing existing outdoor amenities.</p>	
65076 - The Community Group (David G Wintle) [9097]	Object	<p>Policy DS16 Sub-Regional Employment Site is unsound, it contravenes the NPPF (National Planning Policy Framework); there has been no consultation with the local community and other stakeholders concerning the removal of this land from Green Belt; the Sub-Regional Employment Site is NOT the most appropriate strategy when considered against reasonable alternatives. There are no 'exceptional circumstances' that would justify the revision of the Green Belt in this location. The identified site should be removed from the proposals map and the area around Coventry airport retained in Green Belt.</p> <p><i>In so far as Policy DS16 affects Policy DS19 and the proposals map. The identified site should be removed from the proposals map and the area around Coventry Airport retained in Green Belt.</i></p> <p><i>Reason</i> <i>The site was identified in the Revised Development Strategy as being retained in the Green Belt to ensure that any subsequent applications, if different from the Gateway application, would still need to demonstrate 'very special circumstances'. Removal of the site from the Green Belt would remove such a safeguard. There has been no consultation with the local community and other stakeholders concerning the removal of this land from Green Belt.</i></p>	<p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development and exceptional circumstances exist to do so. See response to DS16 for further detail on justification for allocation.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65411 - Cllr George Illingworth [1083]	Object	<p>In paragraph 2.81 it is proposed to include "Land in the vicinity of Coventry Airport (sub-regional employment site)" amongst areas to be removed from the Green Belt. It is national planning policy that changes to the Green Belt can only be made in exceptional circumstances through the Local Plan process involving public consultation and robust examination. On this particular change there has not only been no public consultation, but a complete reversal of the previously consulted policy.</p> <p><i>In paragraph 2.81 delete the bullet point "Land in the vicinity of Coventry Airport (sub-regional employment site)" and remove the areas from the relevant Policies Maps 1 and 8 reverting them to the established Green Belt.</i></p>	The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development and exceptional circumstances exist to do so.	
66216 - NFU (Sarah Faulkner) [1119]	Object	<p>Does not refer to agricultural and rural businesses located in the Green Belt. Green Belt policy should be more flexible to allow rural businesses to develop and evolve, which will help safeguard their long term viability.</p> <p>Agricultural business located within greenbelt have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those businesses located in other areas of the county.</p> <p>It should also recognise that farming businesses have an essential role in maintain the local landscape.</p> <p><i>Policy should make a more specific reference to the need for agricultural businesses to develop that are located in Green Belt areas such as new small-scale economic development in the rural economy and farm diversification schemes.</i></p>	<p>Local Plan policy on Green Belt is consistent with national policy, which in general supports agricultural uses subject to the conditions set out in the NPPF.</p> <p>See proposed change to NE1 in relation to agriculture and management of the natural environment (REP ID 66223).</p>	
64921 - Barford, Sherbourne and Wasperton Joint Parish Council (Mr John MURPHY) [566]	Object	<p>The JPC is disappointed that WDC have not seized the opportunity to re-evaluate the Greenbelt within its area in a realistic and imaginative manner.</p> <p>An aggressive "growth agenda" in a district of c.80% Greenbelt, with a near sacrosanct approach to Greenbelt puts unrealistic and unsustainable pressure on the remaining non-Greenbelt area, south of Warwick and Leamington, and renders this Draft Local Plan UNSOUND.</p> <p><i>Imaginative use of pockets of relaxation immediately adjacent to other settlements could dramatically improve capacity and relieve some of the pressure currently focussed on the area south of Warwick and Leamington.</i></p>	Through the plan preparation process the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, this includes being more flexible in growth villages currently in the Green Belt by insetting them. The availability of land in sustainable locations outside of the Green Belt means that it would be difficult to justify exceptional circumstances for the further changes suggested.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67139 - Mr Ray Steele [5886]	Object	<p>Also applies to greenfield sites:</p> <ul style="list-style-type: none"> <li>- to check unrestricted sprawl</li> <li>- to prevent neighbouring towns merging into one another</li> <li>- to assist in safeguarding the countryside from encroachment</li> <li>- to preserve the setting and special character of historic towns; and</li> <li>- to assist in urban regeneration by encouraging the recycling of derelict and other urban land</li> </ul> <p>WDC comprises 82% of Green Belt and 18% of green field. This cries out for a relaxation of Green Belt as a special case. Use of any of the Green Field space will have adverse effects on its near residents</p>	<p>The Local Plan strategy recognises the importance of maintaining the separation of different settlements and avoiding coalescence. Whilst green fields that are not designated as Green Belt may meet certain purposes to an extent, national policy only applies to land designated as such.</p> <p>The adverse affects of allocating green fields, whether designated as green belt or not, is recognised and its weighed against the requirement to meet objectively assessed needs over the plan period, along with positive economic, social environmental benefits it can bring.</p> <p>Through the plan preparation process the Council considered the sustainable effects of different spatial options. It is considered that the plan put forward strikes the right balance between the distribution of growth to meet housing needs and recognising the importance of protecting the function and purposes of the Green Belt, and this includes allocating some development, in exceptional circumstances, in existing Green Belt locations to meet housing needs.</p>	
65482 - The National Trust (Mr Chris Lambart) [591]	Object	<p>Policy DS19 'Green Belt' which is limited to a single page in the document, does not make clear the full extent of development being proposed in the Green Belt and would benefit from much better cross-referencing with other policies and proposals in the plan (e.g. DS10, DS11, DS16, MS1, MS2, H1, H11, HE4, CT2, CT4, NE6), together with the specific references defined on the Proposals/Policy Maps. It should not really be necessary to have to read the whole document in order to try and understand all the Green Belt implications of the Plan. For example, Policy MS2 'Major Sites in the Green Belt' does not make any reference to the 'Coventry and Warwickshire Gateway' proposal, which may have significant Green Belt implications and is discussed in Policy DS16, but not cross-referenced in Policy DS19. The potential 'cumulative impact' on the Green Belt from possible major development and associated transport infrastructure is also not mentioned, e.g. Coventry &amp; Warwickshire Gateway; HS2; coal gasification; and housing development.</p> <p><i>Make clear the full extent of development being proposed in the Green Belt and provide much better cross-referencing with other policies and proposals in the plan.</i></p>	<p>Currently paragraph 2.79 makes reference to other policies in the plan where Green Belt has a bearing.</p> <p>However, it is not considered necessary or appropriate to cross reference to specific development allocations that are currently in the Green Belt any more than is cited at paragraph 2.81.</p> <p>It is considered that despite the changes proposed to the Green Belt, the overall function of green belt and the purposes of retaining land within it is maintained. Furthermore it should be noted that HS2 and any coal gasification proposals are primarily outside the control of the Local Planning Authority.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65347 - Mrs Laura Teodorczyk [5011] 65352 - Martin Teodorczyk [5004]	Object	<p>The NPPF generally protects Green Belts from development. It does encourage some specific growth, but this should be concentrated on previously-developed land or within towns/villages, NOT to the edge of villages.</p> <p>WDC has not published its discussions with neighbouring authorities, so working to an assessment based on the maximum 12,900 across the district is premature.</p> <p>WDC has not clearly adopted a sequential test to prioritise development in brownfield locations, and is not doing enough to deliver homes on current development sites and other derelict urban sites (eg along the canal).</p> <p><i>Not rely upon the 12,900 growth target as a basis for current or future planning policy (i.e. any applications prior to the Local Plan adoption to be resisted, and specifics of the Local Plan to be determined on a more robust number).</i></p> <p><i>Adopt Planning Briefs for major previously-developed sites to provide clear policy support for principle of residential development in key future sites (e.g. land SE of Leamington station to avoid the recent travesty of a low-rise supermarket - Morrisons - on a large urban land area). To also look at existing derelict sites, particularly along the canals, within and around Leamington Spa. WDC should be ensuring these prime sites are utilised before ever considering Green Belt sites.</i></p>	<p>The NPPF provides for the alteration of Green Belt boundaries where exceptional circumstances exist. It does not prevent such amendments being made adjacent to the edge of villages.</p> <p>In preparing the Local Plan the Council has engaged with its neighbouring authorities on an active and ongoing basis on cross border matters such as housing needs. This will be explained in detail in the Duty to Co-operate paper submitted to government alongside the plan. The housing requirement is considered an appropriate figure on which to plan for and there is provision through policy DS20 for an early review of the Plan if required in light of neighbouring housing needs.</p> <p>The Local Plan sets out a strategy for the development on vacant and underused brownfield sites and canalside regeneration and this is a key part of the housing supply. However the availability of brownfield land is insufficient to meet the housing requirement within the plan period.</p>	

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66722 - Baginton Parish Council (Mr Steve Williams) [726]	Object	<p>A. Insufficient consideration of alternatives and no consultation of latest proposals. Policies DS 8 Employment land &amp; DS16 Sub-Regional Employment Site are unsound as there has been insufficient sub regional consultation. There is reference within the Local Plan to a Joint Employment Land Review. However, it is understood that this has not been published and that it does not adequately consider alternative proposals. BPC believes that exceptional reasons do not exist for proposing that the land shown on the policy Map 8 is removed from the Green Belt. As such BPC believes that the lack of adequate consideration of the proposals renders the Local Plan unsound. Furthermore, the Local Plan is unsound as the Sub-Regional Employment Site is not the most appropriate strategy when considered against reasonable alternatives, which have not been given adequate consideration. Some alternatives have been proposed in previous BPC correspondence opposing the Gateway. Furthermore BPC and others have no visibility of the review and have not been consulted on its proposals. BPC believes this lack of transparency, consultation and lack of alternatives renders the Local Plan unsound.</p> <p>B. No account of desires of local communities. In previous draft report section 5.5.5 it states:- "In the 2012 Preferred Options the Council committed to exploring the case for land at the Coventry and Warwickshire Gateway to be identified to provide a major employment site that could meet these needs. Since then, a planning application has been submitted. Although this application has yet to be formally determined by the Council, the evidence would support the identification of land in this area for a major employment use of sub-regional significance." You have our letter L090 response to that consultation dated 18.7.12. Many of the points made in that letter remain applicable. Your policy DS16 Sub Regional Employment Site ignores our previous requests therefore is unsound.</p> <p>C. No consultation with local communities on removal of Green Belt. The previous Revised Development Strategy specifically maintained the Gateway development area in the Green Belt. BPC have received previous assurance that this remained the intention of WDC. However, there has been a volte-face with the Local Plan as now presented, with the area suddenly removed from the Green Belt. Post public consultation. Yet there has been no consultation with our and other Parish Councils, our and other local communities and other stakeholders concerning the removal of this land from</p>	<p>The Focused Changes consultation undertaken in November &amp; December 2014 consulted upon the evidence in relation to the sub regional employment site. See responses to DS8 and DS16 and response to the Focused Changes in relation to this matter.</p> <p>The Council considers that consultation on the Publication Draft is an appropriate period in which to consult on such proposals. It is necessary to amend Green Belt boundaries to enable the development and exceptional circumstances exist to do so.</p> <p>See responses to DS6 in relation to ONS projections and OAN.</p>	

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	<p>Green Belt.</p> <p>We believe that it is unsound, unreasonable and possibly illegal for WDC to change their mind on such a fundamental issue without adequately consulting the local community. The Local Plan policies DS8, DS16 and DS19 are therefore unsound.</p> <p>D. Contrary to the NPPF.</p> <p>BPC remain wholly opposed to the Sub-Regional Employment Site (Gateway Development) for all the legitimate planning reasons given in our extensive correspondence objecting to the development and lodged on the WDC website along with over 800 other objectors against planning application W12/1143.</p> <p>In summary, the Sub-Regional Employment Site Gateway is unsustainable and inappropriate development of the Green Belt with no very special circumstances and is ruinous to the openness and rural character of our Parish. The open fields also act as a vital barrier against urban sprawl. The proposal will not support regeneration within the Coventry &amp; Nuneaton Regeneration Zone, as it would directly compete with established underutilized sites with extant planning permission such as that at Ansty. There are many suitable alternative sites outside the Green Belt and no preferential sites within the Green Belt. Development can and should be carried out on existing sites with hundreds of acres of already available land. The Gateway application has been subject to a Public Inquiry, which has just closed. The PI has written to us advising that the SoS is due to make a decision on or before 5th December 2014.</p> <p>BPC and Parishioners continue to vociferously object to any mention of the Sub-Regional Employment Site Gateway in the Local Plan. BPC requests that the Local Plan be withdrawn and amended to remove all references to the Gateway, with all its projections amended accordingly.</p> <p>BPC is of the view that policy DS16 is fundamentally flawed as it is contrary to the NPPF for all the reasons given in previous representations; hence the Local Plan is unsound.</p> <p>Furthermore the Local Plan must not be concluded until the SoS has completed his deliberations following the recently completed Public Inquiry. As such the Local Plan as written can be seen to be prejudging the outcome of this inquiry and is unsound.</p> <p>E. Based on out of date excessive growth projections.</p> <p>As such we believe that the Local Plan is fundamentally flawed as it is based on out of date information. Had it been based on the latest predictions there would be further demonstration that there is no need for the Gateway (or for the proposed level of increase in housing across the District). As the Local Plan is based on very significantly higher population growth this is unsound.</p> <p>On 29.5.2014 the ONS published the mid-2012 based population projections for all local authorities in England &amp; Wales. This shows</p>		

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	<p>that in Warwick District, the population growth by 2029 will be about 29% less than anticipated by the Joint SHMA which was predicated on the mid-2011 ONS projections.</p> <p>At the Council meeting on the 23rd April, when it was decided that the publication draft should proceed to a public consultation on its soundness, the Chief Executive, in answering a question from a Councillor said, that if these anticipated projections demonstrated a significant change to the provision in that plan, then the situation would need to be reviewed.</p> <p><i>Please amend your proposals by withdrawing the Local Plan as it stands, omitting the Sub-Regional Employment Site (Gateway development) and retaining the Green Belt throughout this Baginton Parish.</i></p> <p><i>Should you continue to ignore our reasonable requests and maintain the Local Plan in its current form we understand that the PI will be Examining the Local Plan before adoption. It is our intention to make representations at a hearing during the Examination to demonstrate that the Local Plan is all of the below:-</i></p> <p><i>A. Unsound.</i></p> <p><i>B. Unjustified.</i></p> <p><i>C. Not based on robust and credible evidence.</i></p> <p><i>D. Not in accordance with the NPPF hence contrary to national policy.</i></p> <p><i>E. Resulting from a consultation process that has not allowed for effective engagement of all interested parties to the proposals as they stand.</i></p> <p><i>F. Resulting from a lack of WDC's duty to cooperate.</i></p> <p><i>G. Not legally compliant</i></p> <p><i>H. Supported by assumptions made in the preparation of the Local Plan which are not reasonable and justified.</i></p> <p><i>I. Devoid of reasonable alternatives that have been adequately considered and with no clear audit trail showing how and why these decisions have been made.</i></p> <p><i>J. Is not the most appropriate strategy when considered against all the alternatives, all as previously presented?</i></p> <p><i>K. Resulting from a flawed consultation process with last minute fundamental changes of policy not previously consulted upon</i></p> <p><i>L. The result of last minute changes made due to the proceedings of the Gateway Public Inquiry, which was ongoing at the time, the outcome of which remains unknown.</i></p> <p><i>M. Fails to bring together and integrate policies for the development of other land in the sub-region.</i></p> <p><i>N. Has failed to protect valued rural landscapes</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>
65828 - Mrs E Brown [5142] 66039 - A C Lloyd Homes Ltd [5958] 66730 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Support	The Council has recognised the need to allocate existing Green Belt land for residential development. This has been fully justified. It is therefore essential that the Green Belt boundaries be amended to allow the development to proceed, as set out in DS19 and paragraph 2.80.	Noted	
65355 - Martin Teodorczyk [5004]	Support	<p>This should not detract from my other representations made, specifically about how the Green Belt is not suitable for development as exceptional circumstances do not exist.</p> <p>However I support the principle that where a site is to be taken out of the Green Belt to facilitate development, settlement boundaries are drawn tightly and decisively to provide a clear distinction between the settlement envelope and the Green Belt.</p> <p>This will protect the remaining Green Belt more strongly and eliminate ambiguity where Green Belt 'washes over' settlements</p>	Support to approach to Green belt Boundaries noted. See separate response in relation to objection.	
66089 - Gleeson Developments [5117]	Support	Inline with Policy DS19, the Council has identified that Southcrest Farm will be removed from the Green Belt in accordance with the exceptional circumstances set out in the NPPF. This is entirely in accordance with NPPF policy. However, should the land swap between Southcrest Farm and the two Kenilworth school sites not take place, the land at Southcrest Farm should be "safeguarded" in accordance with paragraph 85 of the NPPF to meet longer term development needs both within the current plan period and beyond in accordance with the NPPF. This would either be to meet unmet needs for housing and/or educational uses arising out of the failure to deliver the proposed level of housing at Thickthorn and the two existing school sites.	Support noted. However, the Council does not consider that Southcrest Farm should be safeguarded, as it is necessary to allocate the land now as part of the proper planning of the local area; in order to enable the development housing allocations elsewhere and Kenilworth and meet its educational and community needs.	
65340 - Mr Peter Barclay [12714]	Support	I support the plan as drafted, as it allows for the controlled incursion into current greenbelt land that is deemed necessary for a controlled expansion of housing to extend existing communities. However I am concerned that the recent news in the press regarding Kings Hill may be re-considered as a possible development site for 5,000 homes within the new local plan. This type of development would destroy ay kind of boundary between Coventry and Kenilworth, creating an urban sprawl that would be unsupportable by the current road infrastructure.	Support noted.	There are no current plans to develop in the Kings Hill area. Should Coventry City Council or another authority in the local area require Warwick District to assist in meeting their housing need however, additional sites may be required. This will however trigger an early review of the Local Plan together with consultation on any new sites brought forward through that process.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66289 - Mr H E Johnson [12846]	Support	We support the confirmation that Green Belt policy will follow that set out in national policy. On that basis, the Green Belt boundary should be long term and defensible, and safeguarded land should be identified in this Local Plan in accordance with NPPF paragraph 85.	Noted.	
65475 - King Henry VIII Endowed Trust (Warwick) [6195]	Support	The District Council's decision to review Green Belt boundaries is consistent with national planning policy guidance. The lack of suitable and available sites to meet objectively assessed housing needs provides the exceptional circumstances for a review of Green Belt boundaries. However before land can be released from the Green Belt for development it has to be shown that doing so would not be in conflict with the fundamental aim of Green Belt policy nor the stated five purposes it serves (refer NPPF paragraphs 79 - 80). This has been achieved via the Warwick District Council's own review of village green belt boundaries undertaken in 2013 to inform the Village Housing Options and Settlement Boundary Consultation (November 2013). We consider the approach adopted in the District Council's Green Belt study to be sound and the key findings robust.	Support of allocations, evidence and approach to Green Belt noted.	
66006 - NHS Property Services [9112]	Support	NHS Property Services has interests in land at Beausale Lane/Birmingham Road, Hatton. It therefore supports the Council's decision to exclude Hatton Park from the Green Belt and further supports the boundary as proposed and shown on Local Plan Policies Map 21. Consequential support is therefore given to Policy DS19 and paragraphs 2.79-2.81 as they relate to Hatton.	Support noted.	
65450 - Sworders (Miss Rachel Padfield) [11530]	Support	We support this policy as it is entirely in accordance with national policy and consequently sound. Our support is, however, on the basis that the Green Belt boundary as per the policies map includes the Green belt releases necessary to deliver the District's housing needs. Without the Green Belt Review the Green belt boundary would not endure beyond the plan period and consequently fall foul of paragraph 83 of the NPPF and be unsound.	Support noted. The policies map as proposed includes amended Green Belt boundaries to accommodate growth.	
66215 - Savills (Mr Richard Shaw) [11305]	Support	We support the Council's commitment to releasing Green Belt land for development where required and in appropriately sustainable locations in order to deliver the strategy.	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>DS20 Accommodating Housing Need Arising from Outside the District</i>				
66290 - Mr H E Johnson [12846]	Object	It appears from the joint SHMA that there is a reasonable likelihood that additional housing will be required in Warwick District as a result of needs arising outside the District requiring to be met within the District. Whilst the approach set out in Policy DS20 is in many ways sensible, it is not sound as it is not positively prepared. This additional need can be reasonably foreseen and allowance should be made for it by way of additional site allocations. At the very least, additional land should be safeguarded for this purpose to provide some certainty, in accordance with NPPF paragraph 85.	Any review of the Local Plan will need to be done as part of a coordinated process and agreement with the other Councils in the HMA to ensure the HMA's housing requirement is being met in full. DS20 provide a pragmatic way of addressing this and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020. There are also provisions for an earlier review if required.	
66115 - Mr and Mrs Martin [12851]	Object	<p>Although Policy DS20 builds in a degree of review to the Plan, the policy only aims to accommodate the housing need that arises from neighbouring authorities and does not allow for a review should the market and affordable housing needs of Warwick District increase and housing land supply becomes inadequate.</p> <p>The impact of Warwick District Council's neighbours needs will be significant, the Duty to Cooperate is ever more important, if the Council do not adequately discharge this duty, their Plan will be found unsound.</p> <p>Further evidence is required in order to demonstrate that the Council has satisfactorily discharged its Duty to Cooperate.</p> <p><i>The policy should be redrafted accordingly.</i></p>	Policy DS20 seeks to address a specific situation and builds on sub-regional agreements. Other circumstances such as those mentioned in this representation are covered by the Delivery and Monitoring Activities table in Chapter 6 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>
66468 - Gladman Developments (Peter Dutton) [9149]	Object	<p>Outlines that unmet needs outside of district will not render Plan out of date, but that the Plan will be reviewed if evidence demonstrates that significant housing needs arising outside the district should be met within the district and cannot be adequately addressed without a review. To establish this, it sets out that Council will work with other local authorities in the Coventry and Warwickshire HMA to prepare joint evidence base on housing need, agree a strategic approach to address any shortfall in land availability to deliver the full objectively assessed need, and where evidence and the Duty to Cooperate clearly indicates unmet needs would be most appropriately met in the district, seek to meet these needs and review the Local Plan.</p> <p>Policy Analysis</p> <p>Whilst welcoming the sentiment of Policy DS20 we submit that its provisions are not sufficient to address the unmet housing needs that are already acknowledged to exist outside of the district. There is a clear need for action to be taken to address these needs now, rather than deferring them to future joint working or a review of the Local Plan. We further query the statement in Policy DS20 that unmet needs will not render the Local Plan out-of-date. Once the Local Plan comes into effect the Council is still obliged to work with its neighbouring authorities on an ongoing basis to address unmet housing needs.</p> <p>Conclusions on Soundness</p> <p>Whilst welcoming the provisions of Policy DS20, submit that measures it proposes are insufficient to address unmet housing needs that are already acknowledged to exist outside the district. If the Council does not make adequate provision to assess and address these needs now we submit that Policy DS20 and the Local Plan cannot be considered positively prepared or effective.</p>	<p>The unmet housing need arising outside the District is still being crystallized. The Council will continue to work with other Councils to ensure that all the HMA's needs, plus any need arising from outside the HMA that needs to be met within the HMA is met in full. However, at present, it is not clear what the scale of this unmet need is (e.g two Councils within the HMA are still working on their SHLAAs), nor is it clear what the most appropriate strategy for addressing this would be.</p> <p>Any review of the Local Plan will need to be done as part of a coordinated process and agreement with the other Councils in the HMA to ensure the HMA's housing requirement is being met in full.</p> <p>DS20 provide a pragmatic way of addressing this and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020. There are also provisions for an earlier review if required.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66701 - Barwood Strategic Land II Limited [9441]	Object	<p>National guidance sets out a prescriptive set of requirements in relation to the Duty to Cooperate and it is confirmed that robust evidence is required to demonstrate how this has been complied with.</p> <p>The Sub-Regional Approach to Delivering the Housing Requirement report identifies that further work is required to ensure the HMA has a robust subregional evidence base to support collaborative work on a sub-regional spatial strategy.</p> <p>The Council's approach to the Local Plan's housing spatial strategy is premature given the significant uncertainties which the joint HMA evidence base could deliver.</p> <p>This approach lacks certainty and is dependent on a number of significant pieces of technical evidence that are not yet complete. There can be no assurance that the Council's assumptions will translate to the HMA's unmet housing requirements being provided for.</p> <p>Barwood conclude that the legal compliance of the Plan has not been satisfied on the basis that the Duty to Cooperate is not a matter which can be rectified at the Examination stage.</p>	DS20 provide a pragmatic way of addressing the issues raised here and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020. There are also provisions for an earlier review if required.	
66614 - Mr's & Mrs S & D & G Harrison & Rowe [12860]	Object	<p>It is noted that the Council recognises that there is likely to be significant need to provide for housing need arising outside the district. However the Council has focused on Coventry and Warwickshire with less emphasis on potential demand arising from the Greater Birmingham area despite Warwick District physically abutting Solihull.</p> <p><i>We consider that a comprehensive review of Green Belt and a full and proper assessment of housing need arising from not only the Coventry and Warwickshire Market Area but also the Birmingham conurbation needs to be undertaken and appropriate provision made including release of land from the Green Belt.</i></p>	A full review of the green belt will be undertaken to inform any review process. Needs arising from Birmingham can be addressed through Policy DS20. However at this stage Birmingham has not asked Warwick to address any housing shortfall and is focusing its efforts elsewhere.	
66315 - A C Lloyd Homes Ltd [5958] 66320 - A C Lloyd Homes Ltd and Northern Trust [6105]	Object	<p>The principal concern is the lack of provision to meet future needs arising from the conurbation especially Birmingham. The fact that 10.9 % of Birmingham's migration was directed to Coventry and Warwickshire LIP area in the period 2000/1 - 2010/11 indicates that some of this may be directed towards Warwick District, especially given the excellent rail and road links with the conurbation.</p>	Policy DS20 addresses the issues raised in the representation. Cooperation with the Greater Birmingham LEP area is ongoing	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65990 - Barwood Development Securities Ltd [12821]	Object	<p>National guidance sets out a prescriptive set of requirements in relation to the Duty to Cooperate and it is confirmed that robust evidence is required to demonstrate how this has been complied with.</p> <p>The Sub-Regional Approach to Delivering the Housing Requirement report identifies that further work is required to ensure the HMA has a robust subregional evidence base to support collaborative work on a sub-regional spatial strategy.</p> <p>The Council's approach to the Local Plan's housing spatial strategy is premature given the significant uncertainties which the joint HMA evidence base could deliver.</p> <p>This approach lacks certainty and is dependent on a number of significant pieces of technical evidence that are not yet complete. There can be no assurance that the Council's assumptions will translate to the HMA's unmet housing requirements being provided for.</p> <p>Barwood conclude that the legal compliance of the Plan has not been satisfied on the basis that the Duty to Cooperate is not a matter which can be rectified at the Examination stage.</p>	<p>DS20 provides a robust, but pragmatic way to deal with uncertainties at the same time as progressing this Plan. It should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020.</p> <p>the Duty to Cooperate paper demonstrate s the extensive work the Council has undertaken to ensure legal compliance with the Duty</p>	
65880 - Centaur Homes [9117]	Object	<p>Centaur Homes object to the wording of the policy. This goes against paragraphs 178 to 182 of the Framework, including the duty to cooperate and the Local Plan being positively prepared. It also does not support paragraphs 47 and 49 of the Framework as any unmet need should form part of the objectively assessed need and if it cannot be demonstrated that enough land is available to meet this need then paragraph 49 applies.</p> <p><i>This policy should be reworded.</i></p>	<p>The Policy is consistent with para 178 to 182 of the NPPF in that it has been prepared with the support of all the Councils in the HMA and is based on a shared agreement between the Councils. The approach provides a robust, but pragmatic way to deal with uncertainties at the same time as progressing this 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>
66183 - Hallam Land Management and William Davis [8278]	Object	<p>Policy DS20 is considered unsound as it is neither justified nor the most appropriate strategy when considered against the reasonable alternatives, furthermore it has not been prepared in accordance with the Duty to Co-operate. It is therefore not legally compliant.</p> <p>It is clear from this approach that if it is shown that significant housing needs arising outside of the District should be met within its administrative area, the Council is relying upon a review of the Local Plan. This will further delay the provision of new homes which it is already apparent will be required. They should be planned for now rather than deferred.</p> <p><i>The submitted plan is not considered legally compliant as it does not properly comply with the Duty to Co-operate. Despite the commissioned SHMA, the Council has not established with their partner authorities how the overall requirement might be distributed across the sub-region.</i></p> <p><i>Similarly the Council has not co-operated in similar terms with the authorities in the Greater Birmingham area, notwithstanding the evident shortfall in housing provision that has emerged.</i></p> <p><i>The plan is not sound as it has not been positively prepared as it is not based on a strategy which seeks to meet objectively assessed development requirement, including unmet requirements from neighbouring authorities; nor is it justified, effective and consistent with national policy. It is not considered sufficient to suggest that accommodating housing needs that arise from outside the District is a matter for a subsequent review. The approach falls short of the expectation in the NPPF that this plan should meet the objectively assessed needs for market and affordable housing across the housing market area. It is only by determining the distribution of the total housing requirement in the SHMA and accommodating that part of the unmet need which falls to be met within Warwick District that it will be possible to have a legally compliant and sound plan.</i></p>	<p>1) the Councils within the HMA have cooperated and have agreed how the HMA's need will be distributed 2) the C&amp;W HMA has cooperated with the Greater Birmingham Area and continues to do so. This is the approach agreed by both HMAs.</p> <p>The Council considers that the Plan does meet Objectively Assessed Need and makes an allowance for some redistribution of need from Coventry.</p> <p>Policy DS20 supports this approach by committing the Council to an early review should current uncertainties crystalize in such as way as to mean the District is required to take more housing.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66611 - Richborough Estates Ltd [5927]	Object	<p>As drafted it is considered that Policy DS20 is not sound. It fails in our opinion to provide a 'concrete action' or satisfactory outcome as the LPA is effectively deferring the identification of developable sites to meet the needs of an adjoining authority if the need arises. There is concern, following the withdrawal of the Coventry Core Strategy in 2013, that the Council will not be able to meet all of its identified housing need within its administrative boundaries. Accordingly, Coventry City Council will be looking to the adjoining authorities - in particular Warwick District - to make provision for its housing needs. This is highlighted in the Coventry and Warwickshire Duty to Cooperate Statement that forms part of the evidence base underpinning this WDLP.</p> <p>If it is found that Coventry will not be able to meet its own housing needs then Warwick District should seek to identified a suitable housing implementation strategy now rather than delaying the inevitable. It is submitted that the LPA is not taking a proactive, positive and collaborative approach to resolve these issues.</p> <p><i>We would remind the LPA of the advice contained within the Framework at paragraph 8 that the planning system should play an active role in guiding development to sustainable solutions. It is considered that a sustainable solution in this instance would be to identify a suitable housing implementation strategy through the allocation of additional land for housing. Through these changes Policy DS20 can be made sound.</i></p>	DS20 provide a pragmatic way of addressing uncertainty and a changing context and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020.	
65130 - Mr Tony Robinson [12687]	Object	<p>History has shown that 'overspill' developments in the 1960's were a failure as employment and community were inadequate and not sustained long term</p> <p><i>The concept of #Overspill# from Coventry and Birmingham should be rejected in favour of holding the existing communities together, perhaps needing imaginative solutions.</i></p>	Should the District need to accommodate developments needs arising elsewhere, we will seek to bring forward these developments in line with the policies of the plan to ensure they deliver sustainable communities	
64562 - Mr Haydn Rees [7859] 65256 - Lapworth Parish Council (Mrs Elaine Priestly) [1334]	Object	<p>Concerned that any revision to the Local Plan will not be considered and consulted as fully and carefully as the process so far.</p> <p><i>Reassurance that any changes will be fully consulted, and not a knee-jerk response to allocate developers' favourite sites</i></p>	A review of the Plan will be subject to the planning regulations (including consultation) and will need to be soundly based on evidence	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66389 - Warwick Town Council (Mr Derek Maudlin) [1059]	Object	WDC should critically examine the population figures for Coventry. Any impact can be shared with other adjoining Councils. Large houses will have little relevance, for much of Coventry's needs, will be social housing.	WDC has worked closely with Coventry City Council in preparing evidence regarding housing needs. It is accepted by all Councils within the HMA that any shortfall in housing provision should be addressed jointly. Coventry City has a significant need for larger, high quality family housing (not just affordable housing).	
66109 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991]	Object	As a result of the significant increases in housing requirements for neighbouring authorities to Warwick District, concern is raised that it will have a significant impact on the spatial strategy for the District and could render the Plan unsound. Further evidence is required in order to satisfactorily discharge the Duty to Cooperate and to ensure that the delivery of housing does not become bogged down in political stalemates.	DS20 provide a pragmatic way of addressing this and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66053 - Lenco Investments [1165] Object		<p>RPS objects to the fundamental basis of this policy. It is not justified and is unsound. It is incorrectly predicated on unmet need arising from outside of the District and fails to reflect the commitment given by the authority in the Coventry and Warwickshire Local Enterprise Partnership.</p> <p>A basis for objection is that the Council proposes a review mechanism to address sub-regional housing need.</p> <p>Warwick is already accommodating sub-regional employment requirements within this current plan without the need for review. However there is no sign of any housing and job balanced agreement on associate levels of housing provision. The justification for this is that the Council does not know the capacity and other needs of other districts and thus a review mechanism is the only approach that it has considered.</p> <p>There is a concern that no reference is made to the ability of Warwick or neighbouring authorities to accommodate the need within Warwick from the Gateway site.</p> <p>RPS considers that a review mechanism is not required and that it is Warwick District Council that has a significant unmet need that needs to be addressed by adjoining authorities.</p> <p><i>The plan should therefore positively identify a level of housing associated with the Gateway Site for Warwick specifically, and in seeking to promote sustainable patterns of development, seek to maximise the level of new homes within close proximity to the Gateway Site. It should then identify what is required to be accommodated by neighbouring authorities as part of unmet need for Warwick.</i></p> <p><i>The plan should make allowance for an urban extension to Coventry adjacent to the Gateway Site that can meet a significant component of the housing needs to support the sub-regional employment allocation as part of Warwick's own contribution and that of other authorities.</i></p>	<p>The Economic and Demographic Forecasts Study undertaken in 2012 identified the housing impacts of the Gateway and showed that if this application were approved, there would be very little impact on the District's housing requirement. This was further backed up by the Joint SHMA (2013) which looked at the difference in the CE Economic Forecasts and the Experian Economic Forecasts and recognised that for Coventry there is a 6000 jobs difference in the forecast which balances with the potential employment generation from the sub-regional employment site, particularly as the sub-regional employment site seeks to provide jobs for the former regeneration zone and will therefore provide to a considerable degree for those who are currently out of work.</p> <p>It can therefore be concluded that the housing impact of the Gateway/Sub-regional employment site have been reasonably addressed through the Local Plan's housing provision and in the HMA's objectively assessed need.</p> <p>Further Policy DS20 should be amended to provide the context for a review of the Plan should monitoring data (including employment data) indicate the need to do this.</p>	<p>Amend Policy DS20 to read: "The existence of unmet housing need arising outside the District will not necessarily render this Plan out of date. However, the Plan will be reviewed if housing need evidence (arising outside the District or as a result of changing conditions within the District) demonstrates that significant housing needs should be met within the District and cannot be adequately addressed without a review.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66043 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	<p>The NPPG affirms that a LPA should assess its development needs working with other authorities in the relevant HMA in line with the Duty to Co-operate. Each of the authorities within the sub region is at a different stage in preparing their local plan or core strategy, therefore the capacity of the other districts to deliver their housing requirement is unknown. Policy DS20 states that existence of unmet housing need arising outside outside the District will not render the plan out of date, however the Plan will be reviewed.</p> <p>There is evidence of a potential shortfall arising from a number of the neighbouring local authorities. Therefore it is not agreed that the existence of an unmet housing need outside the District will not render the Warwick Local Plan out of date. If a LPA preparing a Local Plan provides robust evidence of an unmet housing need identified in a SHMA other LPAs in the HMA will be required to consider the implications including the need to review their housing policies.</p> <p>In conclusion whilst there remain uncertainties about the meeting of unmet housing need in the LPAs adjoining Warwick District Council and Birmingham it is impossible to determine if the legal requirements of the Duty to Co-operate has or has not been discharged by the Council because the evidence is not available on which to make such a judgement.</p> <p><i>It is recommended that the Council provides further evidence such as a statement of compliance with Duty to Co-operate including formal agreements signed by elected members confirming that objectively assessed needs identified in the SHMA will be met by the respective LPAs.</i></p>	Noted. The Council has continued its Duty to Cooperate work since the publication of the Draft Local Plan and will publish a DTC paper along with relevant agreements	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66242 - Crest Strategic Projects [9115]	Object	<p>This objection should be read conjunction with our objections to the 'Duty to Co-operate' . The NPPF requires that the Local Plan be positively prepared and to meet the fully objectively assessed housing needs not only for the District but also any unmet housing need from adjoining Districts. It is apparent that the Council anticipates that it will have to meet unmet housing needs from adjoining Districts (probably Coventry) in the future. In such circumstances, the Local Plan should be planning for this eventuality now and not to delay until a Local Plan review. Such an approach is contrary to the advice in the NPPF which seeks that Local Plans are 'positively prepared ' and ensure that Local Plan ' boost the supply of housing'.</p> <p><i>The Local Plan should be planning to meet unmet housing needs from adjoining Districts, now rather than in a future Local Plan or Review.</i></p>	<p>Any review of the Local Plan will need to be done as part of a coordinated process and agreement with the other Councils in the HMA to ensure the HMA's housing requirement is being met in full.</p> <p>DS20 provide a pragmatic way of addressing this and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020. There are also provisions for an earlier review if required.</p>	
65999 - Barratt & David Wilson Homes;Bloor Homes;Catesby Group;Crest Strategic Projects;Hallam Land Management;Richborough Estates;Taylor Wimpey;William Davis [12832]	Object	<p>It is unlikely that Coventry City will be able to accommodate all of its objectively assessed housing needs within its own administrative area. However, no specific allowance has been made for this within the Plan's housing target. For the reasons stated above, we consider there to be a number of deficiencies within the Joint SHMA that call into the question the accuracy of the objectively assessed need within the HMA.</p> <p>We do not consider that part C of Policy DS20 constitutes a 'concrete action or outcome' as the Council are effectively deferring the identification of suitable sites to meet the needs of an adjoining authority.</p> <p>Whilst we are therefore generally supportive of the sentiment that the Council are expressing in Policy DS20, we do not consider that it goes far enough.</p>	<p>Point c) should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020. There are also provisions for an earlier review if required. In this context point c) can be seen as a concrete action</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65114 - Nurton Developments & the Forrester Family [12680] 65425 - Nurton Developments [12697] 66090 - Gleeson Developments [5117]	Object	<p>Policy DS20 is unsound and is not legally compliant because it does not provide any commitment to a timely review of the Local Plan. Furthermore, given the housing land supply in the district, the circumstances are not appropriate to rely upon review of the plan to meet housing needs and it is considered that the existence of unmet housing need arising outside the District will render the Plan out of date.</p> <p><i>The first sentence of Policy DS20 should be deleted. Policy DS20 should be amended to commit to an early review of the Local Plan, in addition to further housing provision being made in the current draft Local Plan in order to provide sufficient flexibility to respond to housing needs from other districts.</i></p>	<p>Any review of the Local Plan will need to be done as part of a coordinated process and agreement with the other Councils in the HMA to ensure the HMA's housing requirement is being met in full. DS20 provide a pragmatic way of addressing this and should be read in conjunction with Duty to Cooperate agreements which have committed all the Council in the HMA to undertake a review or a Joint Core Strategy between 2017 and 2020. There are also provisions for an earlier review if required. The first sentence of DS20 would comply with the NPPG if the word "necessarily" was added. This indicates that although SHMA from a neighbouring authority may impact on Warwick District it does not necessarily render the Plan out of date.</p>	<p>Amend first sentence to read "The existence of unmet housing need arising outside the District will not necessarily render this Plan out of date"</p>
65523 - Sharba Homes Group [12779]	Object	<p>This policy does not discharge to the Duty to Cooperate. As the 'duty' has not been discharged, the plan cannot be found to be legally compliant, and cannot be declared sound by an inspector. In this case the inspector must recommend the plan's withdrawal.</p> <p>The Plan is not therefore legally compliant</p> <p><i>Because this work should be carried out throughout the plan making process, and not as an 'add on', it is felt that this requires a complete review of the plan before submission.</i></p>	<p>Duty to Cooperate has been an ongoing process throughout the development of the Plan (see Duty to Cooperate paper). This policy alone does not discharge the Duty but is consistent with the agreements reached across the Housing Market 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>
66577 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Because the Plan assumes substantial continuing in-migration, there is already in effect significant provision for meeting needs originating elsewhere. However Policy DS20 of the Plan is ominous because it envisages even higher housing provision than is currently proposed. It is fundamentally wrong to act simply as a repository for housing development not wanted elsewhere in order to fuel the Council's growth aspirations.</p> <p>The revised ONS figures for households in Coventry (issued in May 2014) have significant methodological faults. The claimed requirements for the City Council area are not reliable and should not be given weight.</p> <p><i>The in-migration element in the figures for housing proposed in the plan (DS6) means that the Plan as published indicate that the Plan would be meeting the needs of other areas. This should be reflected in the text.</i></p>	DS20 is necessary because Local Plan's are always prepared in the context of change and given the varying progress of neighbouring authorities on local plan development, uncertainty.	
65655 - Lioncourt Homes [11870]	Object	<p>The plan should provide a proactive approach to support the needs of neighbouring authorities. The housing requirement identified in the GL Hearn Joint Housing Market Area Assessment shows that Coventry will potentially require land outside its' boundary. The release of the Kings Hill area of Green Belt in Warwick District could address the necessary additional housing required in Coventry.</p>	Along with other Council's within the HMA a clear and robust process has been agreed to ensure the HMA's housing need is met in full. At this stage it is not possible to say whether Kings Hill or any other site in the District, is required or appropriate to meet this need. Policy DS20 provides a robust but pragmatic way to manage these uncertainties at the same time as progressing the Plan	
66513 - Friends of the Earth (John Brightley) [1113]	Support	Support	Noted	
66800 - Gallagher Estates [644]	Support	<p>We are encouraged that Warwick District Council recognises its statutory obligations with regard to the Duty to Co-operate with neighbouring authorities in the preparation of their Local Plan in order to maximise its effectiveness with regard to strategic planning matters. We do, however, reserve our position on whether the District Council has effectively discharged that Duty and look forward to considering this matter further on publication of the necessary attendant evidence based information</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>
64989 - Solihull MBC (Mr Maurice Barlow) [12664]	Support	Warwick District has not had a direct approach seeking to accommodate housing shortfall from the Birmingham housing market area, but Policy DS20 and the Duty to Cooperate and Strategic Planning section explain how this would be handled in the event of an approach, including the commitment to review the Warwick District Local Plan if such needs could not be adequately addressed. This should enable any issues relating to the migration flows between Solihull and Warwick District to be addressed.	Noted	
66154 - Coventry City Council (Mr Mark Andrews) [12864]	Support	Recognises the effort WDC put into discharging their responsibilities in relation to the duty to cooperate. This includes numerous areas of joint working, most notably the work on the Coventry and Warwickshire Gateway proposals and the Joint SHMA. Welcome the inclusion of DS20 and its supporting text. CCC are satisfied that WDC have discharged their duty and put in place a firm commitment to on going cooperation as it will relate to CCCs Local Plan.	Noted	
65995 - West Midlands HARP Planning Consortium [5118]	Support	<p>We are glad that the Council has recognised the issues surrounding housing need arising from outside of the District; this is supported by the NPPG which requires effective strategic planning or cross border growth "from the outset" of Plan preparation.</p> <p>It is of course desirable for an authority to have assessed the entire housing need that must be accommodated in its borders before preparing its Plan. The Council seems to be taking significant measures to positively front up to this potential need. We would like to see adopted, the inclusion of a proactive timetable defining key events that will trigger a review with regards to cross border need.</p>	Noted	
65980 - Mr and Mrs Swindells and Star Pubs and Bars Ltd [12842]	Support	The approach contained in emerging Policy DS20 is welcomed taking into consideration the Inspector's comments regarding the withdrawn Coventry Core Strategy, where it was concluded that delivery of Coventry's housing requirement was a strategic priority planning issue that crosses local boundaries, an issue which is likely to impact Warwick District and Burton Green in particular given its close relationship to Coventry. It is urged that work is undertaken as soon as possible, to identify sites suitable for accommodating Coventry's housing needs to ensure there is no delay to the housing supply. Furthermore, it is considered that sites adjacent to the boundary shared with Coventry, should be considered first to address this need.	Support noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3. Prosperous Communities</b>				
<i>PC0 Prosperous Communities</i>				
66060 - Lenco Investments [1165]	Object	<p>There is a significant deficiency and the relationship between the level of housing and employment proposed in the Plan and the components of policy set out in Policy PC0.</p> <p><i>RPS has set out that there is a detachment between the Vision and Objectives of the Plan and that of the strategy adopted for the provision of housing and employment. RPS requests the opportunity to present further oral evidence and respond to issues raised in its representation in any session examining the level of employment provided in the plan and its location.</i></p>	The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this in response to representations made to DS2.	No change required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
66759 - The Theatres Trust (Rose Freeman) [218]	Object	<p>There is no policy to reflect item 70 of the National Planning Policy Framework (NPPF) and protect cultural, leisure and tourism facilities. The policies do not compliment the following aspirations in the text:</p> <p>*para.3.112 states that as cultural assets such as theatres, cinemas, libraries etc enrich people's quality of life, it is appropriate to consider how planning can assist (presumably in their protection and enhancement).</p> <p>*para.3.116 states that culture, leisure and tourism are important for centres to be vibrant and prosperous (i.e. 'valued facilities').</p> <p>*para.3.128 says that 'meeting places, cultural facilities and public art are important features in sustainable communities (i.e. 'valued facilities').'</p> <p>*para.3.129 says that 'new development will inevitably place demands on existing public meeting places such as community halls and public cultural facilities such as theatres, concert halls and libraries (i.e. 'valued facilities').'</p> <p>*para.3.9 repeats para.3.112 regarding the importance of cultural assets with reference to policy PC0 which supports 'the important role of culture and leisure assets.</p> <p>HS8 does protect community facilities but is inadequate in providing a comprehensive description for the term 'community facilities'. Paragraph 5.90 gives some D1 examples and says that other facilities (presumably cultural, leisure and tourism) may be protected, but only in exceptional circumstances. Theatres are sui generis, and all other entertainment facilities are D2 so are not included in this policy.</p> <p><i>There needs to be a clear definition for the term 'community facilities'. It is not adequate for Policy HS8 to only protect some community facilities, it should protect all to reflect item 70 of the NPPF. A comprehensive description for all community facilities should be included in the Glossary which would obviate the need to provide examples: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p> <p><i>If the council wishes to support its cultural, leisure and tourism offer, there must be clearer and more practical guidance in Policies PC0 and CT1.</i></p> <p><i>For PC0 we suggest h) is amended to read to support existing culture and leisure assets for the important role they play in our communities and economy, .....</i></p> <p><i>CT1 only deals with new developments and there is no mention of assessing existing venues and whether there is any requirement for</i></p>	<p>Para 5.90 provides guidance on how the term community facilities should be interpreted in dealing with planning applications. However it is not possible to define this too specifically as different types of facility may be important to different communities. Having said that, it is accepted that Para 70 of the NPPF identifies some community facilities that are not covered in paragraph 5.90 of the Local Plan and the Plan should therefore be amended to reflect this.</p> <p>The proposed wording for PC0(h) is to narrow as this overarching policy aims to support existing and proposed assets (not just existing assets. It is therefore suggested that this amendment is not made.</p> <p>It is agreed that a policy to protect existing cultural facilities would be appropriate. However the suggested amendments to policy HS8 would achieve this</p>	<p>Amend para 5.90 to read: 5.90 For the purposes of these policies, the reference to community facilities includes a wide range of uses within Use Class D1 such as places of worship, dental and medical surgeries, community halls, local education facilities, crèches and nurseries for the care of children as well as local cultural facilities, local convenience stores (under 500spm gross floorspace), and public houses where there is no alternative provision within the community. In exceptional circumstances, the Council may apply this policy to other facilities that meet a community need where the grant of permission would result in a demonstrable shortfall in the locality.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>new. We suggest there is an additional policy to protect and enhance existing cultural infrastructure if there is no amendment to Policy HS8 because, as stated previously, the document contains no policy to protect its existing successful and important cultural and leisure infrastructure.</i>		
66801 - Gallagher Estates [644]	Object	This policy provision is supported, however there is a concern that the Plan is not effectively balancing housing and employment growth as currently drafted. In order to help support economic growth and meet the projected target (11.6% employment jobs growth) for Warwick District over the plan period, there needs to be an increase in the population, in particular the working population. Using the Chelmer model it is considered that a housing requirement of circa 18,043 dwellings is needed to fulfil economic potential.	The Joint SHMA and 2014 addendum considered economic forecasts in relation to the number of jobs and how this relates to the objectively assessed need for housing. More detail is given on this in response to representations made to DS2.	No change required
66747 - Mr Edward Walpole-Brown [7504]	Object	In terms of site allocations insufficient regard has been given to PC0 to ensure there is balanced housing growth across the District and protecting and supporting a strong tourism sector. Policy does not give sufficient regard to the need to provide new and supplement existing services in key locations.	The Council has sought to distribute new residential allocations to the most sustainable locations on the edge of existing urban areas but also to villages where there are a appropriate level of services.	No change required
65511 - Keith Wellsted [8636]	Object	Whist I support this policy in principle your plans for the land on the edge of Warwick Leamington and Whitnash fly in the face of these!  <i>Less houses in this are!</i>	The Council does not consider this to be the case, the proposed allocations seek to maximise opportunities to support sustainable patterns of travel to adjacent employment within the existing urban areas.	No change required
65512 - Mr Andrew Day [314]	Support	There is no single parish or town council area which does not have a village, church or parish hall in Warwick District, apart from Bishop's Tachbrook. Bishop's Tachbrook has the 3rd largest population size of the Warwick District parish council areas. Why is there no provision in this plan for such an important community facility?	Planning permission has already been granted for a community hall so it is not necessary to allocate land for such a purpose. For future proposals policy CT1 allows for locally important community facilities providing that the facility is of a type and scale that will mean it primarily serves a local community who can access it by means other than the private car. This policy is being amended in response to representations elsewhere which will set this out more clearly.	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>
65148 - Sport England (Mr Bob Sharples) [1355]	Support	I support the thrust of this policy but would suggest a minor change to bullet point 8):  <i>Amend criteria h) to support the important role that culture, leisure and sports assets play in our communities and economy, particularly focusing on the role of town centres;</i>	Agreed, change criteria h) accordingly.	Amend criteria h) to support the important role that culture, leisure and sports assets play in our communities and economy, particularly focusing on the role of town centres;
66525 - Friends of the Earth (John Brightley) [1113]	Support	We support this policy as long as a balance of housing growth and employment land is maintained.	Noted	No change required
65149 - Sport England (Mr Bob Sharples) [1355]	Support	A small point of clarification: does WDC mean indoor bowling centres and/or 10-pin bowling centres? I would have said both.	This repeats the definition set out in the glossary to the NPPF, although it is not specific we would consider this would relate to both types of use.	No change required
66291 - Mr H E Johnson [12846]	Support	We support the aim set out at part i) which is to support opportunities for regeneration.	Noted	No change required
<i>The Economy</i>				
66177 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	Employment sites - Notwithstanding the Green Belt issues at Fen End, Stoneleigh Park and Thicketthorn the document is a bit cautious in tone. In addition, there should be a commitment for the monitoring and alignment of employment with the needs of business and investment, which should be based on evidence of revised economic forecasts.	Policy DS8 recognises the need to support existing and growing sectors and to demonstrate a clear understanding of business needs within the area. An employment land review update was undertaken to inform qualitative and quantitative needs when preparing the plan. Both studies involved participation with the business community. Employment land supply is monitored on an annual basis in accordance with the regional monitoring framework and the Council regularly meets with local commercial agents to understand market trends. It would be useful however to add some further text in the reason justification to DS8 to set out the Council's commitment to understanding needs throughout the plan period.	Add additional sentence to paragraph 2.30 to state 'The Council will annually monitor the supply of employment land and ensure sufficient land is available to meet the needs of the local economy taking account of the needs of the business community and economic forecasts'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>EC1 Directing New Employment Development</i>				
66495 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	Failure to adequately consider employment for new residents. Key land allocations are remote from housing allocations which will create severe congestion and pollution as road access is limited and already congested. Alternatives have been put to WDC including spread of housing fairly through district or new town in central location	The Council is satisfied that it is making sufficient provision for employment over the plan period. The employment land review update specifically looked at employment growth sectors and need compared with the supply. New employment allocations to meet local need have been located adjacent to existing urban areas or proposed residential allocations to encourage sustainable patterns of travel.	No change required
66034 - NFU (Sarah Faulkner) [1119]	Object	Policy EC1 requires applicant to demonstrate that a proposal "would not generate significant traffic movements which would compromise the delivery of wider sustainable transport objectives, including safety, in accordance with TR2". We would be concerned if a proposal for a rural business were rejected because of the perception that the business is unsustainable because potential clients would access the service via car transport.	The intention within policy EC1 is to ensure that employment uses likely to generate significant traffic movements are located in urban areas where there are more opportunities to utilise more sustainable transport alternatives. This does not preclude rural development but seeks to ensure that it would not compromise overall sustainability objectives. Weighing up this balance is in line with paragraph 34 of the NPPF which states that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised but also take account of other policies in the framework such as rural policies. This approach also seeks to reflect the town centre first approach which identifies offices as a main town centre use.	No change required
		<i>Amend Policy EC1 to recognise the lack of alternative transport options available to rural businesses. Tourism businesses also rely on access by private car and therefore new tourism enterprises must not be limited to sites that are accessible by public transport routes.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65497 - The Community Group (David G Wintle) [9097]	Object	<p>Policy DS16 Sub-Regional Employment Site is unsound, it contravenes the NPPF (National Planning Policy Framework); there has been no consultation with the local community and other stakeholders concerning the removal of this land from Green Belt; the Sub-Regional Employment Site is NOT the most appropriate strategy when considered against reasonable alternatives. There is neither objectively assessed need for the policy nor any consideration against reasonable alternatives subject to sustainability appraisals. The policy should be based upon evidence including the production of a sub-regional strategy. The evidence should not be prepared retrospectively in an attempt to justify the plan.</p> <p><i>Remove references to sub-regional employment site from policies EC1 and EC3</i></p>	The Councils justification for the sub regional employment site is set out in response to representations made to policy DS16.	No change required
66526 - Friends of the Earth (John Brightley) [1113]	Object	<p>We support these proposals, with the exception of the proposals at the 'allocated sub regional employment site' (Coventry Airport), and the notes below.</p> <p>EC1 (Rural Areas -d) refers to 'DC13'. We believe this should read 'DS16'.</p> <p><i>EC1 (Rural Areas -d) refers to 'DC13'. We believe this should read 'DS16'.</i></p>	The Council's justification for the sub regional employment land site is set out in response to representations made to policy DS16.	No change required
66584 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>As described in our response to Policy DS16, there is no justification for circumstance d) in the Rural Areas section of Policy</p> <p><i>Remove circumstance d) from Rural Areas</i></p>	The Councils justification for the sub regional site is set out in response to representations to DS16.	No change required
66175 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	<p>Policy EC1 fails to comply with the policies of the NPPF in relation to opportunities for SMEs. The NPPF provides for the conversion of existing buildings (not just as part of a farm diversification scheme) plus the erection of well-designed new buildings within rural areas. The NPPF also provides for the replacement of a building. These forms of development do not appear to be provided for in the plan (except in the Green Belt). There should also be no need in EC1 - In rural areas, criterion e) to limit support to just the growth and expansion of 'existing rural businesses and enterprise'. In line with the SEP and NPPF the policy should allow for new business start-ups and enterprises moving into the area. The provision and effect of the policy is inconsistent with the explanation to it</p>	The Council is supportive of rural economic growth in line with the approach of the NPPF. It is agreed that criteria e) does not adequately reflect this intention or the reason justification of the policy. It is therefore proposed to amend criteria e) to remove the reference to 'existing' rural businesses	Amend criteria e) to remove reference to 'existing' rural businesses

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66229 - La Salle Investments [5130]	Object	<p>In the event that a specific policy for Stoneleigh Park is included in the plan as requested a cross reference to this should be included in Policy E1</p> <p><i>Consider a new policy guiding development at Stoneleigh Park should be included in the plan and cross referenced in Policy E1.</i></p>	It is not considered necessary to include a specific policy on Stoneleigh Park in the Local Plan, full justification for this is provided in response to the representation received to Policy MS2.	
65514 - Keith Wellsted [8636]	Object	<p>This policy is at odds with your policy with growth villages. This will add housing in these areas but not employment. Just more people driving cars in the area!</p> <p><i>Less houses</i></p>	A small amount of residential land is proposed in the growth villages as these are the most sustainable in terms of access to key services and public transport. The majority of allocations are located adjacent to the existing urban area, close to potential employment land options.	No change required
65670 - Swords (Angus Hudson) [12808]	Object	<p>This policy is not in accordance with the NPPF and conflicts with the previous Draft Local Plan policy PC0 Prosperous Communities. Policy EC1 which sets out how this economic development will be delivered is overly restrictive and not positively worded, this is in conflict with the NPPF presumption in favour of sustainable development at para.14 and Chapter 1, Building a strong, competitive economy, Chapter 2, Ensuring the vitality of town centres and Chapter 3, Supporting a prosperous rural economy. Being inconsistent with national policy, this policy is unsound. Specifically in relation to rural areas, this policy places additional burdens on applicants, such as the requirement to demonstrate that traffic movements will not be significantly increased and impact on the landscape. The supporting text states that "It is important that this Plan allows appropriate rural enterprise to grow and expand whilst protecting the countryside from development and uses which should be directed to urban areas." Whereas the NPPF supports growth and expansion of "all types of business and enterprise in rural areas" (paragraph 28. It is also poorly drafted and unclear as it refers to criteria A-C but lists criteria 1-3.</p>	The Council does not consider that the policy is overly restrictive, the policy sets out sufficient flexibility to allow employment uses in a range of suitable locations. Whilst the Council is fully supportive of economic growth in line with the NPPF it is important that such uses are directed to sustainable locations. The Council is also supportive of the growth of rural enterprise in line with the policy framework set out in the NPPF. It is accepted that criteria e) of the policy as currently worded does not reflect this commitment or the reason justification. It is therefore proposed to remove the reference to 'existing' rural businesses.	Amend criteria e) to remove reference to 'existing' rural businesses.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66628 - Mr Chris Walkingshaw [12824]	Object	Object to specific reference to the test on rural areas and permitting new development in accordance with Policy MS2. The Former Honiley Airfield has significant potential to provide further facilities however a barrier to this growth would be the limited boundary of the proposed MDS. Given the importance and investment, the barrier of the MDS will not provide any certainty for any future investment over and above the existing planning permission, over the plan period. Private sector investment in sectors such as automotive sports/advanced manufacturing will not be encouraged to come forward with plans for development if there are counter-active barriers.	<p>The Council recognises the role of the site in the local and sub regional economy but is also mindful that its development needs to be carefully managed in the context of its green belt setting. A response to the points raised here is made in connection with the respondents comments to MS2.</p> <p>It is proposed to be more positive by adding an additional sentence to paragraph 3.152 of MS2 and deleting the statement in the policy relating to the restriction of uses.</p>	<p>Add additional sentence to paragraph 3.152 of MS2 after 'It is also recognised that the delivery of the planning permission may provide benefits to the wider community such as 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'.</p> <p>Delete last sentence of the policy.</p>
<i>EC2 Farm Diversification</i>				
65865 - Sworders (Angus Hudson) [12808]	Object	NPPF paragraph 28 supports both conversion of existing buildings and well-designed new buildings and promotes "the development and diversification of agriculture and other land-based rural businesses". Conversely, policy EC2 introduces additional burdens which will restrict development, for example that existing buildings are used in preference to new buildings. Being inconsistent with national policy, this policy is unsound virtue of NPPF paragraph 182.	The Council is supportive of farm diversification proposals in line with the framework set out in the NPPF. Paragraph 28 states that policies should support economic growth in rural areas by taking a positive approach to sustainable development and lists the diversification of agricultural and land based rural businesses as one such opportunity. The criteria in the policy are intended to clarify what is meant by sustainable in this context. In doing so it seeks to ensure that proposals are commensurate to the rural setting and don't encourage a scale of development which would be more appropriate in the urban setting. In addition whilst it is accepted that farm diversification may involve well designed new buildings from a sustainability perspective the reuse of existing buildings would be preferable and therefore encouraged.	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>
65515 - Keith Wellsted [8636]	Object	Support the policy but how do your plans for housing fit with this  <i>Less houses</i>	Employment generated through this policy is intended to be small scale and appropriate to the rural setting. Whilst it will contribute to the rural economy separate provision has been made to meet the Districts overall employment land requirement over the plan period and is located close to existing and proposed housing to encourage more sustainable patterns of travel.	No change required
64528 - Mr Richard Thwaites [11460]	Object	The Plan states that farming makes a significant contribution to the rural economy and that the best and most diverse agricultural land is protected. Equine activities are specifically excluded.  All the sites within Hampton Magna, put forward for development, with one exception, are 100% high quality agricultural land.  The Maple Lodge site is 75% equine and 25% previously developed brownfield land.  Developing the Maple Lodge site would lead to the loss of NO important agricultural land.  <i>The Maple Lodge site should be the preferred option for development within Hampton Magna.</i>	The Council recognises the significant contribution made by farming. The NPPF requires Local Plans to meet objectively assessed needs for housing, however it is not possible to meet all of the housing requirement on previously development land. It is not considered that the adverse impact of allocating agricultural land demonstrably outweighs the benefits when assessed against the NPPF as a whole. Where possible allocations have sought to avoid the best and most versatile land, however, it is only one of many factors taken into consideration when determining the most sustainable development options. Hampton Magna is one of the more sustainable villages, the loss of any agricultural land has to be weighed against the benefits of providing housing in such a location.	No change required
64683 - Federation of Small Businesses (Mrs Linsey Luke) [5626]	Support	To encourage development in rural areas Warwick District Council could provide tailored guidance on appropriate types of farm diversification so farmers get the best chance of submitting a successful planning application. They should also consider permitting the development of small and larger agricultural buildings subject to 'prior notification procedure' rather than the full planning control, and make greater use of the discretionary element of rural rate relief for rural businesses.	The Council is happy to engage in pre application discussions with farmers to guide proposals for appropriate farm diversification. However the type and nature of appropriate schemes will be subject in part to the circumstances and location of the farm therefore probably better considered on a case by case basis rather than through standardised guidance. The parameters for prior notification are set nationally and the Council is happy to work within these. It is noted that local authorities are able to grant a higher rate of rural business rate relief. This would need to be considered as part of the Council's approach to supporting rural enterprise and consequently will be raised with the Economic development team	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>
66453 - Environment Agency (Becky Clarke) [6581]	Support	<p>Recognise importance of farming to the rural economy, and need to support diversification into non agricultural activities. However farm diversification can involve range of activities from recreational to energy production that may have negative impact upon the environment. Therefore recommend insertion of the following statements into the policy:</p> <p>'d) Farmland is important for nature conservation and biodiversity. Enhancements to maintain ecological resilient networks through the countryside should be incorporated to proposals</p> <p>e) Connectivity of riparian corridors are maintained and protected with buffer margins and tree planting</p> <p>f) There will be a presumption against development that could lead to the degradation of the Water framework Directive (WFD) status of the water body should not be permitted'.</p>	It is agreed that it is important to protect and enhance ecological networks and watercourses as part of any farm diversification proposals. However this is covered by the natural environment policies which such proposals would need to accord with.	No change required

Representations	Nature Summary of Main Issue/Change to Plan	Council's Assessment	Action
<i>EC3 Protecting Employment Land and Buildings</i>	<p>65150 - Sport England (Mr Bob Sharples) [1355]</p> <p>Object Commercial indoor five aside, commercial indoor cricket, have been growing markets even in the most recent recession, creating employment and training opportunities on business parks. D2 uses therefore should be considered along side B1 uses, just as a number of gyms such as Virgin and Fitness First have been on business parks elsewhere in the country. E.g. Wolverhampton Business Park , Wolverhampton.</p> <p>Also it should not be overlooked that there is usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First D2 use, than a 100,000m2 B8 use.</p> <p>In conclusion, Sport England wishes the WDC Planning department to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. And therefore should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this table.</p> <p><i>Commercial indoor five aside, commercial indoor cricket, have been growing markets even in the most recent recession, creating employment and training opportunities on business parks. D2 uses therefore should be considered along side B1 uses, just as a number of gyms such as Virgin and Fitness First have been on business parks elsewhere in the country. E.g. Wolverhampton Business Park , Wolverhampton.</i></p> <p><i>Also it should not be overlooked that there is usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First D2 use, than a 100,000m2 B8 use.</i></p> <p><i>In conclusion, Sport England wishes the WDC Planning department to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. And therefore should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this table.</i></p>	<p>The Council recognises the importance of such facilities in generating employment however it is important that the supply of B Class employment land is not compromised. Furthermore the NPPF identifies leisure and certain sport and recreation uses including health and fitness clubs as main town centre uses and directs that they should be located according to the town centre first approach.</p>	<p>No change required</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65499 - The Community Group (David G Wintle) [9097] 66142 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	Policy DS16 Sub-Regional Employment Site is unsound, it contravenes the NPPF (National Planning Policy Framework); there has been no consultation with the local community and other stakeholders concerning the removal of this land from Green Belt; the Sub-Regional Employment Site is NOT the most appropriate strategy when considered against reasonable alternatives. There is neither objectively assessed need for the policy nor any consideration against reasonable alternatives subject to sustainability appraisals. The policy should be based upon evidence including the production of a sub-regional strategy. The evidence should not be prepared retrospectively in an attempt to justify the plan.  <i>Delete the exception relating to sub-regional employment</i>	The Council's justification for the sub regional employment site is set out in response to representations received to policy DS16	No change required
66527 - Friends of the Earth (John Brightley) [1113]	Object	We object to the last sentence in proposed policy EC3 "this policy does not apply to land which provides for sub regional employment needs". It is very important that if land in the Coventry Airport area is allocated for employment use, that it remains in that use in perpetuity, and is not converted to housing use, for example	It is intended that the policy does not apply to the sub regional employment land allocation to ensure that none of the criteria for allowing the redevelopment or change of use of committed employment land would apply to the site. It could be made clearer in the policy by amending this sentence	Amend sentence to read 'The redevelopment or change of use of existing or committed of employment land and buildings (Use Classes B1, B2 and B8) on the sub regional employment land allocation will not be permitted.'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66373 - Ignis UK Property Fund [12820]	Object	<p>Ignis property UK object to the allocation of the site at Olympus Avenue/ Apollo Way as committed employment land under Policy EC3(Protecting Employment Land and Buildings) for the following reasons:-</p> <p>* The basis for its allocation as committed employment land is unclear. The policy relates to existing and committed employment land and buildings. The site in question is undeveloped and comprises a greenfield site, never having been developed in the past. It cannot therefore comprise existing employment land or building.</p> <p>* Paragraph 3.41 of the draft Local Plan notes that "the Districts portfolio of available employment land includes sites with planning permission, those covered by Development Briefs or allocations from the previous Local Plan". The site in question was included in the area granted outline planning permission in 1989 (W88/0385) for the wider Tachbrook Park employment area. That permission is no longer extant and in any event the land has lain undeveloped for circa 15 years. While a development brief did exist to guide the development of this wider area (adopted 1987) the opening paragraph of this document makes it clear that this was prepared pursuant to the Warwick, Leamington and Kenilworth Urban Structure Plan (1979). Importantly the site was not allocated in the Local Plan for the period 1996-2011, including following its review on September 2010.</p> <p>* The NPPF states that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of the site bringing forward uses for that purpose and that alternative uses for land and buildings should be considered on their merits. The lack of investment over the last 15 years suggests such alternatives should be considered.</p> <p>* The NPPF requires the Local Plan to be justified forming the most appropriate strategy when considered against reasonable alternatives based on proportionate evidence. The Council's most recent employment evidence base (Employment land Review May 2013) fails to consider the site in question for employment use and accordingly the potential to release the site for other alternative uses. Reference to</p> <p>* The site is not required to meet employment land needs as the Employment land demand identified in policy DS8 includes a 16.5ha margin of flexibility. The calculation of this required margin is flawed and it is over inflated by virtue of the calculation relating to the higher development trends of the 2000-2008 period. The reduction in employment land by 1.7 ha (the area of the land in question) will have no material effect on employment objectives.</p> <p>To summarise - the site is undeveloped, does not benefit from</p>	<p>Tachbrook Park is an important part of the District's employment land portfolio and the remaining plots contribute towards the available supply. It is accepted that the original outline applications which include these plots may now not be extant and therefore it would be inappropriate to include within the commitments. The Council therefore propose to allocate the remaining plots for employment through policy DS9.</p>	<p>EC3 - Delete Tachbrook Park as an employment commitment in the table.</p> <p>DS9 - Add new site to employment allocations table</p> <p>Site E5 - Tachbrook Park, Warwick - Size 6.1 hectares - Uses B1, B2</p> <p>DS9 - Add new paragraph after 2.34 to state:</p> <p>The Council will also take forward the previous employment land commitment at Tachbrook Park, Warwick for which planning permission has expired. This is the largest employment area in the District comprising of mixed B Class uses, of which the allocation represents the remaining plots.</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>extant planning permission, is not subject to an up- to- date Development Brief and is not allocated in the previous Local Plan. Policy EC3 is simply not applicable to the land in question and its inclusion, therefore, is not coherent or justified and is therefore unsound.</p> <p><i>Remove the land at Olympus Avenue/ Apollo Way (identified to form part of Tachbrook Park Employment Area) from major employment allocation on proposals map no 2 Leamington Warwick and Whitnash.</i></p> <p><i>It is considered that retail and leisure uses should be deemed appropriate for the site and therefore not subject to the constraints of the proposed employment land allocation.</i></p>		
65249 - Mapeley Gamma Acquisition Co (4) Limited (acting by its Joint LPA Receivers Fergus Jack & Bryn Williams) [12706]	Support	Support	Noted	No change required
<i>Retail and Town Centres</i>				
65967 - Sworders (Angus Hudson) [12808]	Object	These policies all add additional burdens and requirements which are not contained in the NPPF. These are in conflict with the NPPF presumption in favour of sustainable development at paragraph 14 and Chapter 1, Building a strong, competitive economy and Chapter 2, Ensuring the vitality of town centres.	The policies in the Retail & town centres section of the Local Plan seek to respond positively and actively to requirements set out in the NPPF. Paragraph 23 of the NPPF sets out key requirements for Local Plans as they promote competitive town centres and the policies in the Local Plan do this.	None required.
66528 - Friends of the Earth (John Brightley) [1113]	Support	However, especially with regard to the proposals outlined in TC4 and TC5, additional wording should be added to ensure that any new development proposals give regard to the historic nature of our town centres, including the historic street pattern, grain, form and massing of the surrounding buildings	The plan should be read as a whole and since the chapter dealing with the Historic Environment deals with the design of new developments within historic areas, including the Conservation Areas in the town centres, it is not considered necessary to repeat the policies here	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>TC1 Protecting and Enhancing the Town Centres</i>				
67133 - Mr Ray Steele [5886]	Object	Town centres will all suffer from the effects of pollution and congestion from increased traffic. High traffic movements will ensue in town centres resulting in pollution and congestion with cars driving around to find a space to stop. Towns were never designed to take the volume of traffic we have now. Alternative plans should have been considered to prevent this	The overall strategy of the local plan is to allocate the majority of development at locations that will minimise the need to travel and have the ability to offer a range of sustainable alternatives to the private motor car such as cycling , walking and public transport. In accordance with the NPPF, the Local Plan supports the principle that local planning authorities should "recognise town centres as the heart of their communities and pursue policies to support their viability and vitality." (NPPF para 23) Directing appropriate development to town centres is the most effective way of meeting the needs of communities in a sustainable way and supporting the economic growth and prosperity of the district. It should also be noted that the policies of the plan will require large scale development proposals to be supported by a Transport Assessment and where necessary a travel plan. Contributions from developments towards transport improvements will be central to addressing concerns regarding congestion and other traffic related negative impacts across the District and in town centres in particular.	None required
		<i>None required</i>		
65517 - Keith Wellsted [8636]	Support	Good idea	No response required	Non 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>
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*TC2 Directing Retail Development*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67162 - Ignis UK Property Fund [12820]	Object	<p>Objection is made to the allocation of Chandos Street car park for a major town centre development under Policy TC4 and its identification on the proposals map.</p> <p>Ignis argue that the site allocated is not suitable to accommodate the required town centre uses because:-</p> <ul style="list-style-type: none"> <li>* The Council's retail study identifies capacity requirements for Leamington Town Centre of 5364sqm (2013) rising to 16674sqm net sales by2029.</li> <li>* TC4 allocates the current car park (0.8ha) which will not be adequate</li> <li>* TC4 (Para 3.65)states that further land will be required beyond the confines of the allocated car park area therefore this allocation (identified area) is not considered sound and is inappropriate / not consistent with Government policy and its tests of soundness</li> <li>* The Chandos street car park has fallen within the area of search under the current adopted local plan (policy TCP3). Despite this favourable policy position it has remained undeveloped since the adoption of the current Plan, further calling into question the allocation of this site as an achievable option.</li> <li>* The Chandos street planning history casts further doubt on the soundness of this allocation. Wilson Bowden's application (W10 0340) was refused for reasons including excessive bulk and mass, impact on the conservation area, loss of traditional buildings and historic street pattern, excessive car parking, lack of measures to promote public transport.</li> <li>* In order to address the reasons for refusal(many of which were fully endorsed by statutory consultees), it is clear that any revised scheme would have to be physically smaller (less retail floorspace),have lower parking ratios ,have to respect the historic street patterns, include sufficient buffers so as to respect the residential amenity of nearby properties.</li> </ul> <p>In the three years since the refusal the sites promoters have failed to bring forward a replacement scheme, let alone one which addresses the above points. It is considered that this is a significant challenge and may not be achievable. It is suggested that the plan has therefore not been positively prepared and whether the allocation is a an appropriate strategy which is effective, and thus consistent with national policy as required by the tests of soundness.</p> <p>To conclude the NPPF (para 182) requires the plan to be justified, effective and consistent with national policy. Site allocations in the plan should be demonstrated to be deliverable over the plan period and to be the most appropriate strategy to pursue. Given the problematical site history and the site constraints that limit the size of the development and therefore its ability to meet need it is not considered that this site allocation is sound.</p>	<p>This objector has made the same case to argue for the deletion of policy TC4. For the reasons set out in the response to that objection, it is not proposed that policy TC4 be deleted and therefore TC2 should similarly remain unchanged.</p>	None 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>Remove clause a) from policy TC2. Rely on amended policy TC2 and policy TC5 to direct retail proposals to the appropriate locations in accordance with national policy.</i>		
66503 - Mr Ian Lovecy [8036]	Object	<p>Plan has a number of internal inconsistencies, the most glaring of which is the proposed provision of new retail facilities while expressing the need to retain and develop the retail elements of the town centres, and the express mention of limiting development in existing retail parks for this purpose.</p> <p>Plan makes assumptions about provision of services which are not within power of either Council or Developers to ensure. Will shops in new areas be profitable enough to attract retailers? Will necessary increase in public transport be financially viable? In the light of recent reports will there be sufficient doctors to staff a medical centre - and will it too be financially sustainable?</p>	<p>In line with the NPPF the plan has to make policy provisions for future retail requirements / additional retail floorspace associated with the District's growth and population expansion. Government policy aims to make town centres the focus for new retail development so as to ensure their continued vitality and viability. The Local Plan policy approach recognises the importance of town centres, however the plan has to set out a framework for the consideration of future investment at lower order local centres, and smaller retail outlets in urban and rural areas. The plan also recognises the role of out of centre outlets and enables additions to them provided that such investment does not prejudice the vitality and viability of town centres. It is not considered that this is any inconsistency in such a strategy and that it is wholly consistent with Government planning policy in NPPG paragraph 23. In accordance with this approach, out of centre retail expansion will only be permitted if it satisfies the relevant policy tests needed to ensure it can be assimilated without harm to the town centres.</p>	No action 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>
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*TC4 Chandos Street Town Centre Development Allocation*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65705 - Ignis UK Property Fund [12820]	Object	<p>Objection is made to the allocation of Chandos Street car park for a major town centre development under Policy TC4 and its identification on the proposals map.</p> <p>Ignis argue that the site allocated is not suitable to accommodate the required town centre uses because:-</p> <p>* The Council's retail study identifies capacity requirements for Leamington Town Centre of 5364sqm (2013) rising to 16674sqm net sales by2029.</p> <p>* TC4 allocates the current car park (0.8ha) which will not be adequate</p> <p>* TC4 (Para 3.65)states that further land will be required beyond the confines of the allocated car park area therefore this allocation (identified area) is not considered sound and is inappropriate / not consistent with Government policy and its tests of soundness</p> <p>* The Chandos street car park has fallen within the area of search under the current adopted local plan (policy TCP3). Despite this favourable policy position it has remained undeveloped since the adoption of the current Plan, further calling into question the allocation of this site as an achievable option.</p> <p>* The Chandos street planning history casts further doubt on the soundness of this allocation. Wilson Bowden's application (W10 0340) was refused for reasons including excessive bulk and mass, impact on the conservation area, loss of traditional buildings and historic street pattern, excessive car parking, lack of measures to promote public transport.</p> <p>* In order to address the reasons for refusal(many of which were fully endorsed by statutory consultees), it is clear that any revised scheme would have to be physically smaller (less retail floorspace),have lower parking ratios ,have to respect the historic street patterns, include sufficient buffers so as to respect the residential amenity of nearby properties.</p> <p>In the three years since the refusal the sites promoters have failed to bring forward a replacement scheme, let alone one which addresses the above points. It is considered that this is a significant challenge and may not be achievable. It is suggested that the plan has therefore not been positively prepared and whether the allocation is a an appropriate strategy which is effective, and thus consistent with national policy as required by the tests of soundness.</p> <p>To conclude the NPPF (para 182) requires the plan to be justified, effective and consistent with national policy. Site allocations in the plan should be demonstrated to be deliverable over the plan period and to be the most appropriate strategy to pursue. Given the problematical site history and the site constraints that limit the size of the development and therefore its ability to meet need it is not considered that this site allocation is sound.</p>	<p>The District Council considers that it is very important to deliver a substantive amount of retail floorspace within Leamington town centre in order to provide for new investment over the Plan period. This is necessary to strengthen the towns identified role and success as an important sub-regional shopping destination.</p> <p>Albeit a previous planning application for a retail development was refused for this location, the Council remains committed to working with its development partners (Wilson Bowden) to deliver a development that will be centred on the area currently used as a surface car park. It is clearly stated in paragraph 3.65 of Policy TC4 that a wider area than that currently used as a car park will need to be utilised (this detail will be available as a new planning application/ scheme is formulated in 2015). The site will be well related to the shops on Warwick Street, as well as the Royal Priors shopping centre to the south. New retail floorspace in this location will be important to help to anchor and reinforce the existing primary shopping area and retail circuit to the north of the town centre.</p> <p>Despite the previous refusal of planning permission the developer is continuing to work with the Council to bring to fruition a substantive addition to the town centres offer. There is nothing in the refusal reasons for the 2010 planning application to indicate that a revised scheme which responds to the refusal reasons will not be acceptable to the local planning authority. This continued interest/ commitment has remained strong throughout the tough economic conditions that have prevailed (that have led to the abandonment of many town centre development schemes throughout the country). This is clearly an indication of the intent and the confidence of the developer and the Council to carry this project forward to a successful conclusion. The Government's message regarding retailing remains 'town centres first', despite earlier problems the Council is confident that a significant development centred on Chandos Street car park remains a credible and deliverable priority for Leamington town centre. With regard to its magnitude it is not possible to speculate on the precise amount of floorspace that will come forward until a detailed</p>	none 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><i>Remove Chandos Street car park allocation from the proposals map No3- Leamington Town Centre and Map no 2 - Leamington, Warwick and Whitnash.</i></p> <p><i>Remove Policy TC4 and supporting text entirely from the emerging Warwick District Local Plan (2011-2029) Publication Draft</i></p> <p><i>Rely on amended policy TC2 and policy TC5 to direct retail proposals to the appropriate locations in accordance with national policy.</i></p>	<p>scheme is agreed , however it is anticipated that it should remain a priority and that it would be incorrect to abandon this allocation and thus favour of out of centre alternatives prematurely.</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>
<i>TC5 Providing for Shopping Growth in Royal Leamington Spa Town Centre</i>				

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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>
66370 - Ignis UK Property Fund [12820]	Object	<p>Objection is made to the allocation of Chandos Street car park for a major town centre development under Policy TC4 and its identification on the proposals map.</p> <p>Ignis argue that the site allocated is not suitable to accommodate the required town centre uses because:-</p> <ul style="list-style-type: none"> <li>* The Council's retail study identifies capacity requirements for Leamington Town Centre of 5364sqm (2013) rising to 16674sqm net sales by2029.</li> <li>* TC4 allocates the current car park (0.8ha) which will not be adequate</li> <li>* TC4 (Para 3.65)states that further land will be required beyond the confines of the allocated car park area therefore this allocation (identified area) is not considered sound and is inappropriate / not consistent with Government policy and its tests of soundness</li> <li>* The Chandos street car park has fallen within the area of search under the current adopted local plan (policy TCP3). Despite this favourable policy position it has remained undeveloped since the adoption of the current Plan, further calling into question the allocation of this site as an achievable option.</li> <li>* The Chandos street planning history casts further doubt on the soundness of this allocation. Wilson Bowden's application (W10 0340) was refused for reasons including excessive bulk and mass, impact on the conservation area, loss of traditional buildings and historic street pattern, excessive car parking, lack of measures to promote public transport.</li> <li>* In order to address the reasons for refusal(many of which were fully endorsed by statutory consultees), it is clear that any revised scheme would have to be physically smaller (less retail floorspace),have lower parking ratios ,have to respect the historic street patterns, include sufficient buffers so as to respect the residential amenity of nearby properties.</li> </ul> <p>In the three years since the refusal the sites promoters have failed to bring forward a replacement scheme, let alone one which addresses the above points. It is considered that this is a significant challenge and may not be achievable. It is suggested that the plan has therefore not been positively prepared and whether the allocation is a an appropriate strategy which is effective, and thus consistent with national policy as required by the tests of soundness. To conclude the NPPF (para 182) requires the plan to be justified, effective and consistent with national policy. Site allocations in the plan should be demonstrated to be deliverable over the plan period and to be the most appropriate strategy to pursue. Given the problematical site history and the site constraints that limit the size of the development and therefore its ability to meet need it is not considered that this site allocation is sound.</p>	<p>This objection appears to be seeking the deletion of policy TC5, however it is also arguing that policy TC4 (allocation of land at Chandos Street for a major town centre development) should be deleted and that policy TC5 (and policy TC2) should be used to direct retail proposals to the appropriate locations in accordance with national policy. The response above to the objection to policy TC4 (made by the same objector) sets out the Council's case for why TC4 should remain in the Local Plan. No case is therefore being made for why policy TC5 is inappropriate, incorrect or superfluous, indeed it appears to be relied on as part of the justification for why TC4 is inappropriate.</p>	None 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>
		<p><i>Remove Chandos Street car park allocation from the proposals map No3- Leamington Town Centre and Map no 2 - Leamington, Warwick and Whitnash.</i></p> <p><i>Remove Policy TC4 and supporting text entirely from the emerging Warwick District Local Plan (2011-2029) Publication Draft</i></p> <p><i>Rely on amended policy TC2 and policy TC5 to direct retail proposals to the appropriate locations in accordance with national policy.</i></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>
<i>TC6 Primary Retail Frontages</i>				
65620 - Cobalt Estates [12761]	Object	<p>Cobalt Estates has committed considerable resources to the redevelopment of Talisman Square Kenilworth. Much of the planning permission for retail development with flats above (W03/1260) has been implemented (but not all) and it is therefore still extant.</p> <p>Due to a downturn in the economy and a lack of demand for flats part of the development has not been implemented and Cobalt Estates has secured a five year temporary planning permission for car parking as an interim measure. Cobalt Estates remains committed to redeveloping the site once market conditions improve and the demand for additional retail space within Kenilworth town centre increases.</p> <p>It is noted that this car park area is currently identified in the plan on Policy Map 5A as primary retail frontage and subject to the requirements of Policy TCP6 (Primary retail frontages) that restricts the levels of non-A1 uses in this elevation.</p> <p>Cobalt Estates is broadly supportive of this policy's intentions but considers it overly restrictive in this instance/ location as it could impede the future delivery of this town centre redevelopment site. Therefore this part of Talisman Square should not be designated as Primary Frontage.</p> <p><i>The designation (as Primary frontage under Policy TC6) should be removed from this part of Talisman Square and Policy Map 5A. As an addition a paragraph should be added to Policy TC6 recognising that greater flexibility on the mix of uses will be applied to proposals that bring about redevelopment and overall improvements to town centres.</i></p> <p><i>It is suggested that such an alteration to Policy TC6 would be in proper alignment with the NPPF which encourages Local Authorities to plan positively for the future of town centres.</i></p>	<p>The benefits associated with the Cobalt investment in Kenilworth town centre are recognised and appreciated. The current consent for a car park is a temporary measure. It is envisaged that this area could provide a valuable future site for the appropriate location of further retail provision (in line with Cobalt's original aspirations).</p> <p>The Council is reluctant to lose this opportunity to potentially locate new retail floorspace in Talisman Square and thus complete the refurbishment of this valuable retail destination.</p> <p>Given the allocation of the immediate locality/ other Talisman Square shop frontages as Primary it is considered appropriate to mirror this approach for this site (which would be the concluding section of this Square). It should also be noted that within Kenilworth town centre the Local Plan has created both primary frontages and secondary retail areas. Talisman Square does not lie at the edge of the primary frontage, but at its heart. This area, anchored by the Waitrose store, is an ideal location for further retail development in the future as market conditions allow. If, however in the future there is a compelling case for an alternative town centre use (retail or otherwise) the Council would still be able to consider this in the context of the NPPF and weigh this against the Primary Frontage policy if necessary. Leaving the site in question open for alternative uses is considered too flexible at this point in time as it may allow the introduction of a land use that could prejudice the success/ advances that have occurred at Talisman Square since its refurbishment / redevelopment.</p>	No changes to the plan are proposed

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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>
<i>TC8 Warwick Café Quarter</i>				

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Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
66637 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>The economic benefits that converting Use Class A1 retail units to Use Classes A3, A4, A5 and D2 units would bring to the locations covered by Policies TC8 and TC17 are not disputed, however there are deep concerns about the following problems in the Local Plan: -</p> <p>1.No specific policy and supporting explanation on the evening and night-time economy.</p> <p>2.What guidance there is in the Local Plan on this matter is fragmented and ineffectual.</p> <p>Evening and night-time economy related development is the most resource intensive type of development that the emergency services have to attend to on an-going weekly basis. We would therefore like to see the following in the Local Plan: -</p> <p>1.Policy and guidance that sets out in a clear and concise way where and when evening/night-time economy related development will be located and delivered within Warwick District. Whilst this information can be predicted from reviewing the Local Plan as a whole, it would be much better if a clear list of sites was provided in a similar manner to proposed housing and employment sites. This would in turn help stakeholders like the emergency services to undertake their own planning work in relation to this type of development.</p> <p>2.Providing sufficient policy and supporting guidance in terms of explaining how the well documented negative side effect of evening/night-time economy related development will be actively managed. This is essential in order to ensure that the public are safe and feel safe and thereby secure the maintenance of The Queen's Peace in the District.</p> <p>3.Establishing the basis by which public sector agencies, private companies and other stakeholders will work together to coordinate the active management of the evening/night-time economy in Warwick District. The relationship between the partnership work concerning the planning system and that taking place in respect of implementing licensing arrangements, as required by the Police Reform and Social Responsibility Act 2011, also requires explanation in the Local Plan.</p> <p><i>It is recommended that the evening/night-time economy should be the subject of a specific planning policy and supporting explanation within the Local Plan. The realisation of a successful evening/night-time economy requires careful regulation at the outset and active on-</i></p>	<p>It is not considered necessary to have a specific policy relating to the night time economy, Those areas that currently form part of the evening/night time economy are well known to the council and to other public bodies. Any new areas to be introduced would be done through either the Local Plan or a planning application where consultation will take place. Furthermore, there are a range of measures (other than through the planning system) which can be brought to bear to regulate activities within affected areas to ensure that the evening / night time economy can operate successfully without undue disturbance to residents and in a safe and peaceful manner. For example, the Council is also the Licensing Authority and in 2014 updated its statement of licensing policy. As part of this work it reaffirmed the principle, and extent, of a "cumulative impact zone" within which a special policy relating to the granting of licenses exists. It is relevant that only one cumulative impact zone has been identified in Warwick District; in Leamington town centre (including the area covered by policy TC9 ((Royal Leamington Spa Restaurant and Café quarter).</p> <p>It is consider, however, that a reference to the night time economy and the need to ensure the Council's Community Safety and licensing function work in close co-operation with the police would be beneficial and the suggested text is set out below.</p>	<p>Amend Policy PC0 e) to read: "to enable thriving and vibrant town centres which fulfil a range of functions including retail, leisure, arts and culture, employment and a safe night-time economy."</p> <p>Include an additional paragraph after 5.68 (the text following policy HS1 (Health, Safety and inclusive communities)) as follows: "In designing and laying out development to minimise the potential for crime and anti-social behaviour and improve community safety, the Council is keen to ensure that a successful evening/night-time economy can operate in the district. The Retail &amp; Town Centre policies in this Plan (TC1 to TC13 in particular) set out where evening/night-time economy activities can locate. The Council will continue to engage with the Police, Town and Parish Councils and other relevant bodies to ensure that appropriate safeguards are put in place to both support the evening/night-time economy and at the same time protect the amenity and safety of local residents and the wider public. Furthermore, the Council will also take action in appropriate cases within its powers to address negative issues arising as a consequence of the evening/night time economy. This will include breaches of planning and licensing consents."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>going management once operational.</i>		
<i>TC9 Royal Leamington Spa Restaurant and Café Quarter</i>				
66826 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Object	The establishment of a Restaurant and Café quarter at Livery Street has taken place without any prior consultation with the Town Council on the principle of change of use of this area. The Council would wish to be consulted on the formation of such policies at an earlier stage in future.  <i>Not required</i>	This was not part of the Local Plan process but a Development Management decision based on a planning application.	Comment noted, no action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65689 - New River Retail [12814]	Object	<p>Regent Court is designated as a 'Restaurant and Café Quarter' on the Warwick Local Plan Proposals Map.</p> <p>We note that not all units in Regent Court appear to be included in this designation. The success of café and restaurant units will in part be supported by achieving a critical mass, and the wider environment / public realm provided by the entirety of the Centre. Therefore in order for the policy to be effective, it is necessary for all units to be included as indicated on the map attached - (see original submission / rep). This line clearly outlines where policy TC9 should be applied.</p> <p>Whilst the Council supports restaurant and café uses at Regent Court, the supporting text for Policy TC9 imposes restrictions. It is important to emphasise that significant weight needs to be given to the location of Regent Court in the town centre. Restaurants and cafes are appropriate 'town centre uses' and therefore appropriate in the town centre. The planning policy related to planning applications for new restaurants and cafes should therefore equally and specifically recognise the benefits of the investment in individual units within a new restaurant quarter will bring to Leamington Spa. This includes support for the associated operational works required for the restaurant and café quarter e.g. hours of operation and external seating applications. In order for the policy to be effective, we propose that the Policy TC9 is amended.</p> <p><i>Designate all the units as set out on the plan attached (see original rep) - this plan will then include all the units that should be subject to Policy TCP9.</i></p> <p><i>In order for the policy to be effective, Policy TC9 should be amended as follows</i></p> <p><i>"Changes of use from shops (Use Class A1) to restaurants and cafes (Use Class A3) and associated operational works will be permitted within Regent Court, Royal Leamington Spa as defined on the Policies Map.</i></p> <p><i>When granting planning permission for restaurant and café (A3) uses, permitted development rights for changes of use to financial</i></p>	<p>This policy has been drafted following dialogue with the new owners of Regent Court, and their desire to establish the area as a restaurant/café quarter. In 2013, a planning application was submitted, and subsequently approved, to change the use of a number of the units along Livery Street to restaurant/café (A3) uses (W/13/1578). The units contained within the boundary of this policy are those for which A3 consent was obtained in that planning consent. There is a logic to limiting the restaurant/café quarter to Livery Street, and not to expand it to cover buildings fronting onto Regent Grove (as the objector now seeks), as Livery Street is a pedestrianized street where a focus of A3 uses can create the ambience appropriate to a café/restaurant quarter. The units on Regent Grove, although within the same ownership, do not have the same character or form part of the quarter.</p> <p>The objector also considers that the policy imposes restrictions which, by implication, are unreasonable. The only restrictions that the policy imposes relate (a) to a reference to the need to impose reasonable conditions on new A3 uses to protect the residential amenity of local residents, and (b) that changes of use to drinking establishments (A4 uses) are not permitted. Both of these restrictions are considered reasonable in view of the relationship between local residents in Livery Street and the A3 uses below.</p> <p>The objector also considers that "associated operational works" should be permitted. Such proposals should be considered on their merits (having regard to the need to protect residential amenity) when individual proposals come forward, and not given a blanket approval through a policy such as this.</p>	None 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>and professional services (use class A2) will be removed</i>				
<i>TC10 Royal Leamington Spa Area Action Plan (AAP)</i>				
66661 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	The preparation of an Area Action Plan for Royal Leamington Spa is strongly supported. The Town Council has endorsed the Area Action Plan approach in preference to a Neighbourhood Plan under the Localism Act 2012 and welcomes the opportunity to be directly involved in the preparation of such. It is hoped that the process of developing a Town Centre Action Plan can be commenced in the near future and will not be delayed to await the formal adoption of the District Local Plan.	noted	none required
<i>none required</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>TC12 Protecting Town Centre Employment Land and Buildings</i>				
65713 - Wareing and Company (Mr Bill Wareing) [4880]	Object	<p>Policy makes no provision for circumstances that may favour the re-use of existing buildings within the Town Centre Employment Areas. It does not allow for any use outside B Class which may provide employment. It does not embrace the provisions of paragraph 22 of the NPPF. It essentially limits the use to B1a offices as it is unlikely B1c, B2 or B8 would be suitable. There are existing listed buildings within the town centre employment area, originally dwellings characterised by small cellular room unsuitable for office occupiers who seek a more open plan office environment and the ability to install high technology services, such as cabling. The policy is unduly restrictive in not recognising the benefit that the reuse of listed buildings can bring. This is inconsistent with the statutory duty set by Section 66(1) and 72(1) of the Listed Buildings Act.</p> <p><i>Policy TC12 should not confine employment uses to Class B and recognise that a range of uses would be consistent with the town centre location. A criteria based policy should be incorporated into TCP12 to be consistent with the NPPF and should exclude listed buildings</i></p>	<p>The policy is restricted to limited areas within Leamington and Warwick town centres that have a long history as a concentration of B class employment uses and within which it is considered that these uses should be protected as part of an overall approach to creating balanced and vibrant town centres. It is relevant that the Plan does not preclude B class uses from locating elsewhere in the town centres, nor does it protect B class uses in town centres outside of the areas designated in this policy. As such, this policy is considered reasonable and proportionate.</p> <p>The allocated employment areas do contain listed buildings and it is recognised that there is sometimes a tension between seeking to retain the integrity of listed buildings, keeping them in viable use and complying with this policy. Local Plan policy on this is contained in policy HE1 which provides guidance for cases where applicants seek to demonstrate that the original use of buildings is no longer viable. The policies of the Plan should always be read together and as a whole, and for this reason no change to this policy is considered necessary. Furthermore, the provisions of policy HE1 ensure that the Plan is not inconsistent with the statutory duty set by Section 66(1) and 72(1) of the Listed Buildings Act.</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>
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*TC17 Local Shopping Facilities*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66638 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>The economic benefits that converting Use Class A1 retail units to Use Classes A3, A4, A5 and D2 units would bring to the locations covered by Policies TC8 and TC17 are not disputed, however there are deep concerns about the following problems in the Local Plan: -</p> <p>1.No specific policy and supporting explanation on the evening and night-time economy.</p> <p>2.What guidance there is in the Local Plan on this matter is fragmented and ineffectual.</p> <p>Evening and night-time economy related development is the most resource intensive type of development that the emergency services have to attend to on an-going weekly basis. We would therefore like to see the following in the Local Plan: -</p> <p>1.Policy and guidance that sets out in a clear and concise way where and when evening/night-time economy related development will be located and delivered within Warwick District. Whilst this information can be predicted from reviewing the Local Plan as a whole, it would be much better if a clear list of sites was provided in a similar manner to proposed housing and employment sites. This would in turn help stakeholders like the emergency services to undertake their own planning work in relation to this type of development.</p> <p>2.Providing sufficient policy and supporting guidance in terms of explaining how the well documented negative side effect of evening/night-time economy related development will be actively managed. This is essential in order to ensure that the public are safe and feel safe and thereby secure the maintenance of The Queen's Peace in the District.</p> <p>3.Establishing the basis by which public sector agencies, private companies and other stakeholders will work together to coordinate the active management of the evening/night-time economy in Warwick District. The relationship between the partnership work concerning the planning system and that taking place in respect of implementing licensing arrangements, as required by the Police Reform and Social Responsibility Act 2011, also requires explanation in the Local Plan.</p> <p><i>It is recommended that the evening/night-time economy should be the subject of a specific planning policy and supporting explanation within the Local Plan. The realisation of a successful evening/night-time economy requires careful regulation at the outset and active on-going management once operational.</i></p>	See response to similar objection from Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066] to policy TC8 above (Rep ID 66637).	See response to similar objection from Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066] to policy TC8 above (Rep ID 66637).

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66662 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	The Policy to protect retail activity in the Local Shopping Centres through the limitation of changes of use is supported.  <i>Not required</i>	Not required	Not required
<i>Culture, Leisure and Tourism</i>				
65968 - Sworders (Angus Hudson) [12808]	Object	These policies all add additional burdens and requirements which are not contained in the NPPF. These are in conflict with the NPPF presumption in favour of sustainable development at paragraph 14 and Chapter 1, Building a strong, competitive economy, Chapter 2, Ensuring the vitality of town centres and Chapter 3, Supporting a prosperous rural economy.	The policies are consistent with the Council's objectives and are supported by Chapters 2 and 8 of the NPPF	No change

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65648 - The Theatres Trust (Rose Freeman) [218]	<p>Object</p> <p>There is no policy to reflect item 70 of the National Planning Policy Framework (NPPF) and protect cultural, leisure and tourism facilities. The policies do not compliment the following aspirations in the text:</p> <p>*para.3.112 states that as cultural assets such as theatres, cinemas, libraries etc enrich people's quality of life, it is appropriate to consider how planning can assist (presumably in their protection and enhancement).</p> <p>*para.3.116 states that culture, leisure and tourism are important for centres to be vibrant and prosperous (i.e. 'valued facilities').</p> <p>*para.3.128 says that 'meeting places, cultural facilities and public art are important features in sustainable communities (i.e. 'valued facilities').'</p> <p>*para.3.129 says that 'new development will inevitably place demands on existing public meeting places such as community halls and public cultural facilities such as theatres, concert halls and libraries (i.e. 'valued facilities').'</p> <p>*para.3.9 repeats para.3.112 regarding the importance of cultural assets with reference to policy PC0 which supports 'the important role of culture and leisure assets.</p> <p>HS8 does protect community facilities but is inadequate in providing a comprehensive description for the term 'community facilities'. Paragraph 5.90 gives some D1 examples and says that other facilities (presumably cultural, leisure and tourism) may be protected, but only in exceptional circumstances. Theatres are sui generis, and all other entertainment facilities are D2 so are not included in this policy.</p> <p><i>There needs to be a clear definition for the term 'community facilities'. It is not adequate for Policy HS8 to only protect some community facilities, it should protect all to reflect item 70 of the NPPF. A comprehensive description for all community facilities should be included in the Glossary which would obviate the need to provide examples: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p> <p><i>If the council wishes to support its cultural, leisure and tourism offer, there must be clearer and more practical guidance in Policies PC0 and CT1.</i></p> <p><i>For PC0 we suggest h) is amended to read to support existing culture and leisure assets for the important role they play in our communities and economy, .....</i></p>	<p>Para 5.90 provides guidance on the how the term "community facilities" should be interpreted in dealing with planning applications. However, it is not possible to define this too specifically as different types of facility may be important to different communities. Having said that, it is accepted that para 70 of the NPPF identifies some community facilities that are not covered in the para 5.90 of the Local Plan and the Plan should therefore be amended to reflect this.</p> <p>The proposed wording for PC0(h) is to narrow as this overarching policy aims to support existing and proposed assets (not just existing assets. It is therefore suggested that this amendment is not made.</p> <p>It is agreed that a policy to protect existing cultural facilities would be appropriate. However the suggested amendments to policy HS8 would achieve this</p>	<p>Amend para 5.90 to read: 5.90 For the purposes of these policies, the reference to community facilities includes a wide range of uses within Use Class D1 such as places of worship, dental and medical surgeries, community halls, local education facilities, crèches and nurseries for the care of children as well as local cultural facilities, local convenience stores (under 500spm gross floorspace), and public houses where there is no alternative provision within the community. In exceptional circumstances, the Council may apply this policy to other facilities that meet a community need where the grant of permission would result in a demonstrable shortfall in the locality.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>CT1 only deals with new developments and there is no mention of assessing existing venues and whether there is any requirement for new. We suggest there is an additional policy to protect and enhance existing cultural infrastructure if there is no amendment to Policy HS8 because, as stated previously, the document contains no policy to protect its existing successful and important cultural and leisure infrastructure.</i>		
66516 - Canal & River Trust (Miss Katherine Burnett) [8189] 66529 - Friends of the Earth (John Brightley) [1113]	Support	Support the culture and tourism policies	Notes	
<i>CT1 Directing New Tourism, Leisure and Cultural Development</i>				
65389 - Mr Nigel Hamilton [1656]	Object	The Canal Corridor should be protected from development, as is important both as a leisure space and as part of the tourism economy.	The Council accepts the importance of the canal corridor. This is addressed in DS17	No change
		<i>Changes to Plan: Any new development should protect and enhance it</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66230 - La Salle Investments [5130]	Object	<p>The approach of CT1 does not reflect the NPPF specifically paragraph 28 that advises to support a strong rural economy local plans should support sustainable rural tourism and leisure developments. This should support the provision and expansion of tourist and visitor facilities at appropriate locations where identified needs are not met by existing facilities in rural service centres. Stoneleigh Park is a major tourist attraction as paragraph 3.114 confirms. As drafted CT1 would direct new improved tourism and leisure developments away from Stoneleigh Park.</p> <p><i>Changes to Plan:</i>  <i>Policy CT1 should be amended to include additional text to advise that the Local Authority will:</i>  <i>* Support sustainable rural tourism and leisure developments in accordance with the guidance at paragraph 28 of the Framework.</i>  <i>* The approach towards directing new tourism and leisure developments found in Policy CT1 is not directly applicable to new developments at Stoneleigh Park.</i>  <i>* Future development at Stoneleigh Park will be guided by the new policy in the plan which puts in place a framework for future development at Stoneleigh Park.</i></p>	The uses covered by CT1 are main town centre uses as defined by the NPPF. The Council is therefore of the view that CT1 appropriately applies a sequential test to these uses	No change
65153 - Sport England (Mr Bob Sharples) [1355]	Support	Support for policy, although the title should be changed to include a reference to sport	Accept proposed change to the title to include sport. The same also applies to "meeting places"	Title of Policy CT1 amended to read "Directing New Meeting Places, Tourism, Leisure, Cultural and Sports Development"
<i>CT2 Directing New or Extended Visitor Accommodation</i>				
65388 - Mr Nigel Hamilton [1656]	Object	<p>Given that many local hotels have closed or might be in financial difficulty, should there not be a clause in the local plan stating that no additional large hotels ( more than 50 bedrooms) would be permitted without an economic impact study, they would have on existing operators?</p> <p><i>Changes to Plan:</i>  <i>Given that many local hotels have closed or might be in financial difficulty, should there not be a clause in the local plan stating that no additional large hotels ( more than 50 bedrooms) would be permitted without an economic impact study, they would have on existing operators?</i></p>	Requiring an economic impact study is considered to be an unnecessary burden on development.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66233 - La Salle Investments [5130]	Object	<p>No specific concerns regarding the approach of Policy CT2, however, it fails to take account of the unique circumstances affecting Stoneleigh Park. Stoneleigh Park holds numerous shows and conferences taking place in the site throughout the year where it is necessary for people to stay on the site overnight. The existing hotel has limited capacity and outline planning permission has been granted for a larger hotel on site. Outline planning permission is in place for the development of new and extended camping facilities. However any further applications would be determined in the context of CT2 therefore to add additional clarity additional text should be included to cross reference to the proposed new policy and its guidance on visitor accommodation on the site.</p> <p><i>The policy should cross reference a new policy on Stoneleigh Park that will help guide its future development.</i></p>	Proposals for visitor accommodation at Stoneleigh Park will need to comply with Policy CT2. To add a cross reference to a specific policy will dilute to clarity of Policy CT2	No change
66773 - Jockey Club Racecourses [1161]	Object	<p>We consider that Policy CT2 Directing New or Extended Visitor Accommodation should cross reference to Policy CT7 and the supporting text at Paragraph 3.142</p> <p><i>We consider that Policy CT2 Directing New or Extended Visitor Accommodation should cross reference to Policy CT7 and the supporting text at Paragraph 3.142</i></p>	Proposals will be expected to demonstrate how they comply with CT2 and CT7. the two policies are consistent with each other. It is not considered necessary cross reference and to do so within policy CT2 will undermine to clarity of the policy	

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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>
<i>CT3 Protecting Existing Visitor Accommodation in Town Centres</i>				

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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>
65704 - David Lock Associates (Will Riley) [12817]	Object	<p>Whilst it is acknowledged that visitor accommodation in the town centre helps to support a vibrant economy it is important to ensure that Policy CT3 Protecting Existing Visitor Accommodation in Town Centres is not unduly restrictive for the following reasons:-</p> <p>*Many existing hotels are in Listed Buildings that cannot meet visitor customer expectations/ are not viable to upgrade - the closure of these facilities would impact the street scene and vitality of the town centre.</p> <p>*Due to the scale of existing visitor accommodation in the town centres the conversion of them would not be appropriate and would not meet the demands of potential retail operators(Use Class A1)</p> <p>*In many instances it is not appropriate to convert the upper floors into retail or assembly and leisure uses (with residential being far more appropriate)</p> <p>*It is considered inappropriate to subdivide the ground floor to create numerous shop frontages due to the numbers of facilities that are listed/ in conservation areas. The sub -division would have an adverse impact on the buildings and on the street scene.</p> <p>*The policy is unclear and only addresses visitor accommodation in town centres (no policy about out of centre accommodation)</p> <p>*The supporting text should acknowledge that in some circumstances visitor accommodation occupies the upper floors with retail uses on the ground floors</p> <p>*Warwick District Tourism Strategy forms part of the Local Plan evidence base. The document does not provide any evidence on need for visitor accommodation, nor does it suggest that there have been unprecedented closures of visitor accommodation over the plan period. How can CT3 therefore be justified?</p> <p>For the above reasons the policy is deemed to be unsound due to it being unjustified and possibly having the negative impact of leaving vacant buildings in the historic cores of our town centres, 'run-down' historic buildings, a lack of clarity over visitor accommodation outside town centres and a possible reduction of inward investment.</p> <p><i>CT3 should be retitled 'Protecting Existing Visitor Accommodation in town centres' and reworded as follows</i></p> <p><i>"Redevelopment or change of use from visitor accommodation within town centres (as identified on the Policies Map) will only be permitted where it can be demonstrated that the proposal meets the following criteria:</i></p> <p><i>Ground Floor / street frontage</i></p> <p><i>a)The site is within a retail area as identified on the Policy Map and</i></p>	<p>The points regarding ground floor and upper floors are accepted and to this extent it is proposed to amend the Policy.</p> <p>Outside the Town Centres, it is considered that there is no need to protect visitor accommodation. New or extended visitor accommodation outside town centres will be expected to comply with policy CT2, but there is no need to control existing visitor accommodation in these locations.</p>	<p>Amend Policy CT3 to read: CT3 Protecting Existing Visitor Accommodation in Town Centres</p> <p>Redevelopment or change of use from visitor accommodation at ground floor level within the town centres will only be permitted where it can be demonstrated that:-</p> <p>a. the site is within a retail area as identified on the Policy Map and the proposal is for a change of use to retail or is a change of use to assembly and leisure use within a secondary retail area (see policy TC3); or</p> <p>b. there is evidence of adequate capacity to meet need within alternative accommodation within the same Town Centre; or</p> <p>c. the accommodation is no longer viable and no other parties are willing to acquire it for that use</p> <p>Above ground floor level, criteria b and c only will be applied to such proposals.</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><i>the proposal is for a change of use to retail or is a change of use to assembly and leisure within a secondary retail frontage (see policy TC3).</i></p> <p><i>b)Where (a) is not practical this is to be demonstrated and accompanied by a viability assessment identifying that the existing accommodation is no longer viable.</i></p> <p><i>Upper Floors</i>  <i>Permission will only be granted when it is demonstrated that the proposals meet one of the following;</i></p> <p><i>c)There is evidence of adequate capacity to meet need within alternative accommodation within the same town centre: or</i></p> <p><i>d)The visitor accommodation is no longer viable and no other parties are willing to acquire it for that use</i></p> <p><i>Out of Centre</i>  <i>Where the development falls outside a defined town centre, as identified in the Policies Proposals Map, any proposals for redevelopment or change of use will accord with (c) above.</i></p> <p><i>It is also felt that either in the policy or the narrative, the Council should define what adequate capacity is considered to be, otherwise this term remains a barrier to a well-defined policy.</i></p>		
65391 - Mr Nigel Hamilton [1656]	Object	<p>No new hotels should be allowed which would lead to a loss of diversity or capacity within existing visitor accommodation sector. Replacing of one operator for another is not net economic growth for the district, it is the substitution effect. WDC should not hat smaller independent operators trend to spend more of their income on supplies and services from the district. Therefore in economic terms they are preferable to national/ international chains, due to their greater multiplier effect. Budget hotels do not enhance the tourism experience and therefore are not preferable in economic terms to independent or higher graded hotels.</p> <p><i>Economic impact assessment of any new visitor accommodation of more than 50 rooms on the existing</i></p>	The economic impact assessment is considered to be an unnecessary burden on development	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>CT4 Extensions to Tourism, Cultural or Leisure Facilities in Rural Areas</i>				
66234 - La Salle Investments [5130]	Object	<p>The general approach of the policy is supported however part B needs to be amended. In line with the NPPF Part B of policy should not seek to prevent rural tourism, cultural or leisure developments, simply because they generate significant volumes of additional traffic if that traffic can be mitigated against and does not result in "severe" residual cumulative impacts.</p> <p>Changes to Plan:</p> <p><i>Part B of the policy should be reworded to read "generate significant volumes of additional traffic where appropriate mitigation cannot be put in place; and".</i></p>	part b) seeks to prevent unsustainable traffic movements due to the inappropriate location of facilities. The proposed re-wording is not therefore supported	No change
66748 - Mr Edward Walpole-Brown [7504]	Object	Policy does not have sufficient regard to the need to provide new and supplement existing services in key locations	This policy is about extensions and therefore supports existing facilities. New facilities are covered by policy CT1	No change
65154 - Sport England (Mr Bob Sharples) [1355]	Support	<p>With reference to my comments to CT1, I would recommend that consideration is given to changing the title to Extensions to Tourism, Cultural Sport or Leisure Facilities in Rural Areas</p> <p><i>Change title</i></p>	Accept that title should be changed to include reference to sport	Add "and Sport" to the title

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>CT6 Camping and Caravan Sites</i>				
66454 - Environment Agency (Becky Clarke) [6581]	Support	<p>EA recognises importance of these sites for holiday use is important to local economy, but this needs to be balanced with the requirements of European Directives and the NPPF. In line with existing practice guidance for the NPPF we note that Camping and Caravan parks are classified as „highly vulnerable“ and that planning permission must not be granted for sites located within flood zone 3, and that the exception test must be granted for sites within flood zone 2.</p> <p>We recommend that a precautionary approach be taken and we recommend the insertion of the following policy wording:            'There is a presumption against locating camping and caravan sites within the flood plan because of their vulnerability within a flood event'</p> <p>The Environment Agency is concerned about the potential impacts that new camping / caravan sites may have on meeting the requirements of the Water Framework Directive, specifically in relation to the provision of foul waste infrastructure. During the year there may be significant peaks in use of toileting precautionary approach taken and recommend insertion of the following policy wording:            'There should be a presumption against development of new camping and caravan sites that can not demonstrate adequate provision for the management and discharge foul / waste water'. Refer you to letter sent to your Authority in relation to the preferred options consultation - Sites for Gypsies and Travellers ref UY/2007/101229/SL-04/PO1 - LO1 dated 09 May 2014. where there us more detailed information about potential allocations, and provides supporting evidence for policy recommendations.</p> <p><i>recommend the insertion of the following policy wording:            'There is a presumption against locating camping and caravan sites within the flood plan because of their vulnerability within a flood event'</i></p> <p><i>recommend insertion of the following policy wording:            'There should be a presumption against development of new camping and caravan sites that can not demonstrate adequate provision for the management and discharge foul / waste water'.</i></p>	The suggested additional wording is accepted subject to minor changes	Add the following to Policy CT6 : Due to their vulnerability within a flood event, there will be a presumption against new or expanded camping and caravan sites within high flood risk areas unless the risk can be adequately mitigated. New camping and caravan sites should demonstrate adequate provision for the management and discharge foul / waste water.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>CT7 Warwick Castle and Warwick Racecourse/St Mary's Lands</i>				
64529 - Mr Richard Thwaites [11460]	Object	<p>The plan requires any development to be sensitive to Warwick's Heritage assets.</p> <p>The preferred option for development within Hampton Magna overlooks the Racecourse and will be highly visible from the main stand.</p> <p>Any development must protect and enhance the setting of the Racecourse.</p> <p>The preferred option will detract from the setting of the Racecourse.</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna</i></p>	The Maple Lodge site has not been allocated for a number of reasons including for instance its location within an area of high landscape value.	No change
65374 - DR Hossein Habib [12733]	Object	<p>The possible Pre-determination of a Future Planning Application: Para 3.142 includes "visitor accommodation", alongside items such as recreation, leisure and horse racing. This clause could give the Racecourse a pre-determining future approved planning application for the building of "visitor accommodation" on the land, e.g. a hotel. Therefore, such a reference should be excluded so that any such future planning application can be considered on its own merits and not be influenced by a WDC policy document.</p> <p>Main point of objection is the reference to "visitor accommodation" in 3.142 in the CT7 camping and Caravan sites, this must be removed from this document.</p> <p><i>The main point of our objection is " the reference to visitor accommodation in 3.142 in the CT7 camping and Caravan sites", this must be removed from this document.</i></p>	The potential for visitor accommodation within this area is consistent with Policy CT2. There is no predetermination as clear any application will need to comply with the Local Plan as a whole and with all aspect of policy CT7 specifically.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65369 - Councillor John Holland [4908] 65431 - Mr John Sullivan [12755] 65452 - Jaqueline D'Arcy [8861] 65675 - Warwick Town Council (Mr Derek Maudlin) [1059] 66617 - Mr Michael Kinson OBE [12794]	Object	<p>Strongly object to inclusion in the plan, an important area of land that should only be developed with the full consent of the people of Warwick and not as a Conference Centre or Hotel.</p> <p>Strong objection from people in Warwick to a greater intensive commercialisation of this site, which includes Local Wildlife Site. The area is also within the District Council Conservation Area and the area was common land has a high level of public use (which should remain). The whole area should remain as designated by the Warwick District Council Act 1984. This would be put totally at risk if the Local Plan contained a carte blanche for large scale commercial development.</p> <p>There is not detail of what may be included in a master plan, although it is probable that it will follow GVA's proposal which is to maximise Warwick Racecourse and the Jockey Club's financial position.</p> <p><i>Policy CT7 should be deleted from the Plan</i></p>	<p>CT7 is important to ensure that the future of these two heritage assets in Warwick is carefully managed and their heritage protected and enhanced, at the same time recognising that they play an important in the Town's economy and have development pressures associated with them.</p> <p>The policy does allow for carte blanche development and the importance of land for public recreation, and the setting of the town etc is strongly recognised within the policy</p>	No change
65469 - Antony Butcher [480]	Object	<p>I strongly object to the inclusion of St Mary's Lands within the scope of CT7.</p> <p>Reference is made to a 'Master Plan', which has not been made available in this consultation process. Please remove any reference to St Mary's until this Master Plan has been published and consulted upon.</p> <p><i>Full consultation needs to be undertaken to ensure that the views of all the 'stakeholders' are taken into account, and not just those of a London based property developer.</i></p>	The Local Plan seeks to provide the framework for the Masterplan, which will need to be prepared to align with Policy CT7. The Council consider that this is an appropriate planning process for a high profile site where there is development pressure	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66353 - Miss Emma Bromley [3610] 66358 - Mr & Mrs Peter & Linda Bromley [1086]	Object	<p>Warwick Castle and Warwick Racecourse should have separate policies as they are so different, particularly in terms of scale and the number of visitors. The consultation on the town centre suggested that Warwick Racecourse should not be treated as a special case. The Local Plan is therefore inconsistent with this. There is already a management plan for the St Marys Lands and it is not clear why a new masterplan is needed, how the plan will be developed and who will be responsible for preparing it. The reference to visitor accommodation in 3.142 is inconsistent with previous applications and could be seen as a form of pre-determination without justification. There is already sufficient visitor accommodation in the District including close to the Racecourse. The policy seems to favour the Jockey Club over other stakeholder in St Marys Lands despite evidence that the Jockey Club is not financially under threat. The Policy is in conflict with the 1984 Warwick District Council Act which refers to St Marys Lands and requires 25 hectares should be kept undeveloped for public access and recreation.</p> <p><i>There should be a policy covering publically owned parks, included the Racecourse. All the open space included in the recent open space audit should be included.</i></p> <p><i>Remove reference to visitor accommodation in 3.142</i></p> <p><i>There should be a policy in the Plan stating that no additional large hotels (in excess of 50 bedrooms) would be permitted without an economic impact study.</i></p> <p><i>No development or masterplan should be allowed which is conflict with the 1984 Act</i></p>	<p>Publically owned parks are covered by Policy HS2 and do not require a specific policy. However there are development pressures and range of uses and interests associated with St Marys Lands. It is therefore felt that a specific policy will enable these competing interests to be managed in an appropriate and coordinated way rather than a piecemeal way.</p> <p>Any proposals will have to comply with Acts of parliament. There is no intention to favour the Jockey Club over other stakeholders and it is important that masterplan is balanced. It is therefore suggested that the title of the Policy is amended to refer to St Marys Lands only, removing direct reference to the racecourse. It is also suggested that ara 3.142 be amended to refer to other stakeholders</p>	<p>The policy title is amended to read: CT7 Warwick Castle and St Mary's Lands, Warwick</p> <p>Policy CT7 is amended to read: "Development at Warwick Castle or St Mary's Lands (within the boundaries defined on the Policy Map)..."</p> <p>Para 3.142 is amended to read "3.142 The Council will therefore work with the operators of the Racecourse and other stakeholders to bring forward a Masterplan for the area..."</p>
65310 - Mr Peter Kerr [1698]	Object	<p>The current wording in the draft Local Plan is based on a "Masterplan" that is not yet available for viewing and so current legislation, including the 1984 Act of Parliament, should be used.</p> <p><i>Substituting the term "Warwick District Council Act 1984" for the term "Masterplan" would avoid basing the Local Plan on a "Masterplan" that has yet to be made public.</i></p>	<p>Whilst any proposals will have to be legally compliant with acts of parliament, the local plan is a planning document which seeks to balance material factors. Any Masterplan will have to comply with Policy CT7 and the Council therefore considers that the wording is appropriate</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65386 - Mr Nigel Hamilton [1656] 65397 - Mrs Margaret Hamilton [12741] 65408 - John Ciriani [53] 65410 - Friends of St Marys Lands (Mr Ben Waller) [12749] 65417 - Mrs Pam Ciriani [12754]	Object	<p>I wish to raise an objection to the content of section CT7 in the Local Plan.</p> <p>St Mary Lands already has a comprehensive management plan that was agreed in 2005.</p> <p>A new "Master Plan "is therefore not required for St Mary Land.</p> <p>An explanation as to why a new "master plan" that affects St Mary's Lands is not provided in the new document. The Jockey Club is the current major tenant. They appear to be given a privileged position and input. This is an opportunity for a conflict of interest that should be avoided.</p> <p>Please see attachment</p>	<p>CT7 is important to ensure that the future of these two heritage assets in Warwick is carefully managed and their heritage protected and enhanced, at the same time recognising that they play an important in the Town's economy and have development pressures associated with them.</p> <p>The wording of policy CT7 seeks to strike this careful balance</p>	No change
<p><i>I suggest CT 7 is rewritten to reflect the above and an additional line is added to the effect that no development or " Masterplan" should be allowed which is in conflict with the Warwick District Council Act 1984.</i></p> <p><i>The change to the local plan should be made to take into account all of the above and the specific legislation that protects St Marys land.</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>
66027 - Warwick Castle [192]	Object	<p>Warwick Castle welcomes and supports the inclusion of a specific policy with regards to development at Warwick Castle.</p> <p>Given that Warwick Castle is privately owned, all investment and maintenance costs are met by income. Warwick Castle requires a positive policy environment to clearly support its endeavours.</p> <p>The NPPF (section 12) states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment including heritage assets.</p> <p>Para. 137 goes on to state that LPA should look for opportunities for new development within Conservation Areas, World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting, that make a positive contribution to or better the significance of the asset should be treated favourably.</p> <p>Policy CT7 could be split, including sub-paragraphs on the Castle and Racecourse to explain what a masterplan should cover for each site. This would perhaps make the policy clearer and be consistent with the subsequent explanatory paragraphs.</p>	<p>It is accepted that there is currently a lack of clarity in some aspects of the policy, particularly clause a) which appears to refer specifically to the Castle, but should refer to both assets covered by the policy.</p> <p>The proposed deletion of the last sentence of para 3.137 is not supported as it is important to ensure that visitors to the Castle bring wider economic benefits to the town as a whole and supports the vitality of the town centre specifically.</p> <p>The additional wording proposed for para 3.139 is accepted as keeping the Masterplan under review ensures that it stays relevant</p>	<p>Amend the first paragraph of CT7 to read "Development at Warwick Castle or St Mary's Lands (within the boundaries defined on the Policy Map) will only be permitted where it is brought forward in line with an approved Masterplan setting out the development principles and broad areas for development, indicating the type of uses proposed and, in the case of the Castle, a Conservation Plan for the historic asset. The Masterplan for each, will provide the framework within which planning applications will be determined and will:</p> <p>Amend CT7 clause a) to read: a) identify the physical and economic context.</p> <p>Amend para 3.139 to read: 3.139 It is therefore proposed that individual projects requiring planning permission should be brought forward within the context of a Masterplan for Warwick Castle. This will be a positive strategy for the conservation and enjoyment of the historic environment. The Masterplan should be kept under review. Should other development proposals for the Castle site be promoted, these will be considered in light of points (a) to (e) in Policy CT7 and other policies within the Local Plan.</p>

*Development at Warwick Castle or Warwick Racecourse is supported. The Council will work with Warwick Castle and Warwick Racecourse to prepare a masterplan for each site to guide future development, setting out the development principles and broad areas for development, indicating the type of uses proposed. The Masterplan for each site will provide the framework within which planning applications will be determined and will:*

*a) identify the physical and economic context.*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>b) identify the development principles to underpin future development proposals;</p> <p>c) identify the significance of heritage assets within the vicinity, setting out how these will be sustained and enhanced (including listed buildings, listed parks and gardens, conservation areas and historic landscapes);</p> <p>d) identify the location of developments, demonstrating how proposals will relate to the heritage assets and how they will enhance the positive contribution the asset makes to sustainable communities and to the character and distinctiveness of the area; and</p> <p>e) identify how the proposals support the vitality and viability of the local economy</p>		
		<p>3.136 Warwick Castle is a nationally/internationally renowned tourist attraction bringing significant benefits to the local economy. It is a Grade 1* listed building set within Grade 1 landscaped grounds. The site includes several other Listed Buildings.</p> <p>3.137 Balancing the development pressures with the sensitivity of the location is an on-going challenge. Further there are opportunities to enhance the links between the Castle and Warwick Town Centre, bringing economic benefits to the Town Centre.</p>		
		<p>3.138 In this context this policy supports the role of Warwick Castle as a nationally/internationally renowned attraction at the same time as ensuring the significance of the local heritage assets (including the Castle itself) are sustained and enhanced. It is also important that the mix of activities on offer within the Castle grounds allows both the Castle and the Town Centre to play to their strengths to the mutual benefit of both.</p> <p>3.139 It is therefore proposed that individual projects requiring planning permission should be brought forward within the context of a Masterplan for Warwick Castle. The masterplan should be kept under review. Should other development proposals for the Castle site be promoted, these will be considered in light of points (a) to (e) in Policy CT7. This will be a positive strategy for the conservation and enjoyment of the historic environment.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65858 - Jockey Club Racecourses [1161]	Object	<p>Welcomes inclusion of site specific policy on the racecourse, however object to the requirement for a master plan as well as the associated ban on any development which does not accord with the master plan. Our previous representations sought the inclusion of a site specific policy to enable development within the racecourse in order to make it easier to progress redevelopment proposals should they arise during the plan period. It is important that flexibility is built into the Local Plan to cater for changing circumstances during the plan period to ensure the future viability and vitality of the racecourse. The proposed wording of CT7 will constrain the racecourse. Jockey Club Racecourses have already informed the Council that there is a need to improve visitor facilities at the racecourse in order for it to remain as an attractive visitor destination. Enhanced facilities will need to include the following: a hotel, replacement saddling boxes, a new members entrance, extension to the caravan park.</p> <ul style="list-style-type: none"> <li>- It would be unreasonable for the Council to refuse any applications in the absence of a master plan</li> <li>- If the Council were to withhold approval for a master plan it would not be acceptable for the racecourse to be unable to make any planning applications</li> <li>- The process for approving a master plan is unclear.</li> <li>- The racecourse and castle have very different heritage assets of different values.</li> <li>- It is unclear which sections of the policy apply to the racecourse - it would be inappropriate for the racecourse to comply with criteria a)</li> <li>- The wording of the criteria is ambiguous</li> <li>- It may not be possible to respond to the criteria at master plan stage.</li> <li>- Unclear how applications relating to horseracing would be dealt with in the context of a master plan</li> <li>- It is helpful the policy does not restrict the type of uses however there is discord between the policy wording and supporting text.</li> <li>- Unclear what the Council is seeking to secure in relation to land for public recreation and biodiversity.</li> <li>- The designation of a potential local wildlife site should be fully justified</li> </ul> <p><i>Our Client has previously suggested, on the basis of the above, that the racecourse should be the subject of a policy which specifically relates to the use of the site and which recognises the role of the Racecourse and its facilities to the District and to aid the ability for the racecourse to refurbish and develop itself to protect its long term operation as an important sporting venue without compromising the</i></p>	<p>St Marys Lands provides for a variety of uses and is important to the town for a number of reasons not just the racecourse. Whilst the policy seeks to support the ongoing viability of the racecourse, this needs to be balanced with a wide range of other factors. The Council therefore consider that the wording of Policy CT7 is more appropriate to strike that balance than the wording proposed in the representation which focuses making it easier to progress redevelopment proposals for the racecourse.</p> <p>It is the intention that once the masterplan has been prepared and agreed, the policy will provide all stakeholders of St Marys Land (including the racecourse) with a greater degree of certainty and confidence, the policy is therefore intended to support and encourage appropriate investment and within the context of a masterplan to make it easier to bring forward proposals. The point about flexibility is noted. However as the context changes, it will be possible to also change the masterplan. The Policy does not therefore prevent new proposals coming forward within the plan period.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>nature and character of the district or its Conservation Area setting. As such, we consider that it would be more appropriate for the Local Plan to include a Policy with wording as set out below, rather than that currently set out in Policy CT7:</i></p> <p><i>Suggested Policy and Supporting Text: Policy CT7</i></p> <p><i>'The Borough Council supports the role of Warwick Racecourse, within the area defined on the proposals map, in providing a recreation, leisure and entertainment facility, within the Borough, in order to ensure the continuing vitality and viability of this facility for the benefit of the local economy.'</i></p>		
66402 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	<p>We are concerned that para 3.142 appears to assign policy for development of this part of St Mary's lands to a masterplan to be produced by the tenant of the racecourse. The current proposals for this masterplan which have reached the public domain do not appear to demonstrate any environmental sensitivity and it is inappropriate for this to be a policy in the Local Plan at this stage. The text relating to this policy makes references to the heritage significance of the racecourse and common in themselves, but totally ignores the presence of the Grade II* registered Hill Close Gardens on its boundary. It is essential that any policy for development on and within the racecourse should take account of that fact.</p>	It is recognised that it is important to involve other stakeholders	<p>Amend para 3.142 to read: "3.142 The Council will therefore work with the operators of the Racecourse and other stakeholders (including English Heritage to bring forward a Masterplan for the area..."</p> <p>Amend para 3.142 1st bullet to read: "ensures the ongoing vitality and viability of St Mary's Lands"</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66065 - English Heritage (Mr Rohan Torkildsen) [205]	Support	<p>EH welcomes the principle of the initiative. Due to the national importance of the Castle and the intended role of the masterplan in shaping the future of the site, English Heritage would welcome the opportunity be a partner in its preparation.</p> <p>If the masterplan is to be a development plan should its preparation be subject to the same rigor and discipline of a local plan?</p> <p>It should also be recognised that Warwick Castle is also a Scheduled Monument</p> <p><i>The following additional text is suggested.</i></p> <p><i>To support and inform the masterplan English Heritage and other key local groups will be invited to participate in its preparation.</i></p> <p><i>It is a Grade 1* listed building and Scheduled Monument set within Grade 1 landscaped grounds.</i></p>	Accepted that EH could contribute positively to the preparation of a masterplan	<p>Amend Para 3.136 to read: 3.136 Warwick Castle is a nationally/internationally renowned tourist attraction bringing significant benefits to the local economy. It is a Grade 1* listed building and Scheduled Monument set within Grade 1 landscaped grounds. The site includes several other Listed Buildings.</p> <p>Add a sentence at the end of para 3.139 to read: 3.139 It is therefore proposed that individual projects requiring planning permission should be brought forward within the context of a Masterplan for Warwick Castle . This will be a positive strategy for the conservation and enjoyment of the historic environment. To support and inform the masterplan English Heritage and other key local groups will be invited to participate in its preparation.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66455 - Environment Agency (Becky Clarke) [6581]	Support	<p>Acknowledge need to allow new development within this area that is sensitive to heritage assets; recommend that the following policy wording is added to the policy:</p> <p>f) Identify how the proposals will contribute to EU Water Framework Directive and the Severn River Basin Management plan which requires the restoration and enhancements of water bodies to prevent deterioration and promote recovery of waterbodies.</p> <p>We have the following information about the watercourse status as determined under WFD objectives.</p> <p>GB109054043800 (Gog Brook from Source to confl with R Avon) is failing WFD with Moderate status (2009)</p> <p>GB109054044402 R Avon (Wark) conf R Leam to Tramway Br, Stratford is failing WFD with Moderate status (2009)</p> <p>To meet the requirements of the WFD objectives these waterbodies must reach good ecological status, all new development within this area must contribute to meeting this objective.</p> <p><i>recommend that the following policy wording is added to the policy:</i></p> <p><i>f) Identify how the proposals will contribute to EU Water Framework Directive and the Severn River Basin Management plan which requires the restoration and enhancements of water bodies to prevent deterioration and promote recovery of waterbodies.</i></p>	the proposed additional clause is addressed in the Flooding and Water policies. It is not necessary to include it here	No change

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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>
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*Major Sites in the Economy*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66248 - La Salle Investments [5130]	Object	<p>There is no policy to guide future development at Stoneleigh Park. This is inappropriate as:</p> <p>There may be a need to revisit the masterplan application during the plan period. However, there is no specific guidance in the emerging Plan to confirm the scale, type and nature of uses which are appropriate at Stoneleigh Park. It is likely that a review of the masterplan will be necessary if HS2 comes forward as a significant proportion of the north east section of Stoneleigh Park is within the safeguarding area. The previous Local Plan had a policy which the inspector deemed necessary due to the sites size, and the unique circumstances of the Royal Charter under which it operates. The policy should reflect the range of uses that the outline Masterplan planning permission puts in place.</p> <p><i>Changes to Plan:</i>  <i>The following new policy should be included within the emerging plan "Stoneleigh Park</i></p> <p><i>Planning applications and proposals for new development at Stoneleigh Park that will enhance the Parks status as a rural business park will be supported. Development will be permitted at Stoneleigh Park which provides the following uses:</i></p> <ul style="list-style-type: none"> <li>* Exhibitions, Showgrounds, Rural Business Innovation Park</li> <li>* Other Equine and Veterinary uses</li> <li>* Offices and research and development facilities</li> <li>* Livestock Facilities</li> <li>* Education and Learning</li> <li>* Research</li> <li>* Sustainability and Energy</li> <li>* Hotel &amp; Conference Facilities</li> <li>* Visitor Centre</li> <li>* National Equine Centre</li> <li>* Camping Facilities</li> <li>* Ancillary Leisure, Retail and Catering</li> </ul>	<p>It is not considered necessary or appropriate to include a separate policy as suggested. However it is reasonable to set out the types of uses which may be considered as constituting very special circumstances. An additional sentence should be added to paragraph 3.157 to reflect this. It is also recognised that the implications of the HS2 route will require some changes to the layout of development approved as part of the existing master plan. It is proposed to add an additional sentence to paragraph 3.160 and a new sentence to the policy wording to reflect this.</p>	<p>Add to the policy - In the case of Stoneleigh Park, appropriate amendments as a result of HS2 will be supported without the need to revise the Master plan. Additional sentence should be added to paragraph 3.157 to state - It is considered that uses associated with rural innovation and equine activities necessary as part of enhancing the parks status as a rural business park may justify very special circumstances in the future. Some ancillary uses may also be reasonable as part of bringing forward the wider development of the site as a centre for rural excellence.</p> <p>Additional sentence to paragraph 3.160 to state - Amendments to the existing Masterplan as a result of HS2 will be accepted providing they are within the parameters of what has been approved in terms of overall floor space and 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>
		<p><i>* Other Uses, activities and infrastructure that would support the function of the Park</i></p>		
		<p><i>The extent of the Stoneleigh Park previously developed sited boundary is defined on the Local Plan, Policy's Map No. 9. The above range of uses will be considered appropriate in principle within the defined Stoneleigh Park boundary. The local authority will consider the impact any new development at Stoneleigh Park has on the openness of the Green Belt or the purposes of including land within it."</i></p>		
		<p><i>The line of HS2 is safeguarded by the Warwick District Local Plan and the extent of the safeguarded land at Stoneleigh Park is identified on Local Plan Policies Map 9 - Stoneleigh. If HS2 receives Royal Assent Warwick District Council will work with Stoneleigh Park's owners, tenants and the Royal Agricultural Society for England (RASE) to masterplan the site to take account of HS2. This will include reviewing the range of uses that are appropriate at Stoneleigh Park in the context of the impacts of HS2 and the aspects to protect and create new jobs at the Park. Support will be given to a new masterplan planning application for the site if this is considered appropriate.</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>
<i>MS1 University of Warwick</i>				
65663 - Mr William Blagburn [5448]	Object	<p>The University of Warwick's expansion plans are not adequately detailed in the Plan to cover the period until 2029. The statement in 3.145 does not give any details of the update due of its future vision which is during their current master plan period (2009 - 2019). The Local Plan just states 'development will be permitted in line with an approved Master plan or Development Brief as agreed with the relevant planning authorities'. The expansion plans will affect the local area which already suffers through lack of investment in infrastructure in roads and parking problems. 'Relevant planning authorities' have failed to come up with the answers. e.g. New Road required - no money allocated. A forward looking overall plan is required from the University and the Planning Authorities which addresses all of the problems before any further planning permissions are granted</p> <p><i>The Local Plan will require Warwick University to present their updated Master plan in the near future (in the next 2 years) to cover the period to at least 2029 with measures :-</i></p> <ol style="list-style-type: none"> <li><i>1. To meet their increased land requirement for staff and student accommodation, which could include Green Belt land. Plus any extra housing needs elsewhere in the WDC or Coventry area</i></li> <li><i>2. Transport facilities, solving current parking problems and future traffic congestion.</i></li> <li><i>3. Ideas which include the feasibility of a new bypass road round the University Campus for through traffic from the A46 to Kirby Corner via the Crackley Gap. Avoiding Gibbet Hill Road through Campus.</i></li> <li><i>4. A new railway Station to serve the University on the Leamington -- Kenilworth - Coventry line at Crackley Gap</i></li> <li><i>5. A Park &amp; Ride car park adjacent to the University Railway Station</i></li> <li><i>6. Crackley Gap is the small area of open land between the Coventry and Kenilworth boundaries through which the HS2 line is drawn. The ideas above are practical as they could be adjacent to each other on the North side of the HS2 line (if it goes ahead). Both would require bridges under A429 and old railway.</i></li> </ol> <p><i>This Grand Master Plan will be agreed with all relevant parties before any further Planning Application are determined for Warwick University.</i></p>	As stated the current Master plan for guiding development at the University runs for the period up until 2019. In accordance with MS1 further development will need to be brought forward through a revised master plan, through which it will be necessary to address a range of issues relating to the Universities operations such as traffic and parking. Such a master plan would be subject to public comment either through a consultation or through the planning application process.	No change required
66762 - Coventry City Council (Mr Mark Andrews) [12864]	Support	<p>CCC recognises the important contributions the University of Warwick makes to the prosperity and reputation of Coventry and the wider sub-region. As such, we support the careful amendments to the Green Belt boundary being proposed in the plan, to help enable the continued delivery of the Universities Master plan</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>
66530 - Friends of the Earth (John Brightley) [1113]	Support	We support these policies, subject to new or revised Master plans or Development Briefs being subject to full public consultation.	Noted	No change
66011 - University of Warwick [222]	Support	Policy MS1 is welcomed in supporting the role that the University plays in the local economy as a long established major site. The recognition of the University's intention to refresh its campus master plan is also welcomed. The policy is considered to be sound because it is consistent with national policy in supporting sustainable economic development.	Noted	No change required
<i>MS2 Major Sites in the Green Belt</i>				
66629 - Mr Chris Walkingshaw [12824]	Object	<p>The extended boundary is welcomed and supported. The concept of openness in the green belt needs to be re-examined within the context of the extant planning permission, in the process of being implemented, the existing buildings and use of the site and the future provision of high quality automotive related facilities. The consented Catalyst Building is the focal point for the site; it is a prominent building which will provide facilities in line with the use of the test track. The openness we believe simply refers to the test track and its flat surface but the track itself is made of hard standing materials and provides a facility which is used through the provision of the buildings. The site needs to be considered as a whole as the test track and the building work together. There is existing screening on the number of the boundaries as a whole. The test track would be seen against the backdrop of the new buildings bought forward and would not perform a Green Belt function. As a minimum the Council should re-examine the boundary to include the test track, however it would be more appropriate to remove the entire site out of the Green Belt to ensure the site's future use is secured. The NPPF is clear that local authorities 'should not keep land which it is unnecessary to keep permanently open'.</p> <p><i>AS a minimum re-examine the boundary to include the race track however it would be more appropriate to remove the entire site from the Green Belt.</i></p>	<p>The Council consider that this is an important area of green belt and whilst the unique circumstances of the site in terms of employment generation and its role in the sub regional economy is recognised it is not considered appropriate to remove the site from the green belt. 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. 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. 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</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66238 - La Salle Investments [5130]	Object	<p>Generally supportive of Policy MS2 and recognition that limited infilling and the redevelopment of previously developed sites in the Green Belt is appropriate as set out in the NPPF. However it provides limited guidance on the form and nature of development the local authority will consider appropriate at Stoneleigh Park. The current adopted plan includes a specific policy which the previous local plan inspector confirmed was required due to the significant scale of Stoneleigh Park, the fact it has a Royal Charter and its unique development position. Policy MS2 should be amended to cross refer to a new policy guiding the development of Stoneleigh Park. Support reference that there may be very special circumstances to support further development at Stoneleigh Park given its unique nature. Whilst having a masterplan or development brief to deal with this is desirable it is not essential and could be dealt with through a planning application if necessary.</p> <p><i>Paragraph 3 of the policy should be amended. It should be confirmed that the "very special circumstances" text for development at Honiley Airfield, Stoneleigh Park and Stoneleigh Deer Park, will be considered in the light of any approved Masterplan or development brief for the site where appropriate. However, where there is not a Masterplan or development brief in place, or the proposed development falls outside the context of any Master Plan or development brief, the very special circumstances case will be considered on its own merits.</i></p> <p><i>Additional text should be included within the policy to cross refer to a new policy guiding future development at Stoneleigh Park.</i></p>	<p>It is not considered necessary or appropriate to include a separate policy as suggested. However it is reasonable to set out the types of uses which may be considered as constituting very special circumstances. An additional sentence should be added to paragraph 3.157 to reflect this. It is also recognised that the implications of the HS2 route will require some changes to the layout of development approved as part of the existing master plan. It is proposed to add an additional sentence to paragraph 3.160 and a new sentence to the policy wording to reflect this.</p>	<p>Add to the policy - In the case of Stoneleigh Park, appropriate amendments as a result of HS2 will be supported without the need to revise the Master plan. Additional sentence should be added to paragraph 3.157 to state - It is considered that uses associated with rural innovation and equine activities necessary as part of enhancing the parks status as a rural business park may justify very special circumstances in the future. Some ancillary uses may also be reasonable as part of bringing forward the wider development of the site as a centre for rural excellence.</p> <p>Additional sentence to paragraph 3.160 to state - Amendments to the existing Masterplan as a result of HS2 will be accepted providing they are within the parameters of what has been approved in terms of overall floor space and uses.</p>
65521 - Keith Wellsted [8636]	Object	<p>This protects the King's Hill Lane site which I consider to be irresponsible</p> <p><i>Change status for the King's Hill Lane site</i></p>	Note comments	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>
66173 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	Policy does not support the SEP. The local plan should take a more positive stance to the sites identified including Honiley Airfield at Fen End rather than stating that there may be very special circumstances to justify further development." If this were to be the case there would be no need for the policy at all as further development could be allowed under existing Green Belt policy. The policy should identify the sites for development and set down development management criteria, which should include for flexibility in proposed uses.	<p>It is not considered appropriate to remove the sites from the green belt therefore the policy 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 for each of the sites. It would not be appropriate to set out development management criteria as the special circumstances would be determined at the time of considering the master plan or planning application.</p> <p>In the case of the Former Honiley Airfield it is agreed that the policy could be more positive 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</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66137 - Gerald Eve LLP (Mr Peter Dines) [12857]	Object	<p>Welcomes the Council's 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. The Policy as drafted fails to provide a suitable policy basis for the consideration of development on the site and is therefore not consistent with national policy. The policy repeats the NPPF and as national policy no longer recognises major developed sites in the green belt a particular policy should be provided for the site which recognises the economic benefits. The whole of the airfield is previously developed land and should be recognised as such. The government expects the planning system to actively encourage sustainable economic growth. An automotive and research related employment site 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.</p> <p><i>The following policy should be included in the Local Plan: Former Honiley Airfield 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 proposals in the form of a Masterplan. 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.</i></p>	<p>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</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>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>The range of uses acceptable on the site will include purposes related to the automotive and motorsport industries, both commercially and for leisure purposes and employment associated with these sectors including ancillary activities.</p> <p>Given the site is previously developed land and it does not perform the function of the green belt the site should be removed from the greenbelt as part of the green belt review.</p>		
66531 - Friends of the Earth (John Brightley) [1113]	Support	We support these policies, subject to new or revised Master plans or Development Briefs being subject to full public consultation	Noted	No change required
64990 - Solihull MBC (Mr Maurice Barlow) [12664]	Support	The approach of the plan to the former Honiley Airfield reflects important economic and green belt principles in the NPPF and the duty to co-operate.	Noted	No change required
66456 - Environment Agency (Becky Clarke) [6581]	Support	<p>Note that the major sites include Stoneleigh Park and Stoneleigh Deer Park. The watercourse in this area is failing to meet good status as defined by the WFD, specifically waterbody GB109054043840 R Avon (Warks) - conf R Sowe to conf R Leam is failing WFD with Poor status (2009).</p> <p>It is imperative that any new development contributes positively to improving quality of this watercourse.</p> <p>Recommend that the following policy wording is added to the policy: 'Identify how the proposals will contribute to EU Water Framework Directive and the Severn River Basin Management plan which requires the restoration and enhancements of water bodies to prevent deterioration and promote recovery of waterbodies'.</p>	The objective to address deficiencies in watercourse status is supported however as this would apply to a number of sites and proposals it is better cited in policy NE5 as this policy applies to all development proposals	<p>Revise Policy NE5 - Protection of Natural Resource, to include the following additional criterion:</p> <p>f) where appropriate, identify how the proposals will contribute to the EU Water Framework Directive and the Severn River Basin Management Plan, which requires the restoration and enhancements of water bodies to prevent deterioration and promote recovery of waterbodies.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>4. Housing</b>				
<b>4. Housing</b>				
66673 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The Health Impact Assessment submitted by Public Health Warwickshire suggests that the plan should do as much as possible to ensure that housing (for all sectors of the community) is provided to standards that will ensure the good health of its inhabitant's.</p> <p><i>The Plan should take all reasonable measures to ensure that the design and location of all new housing maximises the opportunities to provide positive health outcomes for its residents. This will include the good location of market and affordable housing / care homes and where necessary the suitable buffering of housing from any other potentially conflicting uses (e.g. employment ).</i></p>	Noted. Policies H0, H1, H2, H3, H4, H5, H6, BE1, BE2, BE3, TR1, TR2, HS6 seek to ensure that the right mix of housing is brought forward in the right locations in line with good quality layout and design.	
66533 - Friends of the Earth (John Brightley) [1113]	Object	<p>We support these proposals, subject to the overall housing requirement figures being revised downwards to take account of the latest ONS '2012-based Subnational Population Projections for England' which were released on 29 May 2014. The Joint Strategic Housing Market Assessment figures will need to be updated (downwards) to take into account these latest ONS predictions.</p>	Supported noted. Please see responses to Policy DS6 for further information about the housing requirement	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H0 Housing</i>				
65358 - Mr Kevin Olney [11601]	Object	<p>The Local Plan makes no reference to the self-build housing as required by paragraphs 50 and 59 of the NPPF. It is not therefore legally compliant in that it fails to comply with Section 19(2) of the 2004 Act which requires plans to have regard to national policy.</p> <p>Self build homes are important (as indicated by recent government announcements) and are important in providing a high quality built environment.</p> <p><i>A survey should be undertaken to establish the demand for self-build and where there is a need, land should be set aside on housing sites for this purpose.</i></p>	<p>NPPF does not require Local Plans to make provision for self build housing. Para 50 requires local authorities to plan for a wide choice of high quality homes "based on the needs of different groups in the community - of which self build housing may be one such need.</p> <p>A policy to "encourage" self build housing would not be effective. For a policy to be effective it would need to either identify or allocate specific sites or require that a proportion of units for self build be made available on certain allocated sites.</p> <p>The Council does not currently have any evidence on the demand for self-build plots and therefore it would be difficult to justify a policy allocating, or identifying, a site for self-build housing. The effect of such a policy would be to restrict the sale of certain housing plots to people who wish to build, and subsequently occupy, a home for themselves. This places a not insignificant restriction on the landowner and the Council is of the opinion that there is insufficient evidence to warrant such a restriction.</p> <p>The Council has started to collect information from anyone making an enquiry about plots for self build. If a landowner is so minded to offer plots for self build, the Council will be able to inform potential self-builders of the potential opportunity.</p>	
65524 - Keith Wellsted [8636]	Object	<p>Your data is wrong - you do not need this number of houses</p> <p><i>Use better data</i></p>	See responses to Policy DS6	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65891 - Miss L R Vickers [504] 66853 - Mrs Carol Cross [12881] 66856 - Mr Dene Jackson-Clarke [8125] 66859 - Mr Bob Davis [12802] 66862 - Mrs Jennifer Bickerstaff [8130] 66865 - Mr Stephen Pilkington [12615] 66868 - Mr Robert Sutton [573] 66871 - Miss Louise Wilson [8105] 66874 - Frank Roper [8619] 66877 - Hampton Magna Residents' Association (Mr Frank Roper) [12305] 66880 - mr clive fennell [8364] 66883 - Mrs Pamela J Sutton [796] 66886 - Linda I Pearce [12625] 66889 - Mrs Patricia Anne Pilkington [12619] 66892 - L H Powell [11948] 66895 - Mr Brian Robert Pearce [11949] 66898 - Lee Jackson-Clarke [8142]	Object	<p>The Local Plan makes no reference to the self-build housing as required by paragraphs 50 and 59 of the NPPF. It is not therefore legally compliant in that it fails to comply with Section 19(2) of the 2004 Act which requires plans to have regard to national policy.</p> <p>Self build homes are important (as indicated by recent government announcements) and are important in providing a high quality built environment.</p> <p><i>A survey should be undertaken to establish the demand for self-build and where there is a need, land should be set aside on housing sites for this purpose.</i></p>	<p>NPPF does not require Local Plans to make provision for self build housing. Para 50 requires local authorities to plan for a wide choice of high quality homes "based on the needs of different groups in the community - of which self build housing may be one such need.</p> <p>A policy to "encourage" self build housing would not be effective. For a policy to be effective it would need to either identify or allocate specific sites or require that a proportion of units for self build be made available on certain allocated sites.</p> <p>The Council does not currently have any evidence on the demand for self-build plots and therefore it would be difficult to justify a policy allocating, or identifying, a site for self-build housing. The effect of such a policy would be to restrict the sale of certain housing plots to people who wish to build, and subsequently occupy, a home for themselves. This places a not insignificant restriction on the landowner and the Council is of the opinion that there is insufficient evidence to warrant such a restriction.</p> <p>The Council has started to collect information from anyone making an enquiry about plots for self build. If a landowner is so minded to offer plots for self build, the Council will be able to inform potential self-builders of the potential opportunity.</p>	
66769 - Burman Brothers [9138]	Object	<p>Evidence base for the plan is not properly and fully up to date, particularly as it uses out of date demographics and without the inclusion of various studies and Warwick's housing requirement is actually an objectively assessed need for market and affordable housing need for market and affordable within the relevant housing market area.</p>	See responses to Policy Ds6 for further information	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66776 - Trustees of the Haseley Settlement [7411]	Object	<p>The Council has failed to identify an objective assessment of objectively assessed need for housing. In line with government guidance and recent case law RPS sets out that establishing OAN requires four key components; demographic analysis, economic analysis, affordability and market signals. The Council's SHMA used 2011 interim population projections up until 2021 and extended these to 2031. There is concern over the use of headship rates from 2008 and 2011 to extend the forecasts. Affordability is a key component of establishing need for housing, the SHMA identifies a requirement for 268 dwellings per annum to be affordable. The Council sets a target of 40% which would appear to provide the policy context however based on Council's track record providing an average of 86 affordable homes per year over the last five years the ability to achieve triple the historic level of provision is doubtful.</p> <p><i>RPS objects to the Council's demographic approach to OAN for housing on the basis that the evidence is misleading and the level of housing unjustified. To be sound: a the plan should be consistent in its interpretation of the evidence, at present it is not. The assessments of the economic driven scenarios should be informed by the same hybrid headship rate sensitivity test. To not do so is misleading, inaccurate and unsound. the headship rate from the 2008 household projections should be applied at an earlier date than 2021.-the date at which they should be applied from is 2016. RPS also contend that whilst the 40% affordable housing provision rate matches the requirement of 268 dwellings of the plan's proposed figure of 720 dwellings per annum, the poor performance of the Council historically must be held in regard. On the basis of paragraph 29 of the NPPG, there is clear evidence and justification that uplift in the total level of housing is required to deliver on affordable housing requirement, especially in respect of its distribution in the rural area. The Council is basing its OAN upon its latest SHMA published in November 2013. This sets out a number of sensitivity scenarios and recommends that an objective assessment of need is 720 dwellings per annum, which over the plan period is 12,960. The Council then proposes 12,800 dwellings. This is claimed to be aligned to the economic potential of the District in scenario 'PROJA - jobs led', however, there are deficiencies in this comparison and the SHMA significantly under represents the level of growth required to sustain the economic aspirations of the District. The Council's approach should be appraised against the four components of the PPG</i></p>	<p>See responses to Policy DS6 for full response. The key points to make in response are:</p> <p>a) economic projections are useful, but unreliable as a basis for identifying OAN. There is therefore no clear benefit in applying headship rates as proposed in the rep. The NPPG supports the Council's approach of not over-relying on economic projections to assess housing requirements</p> <p>b) the difference between the 720 dwelling pa set out in the JSHMA and the 714 dwelling per annum proposed in the plan is purely as a result of the application of headship rates across the plan period and the fact the Plan period is 2 year less than the Joint SHMA period</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><i>guidance on establishing the OAN, which would demonstrate from the available evidence base that the Council's proposals for 12,800 dwellings over the plan period will lead to a significant under provision of housing and is not representative of an objectively assessed housing need.</i></p> <p><i>In order for the plan to be found sound the Council needs to re-appraise its housing need. RPS contends that the OAN is not 120 dwellings per annum but should actually be based more reliably upon a 'jobs delivery' led economic scenario of providing at least 640 jobs per annum. This according to table 50 of the 2013 SHMA would indicate a need for 1,020 dwellings per annum for Warwick alone. This increased level of provision is much more realistic and would require 18,400 dwellings over the plan period to accommodate 11,500 jobs. Also for consideration is the plan period which should be 20 years from 2011, which would require an OAN of 20,400 dwellings and 12,800 jobs.</i></p>		
66749 - Mr Edward Walpole-Brown [7504]	Object	<p>Insufficient regard has been had in other places in the report and the site analysis to in particular, criteria b) - as emphasised before, insufficient regard has been had to the support and regeneration of existing communities.</p>	<p>The Plan has an emphasis on regeneration in two key areas of the District: Canalside (policy DS17) and Lillington (Policy DS18).</p> <p>The Plan seeks to bring forward new development which in turn will support the economic wellbeing of the District (such as employment areas and town centres etc). It also provides opportunities to add to the District's mix of housing, and other facilities.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65212 - Kenilworth Society (Mrs Patricia Cain) [5617]	Object	<p>Policy H0 is unsound because it is not supported by up-to-date evidence on the likely increase in the population of Warwick District.</p> <p><i>To make "Overarching Policy H0: Housing" we would expect to see a reappraisal of population figures and household numbers, and, where necessary, appropriate adjustments made to the Plan's provision for housing land and to figures for new dwellings. The reductions should be spread across Warwick District.</i></p> <p><i>We note that the population projections for Coventry show an increase over previous forecasts. In the event of the Coventry City Council having to find extra housing sites, we believe that it should do so within the boundaries of Coventry City. We are opposed to recent suggestions made by a Coventry councillor that 5000 houses should be built on green belt in the King Hill/Finham area of Warwick District. This would be incompatible with the green belt's objective of preventing urban sprawl and the coalescence of cities, towns and villages.</i></p>	For responses relating to the housing requirement please responses to Policy DS6. Policy DS20 allows for the potential that in the future Coventry City will not be able to accommodate its level of growth and at that stage the plan may be reviewed in line with a sub-regional approach. This Local Plan does not allocated housing at Kings Hill	
66244 - Crest Strategic Projects [9115]	Object	<p>This objection should be read in conjunction with our representations on Policies DS2 -Providing the Houses the District Needs and DS6 level of Housing Growth.</p> <p>Crest support the principle of this policy which indicates that the Local Plan will meet in fully for the objectively assessed need for housing in the District.</p> <p>The unfortunate position is that the Local Plan fails in meeting this basic principal in that the objectively assessed needs are not met and accordingly the Local Plan does not comply with the NPPF's advice.</p> <p><i>The Local Plan must meet its objectively assessed housing need in full for the District and those needs outside the District.</i></p>	See responses to DS2 and DS6 for full response to the points made	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64535 - Mr K Craven [4484]	Object	<p>The number of housing seems excessive according to comments made in the local paper.</p> <p>All new housing MUST have</p> <p>a) off street parking for at least 2 vehicles</p> <p>b) enough space for the storage of all bins, and recycling boxes/bags to stop residents resorting to leaving them on public view.</p> <p><i>Add this to the terms of new developments</i></p>	<p>For housing requirement see responses to Policy DS6. Policy TR4 sets out the policy requirement in relation to parking. This does not require 2 spaces per dwelling as this is in excess of typical car ownership in the District and could not be justified from the evidence. It would also lead to inefficient use of land. However, it recognised that car ownership is changing and the Council is committed to reviewing the Parking Standards to take account of this and to ensure alignment with the NPPF. Policy B1(n) addresses requirements for bin storage</p>	
66548 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Council intend that this Plan will 'provide in full for the Objectively Assessed Need for housing in the District'. However, as per our representations above and the Coventry Sub-Regional Housing Study (Appendix 2), the focus of national guidance is very much on the housing needs of HMAs. In fact, paragraph 47 of the NPPF states that:</p> <p>"... local planning authorities should:</p> <p>- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."</p> <p>The focus on the District as opposed to the HMA in this Policy is also concerning given that the focus for any review of the document is likely to be justified by the need to assist neighbouring authorities who are unable to meet their own needs; which is likely to be an issue in an urban area such as Coventry.</p> <p><i>Would welcome a change in emphasis of this policy form the District to the HMA to reflect these concerns.</i></p>	<p>This point is accepted. It is proposed to amend the wording of H0 Clause a) to reflect the need to plan for the District's Housing requirement rather than OAN.</p>	<p>Amend Policy H0(a) to read: "provide in full for the District's Housing Requirement"</p>
65881 - Centaur Homes [9117]	Object	<p>Centaur Homes question the necessity of this policy as the content is covered within other policies, therefore it does not meet the requirements of the Framework.</p> <p><i>This policy should be removed from the plan.</i></p>	<p>This policy seeks to provide a strategic framework for the other policies in the housing section. Policies H1-H14 should be read in conjunction with this policy</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66091 - Gleeson Developments [5117]	Object	<p>Criteria a) should include reference to not only meeting the Objectively Assessed Need for housing in the District, but also, where necessary, any unmet need arising from outside of the District.</p> <p><i>Criteria a) should include reference to not only meeting the Objectively Assessed Need for housing in the District, but also, where necessary, any unmet need arising from outside of the District.</i></p>	Meeting unmet need arising from outside the District is addressed by Policy DS20	
66057 - Lenco Investments [1165]	Object	<p>The Council has failed to identify an objective assessment of objectively assessed need for housing. The current proposal is deficient and therefore unjustified and thus unsound.</p> <p>RPS expect the authority's housing need to be based upon the Government's latest demographic evidence with close scrutiny of their relevance for future planning, and any adjustments made to them being fully justified.</p> <p>The Council has used the 2011 Interim Population and Household Projections to inform it's housing figures, however these projections only extend until 2021, whereas the Council's SHMA seeks to extend these over the period 2011 to 2031.</p> <p>It is understood that the SHMA undertook two sensitivity tests. With regard to scenario PROJ1A - 2008 Headship RPS concurs that the use of the 2008 headship rate over the entire plan period in this sensitivity test is likely to be unrealistic.</p> <p>The second sensitivity test PROJ1A - Midpoint Headship seeks to apply a hybrid of the 2011 headship rate data to 2021 and then 2008 rates post this to 2031. RPS concur that this is an appropriate scenario to apply within the SHMA, however RPS objects to the manner in which this sensitivity test is applied.</p> <p><i>RPS has set out evidence on the objective assessment of need and the manner in which the Council's proposals are deficient in content and delivery strategy. RPS request that it is able to provide further oral evidence in respect of this and response to issues raised on this matter at the examination.</i></p>	See responses to Policy DS6 for further justification of the Council's approach to the housing requirement	
66347 - David Wilson Homes [11681]	Support	For reasons set out at policies DS2, DS3 and DS4 we support this policy.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66802 - Gallagher Estates [644]	Support	No objection is raised to this policy suffice to say that it adds little to Strategic Policy DS2 of the Plan which is very similar in its drafting. As set out in responding to Policy DS2 we support the Council's policy intent to provide, in full, for the Objectively Assessed Need for housing in the District. This is commensurate with the NPPF, paragraph 47. We are, however, concerned that in practice the housing requirement figure contained within the Plan at Policy DS6 (12,860 new dwellings 2011 to 2029 as derived from the SHMA) is insufficient to meet the full, objectively assessed need for housing. Please refer to our objections to Policy DS6 and the accompanying Housing Background Paper for further information.	Support noted. Please see responses to Policy DS6 for further information	
65991 - Barwood Development Securities Ltd [12821]	Support	Barwood support this policy which sets out the Council's strategic approach to housing, aiming to ensure the District has the right amount, quality and mix of housing to meet future needs.	Noted	
65222 - Finham Residents Association (Mr R Fryer) [2106]	Support	I write on behalf of the Finham Residents Association. We support the Warwick District Council Local Plan as it is presented currently for consultation. It sets out to meet the housing needs of the area in an integrated way by ensuring that any development is restricted to 50 houses. We oppose the late suggestion from Coventry City Council and Councillor Lynette Kelly that 5000 houses should be built on Kings Hill. We fought similar proposals in 2009 CCC Core Strategy and will object to any building on the Green Belt that is Kings Hill.	Noted	
66700 - Barwood Strategic Land II Limited [9441]	Support	Barwood support this policy which sets out the Council's strategic approach to housing, aiming to ensure the District has the right amount, quality and mix of housing to meet future needs.	Noted	
66292 - Mr H E Johnson [12846]	Support	We support the aim of providing in full for the District's housing need. However, as discussed above, the proposed housing requirement is based on unreliable 2011 Interim Projections and thus is not sound. In addition, these figures do not appear to include an allowance for housing need to be met from other Local Authorities in the HMA, or other neighbouring HMA areas. Accordingly, the requirement proposed is not the objectively assessed housing need and thus does not comply with national policy; nor is it positively prepared.	Noted. Please see responses for Policy DS6 for further information	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H1 Directing New Housing</i>				
66151 - Hatton Estate [3196]	Object	<p>We consider that Hatton Station should be moved into Growth Village category on the basis of the station, which makes the settlement highly accessible to higher order services and facilities in the main towns, and accordingly there should be an allocation for residential development within the settlement. In the Local Plan it is currently designated as a Limited Infill Village. On this basis, we believe that Policies DS11 and H1 of the Local Plan are unsound as they fail the tests in respect to being positively prepared, justified, effective and consistent with national policy.</p> <p><i>We recommend, firstly that Hatton Station moved into Growth Village category (largely on the basis of the station, which provides significant accessibility benefits), and land west of Station Road should be an allocation for residential development within the settlement (as set out in the previous representations of Linden Homes and Hatton Estate).</i></p>	<p>Hatton Station does not have the range of services or the population to support substantial growth. The village hierarchy report sets out why Hatton Station is not categorised as a growth village. The Plan does not allocate any sites to Limited Infill Villages and in these circumstances the site would only comply with Policy H1 if it falls within the settlement boundary.</p>	
66707 - Barwood Strategic Land II Limited [9441]	Object	<p>This policy directs new housing growth in accordance with the Publication Local Plan's Development Strategy. As identified through the Development Strategy policies, the Publication Local Plan directs new housing growth to sustainable locations including urban areas, growth villages and greenfield sites on the edge of Warwick, Leamington and Whitnash.</p> <p>Barwood considers that the allocation of The Asps site would be compliant with Policy H1, as the site presents the opportunity to deliver a Sustainable Urban Extension. This suitability of The Asps is further explored within Chapter 5 of these representations.</p>	<p>Noted. However the Asps is not considered to be a sustainable location for development for a number of reasons, including impacts on landscape and heritage assets</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65353 - Mrs Laura Teodorczyk [5011]	Object	<p>The assessment of Hatton Park as a Growth Village is subjective and only JUST places it into this category.</p> <p>Hatton Park is made up of some 750 homes and is responsible for local population growth of 48% since 2001.</p> <p>There is already a wide range of housing types - including affordable housing.</p> <p>Facilities and services within Hatton Park are insufficient to be associated with a Growth Village.</p> <p><i>A Housing Needs Survey for the Parish of Hatton carried out in May 2014 demonstrated a need for 12 dwellings. Any development at Hatton Park is therefore unnecessary.</i></p> <p><i>The calculation and subsequent categorisation of Hatton Park as a Growth Village is highly questionable and should be carefully assessed.</i></p> <p><i>Hatton Park should not be the location of further growth on top of the c.750 homes it has provided in the last 15 years.</i></p>	<p>The Village Hierarchy report sets out the justification for including Hatton Park as a growth village. The proposal to distribute development to growth villages is not only about meeting local need, but is also about meeting the District's housing need in sustainable locations and in a way that supports the longer wellbeing of rural communities.</p>	
66335 - Cllr Ann Blacklock [1090]	Object	<p>Drawing the Growth Village [new Green Belt] boundary so tightly around existing settlement in Burton Green plus proposed new H24 allocation precludes the possibility of a windfall in the future.</p>	<p>To draw the boundary more loosely would effectively lead to the allocation of sites within the village, yet other sites on the edge of the village have been assessed as unsuitable. There are opportunities for windfalls due the nature of Policy H1 which allows for housing development within the growth villages boundaries .</p>	
65238 - Deeley Group Ltd [11623] 65284 - A C Lloyd Homes Ltd [5958]	Object	<p>It is considered that the subsequent explanation and linked policies do not allow this policy to be fully delivered. Specifically, the policy states that it will direct new development to Growth Villages, but the later approach to this is limited solely to allocated sites. It is considered that new housing should not only be allowed on the sites shown on the Policies Map for the Growth Villages, but also on other suitable sites that can assist in meeting the District's housing requirements.</p> <p><i>It is considered that new housing should not only be allowed on the sites shown on the Policies Map for the Growth Villages, but also on other suitable sites that can assist in meeting the District's housing requirements.</i></p>	<p>The Policy does not limit housing development to allocated sites in growth villages. Policy H1(1b) is indicates that housing development will be permitted within growth villages and limited infill villages. However to clarify this and ensure there are no misunderstandings it is proposed to amend b).</p>	<p>Amend Policy H1(1b) to read: within the boundaries of Growth Villages and Limited Infill Villages, as identified below and as shown on the Policies Map;</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66225 - Savills (Mr Richard Shaw) [11305]	Object	<p>There is no justification for the reduction in housing capacity for Kingswood from between 100 to 150 in the Revised Development Strategy to 43 in the Publication Draft. Part of site 8 (Land to the south of Kingswood Close) fronting onto Station Lane (as identified in the enclosed plan) should be allocated for 9 - 16 houses</p> <p><i>Allocation of part of Site 8 (Land to the south of Kingswood Close) fronting onto Station Lane (as identified in the enclosed plan) for 9 - 16 houses.</i></p> <p><i>This site forms a smaller part of SHLAA site R110 which was discounted during the Village Housing Options and Settlement Boundaries consultation process as a result of concerns over the tree frontage and access.</i></p> <p><i>However, this process did not take account of the availability of adjoining land at Kingswood Farm that would allow access to be provided without harm to the tree frontage.</i></p>	<p>The original amount allocated to the growth villages in the Revised Development Strategy reflected an assessment of the potential capacity of the village based on factors such as the quality of services, the existing population and potential sites. Further work through the village consultation process and the SHLAA identified site suitability and capacity allowing the final number to be reached for each village. In the case of Kingswood the final figures reflected flood risk and landscape constraints. In relation to the individual capacity of allocated sites it is proposed elsewhere to amend the plan to state that the figure stated is approximate. Discounted site 8 is located in a corridor of high landscape value and with features of ecological importance. It is considered that development in this location would significantly change the character of this very visible and open Green Belt area.</p>	
67145 - Mr Ray Steele [5886]	Object	<p>Since there is not yet an authorised Development Plan WDC has exceeded their authority in granting planning permission to so many applications that are part of the Local Plan. Suggestions to WDC that these should be withdrawn pending the outcome of the inspection have been ignored</p>	<p>This representation is referring to the assessment of planning applications and is not therefore relevant to policy H1</p>	
65339 - Mr Carl Stevens [4873]	Object	<p>For these areas where green belt is involved the circumstances for those areas are not exceptional enough to lose the heritage land in this way as per NPFF.</p> <p><i>Green belt land within these areas must be removed from the plan</i></p>	<p>Green belt sites have only been allocated in locations where the Council considers there are exceptional circumstances.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66391 - Mr John Fletcher [8466]	Object	Coventry City Council might be prepared to sell to WDC land it owns on outskirts of Coventry but within WDC area. This is Green Belt land but status not easily defensible in current housing situation and the area allows easy car access to proposed Gateway site. Land would be sufficient for up to 5,000 homes. It is reported that the leader of Warwick DC has rejected this offer out of hand	This site is green belt and no exceptional circumstances have been justified to support the allocation of this site.	
65356 - Martin Teodorczyk [5004]	Object	<p>Hatton Park should not be considered as a Growth Village because:</p> <p>Classification is unsound, subjective and borderline;</p> <p>Hatton Park has provided significant population growth, especially young people</p> <p>There is already a wide range of housing types;</p> <p>A Housing Needs Survey for the Parish of Hatton carried out in May 2014 demonstrated a need for 12 dwellings.</p> <p>The calculation and subsequent categorisation of Hatton Park as a Growth Village is highly questionable and should be carefully assessed.</p> <p><i>The calculation and subsequent categorisation of Hatton Park as a Growth Village is highly questionable and should be carefully assessed.</i></p>	The village hierarchy justifies the inclusion of Hatton Park as a growth village. Whilst it is acknowledged that the village's facilities/services are not as extensive as many villages of its size, it does have a number of core facilities and is considered to be a sustainable location. Further the proposed growth has the potential to support and sustain the village's services.	
66750 - Mr Edward Walpole-Brown [7504]	Object	We challenge the distribution and in particular, the table which features at 4.7 and the classification of the areas at Hatton Park and Hatton Green separately. We contend that Hatton Green should be considered in the context of the Hatton area generally and be more aligned to a growth village. It should feature highly and this is supported by the first sentence of 4.7 which recognises the need to direct growth to those villages which .... "have a reasonable range of services and facilities" - it should feature more highly in the mix of Site Allocations. There are more key services available in the Hatton Green area than at Hatton Park.	Whilst there are clearly some connections between the two settlements, they are separate and development at Hatton Green is not considered to be a sustainable location in comparison with Hatton Park. However it is recognised that development at Hatton Park, may support services in Hatton Green.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65718 - Court (Warwick) Ltd (Richard Hayward) [7361]	Object	<p>Identification of Stoneleigh as Limited Infill Village is supported but it is considered that the forms of development likely to be permitted are unnecessarily restrictive/inflexible, and as a result the Plan will not deliver the level of windfalls required to meet the housing needs. Plan therefore is ineffective/unsound.</p> <p>Limitation on use of garden land in Policy H1 is deemed unnecessary/redundant in that impacts of a development are to be considered under other Plan policies. No policy objection in principle to development of garden land contained in national planning guidance. Paragraph 53 of the Framework notes that lpa's should consider the case for setting out policies to resist inappropriate development of residential gardens where specific circumstances exist, (e.g. where development would cause harm to local area). Guidance does not set automatic/general presumption against development of garden land.</p> <p>Little legacy of redundant brownfield sites in Limited Infill Villages in order to provide opportunities for windfall housing development. There are, examples of waste, unused, under-used and damaged plots of 'greenfield' land within villages which could be released for housing without harm to character/appearance of village. Release of such sites would provide best efficient/effective use of land and make important contribution to supply of housing.</p> <p><i>Policy H1 section 2 should be deleted</i></p>	Policy H1(2) clarified how Para 53 of the NPPF will be applied in local circumstances and explains the circumstances where garden land development may be acceptable.	
66245 - Crest Strategic Projects [9115]	Object	<p>Crest object to the proposed hierarchy in that it does not consider how unmet development needs from adjoining Districts can and should be met. It is highly likely that the District will have to accommodate some of the unmet housing needs from Coventry City. The Local Plan should consider how best such housing needs can be accommodated in a sustainable way.</p> <p>It is concluded that these housing needs me best accommodated on land currently within the green belt to the south of Coventry. Where it has been recognised previously that Coventry's housing needs could not be met land to the south of Coventry partly in the green belt have been identified for release. Crest control land at Lodge Farm, which is immediately available to accommodate additional housing development the Joint Strategic Green Belt Study confirmed that the land had potential to be released from the green belt.</p> <p><i>Amend the Distribution of New Housing to indicate a further distribution tier namely land to the south of Coventry.</i></p>	It has not been established that there is a need to meet Coventry's growth within the District's boundaries and in these circumstances exceptional circumstances for growth within the green belt adjacent to Coventry cannot be justified.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66457 - Environment Agency (Becky Clarke) [6581]	Support	In line with recommendations within Halcrow Water Cycle Study 2010, which recommends that: „Floodplains should be safeguarded from future development and local authorities must apply the Sequential Test to ensure all new development is directed towards Flood Zone 1 in the first instance. Opportunities should be taken to reinstate areas of functional floodplain which have been previously developed and Flood Zones 2 and 3 should be left as open space“ Recommend addition of the following points within the policy wording: vi) the development is not at risk of flooding and will not increase the risk of flooding elsewhere. vii) All development proposals should be discussed with STW at the earliest possible opportunity, to understand the constraints for development and potential upgrades required to ensure the provision of adequate foul/ waste water infrastructure.'	Policies FW1, applies to all new housing development and therefore provides the protection to flood plains being sought in the representation	
65883 - Centaur Homes [9117]	Support	Centaur Homes support Hampton Magna being identified as a Growth Village, however, due to the acknowledged limited supply of sites in urban areas, this Policy should make a provision for development to be allowed to occur in locations adjacent to existing settlement boundaries. This Policy provides an opportunity for development to occur on brownfield sites adjacent to settlement boundaries, not only to re-use redundant or disused buildings, but to re-use the whole site to enhance the local environment	Support noted. Policy H1(1b) sets out the circumstances where development will be permitted within village boundaries. Outside these areas, proposals would need to comply with H1(1c) and, of course, paras 55 and 88 of the NPPF. In this context the Council considers that there is a clear policy framework already in place to address the circumstances described in this representation. The Council does not consider it appropriate, or consistent with the NPPF para 55 to have a policy which necessarily allows development on brownfield sites adjacent to settlement boundaries and that it is therefore considered that it is not appropriate or necessary to amend policy H1 to	None
65472 - King Henry VIII Endowed Trust (Warwick) [6195]	Support	The Trust supports the Council's decision to direct most new development to sites within, or to the edge, of the main towns within Warwick District namely Leamington, Warwick, Whitnash and Kenilworth. Having regard to existing development constraints within the district, including the extent of designated Green Belt land, we also support the Council's decision to direct some development to named 'Growth Villages'. Accordingly, the Trust broadly supports the distribution of housing growth and the spatial hierarchy set out in policy DS10 'Broad Location of allocated Housing Sites' and Policy H1 'Directing New Housing'.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66299 - Mr H E Johnson [12846]	Support	We support the Council's aims to create healthy, safe and inclusive communities.	Noted	
65525 - Sharba Homes Group [12779]	Support	We agree with paragraph 4.7 of the plan, which offers detailed explanation on this policy. This correctly identifies Barford as a Growth Village within the District, therefore designating it as an area where a level of housing growth is to be expected.	Noted	
65720 - Mark and Sarah Grimes [12973]	Support	H1 is considered sound. Support criterion b) presumption in favour of new housing development within Limited Infill Villages. Bubbenhall is designated as a Limited Infill Village	Noted	
64959 - Mrs Angela Fryer [2105]	Support	I support the housing plans suggested as they look at small developments of approximately 50 houses maximum. I object to any plans put forward by Coventry City Council for the building on the land of Kings Hill. This suggestion by CCC of offering Green Belt land for up to 5000 houses is totally unacceptable as it will destroy Green Belt and remove the existing 'buffer' of green land between Kenilworth and Coventry creating an	Noted	
66040 - A C Lloyd Homes Ltd [5958]	Support	The Council has carefully considered the strategy for distributing housing across the District to ensure the needs of all can be met in the most sustainable manner. The designation of Growth Villages, irrespective of whether they lie in the Green Belt or not, is an appropriate way to ensure the needs of the more rural areas can be met, consistent with national policy. In particular the recognition that Kingswood should be designated as a Growth Village is appropriately justified by the Council's evidence base.	Noted	
66731 - Sir Thomas White's Charity & King Henry VIII Endowed Trust [3186]	Support	The designation of Growth Villages, irrespective of whether or not they lie in the Green Belt, is an appropriate way to ensure the needs of the more rural areas can be met, consistent with national policy. In particular the recognition that Cubbington should be designated as a Growth Village is appropriately justified by the Council's evidence base.	Noted	

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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>
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*H2 Affordable Housing*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66834 - Europa Way Consortium [197]	Object	<p>We are concerned that the wording requiring a minimum of 40% affordable housing may not allow sufficient flexibility to take into account viability or site specific factors. Consideration of viability is required to be consistent with para 173 of the NPPF.</p> <p>With regard to sub point ii) sizes, types, and tenures of homes; flexibility is needed to allow for changing housing needs and market conditions over the time required to build an urban extension. Flexibility is needed to facilitate a wide range of factors being taken into account in determining overall housing mix.</p> <p>We would recommend changing the words 'determined on' in the first line to 'guided by'.</p> <p>There is a very real danger of creating pockets of relative social exclusion if the proportions of social rented tenures are inflexibly required.</p>	<p>The flexibility in the policy is included within the statement that the provision will be the subject of negotiation at the time of the planning application. This will include viability issues but could also include any other issues which are relevant to the issue of meeting affordable housing needs (including those set out in para 50).</p> <p>If market conditions fall back, then the applicant will be able to justify a reduced provision on the basis of viability. However evidence from the recent past, when markets were less active than usual following the credit crunch, shows that this District is an attractive location in which to develop homes and a proportion of 40% affordable homes has been forthcoming on most sites. In general it is sites with particular development constraints (such as heritage considerations or costs associated with site clearance or contamination) where the applicant has been able to demonstrate viability issues.</p> <p>This policy is not significantly changed from the existing Local Plan policy which has served the Council through high and low market conditions. Indeed, the Viability Assessment was carried out during a time of low market conditions and it still concluded that there were relatively high levels of viability on some sites in the District.</p> <p>With regard to size, type and tenure, this will need to meet needs as evidenced by the SHMA, other local needs surveys and other information. In practice the determination of more specific needs will be informed by the Housing Register as well as feedback from Registered Providers in terms of demand. For example, whilst social rented housing will always be in demand, there may not always be demand for certain sizes of affordable rented properties due to the higher rent levels. Similarly, the demand for shared equity homes may depend upon the ability to obtain mortgage funding. All these considerations will be taken into account in negotiations on the sizes, types and tenures of homes to be provided.</p> <p>The Council maintains that where affordable housing is provided in small pockets across the site (rather than concentrated in one particular part of the site) then issues of lack of community cohesion will not</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>Create greater flexibility in the wording of the overarching policy to state:</p> <p>H2: Residential development on the following sites will not be permitted unless provision is made for at least 40% affordable housing to meet local needs where viable.</p> <p>Delete the words 'The viability of the development will be a consideration in such negotiations' (4th para).</p> <p>Change the words in Policy H2, sub point ii) from 'determined on' in the first line to 'guided by'.</p>	<p>occur.</p>	
66293 - Mr H E Johnson [12846]	Object	<p>We support the Council's intention to provide affordable homes. However, we object to a blanket requirement of 40%: this is too prescriptive. It is not justified or effective and the policy is therefore unsound. The policy should make it clear that the amount of affordable housing will be determined on a site by site basis with an overall aim of achieving 40% where possible and viable, in order to be sound.</p>	<p>The Affordable Housing Viability Study Addendum did not come to any conclusions regarding the proportion of affordable housing. This was because the evidence showed that there are differing levels of viability on different types of sites in different locations, depending upon the tenure mix of affordable housing. The problem for the Council is that if it chooses to pitch the proportion at a level where most sites would be viable, it would be missing out on affordable housing on some sites which could have delivered a higher proportion. This was the reason why the Consultants suggested a zonal approach. The Council considered this as an approach but concluded that it would be impossible to determine sensible boundaries and proportions for different zones. The most sensible approach was considered to be a flexible one where the existing proportion of 40% is continued but with flexibility for negotiation, which would include viability issues. The existing proportion of 40% has been implemented since 2009 and has been successful in delivering sensible proportions of affordable housing or contributions for off-site</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65526 - Sharba Homes Group [12779]	Object	We seek clarification on this policy over whether Growth Villages, as defined in policy H1 fall under point A or point B, as the policies map does not identify rural areas explicitly.	Recent Government's changes to Planning Policy Practice states that contributions should not be sought from "developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000 sqm". In view of this the Council is obliged to amend the Policy to include a common threshold of 11 or more dwellings to apply to all areas. The Council proposes that sub-sections a) and b) of the policy be deleted and the first paragraph of the policy be amended to set a threshold of developments of: - 11 units or more, and; - a combined gross floorspace of more than 1,000 sq.m.	Amend Policy H2 as follows:  Amend first paragraph of the Policy to read: Residential development on sites of 11 or more dwellings, where the combined gross floorspace is more than 1,000 sq.m., will not be permitted unless provision is made for a minimum of 40% affordable housing to meet local needs.  Delete a) and b) of the Policy Amend para 4.15 of the Explanation to read: The target percentage of 40% and the site size threshold are evidenced by the Affordable Housing Viability Assessment (2011) and the follow-up Addendum (2012)  Delete para 4.17 of the Explanation and its sub-heading.
		<i>We seek clarification on this policy over whether Growth Villages, as defined in policy H1 fall under point A or point B, as the policies map does not identify rural areas explicitly.</i>		
66469 - Gladman Developments (Peter Dutton) [9149]	Object	Sets out that development will not be permitted unless provision is made for 40% affordable housing of sites of 10 or more dwellings, or 0.3 ha or more within the urban areas, and on sites of 5 or more dwellings or 0.17 ha within rural areas. Policy Analysis Council should ensure that its affordable housing requirements are based on robust evidence, taking account of development viability. In this regard we note that the authority's most recent Affordable Housing Viability Study was published in 2011, with a further addendum prepared in 2012. Concerned as to whether this evidence is out-of-date inadequate to support the LP's proposals. Conclusions on Soundness In light of the time that has passed since publication of affordable housing viability evidence, query whether this is still up to date and sufficient to support the approach set out in Policy H2.	The Viability Assessment Addendum is 3 years old and it is not considered that this is unduly out of date, especially since the report took into account different housing market conditions. If such reports were only considered to be sufficient evidence for a few years, it would be inappropriate to base on their findings a Local Plan policy which could endure for 15 years. The Council considers that it would be an inappropriate use of public money to undertake reviews of this type of evidence every 2 years.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66751 - Mr Edward Walpole-Brown [7504]	Object	We feel the Policy is unsound and needs to be challenged on the basis that it indicates there should be a minimum of 40% affordable. We should suggest that it should be up to 40% subject to viability and establishing local needs. Whilst it is accepted there may be an affordable housing problem, much of this has been due to the lack of supply of housing land as a result of ineffective Plans from the past and the inability to delivery adequate land for housing growth.	The Council considers that if the policy wording included the requirement for "up to 40%" affordable housing, this would significantly impact upon its effectiveness. "Up to 40%" suggests that any proportion up to this level is acceptable and the majority of developers would choose to deliver no affordable homes. If the policy was to suggest that the amount should be subject to local needs and viability, this would lead to long and drawn out negotiations and discussions on every eligible site. The policy is not dissimilar to the current adopted policy and this has worked well in delivering sensible amounts of affordable housing, or financial contributions, in respect of suitable and viable sites.	No change
66048 - Home Builders Federation Ltd (Ms Sue Green) [7773] 66092 - Gleeson Developments [5117] 66112 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991] 66122 - Mr and Mrs Martin [12851]	Object	<p>This policy proposes that a minimum of 40% affordable housing to meet local needs is provided on residential developments of 10 or more dwellings within the urban area and 5 or more dwellings within the rural areas. The form of affordable housing, its location on the site and its means of delivery will be subject to negotiation at the time of a planning application.</p> <p>Policy H2 together with other policy requirements such as Policy CT5 Infrastructure Contributions to Meeting Places, Cultural Facilities and Public Art, Policy CC3 Building Standards Requirements, and DM1 Infrastructure Contributions are not justified by the viability assessments, which demonstrate that at the Baseline Market Position no development was viable at 40% affordable housing provision.</p> <p><i>Paragraph 10.8 of the Affordable Housing Viability Assessment recommends "given that certain areas of the District perform far better than others, DTZ would suggest Warwick District Council consider producing a zoned affordable housing policy which has different affordable housing percentages by area".</i></p>	It is the case that viability varied across the different zones tested in the Affordable Housing Viability Assessment but it will also vary within zones. For example, Leamington town centre had high levels of viability overall but clearly some parts of the town centre would show lower levels of viability - such as Leamington Old Town which lies south of the river. In general, the Viability Assessment showed that viability across the District was generally good. The Council takes the view that it would be impossible to draw a line around zones where different proportions of affordable housing could be sought. It would be better to apply a blanket approach and consider aspects of viability when and where they occur.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65477 - King Henry VIII Endowed Trust (Warwick) [6195]	Object	<p>We broadly support the 40% affordable housing target to meet local needs. However the policy wording may not allow sufficient flexibility to take into account viability or site specific factors. Not in all cases will 40% affordable housing be viable.</p> <p>Viability is referred to in the second paragraph of the policy; however this appears to relate solely to the form of provision, its location on site and the means of delivery.</p> <p>Whilst we acknowledge that the SHMA is an important source of housing needs information, applying this policy rigidly may not necessarily assist in meeting local housing needs. The SHMA is only a 'snapshot' in time and will not always reflect the dynamic nature of the housing market. We would emphasise the need for flexibility to ensure that a wider range of factors can also be taken into account in determining the overall housing mix. These may include site specific factors relating to the existing local area or site specific viability factors.</p> <p>There is a very real danger that pockets of relative social exclusion may result and indeed that the mix prescribed for the urban extension may prejudice its compatibility and full social integration into the main core community to which it relates. Such dangers are obviously exacerbated in circumstances in which relatively high percentages of affordable housing and, within this, relatively high proportions of social rented tenures are being inflexibly required, with no scope for reasonable negotiation.</p> <p><i>H2 Affordable Housing</i>  <i>Residential development on the following sites will not be permitted unless provision is made for at least 40% affordable housing to meet local needs where viable:</i>  <i>a) within the urban areas, sites of 10 or more dwellings, or 0.3 hectares or more in area irrespective of the number of dwellings; and</i>  <i>b) within the rural areas, sites of 5 or more dwellings, or 0.17 hectares in area irrespective of the number of dwellings.</i>  <i>The form of provision, its location on the site and the means of delivery of the affordable element of the proposal will be subject to negotiation at the time of a planning application. Planning permission will not be granted until satisfactory arrangements have been made to secure affordable housing as determined by the following principles.....[ no proposed modifications to the wording of the remainder of the Policy].</i></p>	<p>Viability  With regard to viability, the Council considers that the "form of provision" means the details of provision in physical terms and this would include the quantity of affordable homes. A recent example of such negotiations includes those with the objector regarding the allocated site west of Europa Way where the amount of affordable housing was reduced to take into account specific site factors.</p> <p>Housing Mix  The future housing needs in the SHMA are not a snapshot. They are based on the projections of households, including projections of household formation, and the way in which different types of households occupy dwellings including affordability of different tenures of dwellings. Sub-section II of the Policy also refers to local needs being determined by "other local needs surveys and information".</p> <p>The Council maintains that where affordable housing is provided in small pockets across the site (rather than concentrated in one particular part of the site) then issues of lack of community cohesion and social deprivation will not occur.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66770 - Burman Brothers [9138]	Object	Understand Council's desire to see to provide a requirement on all principle sites of up to 40% affordable housing, this has got to be properly tested for each allocation in terms of tenure/mix	The Council is unsure what is being suggested here. If the suggestion is that the desired affordable/market tenure mix is tested, then the Council's response is that the developer is welcome to test the viability (or any other aspect of the scheme)and share this with the Council during negotiations.	
65884 - Centaur Homes [9117]	Object	<p>The Policy could be interpreted to seek higher levels of affordable housing and, therefore, lacks any precision or certainty for applicants. In accordance with the SHMA, the amount of affordable housing required in the District is broadly proportionate to 40% of the total housing need, excluding any requirement that arises assisting adjacent authorities with their housing need. The insertion of "up to 40%" merely reflects the need for flexibility with proposals involving an odd number of houses.</p> <p><i>The wording of the policy should be altered to remove "a minimum of", from the Policy and be reworded as follows: 'Residential development on the following sites will not be permitted unless provision is made for up to 40% affordable housing to meet local needs.'</i></p>	The Council maintains that the suggested wording would mean that 40% is the maximum and that 1% may be acceptable. The spirit of the Policy is that 40% is the starting point but if issues of viability can be proven the Council may agree to a lower figure. The Policy must be written in this way otherwise very small proportions of affordable housing will be achieved and this will not meet needs as required by NPPF.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66246 - Crest Strategic Projects [9115]	Object	<p>Objections are lodged to the proposed 40% affordable housing provision. This is contrary to the evidence which concludes that 35% affordable housing is a viable level. The purpose of the Plan led system is to provide certainty to developers, landowners etc. If the Council ignore their own evidence and adopt a higher threshold for affordable housing, there will be no guarantee that they would adopt a flexible approach once the 40% threshold was adopted.</p> <p>This approach is totally contrary to the guidance in the NPPF which requires that viability of affordable housing and other policy requirements of the plan are deliverable and to ensure that these do not render development unsuitable and thus that plans undeliverable. The onus should not be placed on the developer to provide viability but for the Council to ensure that viability has been assessed when arriving at the initial figure for affordable housing within policy. This is in line with the NPPF but also the decision in Blyth Valley DC v Persimmon Homes (North East) limited (2008).</p> <p>Concerns are also expressed at the content of the viability assessment which underpins the affordable housing policy. It considered that either a number of costs have not been taken into account e.g. biodiversity offsetting, flood mitigation etc or that the figures included within the viability assessment are too low e.g. planning contributions.</p> <p><i>In view of the above, it is recommended that the policy be amended to reflect the level of affordable housing based on the evidence base i.e. 35%. In addition, the Council should also undertake a financial viability assessment to ensure that it is compliant with NPPF and the Blyth Valley judgement</i></p>	<p>The Affordable Housing Viability Study Addendum did not come to any conclusions regarding the proportion of affordable housing. This was because the evidence showed that there are differing levels of viability on different types of sites in different locations, depending upon the tenure mix of affordable housing. The problem for the Council is that if it chooses to pitch the proportion at a level where most sites would be viable, it would be missing out on affordable housing on some sites which could have delivered a higher proportion. This was the reason why the Consultants suggested a zonal approach. The Council considered this as an approach but concluded that it would be impossible to determine sensible boundaries and proportions for different zones. The most sensible approach was considered to be a flexible one where the existing proportion of 40% is continued but with flexibility for negotiation, which would include viability issues. The existing proportion of 40% has been implemented since 2009 and has been successful in delivering sensible proportions of affordable housing or contributions for off-site</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66192 - Hallam Land Management and William Davis [8278]	Object	<p>In its present form there are a number of concerns about this policy, it is considered inconsistent with the advice in para. 50 of the NPPF and on that basis is unsound.</p> <p>If market conditions for the development of land for new homes were to fall back from those currently experienced, securing the provision of at least 40% of the new homes as affordable on any one site, may render a development proposal unviable. The policy as presently drafted is insufficiently flexible to allow for such future circumstances.</p> <p>It is considered that by including in Policy H2 the expression that on all qualifying sites, a minimum of 40% of the new housing must be affordable, then there will be flexibility in the application of the policy over time.</p> <p><i>In order to make Policy H2 consistent with the advice on the NPPF and to reflect the findings about housing need in the 2012 SHMA, the first paragraph of policy should be modified as follows, in order to make it sound.</i></p> <p><i>"Residential development on the following sites will not be permitted unless provision is made for affordable housing.</i></p> <p><i>(a) within the urban areas, sites of 10 or more dwellings, or 0.3 hectares or more in an area irrespective of the number of dwellings; and</i></p>	<p>The Council considers that the policy does comply with NPPF para 50. The flexibility in the policy is included within the statement that the provision will be the subject of negotiation at the time of the planning application. This will include viability issues but could also include any other issues which are relevant to the issue of meeting affordable housing needs (including those set out in para 50). If market conditions fall back, then the applicant will be able to justify a reduced provision on the basis of viability. However evidence from the recent past, when markets were less active than usual following the credit crunch, shows that this District is an attractive location in which to develop homes and a proportion of 40% affordable homes has been forthcoming on most sites. In general it is sites with particular development constraints (such as heritage considerations or costs associated with site clearance or contamination) where the applicant has been able to demonstrate viability issues.</p> <p>This policy is not significantly changed from the existing Local Plan policy which has served the Council through high and low market conditions. Indeed, the Viability Assessment was carried out during a time of low market conditions and it still concluded that there were relatively high levels of viability on some sites in the District.</p> <p>The Council is unclear why the respondent considers a proportion of 37% is justified.</p> <p>The Council considers that the wording of the suggested alternative policy is insufficiently clear and will not maximise the Council's ability to provide for affordable housing on suitable and viable sites. Further, it would lead to protracted negotiations due to the lack of clarity in the policy.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>(b) within the rural areas, sites of 5 or more dwellings, or 0.17 hectares in area irrespective of the number of dwellings.</i></p> <p><i>The means of provision either on-site, off-site or via a contribution of broadly equivalent value will be the subject of agreement with the Council.</i></p> <p><i>Affordable Housing will comprise in the order of 37% of the overall scale of provision on any qualifying site, subject, as appropriate, to sustaining the viability of the overall scheme and as agreed with the Council."</i></p>		
65244 - Deeley Group Ltd [11623] 65291 - A C Lloyd Homes Ltd [5958]	Object	<p>Deeley Group object to part (b) of policy H2 regarding Affordable Housing. It is considered that the threshold of sites of 5 or more dwellings or 0.17 hectares is too low and disregards the costs of developing small sites over larger one's. This policy will have an adverse effect on the ability of developers to bring forward small sites which can provide a valuable contribution to housing provision across the district. If a higher threshold is introduced this will encourage more sites to come forward and more affordable housing provision to be provided in the District.</p>	<p>The Government's recent changes to Planning Policy Practice states that contributions should not be sought from "developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000 sqm".</p> <p>In view of this, the Council proposes that sub-sections a) and b) of the policy be deleted and the first paragraph of the policy be amended to set a threshold of developments of:</p> <ul style="list-style-type: none"> <li>- 11 units or more, and;</li> <li>- a combined gross floorspace of more than 1,000 sq.m.</li> </ul>	<p>Amend Policy H2 as follows:</p> <p>Amend first paragraph of the Policy to read: Residential development on sites of 11 or more dwellings, where the combined gross floorspace is more than 1,000 sq.m., will not be permitted unless provision is made for a minimum of 40% affordable housing to meet local needs.</p> <p>Delete a) and b) of the Policy</p> <p>Amend para 4.15 of the Explanation to read: The target percentage of 40% and the site size threshold are evidenced by the Affordable Housing Viability Assessment (2011) and the follow-up Addendum (2012)</p> <p>Delete para 4.17 of the Explanation and its sub-heading.</p>
		<p><i>A higher threshold for sites to deliver affordable housing should be introduced.</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>
66348 - David Wilson Homes [11681]	Object	<p>We support this policy, however we recommend that the Council applies a flexible approach to viability and deliverability as emphasised in the Framework which states that 'the sites and the scale of development identified in the plan should not be subject to such a scale of obligation and policy burden that their ability to develop viably is threatened'.</p> <p>This applies equally to the setting of and application of affordable housing policies.</p>	<p>The flexibility in the policy is included within the statement that the provision will be the subject of negotiation at the time of the planning application. This will include viability issues but could also include any other issues which are relevant to the issue of meeting affordable housing needs (including those set out in para 50).</p> <p>If market conditions fall back, then the applicant will be able to justify a reduced provision on the basis of viability. However evidence from the recent past, when markets were less active than usual following the credit crunch, shows that this District is an attractive location in which to develop homes and a proportion of 40% affordable homes has been forthcoming on most sites. In general it is sites with particular development constraints (such as heritage considerations or costs associated with site clearance or contamination) where the applicant has been able to demonstrate viability issues.</p> <p>This policy is not significantly changed from the existing Local Plan policy which has served the Council through high and low market conditions. Indeed, the Viability Assessment was carried out during a time of low market conditions and it still concluded that there were relatively high levels of viability on some sites in the District.</p>	No change
		<p><i>We recommend that the Council applies a flexible approach to viability and deliverability as emphasised in the Framework</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>
66549 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Policy H2 should be re-worded in order to clarify that the overall requirement of 40% affordable housing can be reduced based on viability. In its current form the policy appears to allow for the: form of provision of affordable housing; location on the site of affordable housing; and the means of delivery of affordable housing to be subject to negotiation at the time of a planning application, and it states that the viability of the development will be a consideration in such negotiations.</p> <p>However, this does not clearly state that the actual proportion of affordable housing can be negotiated based on the viability of a site, which when considered against paragraph 173 of the NPPF is something which a developer should clearly be capable of doing.</p>	<p>The flexibility in the policy is included within the statement that the provision will be the subject of negotiation at the time of the planning application. This will include viability issues but could also include any other issues which are relevant to the issue of meeting affordable housing needs (including those set out in para 50).</p> <p>If market conditions fall back, then the applicant will be able to justify a reduced provision on the basis of viability. However evidence from the recent past, when markets were less active than usual following the credit crunch, shows that this District is an attractive location in which to develop homes and a proportion of 40% affordable homes has been forthcoming on most sites. In general it is sites with particular development constraints (such as heritage considerations or costs associated with site clearance or contamination) where the applicant has been able to demonstrate viability issues.</p> <p>This policy is not significantly changed from the existing Local Plan policy which has served the Council through high and low market conditions</p>	No change
		<p><i>Policy H2 should be re-worded in order to clarify that the overall requirement of 40% affordable housing can be reduced based on viability.</i></p>		
65996 - West Midlands HARP Planning Consortium [5118]	Support	<p>We are supportive of the 40% affordable housing target. However the policy wording currently states that residential development "will not be permitted unless provision is made for a minimum of 40% affordable housing" We are of the opinion that such a blanket policy does not allow the flexibility a developer may require to bring forward sites that may not be viable at such a high rate of delivery. In the interests of delivering more affordable housing it would be of benefit to the Council to make clear that lower contributions may be acceptable providing the developer can offer clear evidence to justify a lower target.</p>	<p>The Policy makes clear that the provision will be subject to negotiations at the time of the planning application and that viability will be a consideration in such negotiations.</p>	No change
65527 - Keith Wellsted [8636]	Support	Needed	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66589 - Catesby Property Group (Mr David Morris) [7776]	Support	In general terms we support draft Policy H2 which seeks to secure affordable housing as part of new development. In particular, we support the recognition that the location and means of delivery will be the subject of negotiation and will account for site specific factors such as viability, in accordance with paragraphs 173 and 174 of the NPPF. We would also support a policy which provides flexibility in terms of the sizes, types and tenures of affordable homes provided and which does not seek to set out a prescribed mix. The affordable housing mix needs to respond to the evolving requirements of Registered Providers and allow for flexibility to assist with delivery to meet housing need and align with their funding constraints.	Noted	
65176 - Sundial Group Ltd [12683]	Support	The Affordable Housing mix needs to respond to the evolving requirements of Registered Providers and allow for flexibility to assist with delivery.	National Planning Policy Guidance states that affordable housing provision should meet the identified needs but take account of changing market conditions. The policy allows for issues of viability, which are the issues most likely to result from changing market conditions.	No change
<i>H3 Affordable Housing on Rural Exception Sites</i>				
66534 - Friends of the Earth (John Brightley) [1113]	Object	We also make the following comment: Proposed policy H3 c) 1 - the phrase "where possible" should be omitted for clarity. It is actually clarified by part III of this proposed policy.	Agreed that there is an element of repetition between c)I and c)III.  It is suggested that c)I and c)III are incorporated into c)I and c) III is deleted along with associated grammatical amendments to c)II.	Amend c) I to read:  "all of the affordable housing to be provided will only be available (both initially and for subsequent occupancies) to those with a demonstrable housing need and, first and foremost, to those with a need to be housed in the locality; and"  Amend c)II to read: "the type of accommodation, in terms of size, type and tenure, to be provided will reflect the needs identified in the housing needs assessment."  Delete c)III

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66341 - Shirley Estates (Mr Harry Goode) [1415]	Object	<p>Policy does not accord with presumption in favour of sustainable development as set out in NPPF.</p> <p>The policy is onerous in its discrimination against outline applications. Outline applications are practicable and affordable and assist in establishing the principle of development. They can be properly conditioned and supported by realistic legal agreements.</p>	<p>The main reason for discouraging outline permissions is that it can prolong the period in which full planning permission is obtained. Since the exception for affordable housing schemes is based upon a snapshot of affordable housing need, it is important that the development takes place in good time in order to satisfy the identified need.</p> <p>It is normally the case that detailed pre-application discussions are undertaken between the Council and the Registered Provider prior to the drawing up of detailed rural exception schemes. Hence the suitability of development on a particular site will probably have been established prior to the submission of the planning application.</p>	No change
66752 - Mr Edward Walpole-Brown [7504]	Object	Greater flexibility should be introduced into Policy H3 about the delivery of housing on Rural Exception Sites.	<p>This policy allows for development on sites where development would not normally be acceptable. Therefore, the circumstances where permission could be granted must be tightly restricted to allow only those developments which would meet the aims of the policy i.e. to provide rural affordable housing to meet the housing needs of local people.</p>	No change
65529 - Keith Wellsted [8636]	Support	Gives power in these areas to local people not WDC!	<p>Local people do have some powers to initiate housing development in their areas through Neighbourhood Plans or Community Right to Build. The Local Plan policy does not undermine these powers.</p>	No change
65997 - West Midlands HARP Planning Consortium [5118]	Support	<p>We support the Council in its allowing of Rural Exception Schemes. As our comments above show we have reservations that 40% affordable housing will be achieved on all sites. This will reduce the number of affordable houses developed and so positive affordable housing schemes such as this will promote the production of affordable housing.</p>	Noted	No change
<i>H4 Securing a Mix of Housing</i>				
66300 - Mr H E Johnson [12846]	Object	We object to this policy as drafted. In order to be sound, this policy should make reference to the stated contributions being required only where necessary and viable, and in accordance with other policies in the Local Plan and / or a CIL charging schedule.	The requirement for a particular mix of housing is not considered to be a planning obligation.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65402 - Mr William Campbell [11985]	Object	The Local Plan is not Legally Compliant because it makes no provision for self build housing required by NPPF	<p>NPPF does not require Local Plans to make provision for self build housing. Para 50 requires local authorities to plan for a wide choice of high quality homes "based on the needs of different groups in the community - of which self build housing may be one such need.</p> <p>A policy to "encourage" self build housing would not be effective. For a policy to be effective it would need to either identify or allocate specific sites or require that a proportion of units for self build be made available on certain allocated sites.</p> <p>The Council does not currently have any evidence on the demand for self-build plots and therefore it would be difficult to justify a policy allocating, or identifying, a site for self-build housing. The effect of such a policy would be to restrict the sale of certain housing plots to people who wish to build, and subsequently occupy, a home for themselves. This places a not insignificant restriction on the landowner and the Council is of the opinion that there is insufficient evidence to warrant such a restriction.</p> <p>The Council has started to collect information from anyone making an enquiry about plots for self build. If a landowner is so minded to offer plots for self build, the Council will be able to inform potential self-builders of the potential opportunity.</p>	No change
<p><i>Include policy to encourage self-build housing.</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>
65528 - Sharba Homes Group [12779]	Object	<p>This policy is imprecise, due to its over-reliance on the SHMA, a document that itself is not a part of the development plan, and is only designed to inform it.</p> <p>the SHMA is informed by 2011 data. In paragraph 98 the Solihull High Court Decision, the judge mentioned that pre NPPF data must be used with 'Extreme Caution... because of the radical policy change in respect of housing provision effected by the NPPF'.</p> <p>Therefore, a SHMA must be fully reworked with data from April 2012 onwards, and not simply 'refreshed'. We are not convinced that the 2013 SHMA is a full and complete reworking of the process from the ground up, and is therefore fundamentally flawed.</p> <p>The policy fails to recognise the the differing housing mix requirements of towns and villages and simply argues this will be negotiated on a 'case by case' basis. The policy is therefore not robust enough to be considered acceptable throughout the plan area, hence failing the tests of soundness</p>	<p>NPPF paragraphs 50 and 159 require local planning authorities to identify the scale and mix of housing that is likely to be required over the plan period and to plan to meet this need.</p> <p>The Strategic Housing Market Assessment for the Coventry &amp; Warwickshire Housing Market Area was completed in 2013, after the introduction of NPPF. It conforms with Government guidance in NPPG, by drawing together information on the future trends of population mix and types of households and assessing how this will impact on future needs for different sizes and types of housing. The Housing Market Model, which produces the detailed analysis, provides information on the need for particular sizes and types of dwelling in the market and affordable tenures.</p> <p>The Council utilises the detailed information in day to day development management decisions. However, it recognises that the current information from the latest SHMA may not endure for the whole plan period and so the policy allows for circumstances where the SHMA may be reviewed. Because of the numerous constraints on development within the District (such as Green Belt; flood plains and areas of high risk of flood; and areas of importance for heritage), it is not possible to spread development evenly across the towns. As a result, future housing development tends to be concentrated in certain areas such as south of Warwick/Leamington/Whitnash and east of Kenilworth. However these developments will be expected to meet the needs of the whole District as identified in the SHMA. An exception to this is development within villages. Some parishes choose to take advantage of a Council-funded Parish or Village Housing Needs Survey. Where such a survey has been carried out, the Council accepts that it would be appropriate to meet the needs identified in the survey. The identified needs for market housing in a local needs survey are usually a good reflection of gaps in the local housing offer.</p>	No Change
		<i>The policy should be removed.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66066 - English Heritage (Mr Rohan Torkildsen) [205]	Support	We welcome, support and endorse this policy.	Noted	No change
65177 - Sundial Group Ltd [12683]	Support	We welcome the flexibility of the policy as drafted and recommend that it is not amended to include the specific percentage splits.	Noted	
65530 - Keith Wellsted [8636]	Support	Needed	Noted	No change
66590 - Catesby Property Group (Mr David Morris) [7776]	Support	We welcome the flexibility in the wording of this policy and would recommend that it is not amended to include the specific percentage splits. The NPPF seeks to ensure that a wide choice of high quality homes are provided and requires local planning authorities to "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community" (paragraph 50, bullet 1). It therefore recognises the importance of allowing flexibility to adapt to market trends through development. As drafted, the policy would provide the flexibility to ensure the Plan remains consistent with paragraph 50 of the NPPF over the course of the plan period.	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H5 Specialist Housing for Older People</i>				
66651 - Methodist Homes (Mr Karl Hallows) [12856]	Object	<p>The Council's general approach to ensuring the delivery of specialist housing for older people and consider that this is in compliance with national policy.</p> <p>Notwithstanding this, we consider that some minor modifications to the wording of draft policy H5 will ensure that it is more robust and can be more effectively measured for compliance</p> <p><i>H5 Specialist Housing for Older People</i>  <i>Planning permission for specialist housing for older people will be granted where:</i>  <i>a) the site is in close proximity to shops, amenities and public transport; and</i>  <i>b) it can be demonstrated that satisfactory Primary Health Care services to serve the residents of the development will be available within reasonable proximity; and</i>  <i>c) the development makes a positive contribution towards meeting the identified need 1,800 units of specialist housing for older people over the plan period as identified in the latest 2013 Strategic Housing Market Assessment (or otherwise updated assessment of need) and as agreed by Warwickshire County Council (as the provider of Adult Social Care).</i></p>	<p>The Council does not think it is necessary to quote the figure in the SHMA. The figure of 1,800 units was the estimate as at April 2014 and will change as new estimates are derived from the monitoring exercise.</p>	No change
66493 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The SHMA has considered the needs of various groups within the community which might have specific housing needs. In particular it identifies the need to plan for an ageing population over the period to 2031 in the HMA.</p> <p>The evidence suggests as people get older, some may require support including adaptations to their properties to meet their changing needs, and provision of floating support. It forecasts a growth of 80% in people with dementia and 65% in people with mobility problems over the period to 2031 (linked in particular to improvements in life expectancy). Therefore, housing need should also accommodate these requirements in the evidence base and the policies that reflect these matters.</p> <p><i>The current challenge of an increasing ageing population is the prominence of Alzheimer's and Dementia. Consequently, the County Council is in the process of developing a strategy on "Accommodation with support" and a consultation will be carried out later in the year. The Plan should make specific reference to the problem of alzheimer's and dementia in the community and the need to ensure appropriate accommodation with support is provided.</i></p>	<p>This policy covers all new specialist accommodation for older people including Extra Care Housing (housing with support) and care homes which might specialise in the care of people with Alzheimers or Dementia.</p> <p>ty is not the purpose of the policy to ensure that the need is met in each category as this is outside the remit of a local planning authority. However the Council will continue to liaise with, and consult with, the County Council with regards to whether the proposal does contribute towards meeting need.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64918 - Barford, Sherbourne and Wasperton Joint Parish Council (Mr John MURPHY) [566]	Object	<p>H5 limits provision to urban areas (including the strategic urban extension sites) and hence preclude most of the rural areas, including more sustainable rural villages (ie most Growth Villages and specifically Barford)</p> <p>H5 (b) and H5(c) are too restrictive. We suggest the addition of "in Growth Villages and other sustainable locations where rural local initiative has demonstrated local need (eg through NDPs and/or HNSs etc) and community will address that need along with needs of adjacent areas and such need may be met through a broader range of models than might be required in an urban setting.</p> <p>Changes to Plan:</p> <p><i>The JPC contends that communities should have a mechanism to rise to the challenge of allowing their elderly to remain within their rural community for the whole of their lifetime with all the many benefits to the elderly and their relatives and friends.</i></p>	<p>The purpose of the policy is to ensure that where Extra Care Housing schemes are provided, there are sufficient health facilities, shops, services and public transport facilities to enable the occupants to access services and facilities to meet their daily needs. In rural areas this will ensure that older people are not isolated. In villages Extra Care Housing schemes will be allowed where there are shops, public transport and access to health facilities.</p>	No change
66061 - McCarthy & Stone Retirement Lifestyles Ltd [4782]	Object	<p>Overall welcome the proactive stance the Council has taken in seeking to provide appropriate levels of accommodation to meet the needs of its ageing population. The principle is agreed that specialist accommodation for the elderly should make a positive contribution to housing need, however, the extent of this need should not be determined solely by the SHMA which has limitations in such an area of high owner occupation.</p> <p>Concern is expressed about the extent of the influence consultation with the Primary Health Care Trust will have in determining planning applications. Experience shows that this is used as an opportunity to highlight a shortfall in funding or resources rather than practical consideration of the benefits of the scheme.</p> <p><i>More up to date data than the SHMA should be given weight in decisions if it can be provided.</i></p> <p><i>Constructive engagement with the Primary Health Care Trust is supported provided there is a balanced view taken when providing feedback.</i></p>	<p>Consultations with the providers of GP services have highlighted the fact that older people account for a large proportion of GP appointments and that where accommodation for older people is sited some distance from a health facility this will cause problems for the occupiers as well as for the health service provider.</p> <p>The Council will consult with Warwickshire County Council (Adult Social Care) with regard to meeting needs.</p> <p>The decision-making process on all planning applications will consider all the issues and seek to arrive at a balanced decision, taking into account all the benefits and disadvantages of each scheme</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66458 - Environment Agency (Becky Clarke) [6581]	Support	Specialist Housing for Older People Residential care home are classified as "more vulnerable" in accordance with Table 2 of NPPF and are therefore considered appropriate in Flood Zones 1, 2 and 3a (Exception test required). However, as the occupants are less mobile they are particularly vulnerable in a flood event, making evacuation more difficult. With this in mind, we recommend that you consider adding criteria: 'd) the proposed site is located in Flood Zone1.'	Flood zones 1 and 2 are the most appropriate for this type of housing provided that safe access can be provided including for emergency vehicles in flood zone 2. Whilst Flood Zone 1 would always be the preferred location for a facility for those with reduced mobility of any age, with mitigation, flood zone 2 may also be considered. It would seem that this issue is best addressed through the Flooding and Water chapter and therefore policy FW1 will be applied for locating such facilities. Reference should therefore be made to that policy rather than including it here.	No change
65532 - Keith Wellsted [8636]	Support	Common sense	Noted	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>H6 Houses in Multiple Occupation and Student Accommodation</i></p> <p>66645 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]</p>	<p>Overall, we welcome and support the proposed policy approach by the Council to control the location of new Houses in Multiple Occupation (HMO's). Alongside the problems associated with such properties identified in paragraphs 4.60-4.66, we would add that HMOs are also frequently recorded for breaches of fire safety regulations. They are also amongst the most common type of domestic dwelling for where crimes against the occupants take place. Other typical problems associated with such properties include increased levels of burglary and a proliferation of on-street parking, which prevents ease of access by emergency vehicles. Such problems are multiplied exponentially where HMOs are concentrated in particular areas. Despite these common and well documented problems, policy H6 to our concern makes no reference to them at all in the proposed criteria for assessing whether planning permission should be granted for HMOs. We therefore ask that the amendments proposed below are made to policy H6.</p> <p><i>We propose the following amendment to policy H6 to resolve all of our concerns and ensure the policy's effectiveness: -</i></p> <p><i>'Planning permission will only be granted for Houses in Multiple Occupation, including student accommodation, where...</i></p> <p><i>f) Secured by Design measures are incorporated throughout;</i></p> <p><i>g) Highway safety and ease of access for emergency vehicles is not detrimentally affected; and</i></p> <p><i>h) Appropriate fire precaution facilities and equipment are provided of such type, number and location as is necessary to ensure fire safety.'</i></p> <p><i>There would be three major benefits of accepting the proposed amendments: -</i></p> <ol style="list-style-type: none"> <li><i>1. People living in HMOs will enjoy much greater protection from crime and the fear of crime than is currently the case in such properties.</i></li> <li><i>2. Emergency services response times will be protected in those areas where HMO'S are located</i></li> <li><i>3. The number of deaths, injuries and properties damaged from fire will be reduced in Warwick District</i></li> </ol>	<p>Policy BE1(i) requires new development to incorporate building and street designs and layouts to reduce crime and fear of crime. Policy HS7 also requires development proposals to be designed so as to minimise the potential for crime and anti-social behaviour and improve community safety.</p> <p>Policies TR1,2 and 4 require proposals to take account of all road users to ensure safety on public highways.</p> <p>Fire precautions within buildings are considered as part of the Building Regulations</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66459 - Environment Agency (Becky Clarke) [6581]	Support	<p>Correctly identified that household waste management is often an issue at HMO's and Policy H6 e) requires that adequate provision is made for storage of refuse containers in new HMO's and that storage areas do not impact on the amenity of the local area. While we would support this policy it is also important to ensure that not only is the space provided adequate but it is also appropriate to the functioning of the HMO.</p> <p>For example there should be appropriate storage space internally at the point of arising as well as externally in order to minimise number of trips required to outside storage areas. The distance that occupants need to travel to access waste storage areas should also be considered as carrying waste beyond a certain distance may cause inconvenience and result in reduced participation in collection arrangements.</p> <p>Distance between waste storage areas and waste collection points should also be considered. Routing and access for waste collection vehicles will also be important. In addition clear signage should be provided to identify what waste streams can go into each waste receptacle, this will be especially important for transient populations who may not be familiar with the authorities waste collection arrangements.</p>	<p>Noted.</p> <p>The Council does not have the authority to determine where waste is stored within the property. It would be too onerous to control and enforce issues such as signage. In many HMOs (most of which are conversions) there is little choice of location of the waste storage areas and the Council considers it would be difficult to agree and enforce a minimum distance between the storage area and the collection point.</p>	No change
66827 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	<p>General - The proposed Policy is endorsed as a means of exercising greater planning control on the numbers and location of Houses in Multiple Occupation. (HIMO)</p> <p>The Council is concerned that the quality of design and standard of amenity afforded to the occupants of HIMO's is not comparable with that expected of modern accommodation. It is therefore requested that consideration is given to a review of the current National Building Regulations to ensure that the size and design of accommodation within HIMO's is improved to a standard comparable with other units of accommodation, particularly modern dwellings.</p> <p>The increasing number of HIMO's also results in a concentration of letting signage which has an adverse and unwelcome impact on the street scene of Leamington Spa. It is suggested that a policy statement is considered with the objective of exercising control on the proliferation and location of such signage.</p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66012 - University of Warwick [222]	Support	The University welcomes policy H6 which offers support for student accommodation where it is located on the University of Warwick Campus. This is considered to be sound in supporting the development of sustainable residential accommodation for the student population of the university. Where off-campus accommodation is promoted by others, the University supports the locational criteria in the policy which will help sustain public transport routes that serve the University from both Coventry and	Noted	No change
<hr/>				
<i>H7 Meeting the Accommodation Needs of Gypsies and Travellers</i>				
65227 - National Federation of Gypsy Liaison Groups (Mr Roger Yarwood) [6733]	Object	Whilst the policy is generally supported, there is an implication that planning applications will only be supported if monitoring shows a shortfall in pitches. This would be unacceptable.	The way that the policy is worded may result in some misunderstanding of the way in which monitoring may have an effect on decisions taken on planning applications. A slight change is therefore considered appropriate to make the policy clear.	Change the third point in policy H7 to read "Monitoring may show that there are insufficient pitches available to meet need during the plan period. This will be addressed at that time. Planning applications will be assessed against the criteria in Policy H8."
<i>Delete the words "Monitoring may show that there are insufficient pitches available to meet need during the plan period."</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65373 - mr geoffrey butcher [12086]	Object	<p>1) The process followed by WDC has not complied with NPPF and DCLG guidelines.</p> <p>2) Specifically there is strong evidence that Council Officers misled Councillors in a report to Council in Feb 2014.</p> <p>3) It is demonstrable that WDC failed to meet their statutory obligation to co-operate with and consult neighbouring authorities. This is shown by responses to Freedom of Information requests I made in May 2014.</p> <p>4) The assessment of the need for sites is based on a GTAA which is significantly and demonstrably flawed and in no way provides the required "robust" base of evidence to support the need.</p>	<p>These comments relate to the production of the Development Plan Document which is being prepared as part of the Local Plan process but as a separate document for the allocation of sites.</p> <p>However;</p> <p>1. It was agreed that the phrase 'due in part to a campaign carried out by the landowner.' should be removed from the report and this was done. Councillors were not misled by this phrase and the site was not recommended for inclusion in the next stage of consideration anyway</p> <p>2. Adjoining authorities are at various stages in preparation of their own GTAA's. WDC's GTAA was one of the first to be prepared as there was a more urgent need to do so in relation to the preparation of its Local Plan compared to other Local Authorities. The duty to co-operate has meant that WDC has been in contact with all adjoining authorities with a view to establishing overall need and any potential for sharing sites. Some GTAA work is still needed by these authorities and this is currently underway. The early signs however are that the need in other districts is even greater than in Warwick District and that these authorities are also struggling to identify land to meet those needs. In the meantime, WDC has no land allocated, no available sites and no existing provision for the Gypsy and Traveller community, yet do have a responsibility to provide such. WDC and Stratford DC have in fact carried out a joint consultation event, so are certainly very aware of the needs of one another's G&amp;T community.</p> <p>3. The GTAA was prepared by a professional, respected and very experienced research team based at the University of Salford. Despite requests for evidence that their work is flawed, none has been forthcoming that can be substantiated, and has in fact been refuted. Examples of rejected work by other Local Authorities has again been requested. The only example given (City of York) proved to be totally onerous since the research team from Salford University did not produce work for this LA. There is therefore no evidence that the GTAA has not been properly and independently prepared and therefore no reason for the Council to doubt its findings.</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><i>(1) the report to Councillors needs factually correcting and the Officer's personal views removing. (2) there needs to be a period of full , detailed and formal consultation both on the level of need across neighbouring authorities and sharing of sites with all such authorities</i></p> <p><i>(3) the GTAA of Nov 2012 should at worst be fundamentally reviewed and preferably redone -in either case by a competent independent organisation that sticks rigidly to DCLG guidance in terms of the preparation of a GTAA as it is clear that the original authors were not truly independent and their work has been rejected by other Local Authorities</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>
65301 - Mr KEN Stephenson [12699]	Object	<p>The data used to calculate the needs of Gypsies and Travellers is outdated and therefore, flawed. This has produced an over-statement of needs, which is also reflected in findings of other local councils population growth forecasts. Positive discrimination in favour of Gypsies and Travellers in unfair.</p> <p><i>Reject outdated population statistics and redo the calculations and needs projections.</i>  <i>It is likely fewer pitches than has been projected in the plan will be needed, the plan should be reviewed in light of the new projected population database / statistics</i>  <i>All ethnic groups whether a majority in a minority should be afforded equal treatment.</i>  <i>Any study of 'needs' must include all persons and their groups who may be affected by the development of site in both their own and neighbouring districts.</i></p>	<p>These comments relate to the preparation of and evidence for the Development Plan Document (DPD) which deals with the allocation of sites for Gypsies and Travellers which is being prepared as part of the Local Plan process. However, The population statistics for the Gypsy and Traveller accommodation needs assessment (GTAA) were based on an estimate of the total population within this community at the time (Nov 2012). There has not been any evidence that this is not a robust figure and has therefore formed the basis for the assessment. There has not been a national figure from Census information before the latest Census which was carried out in 2011. This is because the ethnic origins section of the Census form did not give an option of 'Gypsy or Traveller'. This has resulted in estimates being made of the total population historically. Details from the 2011 Census were only made available after the GTAA was published. If there is a change to 'need', this will be demonstrated through monitoring and appropriate adjustments made.</p> <p>Whilst legislation is in place which differentiates between the needs of Gypsies and Travellers as opposed to any other sector of the population, their needs will have to be dealt with as a separate issue. It will take a change in legislation at a national level before this can change. In the meantime, the Council has a duty and responsibility to provide sites for the specific use of Gypsies and Travellers</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>
65283 - Miss Dawn Elliott [11551]	Object	It is a wholly inappropriate type of development for the semi-rural location/area.  <i>Travellers should be accommodated within boundaries of town centre areas and not in rural communities.</i>	This is not the case. The preferred area for Gypsy and Traveller sites is on the edge of towns and villages where there are services provided within the town or village which could be accessible to the community. The semi-rural location/area is therefore the preferred area to locate this type of development. Both the Gypsy and Traveller community and the settled community prefer to have some gap between them and this cannot be achieved in a town centre. There is also a preference by the Gypsy and Traveller community to live outside town centres. This preference in one of the elements that has to be taken into account when areas for development at Gypsy and Traveller sites are considered.	
65282 - Mr KEN Stephenson [12699]	Object	Evidence shows there has been misrepresentation, misleading interpretation and failure to take into account certain but critical aspects of the DCLG guidelines.  <i>This form does not allow for comprehensive explanation, but this detail is available should it be requested or is not apparent upon reviewing the report</i>	It is not possible to respond where no detail has been given	
66301 - Mr H E Johnson [12846]	Support	We support the use of design to minimise the potential for crime and anti-social behaviour.	None required	
65533 - Keith Wellsted [8636]	Support	Carefully planned this is a positive suggestion	None 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>H8 New Gypsy and Traveller Sites</i>				
65286 - Miss Dawn Elliott [11551]	Object	<p>The proposed siting of the development is particularly ill-considered: it is on greenbelt, used by villagers and tourists for recreation at the nearby locks and walking dogs, and a traveller site would diminish character of Hatton area.</p> <p>Furthermore, there is no need for this kind of minority housing in the village.</p> <p><i>Travellers (if evidence supports there is any sort of need to accommodate them at all - which I would strongly suggest there is not) should be accommodated in more central town areas, where there is infrastructure to support them and less noticeable impact on character and local residents.</i></p>	<p>This is a site specific response. Sites are not being included in the Draft Local Plan, but are being dealt with through a separate development plan document (DPD). It is only strategic policies that are included within the Draft Local Plan. This objection should be dealt with through the DPD process.</p> <p>A Gypsy and Traveller Accommodation Assessment (GTAA) was carried out and published in Nov 2012. This is the evidence base for the numbers of pitches required in Warwick District. There is no reason to doubt the accuracy of this evidence.</p> <p>Town centres are not suitable locations for permanent Gypsy and Traveller sites. The preferred location is on the edge of towns and villages where they are located further from the settled community but within a reasonable distance of services and facilities.</p>	
66677 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The Health Impact Assessment has suggested the following change to the Plan. The Local Plan makes reference to making "provision for gypsies and travellers in order to deal with local need and historic demand". Consideration could be given to amending this to include 'future demand'. Sites should include access to local services and facilities such as schools, health facilities, fresh food and employment</p> <p><i>Plan makes reference to making "provision for gypsies and travellers in order to deal with local need and historic demand". Consideration could be given to amending this to include 'future demand'. Sites should include access to local services and facilities such as schools, health facilities, fresh food and employment</i></p>	<p>The Gypsy and Traveller Accommodation Assessment covers a period of 15 years from the date of publication which was November 2012. This means that the future demand for a 15 year period has been taken into account. The policy includes the need to include access to services and facilities.</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>
65401 - mr geoffrey butcher [12086]	Object	<p>Policy H8 represents a significant watering down of the NPPF and DCLG planning guidelines for Gypsy &amp; Traveller sites. WDC have demonstrated through their consultation process a lack of consistency in applying these guidelines to site selection. Indeed many of the shortlisted sites are the ones furthest from schools etc and are where infrastructure is at its worst. Policy H8 indicates they intend to continue to make up their own rules.</p> <p><i>Policy H8 should be amended so it fits 100% with NPPF and DCLG guidance. It should be crystal clear that the same criteria are being applied to each site</i></p>	<p>The criteria listed in the Local Plan are those to be used for judging a planning application. The criteria to which the representations apply concern the choice of sites to be allocated.</p> <p>The choice of sites for allocation is being dealt with in a separate Development Plan Document (DPD) whilst the strategic policies are within the Local Plan. Site specific objections and comments will be dealt with through the DPD process.</p>	
64919 - Barford, Sherbourne and Wasperton Joint Parish Council (Mr John MURPHY) [566] 65228 - National Federation of Gypsy Liaison Groups (Mr Roger Yarwood) [6733]	Object	<p>JPC believes the Plan and G&amp;T Preferred Options fails to address adequately the best interests of both the settled and G&amp;T communities.</p> <p>Imposing G&amp;T on mature communities and failure to incorporate them into larger strategic sites is flawed/neglectful, rendering this Plan unsound.</p> <p>Furthermore the reluctance to address the Greenbelt in any imaginative way concentrates the G&amp;T impact into an unrealistically small part of the WDC disregarding both existing residents' and G&amp;T community wishes.</p> <p>G&amp;T provision should be properly planned on the strategic urban extension sites and the gateway area and only located elsewhere when there is explicit community and landowner support.</p> <p><i>G&amp;T provision should be properly planned, from scratch, on the strategic urban extension sites and the gateway area and only located elsewhere when there is explicit community and landowner support.</i></p> <p><i>Document is not Sound</i></p>	<p>The Council has discussed the possibility of including such sites within new developments proposed through the Local Plan, but sites would no longer be viable if this were to be the case.</p> <p>The Government has taken a specifically hard line against development in the Green Belt. This is particularly the case for Gypsy and Traveller sites where the lack of land or sites to meet the need elsewhere does not provide the special circumstances required for utilising Green Belt land. The Gateway site is also in the Green Belt. Evidence of previous consultations shows that there will not be land which the community and landowner specifically support.</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>
65288 - Mr KEN Stephenson [12699]	Object	<p>Sites are not within reasonable distance of services and are remote. There has been effectively no liaison with neighbouring district councils , which as well as being against policy, clearly cannot have taken in to account the intentions or plans of neighbouring district councils.</p> <p><i>The WDC must comply with DCLG guidelines</i></p> <p><i>A correct assessment of road and traffic conditions has not yet been made yet assumptions made on perceived suitability of access to potential sites. A study of site access and suitability for the safety of all road users must be made in order to enable a proper assessment to be made.</i></p>	<p>These are site specific comments and objections. The Local Plan contains strategic policies and the sites will be allocated through the Development Plan Document (DPD). Comments on suitability of specific sites will be addressed through the DPD process.</p>	Not required
66499 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	<p>LP failed to adequately consider Gypsy and Traveller sites as integral part of its plan. WDC deliberately timed consultation after the Plan. Some land that could be used for these sites cannot be considered. Possible options were WCC owned land G&amp;T sites also placed south of R Leam and no site visits undertaken before deciding on sites. One site is established football club.</p> <p>Consultation only just completed and no final report published - large opposition to sites</p>	<p>The allocation of Gypsy and Traveller sites is being considered through a separate Development Plan Document (DPD) however, the strategic policies are included within the Local Plan and the DPD will, in due course, become part of the suite of documents which comprise the Local Plan. The separate consultations on the DPD and the process generally is the same as that for the Local Plan and is therefore in no way lessened. Allocated sites for the Gypsy and Traveller population will be as much a part of the Local Plan as those sites allocated for conventional housing.</p> <p>Site specific comments will be dealt with through the DPD since that is the process through which sites will be allocated.</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>
65902 - Mr Simon Megeney [9312]	Object	<p>Site GT04 Para 4.71</p> <p>Only reason site remains a preferred option is that Leamington FC amendable to sale of land for this use. Majority of shareholders do not want to sell land and CPO not an option - site should be withdrawn from consultation. Points for keeping site do not comply with NPPF and would fail at appeal.</p> <p>Amended map shows substantial area of land beyond FC ownership and land is not for sale. Wholly inappropriate location. Permanent siting would not deliver fair or equal treatment of Gypsies and Travellers residing at this site.</p> <p>In direct conflict with paras 3.3, 3.6 and 3.12 of guidance within 'Designing Gypsy and Traveller Sites' on selecting locations - inappropriate for ordinary dwellings unless exceptional circumstances apply - clear that no such circumstances apply</p> <p>Road Safety: Harbury Lane busy with 50mph speed limit as vehicles travel to M40, Leamington Spa, Warwick and Jaguar Land Rover at Gaydon. Fosse Way has 60mph speed limit with continuous stream of traffic throughout the day. A425 to B4100 is accident black spot. Harbury Lane junction dangerous owing to speed and volume of traffic</p> <p>No footpaths and presumably would not consider having one laid considering limited number of people to benefit. Limited width of Harbury Lane. Gas pipeline stopped consideration of development along Harbury Lane - costly infrastructure.</p> <p>Does not satisfy NPPF with regard to shops, schools, GPs, road safety and safe pedestrian route</p> <p>Children cannot stand on busy road waiting for school transport</p> <p>Education: Nearest school said to be at Bishops Itchington but this does not take account of 115 new houses granted pp there or 200 at former cement works. School age children would have to travel to Leamington Spa. Education does not comply with NPPF requirements</p> <p>Health: GP surgery at Bishops Tachbrook, Whitnash or Harbury. Nearest is Harbury and surgery struggling to cope</p> <p>Health care does not comply with NPPF</p> <p>Integration: Relatively isolated site. Should be right of settled community to decide whether to live close to and integrate with larger settled or traveller community - consensus of opinion is that do not want this</p> <p>Site not considered to be a respectful distance from existing community. Does not comply with NPPF</p> <p>Integration into landscape: Football ground is on low flood plain overlooked by Harbury and Chesterton windmill. Ground itself has been elevated and cannot be integrated into landscape without harming visual appearance and</p>	<p>This is a site specific response. Sites are not being included in the Draft Local Plan, but are being dealt with through a separate development plan document (DPD). It is only strategic policies that are included within the Draft Local Plan. This objection should be dealt with through the DPD process</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>character of the area            Would spoil views from Chesterton windmill, a Grade I Listed Building and landmark. The windmill and Roman Fosse Way must be taken into consideration            Landscape integration does not comply with NPPF            Flooding/Drainage:            Area effectively in flood plain and livestock moved accordingly. Harbury Lane often flooded and impassable            Planning and Building Regulations cannot be complied with as unable to soak away or runoff due to clay based soil            Does not comply with NPPF            Infrastructure:            Infrastructure is poor and requires considerable investment. No mains gas, sewerage or drainage. Electricity supply a problem as rural system which may need upgrading            BT consider site to be too far from Whitnash exchange to provide telephone or internet. There is no reliable mobile phone service            Does not comply with NPPF            Aroma Emissions Zone:            Site close to intensive poultry unit with unbearable odour. Odour plume diagram shows site would be affected according to prevailing winds, especially in August. Area not suitable for residential occupation.            Compulsory Purchase/Planning Policy:            Clear guidance from DCLG that land should not be CPOd for this use -bad practice. When football ground withdraws offer, site should be removed from preferred list            Preferred Option Report:            Public opinion being ignored. Similar sites, but one included and one excluded - neither satisfies NPPF</p>		
66434 - Ms Myra Styles [9988] 66443 - Mr Robert Cochrane [9989]	Object	Much reduced criteria for Gypsies and Travellers sites which no longer considers effect on local community - no integrity in plan	The criteria listed in the Local Plan are those to be used for judging a planning application. The criteria to which the representations apply concern the choice of sites to be allocated. The effect on a local community will automatically be assessed during the decision making process of a planning application and there is therefore no need to repeat it here	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66646 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>Firstly there is an awareness of of disputes that could be exacerbated if sites had transit and permanent pitches in close proximity.</p> <p>Secondly, once permission has been granted for a new site, it is quite possible that over the plan period further planning applications will be made to extend it. The policy therefore needs to give this possibility consideration and provide safeguards as to how to stop conflicting groups locating on the same site.</p> <p>Thirdly, easy access to the emergency services is just as important to gypsy and traveller communities as it is to the settled community. This needs to be recognised in Policy H8.</p> <p>Fourthly, Policy H8 as drafted contains no mention of the partnership work that is required when sites for gypsy and traveller pitches are proposed, given the often contentious nature of such proposals. The policy should cover discussions at the pre-application stage right through to when a decision on a planning application is made.</p> <p>Finally, policy H8 makes no reference as to how new sites would contribute to the achievement of the Government's objectives for the planning system set out in paragraphs 58 and 69 of the National Planning Policy Framework (NPPF). In this regard, including policy support for Secured by Design would help to ensure new pitches complied with a nationally recognised standard.</p> <p><i>To resolve all of our concerns and significantly improve the effectiveness of policy H8, we request that the following amendments are made: -</i></p> <p><i>H8 New or Extended Gypsy and Traveller Sites</i></p> <p><i>Applications for new or extended Gypsy and Traveller sites will be approved provided that:</i></p> <p><i>a)proposals have been subject to pre-application consultation with the Council, Police, local stakeholders and the community;</i></p> <p><i>b)the site is within reasonable distance of schools, GP surgeries, dentists, hospitals, emergency services, shops and community facilities;</i></p> <p><i>c) the site would not result in permanent and transitory pitches being co-located;</i></p> <p><i>d)the site has good access to the major road network;</i></p> <p><i>e)the site is of a suitable size to accommodate between 5 and 10 pitches for permanent sites or 12 pitches for temporary sites;</i></p> <p><i>f)it can be demonstrated that infrastructure requirements can be adequately met; and</i></p> <p><i>g)high quality design, layout, landscaping and screening is proposed incorporating Secured by Design standards</i></p>	<p>The Council whilst suggesting that pre-application advice is sought, cannot insist upon it; therefore criteria a) as suggested, cannot be included. All other suggestions can be incorporated into the policy criteria.</p>	<p>Include additions to criteria with the exception of criteria a) which cannot be insisted upon</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66460 - Environment Agency (Becky Clarke) [6581]	Support	<p>In line with existing practice guidance for the NPPF we note that Gypsy and Traveller sites are considered to be „highly vulnerable” and that planning permission must not be granted for sites located within flood zone 3, and that the exception test must be granted for sites within flood zone 2.</p> <p>Recommend a precautionary approach and recommend the insertion of the following policy wording:</p> <p>f) 'There is a presumption against locating camping and caravan sites within the flood plan because of their vulnerability within a flood event</p> <p>g) The site will not impact on important designated sites for nature conservation.</p> <p>h) Riparian Corridors are protected.</p> <p>i) There should be a presumption against development of new traveller and gypsy sites that can not demonstrate adequate provision for the management and discharge foul / waste water'</p> <p><i>Recommend a precautionary approach and recommend the insertion of the following policy wording:</i></p> <p><i>f) 'There is a presumption against locating camping and caravan sites within the flood plan because of their vulnerability within a flood event</i></p> <p><i>g) The site will not impact on important designated sites for nature conservation.</i></p> <p><i>h) Riparian Corridors are protected.</i></p> <p><i>i) There should be a presumption against development of new traveller and gypsy sites that can not demonstrate adequate provision for the management and discharge foul / waste water'</i></p>	<p>Agree. Add additional criteria:</p> <p>f) 'There is a presumption against locating camping and caravan sites within the flood plan because of their vulnerability within a flood event</p> <p>g) The site will not impact on important designated sites for nature conservation.</p> <p>h) Riparian Corridors are protected.</p> <p>i) There should be a presumption against development of new Gypsy and Traveller sites that can not demonstrate adequate provision for the management and discharge foul / waste water'</p>	
<i>H9 Compulsory Purchase of Land for Gypsy and Traveller Sites</i>				
65273 - Mr KEN Stephenson [12699] 65290 - Miss Dawn Elliott [11551] 65400 - mr geoffrey butcher [12086] 65457 - Jennifer and Gary Ingram [7942]	Object	<p>The Department for Communities and Local Government in 2012 revoked Local Authority / District Council's powers to use compulsory purchase for Gypsy &amp; Traveller sites. This applies both to sites in green belt and open countryside.</p> <p>However despite this being clear and having been called into Scrutiny in Feb / march 2014 by several District Councillors , WDC are persisting with this policy. There were in the initial list of sites, two where the landowners were keen to sell but these were rejected (not for cogent reasons ) by WDC</p> <p><i>This Policy should be deleted from the Local Plan. WDC should adopt the two sites where landowners said they wanted to accomodate Gypsy and Travellers</i></p>	See comments elsewhere	

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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>
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*H10 Bringing forward Allocated Sites in the Growth Villages*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65250 - Deeley Group Ltd [11623] 65293 - A C Lloyd Homes Ltd [5958]	Object	<p>Deeley Group object to Policy H10 as it does not provide a sound basis for future development for the Growth Villages.</p> <p>The policy is too narrow and inflexible, provides no choice and adopts an unsustainable approach to the provision of housing for the Growth Villages.</p> <p>In particular, it is considered that new housing should not only be provided on the sites shown on the Policies Map for the Growth Villages, as there are clearly other suitable sites that can assist in meeting the District's housing requirements.</p> <p><i>It is suggested that the policy be re-named as "Policy H10: Growth Villages", and be reworded as follows:</i></p> <p><i>Housing development for Growth Villages will be permitted on sites allocated in the plan and on other suitable sites where the proposals are in accordance with the following criteria:</i></p> <p><i>a) the site is within or immediately adjacent to the village envelope boundary, is outside of the Green Belt, and would have no significant adverse harm to the landscape setting of the Village or on any ecological and heritage interests;</i></p> <p><i>b) the site can provide suitable vehicular access and good connectivity with existing village facilities and the public footpath network;</i></p> <p><i>c) the design, layout and scale of development is established through a collaborative approach to design and development, involving District and Parish Councils, Neighbourhood Plan Teams, local residents and other stakeholders;</i></p> <p><i>d) the housing mix of schemes reflects any up to date evidence of local housing need through a parish or village Housing Needs Assessment, including those of neighbouring parishes. Beyond meeting this need, or in the absence of a local Housing Needs Assessment, the scheme reflects the needs of the District as set out in the latest Strategic Housing Market Assessment; and</i></p> <p><i>e) on sites allocated for 50 or more dwellings, the proposals include a phasing strategy whereby the homes are delivered across the plan period in phases of no more than 50 dwellings at a time over a period of 5 years, starting from the date the development commences on site.</i></p>	<p>The village boundaries have been carefully considered, as have the allocation of sites, the Council has worked closely with local stakeholders to understand local priorities. In these circumstances it is not appropriate to support sites outside the village boundaries. Sites within the village boundaries can come forward in line with Policy H1. In this context the proposed change of wording is not considered appropriate.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66110 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991] 66119 - Mr and Mrs Martin [12851]	Object	Objections are raised to this policy, in particular to part (c). Restricting developments of 50 or more homes to phasing construction of a development over 5-years is contrary to the NPPF which seeks to make up the shortfall of housing immediately and to boost significantly the housing supply. It has no consideration to the practicalities of building out a site, the finances involved or the prolonged disturbance to existing residents. Limiting to approximately 10 homes a year will have a huge detrimental impact on sales, contractors, financing, viability, housing delivery and the social and physical environment.	It is accepted that Clause c) is contrary to the NPPF's objective of significantly boosting housing supply and that the approach set out will have an impact on site deliverability and will extend construction periods. For these reasons it is proposed to remove clause c)	Remove clause c) from Policy H10
66753 - Mr Edward Walpole-Brown [7504]	Object	Policy should refer to a consultative rather than collaborate approach in involving Parish Council and Neighbourhood Plan Teams to ensure judgements are made on sound planning grounds rather than negative and over prescriptive views. Housing mix should refer to the wider area rather than just local housing need with regard to parishes and villages. It is unnecessarily prescriptive to indicate that sites of more than 50 houses need to be developed over more than 5 years. This is not indicative of how sites tend to get developed and managed by developers and it should be more needs and market assessed to make sure that sites can be delivered in good time and comprehensively.	It is accepted that a consultative approach is more appropriate than a collaborative one in the context of the planning regulations.  The council contends that clause b) correctly seeks to reflect local housing need, but where this data is not available, district-wide housing mix should be reflected.  It is accepted that clause c) should be removed.	Amend H10a) to read a) the design, layout and scale of development is established through a consultative approach to design and development involving District and Parish Councils, local residents, other stakeholders and where appropriate Neighbourhood Plan Teams.  Remove clause c)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65531 - Sharba Homes Group [12779]	Object	<p>This policy puts unnecessary obstacles in the way of housing delivery contrary to the NPPF (paras 14, 47 and 154).</p> <p>The first bullet point places unnecessary weight on the opinions of the stakeholders, transforming a material consideration into a development plan policy where development may be stifled simply because it may be seen as unwanted or unnecessary, for reasons contrary to other aims and ambitions of the plan.</p> <p>The second bullet point undue weight on the SHMA. Because the SHMA is not being subject to consultation or examination before informing the plan, it should not be directly referenced in policy, and instead, a 'Policy On' approach should be taken. Again, the policy fails to make a comparison on a detailed basis throughout the district, and provides no evidential basis to explain the imprecise approach taken.</p> <p>The final bullet point create serious viability issues, who will be unable to develop strategic sites in a timely, and cost effective manner. This is in conflict with both Paragraphs 14 and 47 of the NPPF and will reduce the ability for there to be clear 'choice and competition for land', instead forcing developers to hold onto land for long periods before areas can be brought forward. the policy will make surrounding areas undesirable during prolonged construction periods and will add the development burdens. The policy will also hamper the delivery of 5 year supply. The policy is unjustified and unsound</p> <p><i>Point a) should be considered ultra vires and should be removed</i>  <i>Point b) a "policy -on" approach should be taken to housing mix</i>  <i>Point c) should be removed.</i></p>	<p>It is suggested clause a) be amended to refer to consultation rather than collaboration and that clause c) is deleted as it is not consistent with the NPPF.</p> <p>Clause b) should be retained. The Joint SHMA provide independent and robust evidence regarding housing mix and in the absence of specific local data on housing needs it is reasonable to draw on robust evidence to inform planning policies. The Council is committed to regularly reviewing the SHMA in line with national guidance.</p>	<p>Amend H10a) to read a) the design, layout and scale of development is established through a consultative approach to design and development involving District and Parish Councils, local residents, other stakeholders and where appropriate Neighbourhood Plan Teams.</p> <p>Remove clause c)</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65575 - Mr Robert Cochrane [9989] 65733 - Ms Myra Styles [9988]	Object	<p>H28</p> <p>Fails to comply with Planning and Compulsory Purchase Act 2004 - no provision for self build.</p> <p>Transport policy fails to fully assess impact of increased traffic/congestion on Birmingham Road.</p> <p>Doesn't consider effect on health of people in Budbrooke through air pollution/emissions.</p> <p>Site area reduced but same number of houses reduced only by 10.</p> <p>Major highway safety concern. No local consultation on this. No integrity in plan. Govt. requires exceptional circumstances in Green Belt but there are none and infrastructure issues are incomplete</p> <p>Plan not sustainable. Process confuses and angers people. Housing numbers unsound - old estimates being used so proposals could change without consultation as there is no time. Infrastructure provision not fully assessed, upgrades long overdue. flooding issues in many locations and schools are full. Planned destruction of 1100 year old town</p>	<p>NPPF does not require Local Plans to make provision for self build housing. Para 50 requires local authorities to plan for a wide choice of high quality homes "based on the needs of different groups in the community - of which self build housing may be one such need.</p> <p>A policy to "encourage" self build housing would not be effective. For a policy to be effective it would need to either identify or allocate specific sites or require that a proportion of units for self build be made available on certain allocated sites.</p> <p>The Council does not currently have any evidence on the demand for self-build plots and therefore it would be difficult to justify a policy allocating, or identifying, a site for self-build housing. The effect of such a policy would be to restrict the sale of certain housing plots to people who wish to build, and subsequently occupy, a home for themselves. This places a not insignificant restriction on the landowner and the Council is of the opinion that there is insufficient evidence to warrant such a restriction.</p> <p>The Council has started to collect information from anyone making an enquiry about plots for self build. If a landowner is so minded to offer plots for self build, the Council will be able to inform potential self-builders of the potential opportunity.</p> <p>The transport impacts along Birmingham Rd have been considered and mitigation planned (see Responses to DS11(H28). There are no significant air quality issues in Budbrooke/Hatton.</p> <p>For other points regarding the site in Hatton Park, see responses to Policy DS11(H28). For responses regarding the housing requirement see policy DS6.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66217 - Savills (Mr Richard Shaw) [11305]	Object	<p>The reduction in housing capacity in Kingswood from between 100 - 150 in the Revised Development Strategy to 43 in the Publication Draft Local Plan has not been justified.</p> <p><i>Allocation of part of Site 8 (Land to the south of Kingswood Close) fronting onto Station Lane for 9 to 16 houses. The site forms a smaller part of SHLAA site R10 which was discounted during the village housing options consultations as a result of concerns over the tree frontage and access. However this did not take into account land at Kingswood Farm which would allow access to be provided without harm to the tree frontage.</i></p>	For further information regarding this, please see responses to Policy DS11 (Kingswood) and specifically response to rep no. 66224	
66206 - Bloor Homes Midlands [11532]	Object	<p>H10 criterion b) requires the housing mix of rural schemes to reflect local need through a parish or housing needs assessment. However this does not take into account demographic trends, market trends or the local needs of different groups in the community as set out in the NPPF.</p> <p>It also states that beyond meeting local need or where an assessment does not exist the mix should reflect the needs set out in the latest SHMA. However the evidence in the latest SHMA is based on 2011 information and is district wide. It does not reflect the local demand of the parish or village as required by the NPPF</p> <p><i>It is suggested the policy should be amended to include reference to 'other available evidence as to the housing demands within the Parish or village.</i></p>	The second sentence of clause b) refers to the latest SHMA. this is based on demographic trends, market trends or the local needs of different groups and whilst this is district-wide information, in the absence of more local needs analysis, it is reasonable that developments reflect this in the mix of housing provided.	No change
65449 - Sworders (Miss Rachel Padfield) [11530]	Object	<p>We support the principle of part 1 of this policy, however, the current wording is unsound as it does not enable the delivery of the development strategy.</p> <p>It presents no alternatives where such stakeholder groups do not exist or where agreement cannot be reached. The policy is undeliverable because it provides no scope for the allocated sites in Growth Villages to be delivered, other than via collaboration with the various stakeholders.</p> <p>This will fall foul of the NPPF paragraph 47 requirement to provide five years worth of deliverable sites and paragraph 182 requirement to be deliverable.</p> <p><i>Part 1) should be deleted.</i></p>	Amend clause a) to address this point	Amend H10a) to read a) the design, layout and scale of development is established through a consultative approach to design and development involving District and Parish Councils, local residents, other stakeholders and where appropriate Neighbourhood Plan Teams.

## H10 Bringing forward Allocated Sites in the Growth Villages

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66044 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	<p>Within this policy is a stipulation that sites allocated for 50 or more dwellings must be phased with "no more than 50 dwellings at a time over a period of 5 years". This is inappropriate, as the fundamental thrust of government policy is the need to boost significantly the supply of housing.</p> <p>The phasing proposal within this policy means that the Council will not be meeting its objective assessment of housing needs.</p>	It is accepted that Clause c) is contrary to the NPPF's objective of significantly boosting housing supply and that the approach set out will have an impact on site deliverability and will extend construction periods. For these reasons it is proposed to remove clause c)	Remove clause c)
65992 - Barwood Development Securities Ltd [12821]	Object	<p>Barwood object to the inflexible approach taken to bringing forward allocated sites in the Growth Villages through Policy H10.</p> <p>Barwood consider that the approach taken in clause (c) is overly restrictive. By the very fact that the Council has allocated a site for development, the site's deliverability is reinforced. The Council should not therefore put a limit of the number of dwellings which can be delivered per annum. This approach is restrictive and does not follow the Framework's positive growth message.</p> <p>Barwood suggest that this clause is removed from the Policy H10.</p>	It is accepted that Clause c) is contrary to the NPPF's objective of significantly boosting housing supply and that the approach set out will have an impact on site deliverability and will extend construction periods. For these reasons it is proposed to remove clause c)	Remove clause c)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64530 - Mr Richard Thwaites [11460]	Object	<p>The preferred option for development within Hampton Magna has been overwhelmingly rejected by the residents.</p> <p>The requirement for the design, layout and scale of the development to be made in collaboration with local residents cannot possibly be fulfilled.</p> <p>The phasing requirement of the development will subject the existing residents to 15 years of construction traffic through small estate roads.</p> <p>The local Plan is ignoring the availability of previously developed land in Hampton Magna.</p> <p>The Maple Lodge site is preferred by the residents and would easily allow construction traffic access via non residential roads, to be phased with minimal disturbance to existing residents.</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna</i></p>	The Maple Lodge Site has been considered and has not be allocated on grounds of landscape sensitivity	
65342 - Mr Carl Stevens [4873]	Object	<p>Green belt areas in these villages should be protected at all costs</p> <p><i>Whilst green belt should be removed from the plan it is alarming that there is nothing in the plan to treat green belt development as a last resort</i></p>	Protecting green belt at all costs is not consistent with the NPPF. The Council has only allocated current green belt sites where exceptional circumstances can be justified. See responses to DS11(H27) for details.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66553 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Object to part c and use of arbitrary figure. would work with the Council to bring sites forward in a manner which suited both parties, the commercial realities of delivering a site mean that restricting a delivery on site to only 50 dwellings over a five-year period is not feasible. Furthermore, there seems to be no evidence base which supports this figure as to why at this point there is an impact and whether it is significantly increased or decreased from a site of 40 or 60 dwellings.</p> <p>It would clearly not be viable for a national house builder to build out schemes at a rate of 10 dwellings per annum in order to comply with this policy as there is inevitably an additional resource from being on a site for such an elongated period.</p> <p>Site H21 at Barford is allocated for 60 dwellings and with average build rates of 30 dwellings per year this could realistically be built in between 2 2.5 years.</p> <p><i>Would therefore wish to see part 'c' struck out and part 'b' amended to allow for developers to: justify housing mixes based on their own local evidence base; allow for market demand; and allow for a continued site build out to support the delivery of affordable housing and also the delivery of S106 contributions linked to the development of the site.</i></p>	<p>It is accepted that Clause c) is contrary to the NPPF's objective of significantly boosting housing supply and that the approach set out will have an impact on site deliverability and will extend construction periods. For these reasons it is proposed to remove clause c).</p> <p>The second sentence of clause b) refers to the SHMA, which is based on market signals and demographics, albeit on a district-wide basis. In the absence of up to date local housing needs data, it is reasonable to expect developments to reflect the data in the latest SHMA</p>	Remove clause c)
65478 - King Henry VIII Endowed Trust (Warwick) [6195] 65496 - Sarah Palmer [12871]	Object	<p>The criteria identified in the policy are reasonable and appropriate for allocated (and unallocated) housing sites in the Growth Villages. Our representations under other policies propose the allocation of a site at Red Lane, Burton Green for housing and it is confirmed here that it is accepted that such an allocation would be fully on the basis set out in this policy and its three criteria.</p>	Noted	
66207 - Bloor Homes Midlands [11532]	Object	<p>Objects to phasing of development of over 50 dwellings at a rate of 50 dwellings per 5 years. This will not boost housing in a district where a 5 year supply cannot be demonstrated It is contrary to the NPPF, will have unintended consequences on the character of villages and not support social cohesion. This approach would result in the phased delivery of infrastructure which may result in new residents being isolated from the existing settlement and services.</p> <p><i>This part of H10 should be deleted.</i></p>	Agreed	Remove clause c)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65758 - Mr Stephen Halliday [9843]	Object	<p>H28 Hatton Park Validity of consultation process Change of site without consultation with local community Overall housing need No exceptional circumstances for building in Green Belt No assessment for health and safety of people living on Birmingham Road</p> <p><i>Reconsider proposed plans for development of Hatton Park Safety review needed of current traffic/accident issues on Birmingham Road before proposals can realistically be put forward</i></p>	See responses to DS11(H28) for response to this	
65535 - Keith Wellsted [8636]	Support	Local people should have their say and any development should be phased	Support noted.	
66771 - Burman Brothers [9138]	Support	<p>Important that this policy reflects requirements of market fully. House builders are in best position to decide on range and mix of housing taking on board Council's desire, where appropriate, of any special Local Housing Need but policy should not be restrictive or unreasonable. Policy as worded is not reasonable and needs further clarification on this point.</p> <p>Reference to Hatton Park restricts the number of dwellings to be built in phase one to 50 out of 80. This is ridiculous because it seeks to influence the market, the build period and economics of development on the site. No rational planning reason given and is Council interfering with release of sites and almost reverse phasing across H10 allocations contrary to NPPF and provides wholly uneconomic and restrictive policy element that should be deleted.</p>	<p>The second sentence of clause b) refers to the SHMA, which is based on market signals and demographics, albeit on a district-wide basis. In the absence of up to date local housing needs data, it is reasonable to expect developments to reflect the data in the latest SHMA.</p> <p>It is accepted that Clause c) is contrary to the NPPF's objective of significantly boosting housing supply and that the approach set out will have an impact on site deliverability and will extend construction periods. For these reasons it is proposed to remove clause c)</p>	Remove clause c)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H11 Limited Village Infill Housing Development in the Green Belt</i>				
66602 - Court (Warwick) Ltd (Richard Hayward) [7361]	Object	<p>As drafted, policy is unnecessarily restrictive and inflexible and as a result the Plan will not deliver level of windfalls required. Plan therefore ineffective/unsound.</p> <p>No sound justification for artificially limiting scale of development to 2 dwgs as proposed by criterion a). Larger infill and other small scale schemes should be capable of consideration on site-by-site basis without harm to character of village/Green Belt.</p> <p>Stoneleigh not solely linear with examples of development behind main road frontages. Requirement in criterion c) therefore inappropriate for Stoneleigh. Development could take place on land which does not front public highway without harming character of village/Green Belt</p> <p>Criterion c) redundant in that impact of proposed development is to be considered under other Plan policies</p> <p><i>Three criteria in H11 should be deleted and replaced with words along the lines that infill and other small scale proposals will be permitted within the defined village envelopes of Limited Infill Villages where they comply with other relevant policies of the Plan</i></p>	<p>a) By restricting development to no more than two dwellings in certain circumstances, the policy seeks to ensure the character of the settlements and the role they play in the green belt is maintained.</p> <p>Further, the restriction to 2 dwellings is consistent with the size, nature and sustainability credentials of the smaller green belt villages.</p> <p>The Council considers that criterion b) is important to ensure that the policy restricts back-land development where development does not front a public highway and to restrict developments on significant gaps in frontage which lay an important role in the character of the settlement and potentially to openness of the green belt.</p> <p>Criteria c) is important to recognise that some sites which could be developed under criteria a) and b) actually play an important role in the character and distinctiveness of the village.</p>	
66342 - Shirley Estates (Mr Harry Goode) [1415]	Object	<p>H11 Policy does not accord with presumption favour of sustainable development set out in NPPF.</p> <p><i>Policy too restrictive in limiting development to 2 no. dwellings. Policy inconsistent with rural exceptions policy where may need more than 2 dwellings.</i></p> <p><i>Policy should be related to physical features on the ground rather than an arbitrary number.</i></p>	<p>By restricting development to no more than two dwellings in certain circumstances, the policy seeks to ensure the character of the settlements and the role they play in the green belt is maintained.</p> <p>Further, the restriction to 2 dwellings is consistent with the size, nature and sustainability credentials of the smaller green belt villages.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66716 - Mr. A. Burrows [2117]	Object	The National Planning Policy Framework (NPPF) requires 'exceptional circumstances' to allow development in the Green Belt. With regard to the proposed housing development site at Hatton Park, no such special circumstances exist. This is proven by the very recent Housing Needs Survey conducted by the Parish Council and the Warwickshire Rural Communities Council which returned a need for a maximum of 12 homes which could be accommodated by village infill or already identified brown field sites within the parish. The Hatton Parish Plan (2013) also documents major opposition to development in the parish.	Exceptional circumstances for development at Hatton Park in general are justified for a number of key reasons: a) there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development b) some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the village hierarchy report c) Additional housing in rural settlement provides badly needed affordable homes and also provides opportunities and choice. This enable local communities to thrive and local people to remain within their communities	
65415 - Mr John Gaffey [12752]	Object	H11 infers deemed consent for infill developments which are located within a Limited Infill Village and comply with the three specified criteria.  The appropriateness of the development should also be assessed in terms of potential harm being caused to the green belt and this should be the over-riding consideration.  <i>The word 'may' should be used in place of 'will' after 'Green Belt' in the first line.</i>  <i>Add a further condition d) which requires the development to satisfy appropriate tests extracted from section 9 of NPPF, e.g. does the development impact on the contribution which the open character of the village makes to the openness of the Green Belt, keeping land permanently open and safeguarding the countryside from encroachment.</i>	Policy H11 is broadly consistent with para 89 of the NPPF. development proposals will need to comply with other policies in 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>
66029 - David Pickering [12849]	Object	<p>The process of identifying Primary and Secondary Service Villages, has failed to examine in any objective depth whether other limited infill villages might benefit from modest further development.</p> <p>Within Rowington Green a further limited amount of residential development - beyond the suggested one or two dwellings set out in the policy - would meet the wider identified needs of the community. The strong locational synergy between Kingswood and Rowington would mean that release of this site at Rowington Green would either take the place of at least one of the sites identified at Kingswood to fulfil the number of dwellings required in that settlement (100-150) of which sites for only 62 were originally designated, now reduced to 43, or contribute additional housing to the total provision being sought by the Council in rural areas. The Rowington Parish Plan 2009 for example recognised in its guiding principles the need to ensure the continuation and regeneration of the Parish by having a broad range of accommodation including for the elderly, single or young families looking for either smaller or affordable accommodation. This need was seen as enabling a limited number of younger people to move into the Parish to provide new blood in the community.</p> <p><i>Remove the first criteria of the policy so that appropriate infill development of more than one or two dwellings on suitable sites might be permitted where it would meet the local needs of local families and single people over the full age range, without significant impact on the green belt.</i></p> <p><i>Include specific policy with criteria about rural exception sites, which is not clearly apparent in the current list of proposed policies. These sites can be identified by local communities in Parish Plans or Neighbourhood Plans so giving greater credence to the localism agenda.</i></p>	<p>Rowington Green is a relatively dispersed settlement with limited community facilities. It is the Council's view that for these reasons it is correctly designated as a limited infill village which should be retained in the green belt. In these circumstances it is not appropriate to allocate housing land here and Policy H11 is appropriate to these circumstances</p>	
65679 - The Rosconn Group [9057]	Object	<p>The policy is too restrictive. By restricting new development, the opportunity will be missed to allow villages and their services to remain viable. Without a critical mass, local bus and rail services will be at risk of closure or cuts to services.</p>	<p>Limited infill villages are those that currently have only a limited range of services. For this reason they have been assessed as not being suitable locations for allocated growth. This policy seeks allow small scale growth in these village to enable the villages to continue to expand and to meet local need.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65536 - Keith Wellsted [8636]	Object	If all villages in the district, i.e. those within or outside the green belt, there would be less pressure on the growth villages thus reducing the negative impact on these.	The approach to development in villages seeks to provide for growth in the most sustainable locations and ensuring that green belt boundaries are only amended where exceptional circumstances exist. A more even spread across the District's village would lead to unsustainable locations being allocated.	
		<i>Spread village development fairly</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66564 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Policy H11 as written is sound and is established Policy for Green Belt, as earlier set out in PPG2. It allows new houses in washed-over settlements under very strict controls. These are well set-out in the Policy.</p> <p>Paragraphs 4.77-4.79 are also sound and in accordance with national Green Belt policy.</p> <p>The policy makes no reference to the village boundaries identified on the policy map. The boundaries do nothing to assist the implementation of Policy H11 and would be likely to harm it by increasing applications which then need to be refused under the terms of the Policy itself.</p> <p>The NPPF gives no support to showing 'village infill boundaries' for washed-over settlements in the Green Belt.</p> <p>Village infill boundaries are shown for some small villages outside the Green Belt. These should also be deleted.</p> <p>Changes to Plan: Remove all the 'village infill boundaries' from the Proposals Map. The following settlements have village infill boundaries shown. They should all be removed. Stoneleigh Eathorpe Weston-under-Weatherley Hill Wootton Old Milverton Offchurch Wasperton Sherbourne Hampton-on-the-Hill Norton Lindsey Hatton Green Hatton Station Shrewley Little Shrewley Beausale Haseley Knob Lowsonford Rowington Rowington Green Baddesley Clinton Lapworth</p>	<p>Village infill boundaries are important to define the areas to which certain policies apply (such as H10, H11 and H13). It is therefore important to retain the village boundaries for all growth village and limited infill villages. It is correct that policy H11 makes no reference to the policies map and to address this it is proposed that Policy H11 be amended as shown.</p>	<p>Amend Policy H11 to read: "Limited village infill housing development in the Green Belt will be permitted where the site is located within a Limited Infill Village (as shown on the Policies Map) and the following criteria are satisfied..."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		Chessetts Wood Aylesbury House  Remove all the 'village infill boundaries' from the Proposals Map. The following settlements have village infill boundaries shown. They should all be removed. Stoneleigh Eathorpe Weston-under-Weatherley Hill Wootton Old Milverton Offchurch Wasperton Sherbourne Hampton-on-the-Hill Norton Lindsey Hatton Green Hatton Station Shrewley Little Shrewley Beausale Haseley Knob Lowsonford Rowington Rowington Green Baddesley Clinton Lapworth Chessetts Wood Aylesbury House		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66013 - Hatton Estate [3196]	Object	<p>This policy is too restrictive as the specified boundaries for infill essentially trace the built up area of the settlements, leaving no available land within the boundary for infill development. This is not consistent with the strategy set out in the Local Plan.</p> <p>Policy H11 seeks to limit any infilling to two dwellings, which we believe is far too restrictive and is effectively limiting benefits that could be delivered through new development in the village. In relation to Hatton Station, it could prevent development that could itself provide facilities that are not currently available and could have a potential impact on the viability of the station.</p> <p>Policy H11 is considered to be unsound as it fails the tests in respect to being positively prepared, justified, effective and consistent with national policy.</p> <p><i>To address the current issues with the Limited Infill Village policy we recommend that policy H11 should be either a village boundary/site allocation policy or a criteria-based infill policy, not both as is currently the position, as this essentially prevents any infill development.</i></p> <p><i>In addition the current policy is too restrictive on the number of dwellings allowed on any identified infill site, the limit of 2 dwellings should either be increased to allow greater flexibility and responsiveness or, preferably, this should be assessed on a case by case basis.</i></p>	<p>The Council considers that it is appropriate to draw the village boundaries reasonably tightly around the build up area to ensure the openness and overall purpose of the green belt is retained. The Policy is considered to be consistent with the NPPF which refers to "limited infilling" and with the Council's spatial strategy (see DS4). By restricting development to no more than two dwellings in certain circumstances, the policy seeks to ensure the character of the settlements and the role they play in the green belt is maintained. Further, the restriction to 2 dwellings is consistent with the size, nature and sustainability credentials of the smaller green belt villages.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66612 - Mark and Sarah Grimes [12973]	Object	<p>Support thrust of H11 but there is no robust empirical evidence to restrict the scale to no more than 2 dwellings. Likewise the definition of infill development, being too narrow.</p> <p>Para. 89 of the framework identifies specific exceptions where new development is appropriate within the Green Belt; limited infilling in villages being one such exception. As presently drafted the policy does not embrace the sustainability ethos set out within the framework at paras. 14, 151, 187 and is therefore unsound, not positively prepared or justified.</p> <p>To contribute to the present and future economic environmental and social sustainability of villages, especially those washed over by Green Belt, provisions for new housing should be allowed where the scale and nature of the development does not result in significant or demonstrable adverse impacts</p> <p><i>The definition set out under draft criterion b) should be amended to include reference to sites within the Infill Village Boundaries where the site is closely surrounded by other built form. Furthermore it would be appropriate to restrict new infill to a specific number, but I cannot identify any robust planning objection to restricting infill to 'no more than 2 dwellings'.</i></p> <p><i>It is considered that criterion a) of the policy should be amended to read up to five dwellings. In my opinion, no national or local planning policy principle would be offended by the proposed amendments to the draft policy. Criterion c) and other draft development management policies contained within the draft WDLP provide sufficient safeguards to ensure that this scale of infill development does not have a harmful impact on the integrity and character of the overall village.</i></p>	<p>Criterion a): By restricting development to no more than two dwellings in certain circumstances, the policy seeks to ensure the character of the settlements and the role they play in the green belt is maintained. Further, the restriction to 2 dwellings is consistent with the size, nature and sustainability credentials of the smaller green belt villages.</p> <p>Criterion b): This is also about ensuring that the role these villages play with the green belt is preserved and by restricting development to gaps fronting the public highway, the impact on the openness of the green belt and the character of the village will be minimised.</p> <p>Criterion c): This policy is consistent with the NPPF and other policies in the Plan, but is restated here for clarity.</p>	
66518 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	<p>require any development at these allocations to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. We would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community</p>	<p>These points are covered by NE5 and the Flooding and Water policies. It is not necessary to include specific requirements within policy H11</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>H12 Housing for Rural Workers</i>				
66218 - NFU (Sarah Faulkner) [1119]	Object	<p>Unreasonable to include the size restriction outlined in section 4.83.</p> <p>The 140sq.m includes garaging which in reality makes the residential floor space even smaller.</p> <p>This size limit is at odds with the new permitted development rights, whereby farmers can convert redundant agricultural buildings to up to three C3 residential units with a total floor space of 450m<sup>2</sup>. Therefore we think that it is out of step to attempt to restrict rural workers dwellings to 140sq.m</p> <p>When new dwellings are constructed for farm businesses it is important that they are large enough to cope with the many demands of the farm business, together with the needs of a farming family.</p> <p>It is also important to recognise that an agricultural dwelling must be flexible enough to accommodate families at a range of life stages.</p> <p><i>Remove the size restriction outlined in section 4.83.</i></p> <p><i>The policy needs to provide for a range of accommodation types to meet established local need, which should include dwellings to house people employed in agriculture.</i></p> <p><i>Farming families do not have the option of moving house if they should outgrow their home and this must be recognised when planning new accommodation.</i></p>	<p>This policy allows the development of new homes in the open countryside for the exclusive use of rural workers where they need to live on-site. There is a significant difference between these dwellings and dwellings converted from farm buildings since these do not involve new buildings.</p> <p>The size limit is based on an average 3-bed house. The Council considers that during the life of the rural worker's dwelling there is a greater chance that it will meet needs if it built to an average size. Larger 4- or 5-bed homes may be too costly to maintain for many families in terms of Council Tax and energy.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5. Sustainable Communities</b>				
<i>SC0 Sustainable Communities</i>				
67134 - Mr Ray Steele [5886]	Object	We only have houses, nothing else. All developments in the LP will impose a strain on existing resources that do not have the capacity to cater for increased population e.g. hospitals, schools, dentists, shops, car parking and more. The volume of houses and people surely demand a 'new town' approach as in other districts	The Council contends that it has the right level of growth and the right distribution of this growth (see responses elsewhere). Policy SC0 seeks to provide a framework to encourage high quality developments to deliver this growth, including infrastructure	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66125 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>There is concern that part (e) of policy SC0 is inconsistent with national planning policy and not as effective as it might be, because it does not clarify what is precisely meant or intended by the term 'measures'. We are also concerned about part (f) of the policy, as it does not clearly and unequivocally reinforce the delivery of part (e) of the policy. This in turn undermines the achievement of sustainable communities.</p> <p>With regard to promoting healthy communities, paragraphs 58 and 69 of the NPPF advise that planning policies, decisions and design should aim to achieve safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.</p> <p><i>To resolve the aforementioned concerns, improve the effectiveness of the policy and ensure its consistency with national planning policy, we suggest the following amendments: -</i></p> <p><i>e) take account of community safety including design and infrastructure measures to prevent crime and road accidents;</i></p> <p><i>f) provide good access to community facilities including meeting places, local shops, transport services, health facilities, emergency services and open space.</i></p> <p><i>As well as resolving the aforementioned issues, including the proposed amendments would tie Overarching Policy SC0 more closely to the following policies of the Local Plan, thereby mutually increasing their material weight: -</i></p> <p><i>* BE1 - Layout and Design</i>  <i>* Paragraph 5.9</i>  <i>* HS1 - Healthy, Safe and Inclusive Communities</i>  <i>* HS7 - Crime Prevention</i></p>	Suggested amendments to e) and f) are accepted	<p>Amend Policy SC0 point e) to read: e) take account of community safety including design and infrastructure measures to prevent crime and road accidents;</p> <p>Amend Policy SC0 point f) to read: f) provide good access to community facilities including meeting places, local shops, transport services, health facilities, emergency services and open space.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66372 - The Leamington Society (Richard Ashworth) [4687]	Object	Various policies refer to sustainable communities and lifestyles (DS3, DS5, BE1, TR1, TR2, HS1, HS6 etc). The intentions of these policies are good but the plan fails to follow these through and fails to set effective priorities and policies to achieve these aims. Instead it recommends low density urban sprawl which will be dependent on motor vehicles and will not deliver sustainable lifestyles. It therefore represents an unsound strategy. Whilst the plan seeks to encourage walking and cycling, this will not be achieved as wider, busier roads will intimidate and discourage pedestrians and cyclists. The low density suburbs do not provide a sound basis for supporting an effective bus service.	The point about low density suburbs being inconsistent with the aims of SC0 is not accepted. The garden towns, village and suburbs approach seeks to bring forward high quality neighbourhoods at the same time as encouraging public transport and other sustainable modes of transport. Whilst this is always a challenge, the opportunities provided by people friendly streets and legible layouts make sustainable forms of transport more	
66754 - Mr Edward Walpole-Brown [7504]	Object	This interlinks with comments made before about criteria to assess Housing Site Allocations and the scoring which has been used, in our opinion inappropriately.	The site selection methodology (published on the website) included an assessment against a wide range of planning factors and is aligned with the sustainability appraisal. The Council therefore contends that the process was appropriate and is consistent with the provisions of Policy SC0.	
66616 - Mr Michael Kinson OBE [12794]	Object	The Local Plan is delivering too many houses as the population/ growth estimates are flawed. It is difficult to envisage sustainable communities resulting from such growth with the town of Warwick in particular under threat from the effects of too much new growth stressing existing infrastructure provision, impacting on the historic fabric of the town and its heritage assets as well as impacting on the health of its residents as pollution from traffic congestion occurs. Warwick already has pressures associated with the facilities and organisations that are already located here (large schools, major employers, a major hospital, and tourist attractions). Further growth will make matters even worse.  <i>None offered - assume the plan's overall housing requirement should be revisited and less new growth required/ allocated</i>	This representation doesn't suggest amendments to Policy SC0. Issues around levels and locations of growth are addressed elsewhere.	
66294 - Mr H E Johnson [12846]	Object	We support the Council's overall aims regarding sustainable communities as summarised in this policy. However, the policy requires additional flexibility for these requirements to be assessed on a site by site basis at the application stage (or in a masterplan or development brief).	All policies are assessed on a site by site basis at the application stage. There is no need to state this in policy SC0	
66363 - Mr Dean Epton [8244]	Object	The plan would be seriously damaging to our environment and heritage assets. The plan gives insufficient attention to our heritage and is potentially damaging to it in contravention of the provisions of the NPPF.	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65051 - Emscote Gardens Residents Association (Mr Neil Kenton) [12669]	Object	The plan would be seriously damaging to our environment and heritage assets. The plan gives insufficient attention to our heritage and is potentially damaging to it in contravention of the provisions of the NPPF.	The plan's proposals and policies seek to bring forward the development the District needs in a way that takes full account of the environmental and heritage assets. The plan seeks to balance the need for growth with protecting and enhancing the best of what the District has to offer. The policies within the Sustainable Communities chapter of the local plan are key to this.	
		<i>Do not do this to Warwick like this.</i>		
66461 - Environment Agency (Becky Clarke) [6581]	Support	Would like to include the following points into this policy as they are significant indicators of sustainable development, furthermore without their inclusion into the text below the proposed policy may be judged as not meeting the requirements of the NPPF, or European legislation.  <i>Suggest that point j) is re-worded as follows: „reduce flood risk on the site and to the wider community through the layout and form of the development, and surface water is managed effectively on site through the incorporation of green infrastructure including Sustainable Urban Drainage systems into all new development's. Recommend insertion of text below into the policy: 'h) Development proposals should have regard to and support the actions and objectives of the Severn River Basin Management Plans (RBMPs) and also have regard to the River Severn Catchment Flood Management Plans (CFMPs). i) Protect principal aquifers and the source protection zones associated with public supply boreholes within the northern part of the district, there will be a presumption against development within a groundwater SPZ1 which would physically disturb an aquifer.'</i>	These are very detailed points for an overarching policy, however it is considered appropriate to utilise the points raised in relation to principal aquifers and source protection zones in policy NE5.	Revise criterion c) of policy NE5 as follows:  c) do not result in a reduction in the quality or quantity of groundwater resources, this includes the protection of principal aquifers and the source protection zones associated with public supply boreholes within the northern part of the district, there will be a presumption against development within a groundwater SPZ1 which would physically disturb an aquifer;

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66470 - Gladman Developments (Peter Dutton) [9149]	Support	<p>New development should be of high quality and should be bought forward in a way which enables strong communities to be formed/sustained. To meet the policy's aims, a number of specific criteria against which proposals will be assessed are proposed.</p> <p>Policy Analysis</p> <p>Support principle of delivering high quality development, but concerned that provisions are overly onerous and could place an undue burden on the ability to deliver sustainable development. We note that Policy BE1 Layout and Design also outlines a set of prescriptive policy requirements against which the design of proposals will be assessed.</p> <p>Conclusions on Soundness</p> <p>Submit that it would now be sensible to consolidate requirements of Policies SC0 and BE1, other LP requirements related to layout and design of developments, into single policy.</p>	The Council contend that the provision of Policy SC0 are consistent with the NPPF and are intended to provide a framework for the more detailed policies that follow.	
<p>65537 - Keith Wellsted [8636]</p> <p>66016 - University of Warwick [222]</p> <p>66067 - English Heritage (Mr Rohan Torkildsen) [205]</p> <p>66514 - Warwickshire County Council (Monica Fogarty) [12790]</p> <p>66535 - Friends of the Earth (John Brightley) [1113]</p> <p>66669 - Warwickshire County Council (Monica Fogarty) [12790]</p>	Support	<p>Policy is welcomed and supported:</p> <p>The Health Impact Assessment undertaken by Public Health Warwickshire considers the Plan to be positive for contributing towards improving and protecting the health and wellbeing of people in the District. Overall the Plan is considered positive for health and wellbeing. The Plan includes a range of policies that will contribute towards improving and protecting the health and wellbeing of people in the district, notably overarching policy SC0.</p> <p>The requirement for developments to "protect, and where possible enhance, the natural environment including important landscapes, natural features and areas of biodiversity" is supported. Correct principles, although a lot of your housing plans are in contravention of this policy</p> <p><i>None required</i></p>	Support is noted	No change

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Built Environment*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65647 - Mobile Operators Association [1361]	Object	A clear and flexible telecommunications policy should be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the authority's policy aims. In keeping with the aims and objectives of the legislation any background information should be contained within a separate non- statutory LDD which would not need to go through the same consultation process.	It is accepted that a policy regarding the siting and design of telecommunications infrastructure should be included within the Plan as required by para 43 of the NPPF. It is therefore proposed to add a new policy to address this.	<p>Add new Policy BE6 worded as follows: The Council will support the development of electronic communications networks including telecommunications and high speed broadband. In considering proposals, the Council will have regard to:</p> <ul style="list-style-type: none"> <li>a) the needs of telecommunications operators,</li> <li>b) any technical constraints on location of telecommunications apparatus,</li> <li>c) the potential for sharing sites,</li> <li>d) the impact of development on amenity, its surroundings, the sensitivity of the environment and the design and external appearance of telecommunications apparatus.</li> </ul> <p>Where a new installation is proposed it should be demonstrated that the potential to erect apparatus on or alongside existing buildings, masts or other structures has been fully explored. Such evidence should accompany any application.</p> <p>Development in or adjacent to sensitive locations or environmental assets should not have significantly harm the location or asset. Where the level of harm in these locations may be considered acceptable, the proposal will be permitted only if there is no other technically suitable location that both meets operational requirements and causes less environmental harm and any facility is at a distance of at least twice its height from the nearest residential properties.</p> <p>If on a building, apparatus and associated structures should be</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
			<p>sited and designed in order to seek to minimise impact to the external appearance of the host building and the surrounding area.</p> <p>Add new explanatory text as follows:            Para 5.27(a): National Policy requires that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. Such infrastructure installations are important in supporting the economic wellbeing of the District and are becoming and increasingly important part of social inclusion. This policy therefore seeks to support such infrastructure within the District.</p> <p>Para 5.27(b). It is recognised that telecommunications infrastructure (such as masts) can have an impact on amenity and on important environmental assets and sensitive locations such as areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. It is therefore important that applicants demonstrate need and consider whether infrastructure can be installed alongside existing installations. Where it can be demonstrated that the installation is required, the policy seeks to ensure that care is taken in terms of the location and design of the installation. In particular, the policy seeks to ensure sensitive locations are avoided unless there are no alternatives and where there are no</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><i>A new telecommunications policy to read:-</i>  <i>"Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i>  <i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i>  <i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i>  <i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i>  <i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</i>  <i>We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate Supplementary Planning Document.</i></p>		alternatives, the siting, design and mitigation is carefully considered.
66536 - Friends of the Earth (John Brightley) [1113]	Support	Support	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>BE1 Layout and Design</i>				
66639 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>It is considered that the effectiveness of policy BE1 is undermined through lack of a direct reference to 'Secured by Design'. The omission is surprising, given that paragraph 5.9 of the supporting Explanation does reference Secured by Design.</p> <p>Policy support for Secured by Design would help to ensure new developments comply with a nationally recognised consistent standard. This in turn would mean they would contribute to the achievement of the Government's objectives for the planning system set out in paragraphs 58 and 69 of the National Planning Policy Framework (NPPF).</p> <p>In case the Council and Inspector are not aware, Secured by Design is a long-running flagship initiative of the Association of Chief Police Officers (ACPO). Its objective is to design out crime during the planning process. It is a respected standard in the sector, supported by numerous local authorities (including Warwick District Council) and professional bodies and is therefore, a vital guidance resource for planners.</p> <p><i>Policy BE1 (j) should be changed to read as follows</i></p> <p><i>j) incorporate building and street design and layout to reduce crime and the fear of crime in accordance with the standards and principles of Secured by Design.</i></p>	Policy BE1(i) provides an overview regarding the need to take crime prevention in to account is design and layout. The detail is provided in Policy HS7 and it is therefore proposed that this representation is addressed through policy HS7	
66537 - Friends of the Earth (John Brightley) [1113]	Object	We suggest Paragraph 5.11 (bullet point 3) should not say 'taking into account the Garden Towns prospectus' as this suggests that only Garden Town type layouts will be given consent. We suggest the wording might be: 'identify design principles for the development proposed taking account of any supplementary planning guidance produced by the District Council'	It is accepted that Para 5.11 should be worded to be more flexible in the event design parameters change during the plan period.	Amend para 5.11 (3rd bullet point) to read: "identify design principles for the development proposed taking account of the Garden Towns, Suburbs and Villages Prospectus or any subsequent design guidance produced by the Council".

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65392 - Mr Nigel Hamilton [1656]	Object	<p>All new development should protect residential amenity of both the new accommodation and existing property. Therefore it should meet the,45 degree rule, Distance separation guidelines and comply with Right to Light Legislation standards.</p> <p>Clause 11 does not comply with existing legislation; new buildings must protect and enhance conservation areas and listed buildings including their setting. Therefore delete "where possible".</p> <p><i>45 degree rule</i> <i>Distance separation guidelines</i> <i>Complies with Right to Light Legislation standards</i></p>	<p>The proposed changes are addressed in the Residential Design Guidance and will be included, where appropriate, in the proposed review of this</p>	
64531 - Mr Richard Thwaites [11460]	Object	<p>Any proposed development should harmonise with or enhance the existing settlement including patterns of movement and local topography.</p> <p>The Hampton Magna preferred option sits in a highly visible position close to the A46/M40 junction and will be overlooked by existing residents.</p> <p>All traffic, local or construction will be forced along narrow estate roads causing congestion on a blind bend at the junction with Old Budbrooke Road.</p> <p>The Maple Lodge site, a much more naturally shielded site, will remove lorries from the village and much more evenly distribute the increased traffic load along Old Budbrooke Road.</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna.</i></p>	<p>This representation does not directly address policy BE1. The points raised are addressed elsewhere</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66462 - Environment Agency (Becky Clarke) [6581]	Support	<p>Note policy seems to provide an overarching approach to ensure that built development is both recommend:            following wording is added to the end of bullet point i)            'incorporating sustainable water management features including, wetlands, ponds and swales, green roofs and street rain gardens.'            Recommend insertion of following points within the policy:            'q) Safeguard ecological features incorporating them into design and creating more resilient ecological networks, as an integral part of the scheme.            r) Development proposals must demonstrate that the strategic network of environmental infrastructure will be protected, enhanced and expanded at every opportunity. s) Ensure that there is an appropriate easement between all waterbodies/ watercourses to allow access and maintenance (for Main River this will be a minimum of 8 metres).            t) In line with objectives of the Water Framework Directive (WFD), development proposals must not adversely affect water quality of waterbodies in the District and wherever possible take measures to improve it.'            Recommend you consult your Lead Local flood Authority in relation to their requirements for easements for developments in close proximity to ordinary watercourses.            Development near to waterbodies should include access to them, and watercourses should reflect a natural state. Every opportunity should be taken where development lies adjacent to the river corridor, their tributaries or floodplain to benefit the river by reinstating a natural, sinuous river channel and restoring the functional floodplain within areas where it has been previously lost.            Welcome bullet point n) which requires sufficient provision for sustainable waste management within new developments.</p>	<p>The points are accepted. However they provide substantial detail that in many respects goes beyond the scope of Policy BE1. It is therefore proposed that Policy BE1 be amended to reflect the points regarding easements. The remaining points are addressed through the revisions to policies FW1 and FW2. It is proposed that these policies are specifically crossed referenced within Policy BE1, clause l).</p>	<p>Amend Policy BE1 as follows:            Amend point (l) to read "l) incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features (See policies FW1 and FW2 for further details)"</p> <p>Add "s) Ensure that there is an appropriate easement between all waterbodies/ watercourses to allow access and maintenance</p> <p>Add new para 5.12a to explanation:            5.12(a) Applicants should consult the lead Local Flood Authority in relation to requirements for easements for developments in close proximity to ordinary watercourses. Development near to waterbodies should include access to them, and watercourses should reflect a natural state.</p>
65538 - Keith Wellsted [8636] 66295 - Mr H E Johnson [12846] 66349 - David Wilson Homes [11681]	Support	Support this policy	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>BE2 Developing Strategic Housing Sites</i>				
66712 - Gleeson Developments [5117]	Object	Policy BE2 refers to "Strategic Housing Sites", which is justified as being sites allocated for over 200 dwellings. The term Strategic should be deleted from the policy as it can be confused with the larger allocated sites set out in Policy DS11.	Agreed	Amend title of Policy BE2 to read: "Developing Significant Housing Sites"
<i>The term Strategic should be deleted from the policy as it can be confused with the larger allocated sites set out in Policy DS11.</i>				
66803 - Gallagher Estates [644]	Object	Policy BE2 is similar in intent and drafting to Policy DS15 in requiring the preparation of development briefs for the proposed strategic sites. It is therefore repetitious. Notwithstanding this, as set out in response to Policy DS15, it is considered that the need for development briefs introduces an additional layer of unnecessary development plan making. We propose Policy BE2 be deleted.	Policy BE2 has a significantly different role to DS15. The latter seeks to ensure adjacent sites are considered comprehensively to avoid piecemeal development and for this reason, it has been proposed to amend policy DS15 to only include sites in locations where coordination with adjacent is important. has been a. Policy BE2 seeks to ensure that all significant housing sites are developed to a high quality. Development briefs will play an important role in doing this. However it is recognised that in some cases proposals may come forward in advance of an approved development brief. In these circumstances the proposed amended wording of Policy BE2 (see action relating to rep 66473) will address this.	See action of rep 66473
<i>Policy BE2 should be deleted</i>				
66538 - Friends of the Earth (John Brightley) [1113]	Object	the wording in BE2 (d) (and 5.13) which says 'design principles, taking account of the Garden Towns, Villages and Suburbs Prospectus and Buildings for Life 12;' should instead read ' design principles, taking account of any supplementary planning guidance produced by the District Council'	It is accepted that clause d) should be worded to be more flexible to allow for changes in design guidance during the plan period	Amend Policy BE2 Clause d) to read: d) design principles, taking account of the Garden Towns, Villages and Suburbs Prospectus (or any subsequent design guidance adopted by the Council) and Buildings for Life 12

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65052 - Emscote Gardens Residents Association (Mr Neil Kenton) [12669]	Object	The continued loss of greenfield land and open space is unsustainable. The launch of ill thought out plans will be irreversible.  <i>If development harms the community, directly or indirectly then there is something wrong so do not do it.</i>	The representation does not suggest any change to this policy. The justification for the level of growth and location of sites is covered elsewhere in these responses.	
66078 - English Heritage (Mr Rohan Torkildsen) [205]	Object	To ensure developed briefs are prepared having due regard and consideration of the historic environment an additional criterion is recommended.  <i>Add - The historic environment.</i>	Accepted	Add additional clause reading k) protection and enhancement of the historic environment

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66473 - Gladman Developments (Peter Dutton) [9149]	Object	<p>Development sites of over 200 dwellings, or sites which form part of a wider development area which exceeds 200 dwellings, or other developments which have a significant impact on the character and appearance of an area, will be expected to comply with a development brief. Policy outlines specific requirements that should be contained within such development briefs, which includes densities - that should not be lower than 30 dwellings per hectare average.</p> <p>Policy Analysis</p> <p>Whilst recognising need for developments on larger sites to come forward in coordinated manner, query whether it will always be necessary to prepare development brief for this purpose and whether objectives of policy cannot be better achieved through preparation of site masterplan/development framework. In relation to site densities, submit it would be more appropriate to determine site densities at a level consistent with site's character/location, rather than setting a minimum target.</p> <p>Conclusions on Soundness</p> <p>Submit that in its current form the provisions of Policy BE2 are too prescriptive. In some instances it would be more appropriate to prepare a site masterplan or development framework for proposals, as opposed to a site development brief. Opposed to setting minimum site densities.</p>	<p>The final paragraph of policy BE2 already provides for circumstances where a development brief is absent and this is sufficient to address the concerns raised in this representation. However, to clarify this, it is proposed that this paragraph be included within the opening paragraph of the policy</p> <p>With regard to densities, the Council considers that it is appropriate (and consistent with the NPPF) to require development briefs (or layout and design statements) to set out the appropriate densities. It is also important in light of the need to use land efficiently and to ensure the Plan's housing requirement is met, to propose a minimum density. However it should be clarified that the proposed minimum density is net and includes only those part of the site that can be developed for housing (having accounted for streets, open space, other infrastructure etc)</p>	<p>Amend first paragraph of Policy BE2 to read: "Development sites of over 200 dwellings, or sites which (in combination with other sites) form part of a wider development area which exceeds 200 dwellings or other developments which have a significant impact on the character and appearance of an area, will be expected to comply with a development brief. Where a development brief is absent for a strategic site, planning applications should comply with Policy BE1 and should be accompanied by a Layout and Design Statement providing detailed information to address the information in relation to the matters set out in a) to j) below. Development briefs will set out requirements for: ..."</p> <p>Delete final paragraph of Policy BE2.</p> <p>Amend penultimate para of BE2 to read: "Development Briefs will be approved by the Local Planning Authority"</p> <p>Amend BE2(c) to read c) densities (which should not be lower than 30 dwellings per hectares (net) on average);</p>
66046 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	<p>This policy includes a reference to a Supplementary Planning Document (SPD). This SPD has not been through a statutory process and therefore has a lesser status than the Local Plan. By referring to this SPD in the Local Plan policy a greater weighting of significance is implied which is inappropriate. This reference should be removed and only if necessary placed in the supporting text.</p>	<p>The policy requires a development brief to be prepared and adopted of SPG. It is accepted that the SPG carries lesser weight, however it is reasonable to expect applicants to comply with the Local Plan policy, particularly as there is a clause dealing with cases where the Brief is absent.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65539 - Keith Wellsted [8636]	Support	Support (but will this policy be enforced?)	Noted	
66539 - Friends of the Earth (John Brightley) [1113]	Support	Support para 5.18	Noted	
<i>BE3 Amenity</i>				
64532 - Mr Richard Thwaites [11460]	Object	<p>The preferred option for development at Hampton Magna has a massive detrimental effect on the amenity of the neighbouring residents including 15 years of noise disturbance from construction traffic, visual intrusion of 100 new homes to the loss of enjoyment of their own dwellings.</p> <p>The Maple Lodge site will have virtually no negative effects on the amenity of neighbouring residents. It is well shielded, not overlooked and accessible for construction traffic via non estate roads.</p> <p>The Maple Lodge site as 75% equine and 25% previously developed brown field land has to be the best option for development within Hampton Magna.</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna</i></p>	The Maple Lodge site has been assessed as high landscape value and has not been allocated for this reason. The representation does not suggest that the policy should be amended.	
65540 - Keith Wellsted [8636]	Support	Good idea	Noted	
<i>BE4 Converting Rural Buildings</i>				
65969 - Sworders (Angus Hudson) [12808]	Object	This policy is not in accordance with the NPPF which supports development which would "re-use redundant or disused buildings and lead to an enhancement to the immediate setting". This policy places a raft of additional burdens on applicants which appear to have been lifted from the cancelled PPS7 and would restrict development.	The additional clauses in this policy provide further interpretation of the NPPF by clarify what is involved with enhancing the setting.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Transport</i>				
65889 - Mr Dennis Michael Crips [1851]	Object	<p>The STA has not been undertaken in accordance with a clear specification and has not be coherently managed. It is therefore unsuitable as evidence. It has resulted in proposals which could make traffic conditions worse.</p> <p>Previous work to achieve goals of the LTP and improvement for Warwick Town Centre has not been taken in to account. There is inconsistency in approach with approaches to both reduce and increase traffic volumes being pursued. Options to increase traffic volumes give no consideration to pedestrians and residents. The transport proposals are not therefore credible.</p> <p>The local authorities have failed to cooperate and WCC has failed to exercise it obligation as the highway authority to provide independent advice. There has not been enough objective analysis. The Plan therefore fails the requirements of legality and cooperation.</p> <p>Previous local plans right through to the LPT (2011) seek to reduce traffic flows in Warwick. However these proposals seek to increase traffic flow. This will impact on air quality and the historic environment (especially Avon Bridge). This is contrary to local and national policy.</p> <p>The SA acknowledges air quality as a problem but expects the problem to have disappeared by 2029. This does not deal with the urgent problems faced now. The plan is not therefore sustainable.</p>	<p>The STAs have been undertaken in accordance with nationally recognised standards and the Council is of the view that this is robust evidence. Although it is acknowledged that in some places traffic conditions are forecast to deteriorate, the STAs show the proposed development can be accommodated on the transport.</p> <p>Sustainable transport options are also being explored and it is anticipated that these can be brought forward in a complementary way.</p> <p>Impacts of air quality and historic have been considered. Air quality is ofrecast to improve during the plan period and impacts on the historic environment have been factored in to the outline design work at key junctions. Where necessary heritage settings assessments have been undertaken</p>	No change
66176 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	<p>Rail links - Warwick Parkway/Leamington stations should be identified and the implications should be considered. There could be opportunities to encourage sustainable interchange facilities and at Leamington there could be issues associated with the gyratory at Old Warwick Rd/Bath St/Spencer St/Lower Avenue</p>	<p>Leamington station interchange facilities have recently been improved and Warwick Parkway already has good interchange facilities. There are some opportunities to encourage sustainable facilities accessing both stations and these are in fact linked to the gyratory proposal and the A46 Stanks junction and corridor improvements.</p> <p>Preliminary modelling assessments have shown that the gyratory system can reduce congestion issues and provide improved facilities for public transport, walking and cycling.</p> <p>There is no need to change the transport policies.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65685 - Sir John Egan [9682] 66681 - Save Warwick (MR DAVID WILLIAMS) [4506] 66843 - Patricia Hollis [6286] 66902 - Colin Sharp [1913] 66910 - Ms Alison Cox [588] 66918 - Alison Kelly [9014] 66926 - Andrew Cliffe [6235] 66934 - Angelo Cugini [12883] 66942 - Barbara Groves [8940] 66950 - Professor Bob Ireland [7882] 66958 - Christopher Paden [8844] 66966 - Elizabeth Cliffe [6234] 66974 - Mrs Kay Cugini [1743] 66982 - Mr David Ramsbottom [2030] 66990 - Mr David Drinkhall [12839] 66998 - Ian Frost [2024] 67006 - Mr Geoff Reynolds [8107] 67014 - John Griffiths [8071] 67022 - Justin Richards [8806] 67030 - Louise Kalus [8998] 67038 - Paul Kalus [8995] 67046 - Mr Bernard Hollis [1810]  67054 - Mr R Komarasinha [6306] 67062 - Caroline Komarasinha [12793] 67070 - Matthew Drinkhall [8910] 67078 - Oliver Lane [8814] 67086 - Ms Helen Maclagan [12783] 67094 - Mr and Mrs J Pennington [600] 67102 - Mr Peter Lamb [3491] 67110 - Sarah Hunt [7309] 67118 - Mr Ben Orme [12882]	Object	<p>The transport strategy is ineffective and unsustainable. There is evidence to show that the transport assessment (important evidence for the Plan) is flawed. There are major issues in respect of accommodating traffic through Warwick generated from new estates south of the river.</p> <p>Adverse impacts on air quality and health have not been satisfactorily assessed or tackled. Background evidence for the Plan is considered to gloss over the importance of Air Quality Monitoring Areas of Warwick, Leamington and Kenilworth where illegal levels of nitrogen oxide generated from traffic are prevalent. The Plans evidence claims that the problem will be overcome in the future by cleaner motor vehicles. This is disputed by a number of scientists and considered a risk.</p> <p>The Plan is also considered unsound for the following reasons:-</p> <ol style="list-style-type: none"> <li>1)The traffic consequences of the proposals in the Plan would be disastrous for Warwick and the statistics used to predict the impacts of traffic have been manipulated so as to ensure they can fit the plan.</li> <li>2)In reality measures proposed do not deal with the anticipated transport impacts of the development and the intended development areas are not in the right place (are unsustainable)</li> <li>3)The traffic consequences of the Gaydon development in Stratford District have been underestimated.</li> <li>4)Development areas have not been located where the need to travel has been minimised. The impact of traffic generated by transport movements related to the development proposals has been ignored</li> </ol> <p>*The representation sets out and highlights a series of what are considered key references from the NPPF regarding traffic and transport related matters and associated infrastructure requirements, these can be viewed in the full submission.</p> <p>*The Save Warwick Group, together with the Town Council, The Warwick Society and Bishops Tachbrook Parish Council were concerned that the approach to transport adopted in the Local Plan was seriously flawed. They jointly commissioned Royal Haskoning DHV, the UK branch of the independent international engineering and project management consultancy with special expertise in Transport Planning, to undertake a peer review of the Strategic Transport Assessment 4. This can be seen in full at <a href="http://www.savewarwick.co.uk">www.savewarwick.co.uk</a>.</p> <p>The report confirms the concerns of the campaign groups and provides detailed evidence to provide the background for the matters raised in this submission below.</p> <p>*Wrong Strategic Decisions</p> <p>The fundamental flaw leading to many of the transport issues is the</p>	<p>The Strategic Transport Assessments have been undertaken according to national standards and the findings of the Royal Haskoning DHV have been analysed and considered. The Council remains confident that the STAs provide a robust basis for assessing the impacts and mitigation of the transport options. A short technical response to this has been prepared.</p> <p>The STAs shows, that with mitigation, the proposed development can be accommodated within the transport network.</p> <p>The mitigation has been included within the IDP and can be funded through S106 and CIL</p> <p>The proposed sites are therefore deliverable.</p> <p>Air quality is currently an issue, particularly in Warwick,. However the air quality study undertaken 2013 shows that by the end of the Plan period cleaner vehicle engines will mean air quality will improve significantly and there no exceedences are projected.</p> <p>In addition to the STAs and cumulative impact study has been undertaken looking at the impacts of the SDC's and WDC's development proposals together. The proposed mitigation takes account of this.</p> <p>The proposed development seeks to minimise the need to travel by:</p> <ol style="list-style-type: none"> <li>a) focusing predominantly on urban areas and the edge of urban areas</li> <li>b) bringing forward major greenfield site allocations close to major employment areas and important retail areas</li> <li>c) enabling easy access to the trunk road network without routing through the towns</li> <li>d) ensuring new infrastructure and services are provided within or close to new developments.</li> </ol>	No change

*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

decision to locate most of the major new development areas south of the River Avon. This strategy will not satisfy the needs of the NPPF "to ensure that development that generate significant traffic movements are located where the need to travel will be minimized and the use of sustainable transport modes can be maximised". The plan does not satisfy the "need to focus significant developments in locations which are or can be made sustainable".

The peer review states the following

- The £34 million worth of mitigation proposed will be insufficient to address all the transport impacts
- The methodology used for the TA (Traffic Assessment) for the local plan has a series of shortcomings and is considered unsound.
- The will be left by a legacy of congestion which will damage health , heritage assets and have negative economic impacts on Warwick.

\*Shortcomings of the STA4 Traffic Assessment

- It is incomplete / unfinished
- Despite 27 proposed Improvements for traffic mitigation the traffic modelling has shown network failure and increased congestion in key areas, particularly in Warwick. There is concern that leaving decisions regarding town centres to separate strategies is inappropriate/ ineffective.
- The interpretation of the data does not give the full picture; traffic growth has been ' capped'/ reduced so as to make traffic 'predictions' fit the series of indicative proposals.

Education trips have been excluded, trip discounting assumes 22.5% of trips will be subject to mode shift, peak spreading assumptions have been made assuming that people and institutions will change their working hours and travel times

- The report admits that the current indicative schemes will not solve the problems and goes on to say that "without a full, and potentially increased schedule of highway improvement schemes" the development allocations as proposed cannot be accommodated under the proposals in the current assessments.
- The assessment includes simplistic 'inception design solutions' for the mitigation but has not gone into detailed proposals - without sufficient detail how can the proposals be trusted to deliver what is necessary?
- The traffic assessment report is also considered unacceptable because it concludes that the proposed transport strategy will only mitigate 'in part' the potential impacts and that 'some residual impacts will still occur'.It is considered that further work is required to refine and assess the details of the mitigation schemes and that the order of delivery/ prioritisation of particular elements are agreed.
- The Traffic Assessment acknowledges that in spite of the application of the proposed mitigation measures not all of the

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>impacts are fully mitigated. In the opinion of the campaign groups it is believed that this is unacceptable and that the current plan strategy is therefore flawed/ cannot be accommodated.</p> <p>-The STA4 report recognises that sustainable transport options will have to be provided / improved to reduce traffic impacts and that work is on-going with regard to this matter. There is no evidence to support that sustainable transport measures will significantly reduce car trips (borne out by DFT research), therefore the methods/ assumptions employed by the traffic assessment are questioned/ argued not to be sufficiently robust.</p> <p>-The modelling used in the assessment is unreliable / subject to problems issues of reliability. The ability of the network to cope with 2028 traffic is questioned.</p> <p>*The Cumulative Impact Assessment which looks at combined Warwick and Stratford District traffic issues/ cumulative impacts has been completed too late in the process to effectively influence the proposed development patterns for Warwick District.</p> <p>-The Lighthorne/ Gaydon proposals are seen as having a significant effect on South Warwick as it is the area through which many of the residents will travel to work.</p> <p>-The CIA does not include information and analysis of the proposed schemes in detail, nor does it comprehensively identify the full scope of impacts and benefits that occur as a result of the allocation strategies. It merely identifies what strategic elements of infrastructure are likely to be required to ensure the growth can be accommodated upon the existing network.</p> <p>-The deliveries of capacity enhancements to the M40 corridor are essential to ensure local networks are not overloaded. The plans and their allocative strategies are prejudiced if this does not happen.</p> <p>-It is suggested that the methodology for undertaking the modelling exercise has required a 'capping procedure' that produces model instability and concern over the outputs presented as a consequence.</p> <p>-Journey times and congestion times are predicted to increase despite mitigation, this will have adverse effects on air quality</p> <p>-There is little or no evidence / regard given to the effects of the damage the proposals will do to the historic fabric and heritage assets of Warwick town centre.</p> <p>-There is little or no evidence on the impacts of the traffic proposals on health, air quality in Warwick town centre will deteriorate even more which will be damaging to health and the environment.</p> <p>The representation also attaches detailed supplementary information on traffic congestion statistics and air quality matters (see appendix 2 and 3 of the full submission).</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><i>Please see Representation that accompanies this document which shows that the traffic consequences of the proposals in the plan would be disastrous for Warwick and that statistics used to predict the impacts of traffic have been manipulated so as to ensure the proposals can fit the plan.</i></p> <p><i>In reality the measures proposed do not deal with the anticipated transport impacts of the development and the development areas are not located in the right places for sustainability.</i></p> <p><i>Proposals for sustainable transport are vague and the strategy is unlikely to deliver</i></p> <p><i>The traffic consequences of the proposed development at Gaydon have been underestimated.</i></p> <p><i>Development areas have not been located where the need to travel has been minimised</i></p> <p><i>The impact of the traffic generated by the transport impact of the development proposals has been ignored</i></p>		
66675 - Sworders (Angus Hudson) [12808]	Object	TR1-5; these policies all add additional burdens and requirements which are not contained in the NPPF. These are in conflict with the NPPF presumption in favour of sustainable development at paragraph 14 and Chapter 1, Building a strong, competitive economy and Chapter 4 promoting sustainable transport.	Each of these policies is supported by evidence and/or by the NPPF (Chapter 4). The policies do not conflict with the NPPF	No change
66070 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>Although we support this policy, it is not clear that the implications for the historic environment arising from major development to the south of Warwick have been fully addressed in accordance to such a commitment.</p> <p><i>Prepare evidence to appreciate the implications for the historic environment of the strategic allocations to the south of Warwick to inform the principle of development and appropriate mitigation.</i></p>	The heritage impacts of amendments to the most sensitive junctions (eg Banbury Rd/Myton Rd and Castle Hill) have been scaled back or deleted. A heritage settings assessment has been undertaken for Banbury Rd/Myton Rd.	No change
65870 - Highways Agency (Mrs Lisa Maric) [12807]	Support	The Highways Agency broadly supports the strategic transport objectives set out at Para 5.31 of the Publication Draft Local Plan, particularly the need to carry out improvements to major congestion hotspots and to fostering a more sustainable transport pattern	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66544 - Friends of the Earth (John Brightley) [1113]	Support	<p>Proposed Policies TR1 - TR6 (Transport)</p> <p>We support these proposals. However we do have some comments: We support the proposals in the Sustainable Transport Technical Note (Appendix D of the Strategic Transport Assessment Stage 4), particularly the mention of the proposed Kenilworth to Leamington cycle route (K2L), though we do not agree that 'the cycle network within the Warwick and Leamington area is reasonably well developed' - we believe that it could be considerably improved. There should be the aim to provide exemplary cycle and walking routes within and near to all new developments in order to maximise cycling and walking in those areas. Links to all town centres and railway stations are particularly important</p>	Support noted. Comments can be considered when detailed design work is commenced on cycle schemes	No change
<i>TR1 Access and Choice</i>				
66019 - University of Warwick [222]	Object	<p>We are concerned by the requirement in the supporting text for a recharging point for plug-in and other ultra-low emission vehicles to be provided for each off street parking space. This is excessive and uneconomic on the basis of current practice, and ignores the possible and likely developments in technology in coming years.</p> <p>The University currently has 30 charging points across its campus and its transport consultant Arup considers it almost impossible to estimate how many plug-in vehicles will be in use in years to come as estimates have been widely inaccurate to date. They consider that the growth area will be around hybrids rather than full electric vehicles. The means of charging and storing energy in vehicles will also be subject to change, as technology advances.</p> <p>The supporting text requirement of 1:1 provision is considered unrealistic and unreasonable.</p> <p><i>The final sentence of paragraph 5.40 should be deleted as the policy wording and supporting text combined provides sufficient encouragement and an expectation of the increasing use of electric vehicle charging points in new development but allows for the flexibility in negotiating levels of provision.</i></p>	<p>The explanation set out in paragraph 5.40 should be consistent with the Council Low Emissions Planning Guidance. This requires:</p> <p>1 charging point per unit (house with dedicated parking) or 1 charging point per 10 spaces (unallocated parking)</p>	<p>Amend the final sentence of para 5.40 to read:</p> <p>Unless it can be demonstrated that it would undermine the viability of development, recharging points should be provided in line with the Low Emission Strategy Guidance for Developers (April 2014) or subsequent revisions of 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>
66671 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The Health Impact Assessment undertaken by Public Health Warwickshire considers the Plan to be positive for contributing towards improving and protecting the health and wellbeing of people in the District. In particular it is suggested that the Plan does as much as possible to improve active travel opportunities to reduce reliance on vehicular transport and bring forward related health benefits to the wider community as a consequence.</p> <p><i>The plan should further emphasise the health benefits that will be delivered as a consequence of improved active travel opportunities.</i></p>	WDC has been working with WCC on preparing a study looking at the potential for more active travel. It is considered that this study will influence the IDP, but that the policies in the transport section remain valid	No change
65265 - Mr Brian Bate [1611]	Object	<p>Transport figures flawed due to no consideration of bridge congestion points. Castle bridge was designed for horse drawn traffic and only just copes with today's traffic. The bridge is ignored in the assessment. Building up to 12,900 homes south of the bridge would be a disaster, despite road improvement every single vehicle movement entering Warwick would need to pass Castle Bridge. Vehicle movements to and from Schools are not included, the Myton Road already has severe congestion. Currently air pollution figures are exceeding permitted levels.</p> <p><i>Transport assessment figures for congestion points should include river and railway bridges. Vehicle movements to and from schools need to be added to the total vehicle movement figures.</i></p>	River and railway crossing have been considered in the STAs and as have movements associated with schools	No change
65970 - Sworders (Angus Hudson) [12808]	Object	<p>In particular, TR1 Access and Choice, is negatively worded. Paragraph 32 of the NPPF states that "development should only be refused on transport grounds where the residual cumulative impacts of development are severe". In direct conflict, this policy specifies that development will only be permitted if it satisfies a list of requirements.</p>	The Council contends that TR1 is consistent with the NPPF paras 32 and 35. The policy is positively worded and seeks to permit development which addresses access issues for a range of transport modes effectively.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66071 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>Respondent: English Heritage (Mr Rohan Torkildsen) [205] Received: 27/6/2014 via Email</p> <p>Mindful of the commitment in paragraph 5.29 and 5.41 it is of concern there is no criteria in this policy to ensure transport infrastructure responds positively to the historic environment.</p> <p>It is not clear whether such guidance has been applied to inform an understanding of the implications for the historic environment arising from major development to the south of Warwick.</p> <p><i>- Respond positively to the context of the historic environment, including townscapes and landscapes, ensuring locally distinctive areas are conserved in a manner appropriate to their significance.</i></p> <p><i>Apply Manual for Streets and the Design Manual for Roads and Bridges, at this stage of the Plan, to inform an understanding of the implications for the historic environment of proposed development to the south of Warwick to inform the principle and potential mitigation.</i></p>	It is appropriate to add an additional clause to the policy given the impact that access arrangements can have on heritage assets. Paragraph 5.41 provide further explanation regarding Manual for Streets, and so the expectation that this is used to inform highway infrastructure is already incorporated in the Plan	Add an additional clause to Policy to read as follows: f) have considered and addressed impacts on historic environment and specifically impacts on heritage assets and their setting
66649 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>We do not consider TR1 to be effective in soundness terms, as it does not reference the fact that new developments should allow swift and easy access for emergency services vehicles to attend incidents and individuals quickly, helping to prevent crime and in some cases, save lives. The importance of TR1 requiring this therefore cannot be overemphasised.</p> <p><i>We request that part (b) of TR1 be amended as follows to resolve our concerns and improve the effectiveness of the policy: -</i></p> <p><i>b) are designed to provide suitable access and circulation for a range of transport modes including pedestrians, cyclists, public transport and the emergency services;</i></p>	Proposed change accepted	Amend clause b) to read: "b) are designed to provide suitable access and circulation for a range of transport modes including pedestrians, cyclists, public transport and the emergency services;"
65225 - Mr Kim Matthews [1898]	Object	TR1-5; these policies all add additional burdens and requirements which are not contained in the NPPF. These are in conflict with the NPPF presumption in favour of sustainable development at paragraph 14 and Chapter 1, Building a strong, competitive economy and Chapter 4 promoting sustainable transport.	The Local Plan is a strategic document and does not seek to provide detail on specific cycle routes. The points raised here are more relevant to the detailed planning and design stages associated with transport infrastructure.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65541 - Keith Wellsted [8636] 66296 - Mr H E Johnson [12846] 66663 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	Policy TR1 is supported	Support noted	
		<i>none required</i>		
65361 - Centro (Mr Jonathan Haywood) [12722]	Support	Centro feels that cross boundary transport services is an important issue that should be greater referenced within the document. Continued support and promotion of these services will help to reduce the use of the private car whilst encouraging sustainable travel options. The recent High Level Output Specification Programme announcement made by the Department for Transport will enable the electrification of existing rail lines that will improve accessibility and reliability of rail services. Would enable the proposed NUCKLE Phase 2 service to be electrically operated and linked into other local services. Expected improvement to rail infrastructure should be supported.	The Local Plan seeks to support sustainable mode of transport such as rail and this is set out in objective 1.57. The Plan provides for NUCKLE Phase 2 by safeguarding land for the station at Kenilworth. However it is beyond the scope of the Plan to provide for or require the electrification of lines. the plan is therefore silent on this matter, but would certainly not wish to impede such proposals	No change
<i>TR2 Traffic Generation</i>				
64687 - Mr Leigh Carter [8277]	Object	Increase in traffic along B4087 is 75% (not including Gaydon/Lighthorne development) which is way too much. There is also a documented speeding problem through the village on the B4087.  1. <i>Traffic calming chicanes at the entrances to the village on the B4087 Oakley Wood Road to reduce speeding.</i> 2. <i>Take measures to encourage traffic to use Fosse Way/Harbury Lane by investing in the junction to ease traffic flow.</i> 3. <i>Introduce no right turns off the B4100 Banbury Road into the village to encourage traffic along Fosse Way/Harbury Lane or Europa Way.</i>	The proposed amendments are at a level of detail which would not be appropriate to include in the Local Plan, but which should be taken in to account in addressing local transport impacts of development proposals in the area	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66738 - Warwick County Councillors (J. Holland; A. Warner & J. St John) [11276]	Object	The over-development of the greenfield sites on the edge of south Warwick will result in air pollution which the Strategic Transport Assessments cannot mitigate. This will affect both the health of residents and the structure of our multiple historic buildings, which are so important to our sense of place and culture. Warwick already suffers from pollution levels above European guidelines on safety. The plan is not consistent with national policy on conserving and enhancing the natural environment. The latest ONS figures predict 29% fewer residents through the life of the plan therefore there should be a reduction in the number of homes required in the District, removal of a substantial number of development sites south of Warwick to prevent increased air pollution and comply with the NPPF.	See STAs for evidence as to how transport implications of the proposals can be accommodated The Air Quality Assessment report show that air quality will improve over the Plan period. Policy TR2 seeks to minimise the health impacts of new developments. WDC therefore do not see the need to amend this policy as a result of this representation	
66504 - Mr Ian Lovecy [8036]	Object	appears to be an implication - again an indication of naivety - that housing south of the river will be occupied by people working in the same area, and that the new industrial estates will largely employ only people from those areas. Human nature suggests otherwise. Yet despite the brave words in TR2 about not generating further congestion it seems unlikely that the congestion on the Myton and Banbury Roads, funnelling as they do into a single-lane river crossing, can be mitigated	See STAs for evidence as to how transport implications of the proposals can be accommodated. It is not assumed that the new houses will be occupied by people who work locally. The STAs make reasonable assumptions, based on actual experience, about how and where people will travel.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65652 - Highways Agency (Mrs Lisa Maric) [12807]	Object	Draft Policy TR2 requires all large scale development proposals with significant traffic generation to be supported by a Transport Assessment and a Travel Plan where necessary. At Para 5.49 the supporting text to Policy TR2 states that a Travel Plan will be required for all non-residential developments. This approach does not accord with Government policy set out in the NPPF and Circular 02/2013, which also require the submission of a Travel Plan to support residential developments where there is expected to be a material traffic impact on the SRN	Proposed amendments accepted	<p>Amend 1st paragraph of Policy TR2 to read "All large scale developments (both residential and non-residential) which result in the generation of significant traffic movements, should be supported by a Transport Assessment and where necessary a Travel Plan, to demonstrate practical and effective measures to be taken to avoid the adverse impacts of traffic."</p> <p>Amend para 5.49 to read "5.49 Travel Plans will be required for all developments in line with the Department for Transport's "Good Practice Guidelines: Delivering Travel Plan through the Planning Process" or any subsequent revisions or replacement guidance. This will include developments (whether residential or non-residential) that will result in significant traffic movements on the Strategic Road Network. Travel Plans should ideally form part of the Transport Assessment and be submitted alongside the planning application. Development proposals in areas where public transport is limited, e.g. where services operate with frequency levels of less than one an hour, may also be required to submit Travel Plans. Furthermore, the significant development of education facilities will be expected to produce a Travel Plan.</p>
		<i>Policy TR2 should clearly state that Travel Plans will be required for both residential and non-residential development which will result in significant traffic movements on the SRN</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66406 - The Warwick Society (James Mackay) [3080]	Object	<p>The allocation of greenfield sites south of Warwick make it impossible to meet to meet transport needs sustainably as required by the NPPF.</p> <p>The relatively low densities proposed mean more space devoted to roadways and parking. the location will create journeys as few destinations will be within walking distance. The road network is unattractive for cycling and buses cannot provide the quality of service to compete with the car.</p> <p>Sustainable transport policy is paid lip service (paras 5.28 to 5.59) as evidenced by expenditure splits in the IDP.</p> <p>The effects of the proposed mitigation on traffic flows is questionable and raises doubts about the quality of the modelling. They do however show increased journey times, worse congestion and worse air quality. There are inconsistencies between the IDP and the STA. The STA also appears to indicate that any Plan which depends on increasing the flow of vehicles through Warwick Town Centre is undeliverable.</p> <p>The Plan takes no account of previously well-founded objections.</p> <p><i>The modification necessary to make the Plan sound in respect of sustainable transport is for the allocation of greenfield land to be withdrawn and for a new transport strategy which respects the policy priorities to match the changed pattern of development.</i></p>	See responses regarding housing need and the location of development. Policy TR2 attempts to address air quality and health issues.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66333 - Mr Dennis Michael Crips [1851]	Object	<p>Previous local plans right through to the LPT (2011) seek to reduce traffic flows in Warwick. However these proposals seek to increase traffic flow. This will impact on air quality and the historic environment (especially Avon Bridge). This is contrary to local and national policy.</p> <p>The SA acknowledges air quality as a problem but expects the problem to have disappeared by 2029. This does not deal with the urgent problems faced now. The plan is not therefore sustainable. Policy TR2 is inadequate due to the failings of the STAs. The STAs are based on a standard modelling tool and refer to peak times only. They do not assess impacts for the majority of the time. Taken together with false mitigation, this has led to erroneous conclusions. The needs of pedestrians have not been taken into account. The STAs assume mitigation is about reduced journey times at peak hours only when the measures will be 24/7. This will mean traffic is stopped even when it doesn't need to be, causing unnecessary delay and pollution.</p> <p>There are also errors of fact such as with tables 32-35 of the STA phase 3. This undermines confidence in the documents submitted as evidence and validity of the data.</p> <p><i>Demand management schemes should be introduced for Warwick Town Centre to deter unwanted through traffic. This would create capacity to accommodate new development and would mean other highway modifications are not required. This would eliminate the need for para 5.31 2nd bullet.</i></p> <p><i>Policies TR2 and TR3 should be modified to require developers to demonstrate that increased traffic demand from their developments do not exceed residual capacity. The residual capacity should be identified by introducing demand management approaches to create some spare capacity.</i></p>	<p>The proposed amendments to Policy TR2 would be difficult to enforce as the residual impact will change on a frequent basis as new development, new traffic management and car ownership changes. Further the proposed wording is not compliant with the NPPF.</p>	
65518 - Mr Andrew Day [314]	Object	<p>There has been no consideration given to the traffic that will be generated by Stratford District Council Core Strategy to build 3,000 homes at Gaydon Lighthorne Heath. There is a duty to co-operate.</p> <p><i>Specific measures should be taken to ensure mitigation of speeding traffic along Oakley Wood Road in Bishop's Tachbrook.</i></p>	<p>The impacts of Gaydon/Lighthorne Heath proposals have been considered in the STA - Cumulative Assessment 2014</p> <p>Issues relating to road design are not relevant to the Local Plan and can be considered in local transport assessments associated with planning applications</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66672 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The Health Impact Assessment undertaken by Public Health Warwickshire considers the Plan to be positive for contributing towards improving and protecting the health and wellbeing of people in the District. The Plan should take all reasonable measures to reduce traffic and meet (and wherever possible exceed) the UK guidance on air quality standards. Air quality management should be undertaken with reference to statutory health standards throughout the plan period and be responsive to any changes to the legislative requirements.</p> <p><i>The Plan should take all reasonable measures to reduce traffic and meet (and wherever possible exceed) the UK guidance on air quality standards. Air quality management should be undertaken with reference to statutory health standards throughout the plan period and be responsive to any changes to the legislative requirements. This should be further developed within policy TR2.</i></p>	<p>Points regarding the HIA are noted. The Plan as a whole and the supporting IDP need to reduce vehicular travel. The IDP will continue to evolve as WCC provide further evidence regarding the role that sustainable modes of transport can play in mitigating impacts.</p> <p>WDC contend that TR2 does not need to be amended as it already addresses health impacts associated with air quality, particularly in AQMAs where breaches of guidance on air quality standards occur most frequently</p>	
66368 - Mr John Fletcher [8466]	Object	<p>Stratford DC proposal would entail wholesale car dependency and travel to or through Warwick DC area for employment. Gateway would entail employees living south of Warwick travelling through both towns to their employment</p>	<p>The STAs have taken account of both the Gateway and proposed development in Stratford District</p>	
65050 - Emscote Gardens Residents Association (Mr Neil Kenton) [12669]	Object	<p>New developments bolted onto Warwick inevitably use the Warwick infrastructure and it cannot take it. Consultants are able to show that the transport assessments which form an important part of the evidence base for the plan are seriously flawed. There are major issues in respect of accommodating traffic through Warwick generated from new estates south of the river. Any further increase will create further dis function, increased fuel consumption, pollution, incidents of road traffic collision, accident and injury, whilst diminishing community health, safety, wellbeing and work/home living efficiency.</p> <p><i>No action plan to be accepted or implemented that increases traffic in Warwick or Leamington.</i></p> <p><i>Set any new development of population increase a sufficient distance away from small towns such as Warwick so that they have their own identity and independent means.</i></p>	<p>See STAs for evidence as to how transport implications of the proposals can be accommodated</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64949 - Mr Leigh Carter [8277]	Object	Stratford District Council are building 3,000+ homes at Gaydon/Lighthorne. The traffic generated by this development must be incorporated into the STA for the Warwick local plan as many extra cars will come to Leamington/Warwick as a result.	This has been addressed through the STA - Cumulative Assessment April 2014	
		<i>STA must be re-written to accommodate Gaydon/Lighthorne housing.</i>		
66436 - Ms Myra Styles [9988] 66444 - Mr Robert Cochrane [9989]	Object	Transport policy fails to fully assess impact of increased traffic/congestion on Birmingham Road	Birmingham Road has been included in the strategic transport modelling and the proposed improvements to Stanks Island are, in part, in response to projected congestion on Birmingham Road. More detailed (non-strategic) impacts will be addressed through planning applications	
66500 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	Impacts of air quality on health not assessed satisfactorily. Greater car use and worse congestion mitigated but not eliminated by transport strategy and would worsen air quality. Transport Strategy is ineffective and unsustainable. Proposed large scale use of Greenfield sites will make occupants of new housing car-dependent. The transport strategy is incomplete and inconclusive. It will undoubtedly result in more congestion in and around developments.	The Air Quality Assessment report show that air quality will improve over the Plan period and the Health Impact Assessment shows that the Plan is taking reasonable measures to achieve positive health outcomes. It is accepted that urban sites are generally more sustainable than greenfield sites. However there is insufficient to meet the District's housing needs within existing urban areas. Greenfield sites are therefore essential	
65683 - Matt Western [9379]	Object	The Plan is not justified, as the over-development of the greenfield sites on the edge of south Leamington and Warwick will result in air pollution which the Strategic Transport Assessments cannot mitigate. This will affect both the health of residents and the structure of our multiple historic buildings, which are so important to our sense of place and culture.  The proposed traffic mitigation still results in increased traffic and increased pollution as laid out in the report from Arup. Leamington High Street and Warwick town centre already suffer from pollution levels above European and WHO guidelines on safety.  <i>the removal of a substantial number of development sites south of Leamington and Warwick to prevent an increase of air pollution, and comply with the NPPF.</i>	See STAs for evidence as to how transport implications of the proposals can be accommodated and subsequent work exploring the impact on the historic environment shows that it will be possible to design schemes which do not have an undue impact.  The Air Quality Assessment report show that air quality will improve over the Plan period	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65579 - Mrs Katherine Booty [12784]	Object	<p>Despite various reports that highlight the detrimental effects of poor air quality on health, the Council (as at May 2014) have still not undertaken a health impact assessment of the Local Plan. The level of growth proposed by the plan raises concerns regarding the amount of additional traffic that will be in the District and the potential harmful effects it will have on health (particularly in Warwick). Bland re-assurances regarding mitigation proposals are not enough as the impacts of traffic on air quality are uncertain-localised impacts will cause health problems - of that there is no doubt. As set out the current plan is unsound.</p> <p><i>The Local Plan must be subjected to a Health Impact Assessment, the results of which must be fully analysed and assessed and if needs be the plan and its development allocations should be re-considered.</i></p>	<p>An HIA has been undertaken by Public Health.</p> <p>The Air Quality Assessment report shows that air quality will improve over the Plan period</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>66072 - English Heritage (Mr Rohan Torkildsen) [205]</p>	<p>Object</p>	<p>The policy fails to address the appropriate response arising from development that results in increased traffic generation potentially harming the significance of the Districts historic environment.</p> <p>Whilst a commitment to undertake such an assessment is welcomed it needs to take place at this stage, rather than when a planning application is submitted to inform the principle of the strategic allocations to the south of Warwick.</p>	<p>The proposed additional wording to Policy TR2 is agreed.</p> <p>With regard to the more general concerns raised about the need to ensure heritage impacts and opportunities are addressed in planning new transport infrastructure, it should be noted that traffic growth will be experienced within Warwick irrespective of the Local Plan development allocation option, this is documented in evidence supplied STA1-STA4, furthermore general non-Local Plan traffic growth would result in impacts being experienced. Therefore some of these schemes are required as a result of Local Plan impacts exacerbating forecast background growth impacts.</p> <p>Due to known concerns relating to the historic environment, especially within Warwick Town centre, a set of schemes have been identified which minimise the extent and number of schemes required whilst also minimising the delay, congestion and associated environmental impacts (e.g. AQ, impact on sustainable modes). STA4 schemes have taken this a step further and demonstrates the scope to reduce/remove the schemes in the Warwick town centre area. This includes:</p> <ul style="list-style-type: none"> <li>* Castle Hill gyratory - STA4 Ch.6 RTC assessment identifies the possibility of removing this mitigation, the network still operates but there are residual impacts. Warwick and Leamington Transport Strategy goes onto test the removal alongside further sustainable transport options and proves the removal can be achieved if more radical sustainable transport initiatives are adopted.</li> <li>* Priors Rd/Smith St - this scheme actually presents the possibility of reducing existing street clutter.</li> <li>* Myton Rd/Banbury Rd - the footprint of this scheme is reduced whilst still providing improved pedestrian and cycling access to the town centre, local schools and businesses</li> </ul> <p>All schemes within the core town centre are located within existing carriageway. The impact on the historic environment will be considered further during the development, feasibility and design of the schemes. It should be noted that the form of the</p>	<p>Amend Policy TR2 to add a new paragraph after the existing 2nd para to read:</p> <p>"Any development that results in substantial harm to the significance of heritage assets as a result of traffic generation will not be permitted unless effective mitigation can be achieved. Where the harm to the significance of heritage assets is less than substantial, development will be permitted where it can be demonstrated that the benefits of the development outweigh the harm."</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>schemes identified within the STA will be subject to change during the design process, at which point more detailed environmental/historical assessments will be undertaken this is highlighted in STA3 (below). All schemes will be designed in adherence to guidance set out in the Design Manual for Roads and Bridges and the Manual for Streets.</p> <p>"Furthermore, it should not be assumed that the schemes recommended through this study are fixed and will be delivered in the form described within this report. Rather it is intended that the schemes proposed are outline schemes which may change through further optimisation and detailed design that will precede the final delivery." Source: STA3</p> <p>In response to concerns raised by stakeholders relating to the mitigation highlighted within Warwick and Leamington area, County transport planners have been working with WCC Public Health, Warwick District, local employers, residents, Sustrans and other stakeholders in order to explore the sustainable transport options available in more detail. This work, Warwick and Leamington Transport Strategy (WLTS- report to be made available as part of the submission to EIP) has identified that a higher modal shift towards sustainable modes can be achieved than adopted in the STAs and this may result in the schemes identified being reduced in scale, removed or amended to accommodate sustainable travel options. Furthermore the study will identify the need to reallocate roadspace to sustainable modes, thus improving the public realm within Warwick and Leamington town centres. Objective 2 of this study states "To protect the historic built environment of Warwick and Leamington Spa", further to this, LTP3 overall objectives (3) states "To reduce the impact of transport on people and the {built and natural} environment and improve the journey experience of transport users".</p> <p>It should be noted that due to the robust</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>Add:</i>  <i>Development will not be approved that results in the generation of a significant increase in traffic and results in associated measures to facilitate this increase in traffic, which harms the significance of the historic environment, unless appropriate mitigation can be achieved.</i></p> <p><i>The Transport Analysis Guidance (DOT May 2014) including the methodology for assessing townscape, landscape and the historic environment, should be applied at this stage of the Plan to inform an understanding of the implications of the strategic allocations to the south of Warwick and the appropriate mitigation.</i></p>	<p>assessments using micro scale modelling the County have been able to identify possible schemes layouts as mitigation packages. Evidence provided for other Local Plans within the County and within other LA's has adopted a more strategic approach to modelling and more specific mitigation packages can not be identified through this type of modelling process. The robust approach adopted by the County has enabled the identification of key concerns relating to the impact on historic environment at a much earlier point in the planning process. This has enabled the County to identify ways to mitigate these impacts through further study work such as the WLTS and the Cycle Network Review.</p> <p>The work undertaken by the County in partnership with WDC has identified that there is a highway solution to traffic growth generated by LP development, but has also identified ways to reduce the impacts of this mitigation through alternative measures. The details of these measures are still in development but are described in as much detail as possible within the IDP. As highlighted previously, during the development of these schemes the DMRB and Manual for Streets will be used to guide the development process alongside further stakeholder engagement.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65372 - Councillor John Holland [4908]	Object	<p>The location of development sites seems contrary to the principles set out in the Local Plan. In particular distances will be too far to walk. Roads will be too dangerous for cyclists. Population densities too low for viable public transport.</p> <p>Air quality in Warwick Town Centre is already outside safe limits and it will be worse if this plan were to be approved..</p> <p><i>Do not site development in Warwick, or where more traffic will be created in Warwick.</i></p>	<p>See STAs for evidence as to how transport implications of the proposals can be accommodated</p> <p>See also the Air Quality Assessment report for details on how air quality will improve over the Plan period</p>	
65393 - Mr Nigel Hamilton [1656]	Object	<p>Canyon effects and localised pockets of poor air quality must be addressed by good design and sufficient distance separation between building to reduce air pollution and improve air quality. This should be seen as an amenity issue for neighbours. If the development is along routes limey to have large numbers of vulnerable persons such as young children or the elderly , special care should be taken to ensure air quality guidelines are not breached.</p> <p>Offset schemes are not acceptable if air quality is made dangerous in other areas, and is unlikely to meet EU legislation.</p> <p><i>Air pollution: where levels of safe air pollution are already exceeded, no new development should be permitted which will add to air pollution. Canyon effects and localised pockets of poor air quality must be addressed by good design and sufficient distance separation between building to reduce air pollution and improve air quality. This should be seen as an amenity issue for neighbours. If the development is along routes likely to have large numbers of vulnerable persons such as young children or the elderly , special care should be taken to ensure air quality guidelines are not breached.</i></p> <p><i>Offset schemes are not acceptable if air quality is made dangerous in other areas, and is unlikely to meet EU legislation.</i></p>	<p>Policy TR2 seeks to ensure impacts on AQMAs (the areas most vulnerable to breaches) are addressed. However as it is not exclusively about AQMAs it can also ensure that significant problems do not arise elsewhere as a result of the mitigation.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65385 - Mr Leigh Carter [8277] 65396 - Mr Leigh Carter [8277]	Object	<p>* DLP generates significant traffic movements through Bishops Tachbrook most acutely along the B4087 Oakley Wood Road.</p> <p>* Predicted increase in traffic along B4087 Oakley Wood Road is 75%, the highest in the district (&amp; not including SDC Gaydon/Lighthorne development).</p> <p>* There is a well-documented speeding problem through the village on the B4087 Oakley Wood Road &amp; Mallory Road. Pedestrians wishing to cross Oakley Wood Road are already at huge risk.</p> <p>* The DLP contains no measures to mitigate the negative impacts of congestion, pollution &amp; safety of the increase in traffic on the people of Bishops Tachbrook.</p> <p><i>1. Reduce the traffic that is generated by using the latest ONS figures for population growth which clearly show a 29% reduction in housing requirement. Too much housing is being unfairly concentrated South of Leamington overwhelming the area with traffic. Harbury Lane should be a natural barrier to the further expansion of Leamington / Warwick in line with local peoples documented wishes. This change would bring the traffic generation back in line with the original 2028 housing allocation contained in STA 2 which is a more manageable 20%.</i></p> <p><i>2. Quantify the cumulative increase in predicted traffic flow through Bishops Tachbrook generated by the SDC Gaydon/Lighthorne development so that mitigation measures can be properly considered (duty to co-operate).</i></p> <p><i>3. Carry out an air quality analysis on Oakley Wood Road (under the tree canopy) to establish today's levels so that the predicted deterioration in air quality from the DLP can be quantified / mitigated.</i></p> <p><i>4. Include in the DLP the installation of traffic calming chicanes at the entrances to the village on the B4087 Oakley Wood Road &amp; Mallory Road to mitigate speeding. Include pedestrian crossings on Oakley Wood Road &amp; Mallory Road to mitigate pedestrian safety. This should be paid for by the developers who build houses in the village (TR3 transport improvements).</i></p> <p><i>5. Include in the DLP specific &amp; costed rather than vague measures to encourage traffic to use Fosse Way/Harbury Lane (rather than Oakley Wood Road B4087) by investing in the junction &amp; creating a roundabout to ease traffic flow into Leamington.</i></p>	<p>The Council considers the proposed level of housing is justified.</p> <p>The impacts of Gaydon/Lighthorne Heath proposals have been considered in the STA - Cumulative Assessment 2014.</p> <p>Oakley Wood Road is not considered to be at significant risk from air quality breaches.</p> <p>Issues relating to road design are not relevant to the Local Plan and can be considered in local transport assessments associated with planning applications</p>	
65543 - Keith Wellsted [8636] 66297 - Mr H E Johnson [12846]	Support	Support	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66804 - Gallagher Estates [644]	Support	<p>Policy TR2 is concerned to ensure that the implications of large scale development, in respect of traffic movements and impact, is assessed. This is an approach which is consistent with the NPPF, particularly paragraph 32. In this regard the Background Documents provided for both the site at Lower Heathcote Farm and South of Gallows Hill (provided separately) demonstrate that both of the sites can be accommodated on the highway network without unacceptable adverse impact and that suitable accesses can be achieved. Indeed, a full Transport Assessment (TA) has been submitted for each of these sites in association with the planning applications currently before the Local Planning Authority. The TA demonstrates that, with mitigation as appropriate, the developments (either in isolation or combination) should not be prevented from coming forward and are commensurate with the provisions of NPPF, paragraph 32.</p>	Noted	
<i>TR3 Transport Improvements</i>				
65577 - Midland Red (South) Ltd. dba Stagecoach Midlands (Dr Nicholas Small) [8352]	Object	<p>The Plan has not evaluated, tested for cost-effectiveness, or sufficiently defined, those schemes necessary to mitigate the transport-related impacts of the plan strategy. The Plan is thus not positively prepared, and is therefore unsound as a result.</p> <p>Without sufficient effective mitigation measures being defined in the Plan, including those that take advantage of the opportunity to achieve a step-change in the uptake of more sustainable modes including public transport, the ability of the Authorities to seek suitable funding from development to deliver an effective mitigation strategy is fundamentally undermined. Thus the Plan is not effective, and unsound as a result.</p> <p><i>The LPA needs to continue to work with WCC and with public transport providers to work up effective, costed schemes to mitigate the transport-related impacts of development, in line with the evidence and recommendations set out within WSTA.</i></p>	<p>The IDP puts forward costed proposals to mitigate the impacts of new development, including sustainable travel modes. The IDP will continue evolve as further detail is worked up, including exploring further opportunities for sustainable transport</p>	Consider review of IDP

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66298 - Mr H E Johnson [12846]	Object	We object to this policy as drafted. It is unsound as it is not positively prepared, nor justified. To make the policy sound, these transport improvements should only be required where they are necessary and viable, and where they are in accordance with other policies in the Local Plan and / or a CIL charging schedule.	It is assumed that the Policy should be used in conjunction with other policies in Plan and should comply with the NPPF (para 204). However, for clarity, it is proposed that para 5.51 be amended to reference the conditions of CIL compliance	Amend para 5.51 as shown elsewhere
<i>To explore and justify concerns</i>				
67135 - Mr Ray Steele [5886]	Object	Transport Assessment undertaken at a late stage when it is too little too late to have any impact	The STAs have been undertaken and refined throughout the period of the Plan preparation	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65447 - Mr Leigh Carter [8277]	Object	<p>* The predicted increase in peak time traffic along B4087 Oakley Wood Road is 75% which is the highest in the district (and not including SDC Gaydon/Lighthorne development which should be included).</p> <p>* There is a well-documented speeding problem through the village on the B4087 and Mallory Road.</p> <p>* None of the 27 measures contained in DLP STA 4 will directly mitigate the negative impacts of the huge increase in traffic movements on the people of Bishops Tachbrook with respect to congestion, road safety / speeding, air pollution, noise pollution and vibration, particularly along Oakley Wood Road.</p>	<p>It is noted that the B4087 experiences a significant increase in traffic flows, however the current traffic flows on the B4087 are much lower than the theoretical capacity of the route. It is not clear how the 75% figure has been derived as the only time WCC have assessed the cordon point flows (B4087 is on the cordon) is within STA3. STA3 stated approximately 45% 2 way flow increase in traffic over the reference case conditions (i.e. the situation under natural growth), growth is obviously more intensified in this area due to the proximity of large scale development.</p> <p>The lack of specific strategic mitigation on this corridor is intentional, in order to prevent an even greater increase in traffic flows. When additional growth is allocated in the area, traffic will naturally find its least cost route (i.e. where there is capacity and lack of congestion). The traffic model has assigned an increase in flows to this route which is balanced against the costs of using other parallel routes. We have enhanced the road network on Europa Way and surrounding network to provide a viable alternative which would be perceived as a lower cost route. If we were to provide strategic mitigation solutions on the B4087, this would induce additional demand to use the route rather than using alternatives.</p> <p>The increase on the B4087 is larger in percentage terms, however the increase is from a much lower base compared to other arterial routes. The overall predicted flows are not out of scale with the capacity of the route.</p> <p>Issues relating to speeding/traffic calming were not considered in the strategic assessment. These are local/area specific issues. If related to development, these concerns would have to be addressed during the planning process.</p>	
		<p><i>Changes to Plan:</i></p> <p>1. Reduce the traffic that is generated by using the latest ONS figures for population growth which clearly show a 29% reduction in housing requirement. Too much housing is being unfairly concentrated South of Leamington overwhelming the area with traffic. Harbury Lane should be a natural barrier to the further</p>		

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>expansion of Leamington / Warwick in line with local peoples documented wishes. This change would bring the traffic generation back in line with the original 2028 housing allocation contained in STA 2 which is a more manageable 20%.</p> <p>2. Quantify the cumulative increase in predicted traffic flow through Bishops Tachbrook generated by the SDC Gaydon/Lighthorne development so that mitigation measures can be properly considered (duty to co-operate). Update the table on p62 of STA 3 so the impact vs 2028RA can be assessed.</p> <p>3. Carry out an air quality analysis on Oakley Wood Road (under the tree canopy) to establish today's levels so that the predicted deterioration in air quality from the DLP can be quantified and mitigated.</p> <p>4. Include in the DLP the installation of traffic calming chicanes at the entrances to the village on the B4087 Oakley Wood Road and Mallory Road to mitigate speeding. Include pedestrian crossings on Oakley Wood Road and Mallory Road to mitigate pedestrian safety. This should be paid for by the developers who build houses in the village (TR3 transport improvements) and the neighbouring area.</p> <p>5. Include in the DLP specific and costed rather than vague measures to encourage traffic to use Fosse Way/Harbury Lane (rather than Oakley Wood Road B4087) by investing in the junction and creating a roundabout to ease traffic flow to/from into Leamington.</p> <p>Supporting information:</p> <p>1. Following a freedom of information request to WDC in February 2014 the baseline 2012 peak time traffic flows at various locations around Warwick and Leamington were obtained. By comparing these to the projections contained in STA 3 it was possible to reveal the true predicted increases in traffic which will result from the DLP. For instance the increase along the B4087 Oakley Wood Road through Bishops Tachbrook at peak times is a staggering 75% or 1,000 cars per hour. This does not take account the SDC Gaydon/Lighthorne development.</p> <p>2. The Bishops Tachbrook Community Speedwatch team have collected data that shows 42% of speeding motorists along Oakley Wood Road are travelling at over 40mph in a 30mph limit. A significant number of cars have been recorded at well over 50mph.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66407 - The Warwick Society (James Mackay) [3080]	Object	<p>The allocation of greenfield sites south of Warwick make it impossible to meet to meet transport needs sustainably as required by the NPPF.</p> <p>The relatively low densities proposed mean more space devoted to roadways and parking. the location will create journeys as few destinations will be within walking distance. The road network is unattractive for cycling and buses cannot provide the quality of service to compete with the car.</p> <p>Sustainable transport policy is paid lip service (paras 5.28 to 5.59) as evidenced by expenditure splits in the IDP.</p> <p>The effects of the proposed mitigation on traffic flows is questionable and raises doubts about the quality of the modelling. They do however show increased journey times, worse congestion and worse air quality. There are inconsistencies between the IDP and the STA. The STA also appears to indicate that any Plan which depends on increasing the flow of vehicles through Warwick Town Centre is undeliverable.</p> <p>The Plan takes no account of previously well-founded objections.</p> <p><i>The modification necessary to make the Plan sound in respect of sustainable transport is for the allocation of greenfield land to be withdrawn and for a new transport strategy which respects the policy priorities to match the changed pattern of development.</i></p>	This rep is not suggesting an amendment to this policy. No change	
65448 - Cycleways (Dr Katharina Dehnen-Schmutz) [12716]	Object	<p>Cycleways, a local group promoting cycling in Leamington, Warwick and Kenilworth, considers the Local Plan Section TR3, in particular the Infrastructure Delivery Plan, as inconsistent with national policy. The relevant national policies are the National Planning Policy Framework 2012 and the government's White Paper on Transport (Creating Growth, Cutting Carbon, Making Sustainable Transport Happen, HMG 2011). Whereas the general objectives of the Local Plan are in line with the objectives of the national policies, the IDP does not deliver these objectives.</p> <p><i>To deliver the vision and objectives as set out in the government's White Paper and the NPPF including the recommendation of the White Paper for public consultations on transport issues ("Citizens acting together can also help facilitate the delivery of local transport solutions that meet the needs of local people.").</i></p>	The Local Plan has complied with all regulations regarding consultation. The IDP will continue to evolve as more information is made available regarding the role sustainable transport modes can play in the mitigation	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65886 - Centaur Homes [9117]	Object	The Infrastructure Delivery Plan is not in accordance with paragraphs 203 and 204 of the Framework.	It is a given that contributions under Policy Tr3 should also be CIL compliant (in line with Para 204 of NPPF). However for clarity, it make sense to reference CIL compliance.	Amend para 5.51 to read: 5.51 Developments of one or more dwellings or other developments that will lead to an increase in traffic on the road network will be expected to contribute towards measures to mitigate the impacts, including provision for sustainable forms of transport. These contributions should be take account of the direct impacts of development on the surrounding transport network as well as the cumulative impact of all development proposed in this Plan and other known developments. Contributions should be: - necessary to make the development acceptable in planning terms - directly related to the development; and - fairly and reasonably related in scale and kind to the development. This will ensure that all development brought forward within the Plan Period contributes to the necessary and identified costs of providing transport infrastructure across the whole of the District's network (see the Infrastructure Delivery Plan (IDP)). The strategic transport infrastructure requirements and the justification for these are set out in the IDP. In addition to the requirements set out in the IDP, it is likely that contributions to mitigate against specific localised impacts will also be required.
		<i>The IDP should accord with the Framework in that obligations should only be used where they meet the tests in paragraph 204 and 203 states that consideration should be given to whether otherwise unacceptable development could be made acceptable through the use of conditions or obligations</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66334 - Mr Dennis Michael Crips [1851]	Object	<p>Policies TR2 and TR3 are inadequate due to the failings of the STAs. The STAs are based on a standard modelling tool and refer to peak times only. They do not assess impacts for the majority of the time. Taken together with false mitigation, this has led to erroneous conclusions. The needs of pedestrians have not been taken in to account and the mitigation is focused on reduced journey times for drivers of vehicles at peak hours only when the measures will be 24/7. This will means traffic is stopped even when it doesn't need to be, causing unnecessary delay and pollution.</p> <p>There are also errors of fact such as with tables 32-35 of the STA phase 3. This undermines confidence in the documents submitted as evidence and validity of the data.</p> <p><i>Policies TR2 and TR3 should be modified to require developers to demonstrate that increased traffic demand from their developments does not exceed residual capacity. The residual capacity should be identified by introducing demand management approaches to create some spare capacity.</i></p>	The approach to residual capacity would be difficult to enforce and is unlikely to be CIL compliant (eg with para 204 of the NPPF).	
65544 - Keith Wellsted [8636]	Support	Excellent idea	Noted	
65869 - Highways Agency (Mrs Lisa Maric) [12807]	Support	<p>Draft Policy TR3 states that contributions towards transport improvements will be sought from all development that will lead to an increase in traffic on the road network in accordance with the Infrastructure Delivery Plan (IDP). The draft IDP (April 2014) identifies a number of highway infrastructure schemes relating to the SRN including the A46 Thickthorn Roundabout, Kenilworth; A46/A425/A4177 Birmingham Road 'Stanks Island' and Grey's Mallory Roundabout. The Highways Agency agrees with the priorities and phasing identified in the Draft IDP for these improvements, though we note that the funding source has yet to be confirmed.</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>
66463 - Environment Agency (Becky Clarke) [6581]	Support	<p>Recommend policy amended to reflect the need to retrofit SuDS to existing transport routes, and to all new transport routes.</p> <p>One of the significant contributions to pollution within some watercourses may be attributed directly to discharges of surface water from road network. This can contribute recovery of a watercourse and its ability to reach good ecological status as required by the Water Framework Directive.</p> <p>Recommend policy is reworded to state:            'Contributions should include provision for public transport, footpaths, cycleways, towpaths and sustainable drainage systems, both internal and external to development areas'.</p> <p>CC2 Planning for Renewable Energy and Low Carbon Generation Hydropower proposals (point g) must be supported by an assessment demonstrating that this method of energy generation will not compromise the objectives of the River Severn Basin Management Plan. New hydroelectric developments will also be subject to Flood Defence Consent from the relevant Flood Risk Management Authority.</p> <p>Recommend insertion of following text:            h) Development proposals should have regard to and support the actions and objectives of the River Severn River Basin Management Plan (RBMPs)            i) Hydroelectric developments will also be subject to Flood Defence Consent from the relevant Flood Risk Management Authority'</p>	Proposed amendments accepted	<p>Reword last sentence of Policy TR3 to say:            'Contributions should include provision for public transport, footpaths, cycleways, towpaths and sustainable drainage systems, both internal and external to development areas</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>TR4 Parking</i>				
66408 - The Warwick Society (James Mackay) [3080]	Object	<p>The allocation of greenfield sites out of Warwick make it impossible to meet to meet transport needs sustainably as required by the NPPF.</p> <p>The relatively low densities proposed mean more space devoted to roadways and parking. the location will create journeys as few destinations will be within walking distance. The road network is unattractive for cycling and buses cannot provide the quality of service to compete with the car.</p> <p>Sustainable transport poliucy is paid lip service (paras 5.28 to 5.59) as evidenced by expenditure splits in the IDP.</p> <p>The effects of the proposed mitigation on on traffic flows is questionable and raises doubts about the quality of the modelling. They do however show increased journey times, worse congestion and worse air quality. There are inconsistencies between the IDP and the STA. The STA also appears to indicate that any Plan which depends on increasing the flow of vehicles through Warwick Town Centre is undeliverable.</p> <p>The Plan takes no account of previously well-founded objections.</p> <p><i>The modification necessary to make the Plan sound in respect of sustainable transport is for the allocation of greenfield land to be withdrawn and for a new transport strategy which respects the policy priorities to match the changed pattern of development.</i></p>	<p>The site selected are have been assessed as the most sustainable to meet the District's housing need and the transport infrastructure to support these sites can be provided.</p> <p>The detailed design and layout of schemes will be important and should comply with Policy BE1. As set out in the Garden Towns Prospectus, this need not necessarily mean more space devoted to parking or always a lower density. the parking policy is consistent with the policies for the built environment</p>	No change
65545 - Keith Wellsted [8636]	Support	Excellent but runs totally against your housing policy!	Support noted. The suggested conflict with housing policy is not understood	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>TR5 Safeguarding for Transport Infrastructure</i>				
65864 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	Warwickshire County Council (WCC) considers that the approach that Warwick District Council (WDC) has taken to the delivery of park and ride facilities through the Local Plan Publication Draft consultation document is justifiable. It is reasonable to identify broad areas of search for a park and ride facility to the south of Gallows Hill / Harbury Lane, which have potential to accommodate a park and ride facility, should one be deemed appropriate, desirable, viable and feasible which does not compromise the ability to plan and bring forward development in the preferred development allocation locations to the south of Warwick and Leamington, is considered to be a reasonable approach.	Noted	
65985 - Mr A McGregor [738]	Object	<p>The proposals for P&amp;R at Blackdown are not consistent with national policy (NPPF para 80 and 90) and/or are not justified. Locating a P&amp;R here is inconsistent with the Local Plan spatial strategy which concentrates development to the south of the towns. There is no proven justification for a P&amp;R here. The STA phase justifies a P&amp;R to the south of Leamington and Warwick. However, none of the reasons given for this apply to the north of Leamington - it is not close to development; it does not serve both towns and bus priority measures have not been identified.</p> <p>If a P&amp;R were justified north of Leamington it should be located close to the A46 junction.</p> <p>The land at Blackdown has been identified as high landscape value and the area is mainly residential in nature.</p> <p><i>Areas of search for P&amp;R should be geographically consistent with areas for residential growth and should not conflict with green belt policy. If a P&amp;R is considered of value for North Leamington it should be adjacent to the A46/A452 junction rather than Blackdown.</i></p>	<p>The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated.</p> <p>The area is green bet. However para 90 of the NPPF allows for transport infrastructure in the greenbelt where this can be justified and where the character of the green belt is maintained. The area in question is not high landscape value.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66259 - Ruth Buckley [7200]	Object	<p>Para 5.59.3 identifies an area to the north for a park and ride site. As most additional development will be to the south any park and ride to the north would increase traffic. The sites identified include green belt land, no special circumstances have been demonstrated to justify development. Not opposed to principle of park and ride provided it is located to the south and a brownfield site. However questions viability since both Leamington and Warwick town centres have plenty of car parks and many retail facilities are located outside the town centre.</p> <p><i>If the alternative traffic management study being carried out by Warwickshire County Council concludes that a park and ride facility is viable and desirable, it should be located to the south where most development will take place in order to avoid any unnecessary additional traffic congestion across Warwick.</i></p> <p><i>The areas identified as possible sites must specifically exclude all green belt land.</i></p>	<p>The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated. One option to be considered is whether a park and ride facility works best in the context of a site to the north and the south.</p>	
65744 - Mrs Norma Russell [7196]	Object	<p>There is no basis for the proposed P&amp;Rs. Parking in Leamington for shoppers and commuters is already adequate and so the P&amp;R will not be used. Parking is important to the vitality of the town centre. Without a dedicated bus service, commuters are unlikely to use the park and ride.</p> <p>A large hard surface close to the river could affect flooding. the area is green belt and the proposals do not justify further degradation of the green belt.</p>	<p>The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated.</p> <p>The park and rides will be located in areas where flood risk is low or where any flooding issues can be mitigated.</p>	
66179 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	<p>Wording on Kenilworth Station is a little cautious in tone</p>	<p>The wording is considered appropriate for a Local Plan allocation</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66706 - Barwood Strategic Land II Limited [9441]	Object	<p>The Asps application proposals allocate in the region of 2 hectares of land for a strategic Park and Ride with the capacity to accommodate up to 750 car parking spaces, ideally located for traffic heading to Warwick and Leamington Spa. The Asps presents the only deliverable option for a Park and Ride site, due to the comprehensively designed development which has fully considered how the Park and Ride site will work in practice and a willing landowner.</p> <p>The delivery of a Park and Ride facility on this site, as part of the development of a comprehensive sustainable urban extension, is the only way in which the Council's long-standing ambition to see such a facility provided in the District can be delivered.</p> <p><i>There are complex and significant issues in our client's representations which require attendance at and participation in the debate at the examination hearing sessions.</i></p>	<p>The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated.</p>	
65755 - mr john clutton [12758]	Object	<p>The plan and policy TR5 sets out two areas of search for park and ride facilities. No real need for the facilities has been identified. They are very likely to fail and the area would become redundant and then 'available ' for development in the Green Belt which is unacceptable.</p> <p><i>The proposals for park and ride should be deleted from the plan as they are not justified / credible.</i></p>	<p>The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64689 - Antoinette Sant Cassia [9001] 64924 - Derek Murray [7342] 65061 - Mr Peter Robbins [6399] 65317 - Mr Robert Solt [6225] 65584 - Stoneleigh & Ashow Parish Council (Mrs P.A. Maddison) [1055] 65656 - Mr Richard Sharman [8898] 65664 - Barbara Hingley [424] 65731 - Mrs J Bradley [974] 65887 - Mr D J Brocklebank [6169] 65895 - Mr Michael Kelsey [5671] 65897 - Mrs Ann Kelsey [6495] 66000 - Old Milverton & Blackdown JPC (Mr Graham Cooper) [1060] 66174 - Dr Andrew Entwistle [6272] 66265 - Mr Jerry McDonagh [12885] 66556 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	Object to park and ride proposals to the north of Leamington on the basis that: - it is in the green belt - it is not needed and therefore exceptional circumstances cannot be justified - the concept is flawed and it would not be well used and would not help to ease congestion - there is already adequate parking in Leamington	The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated.	
		<i>Remove proposed area of search for a park and ride to the north of Leamington</i>		
66547 - Friends of the Earth (John Brightley) [1113]	Object	The proposed northern park and ride could be more controversial - there are very few, if any, locations where it would not have a serious impact on the landscape quality of the area.  <i>We would suggest that the provision of such a northern park and ride should be postponed until after the completion of K2L as this cycle route has the potential to significantly reduce the number of vehicle movements between Kenilworth and Leamington.</i>	The proposed area of search is not predominantly in an area of high landscape value and could be brought forward without undue impact on the landscape. The opportunity to link in with cycle routes such as the K2L is noted.	
66545 - Friends of the Earth (John Brightley) [1113]	Support	We support the proposal that the southern Park and Ride will serve both Warwick and Leamington. However we suggest that the detailed design will be very important, so that the facility does not have a major effect on the openness of the countryside, and should not include floodlighting.	Noted, however, it is likely that a park and ride would require some lighting, although this is a matter of design to be addressed in due course	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66438 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>Warwickshire County Council (WCC) considers that the approach that Warwick District Council (WDC) has taken to the delivery of park and ride facilities through the Local Plan Publication Draft consultation document is justifiable. It is noted that the Stage 3 STA raised concerns over the feasibility of a park and ride facility to the south of Warwick and that more testing would be needed. The Stage 4 STA identified that further work had been commissioned to review the case for a park and ride facility. Therefore the approach taken in the Local Plan to identify broad areas of search for a park and ride facility to the south of Gallows Hill / Harbury Lane, which have potential to accommodate a park and ride facility, should one be deemed appropriate, desirable, viable and feasible (as referred to in paragraph 5.59.3 of the Local Plan Publication Draft), but which should not compromise the ability to plan and bring forward development in the preferred development allocation locations to the south of Warwick and Leamington, is considered to be a reasonable approach.</p> <p><i>None required</i></p>	Noted	
66805 - Gallagher Estates [644]	Support	<p>It is noted that the Proposals Map defines, in broad terms, an area of search for a park and ride to the south of Warwick. The proposed development at Lower Heathcote Farm (part of South of Harbury Lane strategic site) and the Omission Site proposal at South of Gallows Hill / West of Europa Way do not prevent the park and ride being delivered in the future. This is consistent with Policy TR5.</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>Healthy, Safe and Inclusive Communities</i>				
66674 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The National Planning Policy Framework (NPPF) makes it clear that local planning authorities (LPAs) have a responsibility to promote healthy communities. Local plans should "take account of and support local strategies to improve health, social and cultural wellbeing for all". The National Planning Practice Guidance (NPPG) refers to promoting access to healthier food.</p> <p>Public Health Warwickshire have produced a health impact assessment that suggests that the Local Plan should include a policy to restrict the proliferation of fast food outlets (particularly in the vicinity of schools).</p> <p><i>It is suggested that the Council should consider a fast food policy, particularly in relation to areas nearby schools. A suggested 400 m exclusion zone for A5 uses in with regard to schools is promoted as a good idea. This is deemed particularly important with regard to the new large secondary schools to be developed in Warwick and Kenilworth during the plan period. This could be achieved by conditions being applied to restrict opening hours so as to stop school children achieving access to fast food in school time / immediately after school.</i></p>	<p>It is considered that the evidence submitted in the Health Impact Assessment regarding hot food takeaways within a certain proximity to schools is not sufficient to justify a policy specific to Warwick District. Whilst the literature review appears comprehensive, there is no specific references to obesity issues in the district nor a clear causative correlation between hot food takeaways and obesity. The other recommendations in the HIA regarding, the importance education and awareness around healthy eating appear to more appropriate tools to utilise. Finally, it should be noted that a policy would only be effective if restricted by the use class order A5 - Hot Food Takeaways, which may well inadvertently discriminate against businesses in this use class order that are selling what could be deemed healthier food. A5 uses are not necessarily limited to Fast food or unhealthy food.</p>	
<i>HS1 Healthy, Safe and Inclusive Communities</i>				
66806 - Gallagher Estates [644]	Object	<p>6.4 The content of this policy is noted. It is the case, however, that all elements of this policy are already included within other draft policies of the Plan. By way of example, providing homes to meet needs of older people is covered in Policy H0, contributing to the development of high quality, safe and convenient cycling and walking network is addressed in Policy BE1 and minimising the potential for crime and anti social behaviour is covered in proposed Policy HS7. It is therefore not clear what the policy adds to the Plan in terms of effectiveness. The Council are therefore invited to consider whether it is necessary to retain this policy in the Plan.</p>	<p>The Council believes that it is important to have an explicit policy for the purpose of ensuring development is delivered that that will deliver healthy, safe and inclusive communities. The strength of this policy is having a key checklist for proposals sited within a single policy.</p>	None required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65131 - Mr Tony Robinson [12687] 66371 - Mr John Fletcher [8466] 66432 - Ms Myra Styles [9988] 66441 - Mr Robert Cochrane [9989]	Object	<p>This section ignores the existing air pollution problems in Warwick, and is therefore disingenuous in seeking healthy lives without giving the issue consideration in placing concentrations of housing south of Warwick</p> <p>Additional traffic to access employment will increase air quality already poor in Warwick and Leamington.</p> <p>Proper assessments not made of impact of more traffic/congestion air pollution/emissions</p> <p><i>The expansion south of Warwick should be shelved until the pollution issues are resolved.</i></p>	<p>The council commissioned an independent air quality assessment (October 2013), to assess the effects that development associated with the Local Plan would have. This identified that whilst there will be an increase in traffic over the plan period there is also likely to be a reduction in the amount that cars pollute over the same period, therefore overall the effect is that air quality will improve over the plan period. By the end of the plan period it is projected that there will be no exceedences of air quality standards.</p>	
65053 - Emscote Gardens Residents Association (Mr Neil Kenton) [12669]	Object	<p>I feel at the moment felt that the council has not properly considered the representations on the local plan submitted to them by residents and the community.</p> <p><i>Listen to the people who are or will be left with the consequences.</i></p>	<p>This representation has no bearing on the soundness of the policy. However, all representations have been considered in accordance with national planning policy and legislation and the statement of community involvement.</p>	
66676 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The National Planning Policy Framework (NPPF) makes it clear that local planning authorities (LPAs) have a responsibility to promote healthy communities (25). Local plans should "take account of and support local strategies to improve health, social and cultural wellbeing for all". The National Planning Practice Guidance (NPPG) refers to promoting access to healthier food</p> <p><i>The Plan should consider the inclusion of a policy that sets clear guidelines to inform developers when they should undertake HIA's. Health Impact Assessments should also be included in the Plans monitoring and evaluation framework (where appropriate this should be linked to existing indicators such as the Public Health Outcomes Framework).</i></p>	<p>Through a revision to policy HS6, the Council has a commitment to undertake an SPD on health impacts.</p>	<p>Add the following sentence to the end of Policy HS6:</p> <p>Guidance on meeting this policy will be expanded upon through the preparation of a Health Impact SPD.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66647 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>Whilst we agree with and support part (c) of HS1, namely that design and layout of development will be important to minimise the potential for crime and anti-social behaviour and improve community safety, delivery of expanded and new police infrastructure will be vital as well. This has been accepted by the Council in its 'Draft Infrastructure Delivery Plan - April 2014'.</p> <p><i>To resolve the above concerns and improve the effectiveness of the policy, we request that the following amendments are made to part (c) of HS1: -</i></p> <p><i>'design development and provide infrastructure to minimise the potential for crime and anti-social behaviour and improve community safety.'</i></p>	<p>It is considered that the aim of this policy is to deliver good quality design outcomes that will be conducive to bringing forward healthy, safe and inclusive communities. Criterion c) clearly sets out that design outcomes should minimise the potential for crime and anti social behaviour. It is not necessary to stipulate a requirement to provide infrastructure. This is picked up in the Local Plan by policy DM1 (Infrastructure Contributions). If the Council is compelled to include the police request for infrastructure in the IDP plan then it naturally follows that negotiations on developer contributions will endure as a consequence).</p>	
65894 - Centaur Homes [9117]	Object	<p>Centaur Homes object to parts a and b of this policy. Part a should promote developments for all. Fuel poverty is connected to household income and local authorities should promote energy efficient housing across the whole market. It is considered that this issue can be best addressed through Building Regulations.</p> <p><i>Part a should promote developments for all and include affordable and market housing, as well as meeting the needs of older people and those with disabilities.</i></p> <p><i>The words "to help reduce fuel poverty" should be omitted from part b.</i></p>	<p>Points noted in part, amend criteria a) and b) of HS1 to be clearer and more specific for the intention of the policy.</p>	<p>Revise the first sentence of HS1, criteria a) and b) as follows:</p> <p>The potential for creating healthy, safe and inclusive communities will be A GUIDING PRINCIPLE when considering all development proposals. Support will be given to proposals which:</p> <p>a) are accessible for older people and those with disabilities;</p> <p>b) maximise opportunities to reduce fuel poverty</p>



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65085 - Sport England (Mr Bob Sharples) [1355] 65548 - Keith Wellsted [8636]	Support	Support subject to the following change to be in line with the NPPF para. 74.  <i>I would suggest the following amendment to be in line with the NPPF paragraph 74 from: 1.an alternative can be provided which is at least equivalent in terms of size, quality, accessibility, usefulness and attractiveness, and a management plan is submitted to ensure the future viability of the provision, or TO 1. an alternative can be provided which is at least equivalent or better provision in terms of size, quality, accessibility, usefulness and attractiveness, and a management plan is submitted to ensure the future viability of the provision,</i>	Support and suggested change noted.	Replace criterion 1 of policy HS2  1. an alternative can be provided which is at least equivalent or better provision in terms of size, quality, accessibility, usefulness and attractiveness, and a management plan is submitted to ensure the future viability of the provision,
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<i>HS3 Local Green Space</i>				
66807 - Gallagher Estates [644]	Object	It is clear from the NPPF and NPPG that the designation or otherwise of Local Green Spaces is a matter directly applicable to a Neighbourhood Plan and not the District Council's Local Plan. HS3 is not appropriate for inclusion in the plan. It is not clear how the Council can support the principle of Local Green Spaces without knowing the detail of them and the extent to which they meet the strict requirements of the NPPF and NPPG. Indeed, paragraph 77 of the NPPF is clear that the designation will not be appropriate for most green areas or open space  <i>Delete Policy</i>	Paragraph 76 states that Local Green Spaces can be designated through local and neighbourhood plans. However, the Council considers that Local Green Space is generally best identified at a local level, therefore this policy is highlighting to potential neighbourhood plans that possibility and that this Local Plan is not proposed any Local Green Space designations.  The policy states that the Council supports the principle of designation in accordance with national planning policy, i.e. the NPPF, which has a bearing on their extent and suitability.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66219 - NFU (Sarah Faulkner) [1119]	Object	<p>Concerned that as it currently worded there appears to be a risk that agricultural land could be designated as Local Green Space.</p> <p>We are concerned about the impacts of this policy farm businesses, particularly those that operate in the urban fringe or for those who already have issues with trespass.</p> <p><i>The document does not provide an adequate explanation of the consequences of designation and therefore we would like to see further explanation or justification for this policy.</i></p> <p><i>The policy should be revised to provide protection for agricultural land and farm businesses.</i></p>	<p>The policy as published is in accordance with the NPPF. Whilst it is the case that agricultural land could be designated, any designation would have to demonstrably special to be a local community and the green area is local in character and not an extensive tract of land.</p> <p>A local green space designation would result in land being managed in accordance with Green Belt policy, which in general supports agricultural uses. Furthermore, the designation does not alter right of access.</p>	None Required.
65549 - Keith Wellsted [8636]	Support	Good idea	Support noted	
<i>HS4 Improvements to Open Space, Sport and Recreation Facilities</i>				
67152 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	<p>Whatever the final agreed extent of housing and employment development at Thickthorn, there will be a need for some relocation of the existing sports facilities. Although there have been discussions, we note that no relocated sports sites feature in the Local Plan. Whilst we appreciate that alternative sites need not be identified until the planning permission stage we wonder whether there should have been some indication given here in order to ensure deliverability.</p>	<p>The Council is fully aware that the ultimate success of the Thickthorn allocation at Kenilworth will require the relocation of the existing sporting interests / pitches. Negotiations on options for the relocation of these interests are continuing . Their success will be required to satisfy current and emerging Planning Policy that sets out that pitches can only be developed in instances where it can be demonstrated where they are not needed(not relevant in this case) or can be relocated satisfactorily elsewhere.</p>	
66755 - Mr Edward Walpole-Brown [7504]	Object	<p>Note other comments with the regard to the provision of sport and recreational and other service facilities to facilitate a sustainable growth and to support the sustainability and viability of rural settlements. This also interlinks with Policy HS5 and page 126.</p>	<p>This representation has no bearing on the soundness of the policy as proposed.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66045 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	This policy includes a reference to a Supplementary Planning Document (SPD). This SPD has not been through a statutory process and therefore has a lesser status than the Local Plan. By referring to this SPD in the Local Plan policy a greater weighting of significance is implied which is inappropriate.  <i>This reference should be removed and only if necessary placed in the supporting text.</i>	In the existing Local Plan (1996 - 2011) policy SC13 does not make reference to SPD in policy but in para 5.80. It is considered appropriate to place this in policy HS4. The current SPD has gone through a statutory process as prescribed in previous local planning regulations, including public consultation and at that time SEA screening. Any future SPD will accord with the regulations set out in the Town and Country Planning (Local Planning) Regulations 2012 or future iteration of these regulations.	
65090 - Sport England (Mr Bob Sharples) [1355]	Support	I would recommend the following change to be in line with nationally methodology for travel time to sports facilities: 3.outdoor and/or indoor sport accessible within a 20 minute travel time (walking and public transport.)  <i>I would recommend the following change to be in line with nationally methodology for travel time to sports facilities: 3.outdoor and/or indoor sport accessible within a 20 minute travel time (walking and public transport.)</i>	Support noted.  Agree with suggested change to criterion c)	Revise Criterion c) of Policy HS4 as follows:  c) outdoor and/or indoor sport accessible within a 20 minute travel time by walking, cycling and/or public transport.
65550 - Keith Wellsted [8636]	Support	Good idea	Support 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>HS5 Directing Open Space, Sport and Recreation Facilities</i>				
66552 - Friends of the Earth (John Brightley) [1113]	Object	<p>needs to be refined to ensure that when new sports or community facilities are proposed on green field sites, planning consent is not granted for floodlighting, and that new facilities are not granted consent in 'areas of tranquility'.</p> <p>Floodlighting can have a major effect on the openness of the countryside, both during the day and at night. Light pollution from floodlighting at existing facilities is a serious problem already in the district and it can for example have serious effects on wildlife and ecology, as well as affecting the quality of life for people who live nearby. We would refer you to the CPRE's 'Dark Skies' campaign, the fact that light pollution can be a statutory nuisance under the Clean Neighbourhoods and Environment Act (2005), and particularly that the National Planning Policy Framework (NPPF) Planning Practice Guidance (paragraph 125) says: ' By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'</p> <p>NPPF Planning Practice Guidance (paragraph 123) also says: 'Planning policies and decisions should aim to: .. identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this</p>	<p>The Council is aware that light intrusion / light pollution is a consideration with regard to the location of some types of sport/ recreational facilities. This matter will have to be given consideration and is a relevant factor covered by criterion a) and j) of policy SCO that specifies the importance of new development protecting and enhancing the historic, built and natural features of Warwick District.</p>	<p>None considered necessary</p>
67153 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	<p>Whatever the final agreed extent of housing and employment development at Thickthorn, there will be a need for some relocation of the existing sports facilities. Although there have been discussions, we note that no relocated sports sites feature in the Local Plan. Whilst we appreciate that alternative sites need not be identified until the planning permission stage we wonder whether there should have been some indication given here in order to ensure deliverability.</p>	<p>The Council is fully aware that the ultimate success of the Thickthorn allocation at Kenilworth will require the relocation of the existing sporting interests / pitches. Negotiations on options for the relocation of these interests are continuing . Their success will be required to satisfy current and emerging Planning Policy that sets out that pitches can only be developed in instances where it can be demonstrated where they are not needed(not relevant in this case) or can be relocated satisfactorily elsewhere.</p>	<p>None required as the matters regarding relocation are in hand.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65091 - Sport England (Mr Bob Sharples) [1355]	Object	<p>I cannot fully support this policy as it is worded in b) ii). I believe to be unrealistic and limiting</p> <p><i>I would suggest the following change to be made: 2. there is a need to enhance an existing facility or provide a new facility that has specific locational requirements. That cannot be accommodated within the urban envelope.</i></p> <p><i>This not only allows for shooting, water sports and equestrian uses in rural locations, but will also allow for the creation of playing pitches and other sports facilities on urban edge which may not be easily served by public transport.</i></p> <p><i>New pitches could be located within the urban transport system, but it may be more appropriate to locate housing than pitches in said areas.</i></p>	The Suggested change is accepted, however slightly different wording is proposed.	<p>Replace criterion b of policy HS5 with the following:</p> <p>b). for sport and recreation facilities, accord with the town centres first principle outlined in national planning policy and elsewhere in this Plan, unless:</p> <p>I. the proposal is accessible to the community it proposes to serve by means other than the private car; or</p> <p>II. there is a need to enhance an existing facility or provide a new facility that has specific locational requirements, outside of the urban area.</p>
65551 - Keith Wellsted [8636]	Support	Good idea	noted	none 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>HS6 Creating Healthy Communities</i>				
66808 - Gallagher Estates [644]	Object	<p>6.7 The content of this policy is noted. It is the case, however, that all elements of this policy are already included within other draft policies of the Plan. By way of example, opportunities for healthy exercise is covered SC0, with access to high quality green and open spaces addressed in Policy BE1. It is therefore not clear what the policy adds to the Plan in terms of effectiveness. The Council are therefore invited to consider whether it is necessary to retain this policy in the Plan. Notwithstanding this view, a minor correction is required to criterion (c) which appears to have some text missing at the end.</p> <p><i>The Council are therefore invited to consider whether it is necessary to retain this policy in the Plan. Notwithstanding this view, a minor correction is required to criterion (c) which appears to have some text missing at the end.</i></p>	<p>The Council considers that it is very important that new developments are designed to a high standard in order to secure positive impacts on the health and wellbeing of both existing and future communities. Whilst there may be some overlap with the requirements of this policy and others in the Local Plan it is considered necessary to have this policy to re-enforce the importance of the planning and delivery of well considered development proposals that will produce positive health impacts. It is accepted that there is a minor typographical error with criterion c) of the policy that should be corrected.</p>	<p>criterion c) of the policy should read as follows - "opportunities for community cohesion by the provision of accessible services and community facilities and places and opportunities for people to interact, regardless of age,health or disability."</p>
65522 - Mr Andrew Day [314]	Object	<p>There is no single parish or town council area which does not have a village, church or parish hall in Warwick District, apart from Bishop's Tachbrook. Bishop's Tachbrook has the 3rd largest population size of the Warwick District parish council areas. Why is there no provision in this plan for such an important community facility?</p> <p><i>Given the extent of housing proposed to be built in the Parish, the provision of a community facility in Bishop's Tachbrook should be included as part of this Plan.</i></p>	<p>This could be brought forward as part of a Neighbourhood Plan</p>	<p>Not required</p>
66756 - Mr Edward Walpole-Brown [7504]	Object	<p>We feel this has not been adequately reflected in the assessment of the sites and the benefits that our client's proposals at Hatton Green can deliver to the community. Note our proposals include sport and recreational facilities, car parking, improved access and parking and amenity issues relating to the local School. This will also benefit the residents of Hatton Green generally.</p>	<p>These points have no bearing on the soundness of this policy. They have been dealt with elsewhere under DS11 (Hatton)</p>	<p>Not required</p>
65552 - Keith Wellsted [8636]	Support	<p>Good idea.</p>	<p>Support noted.</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>
65395 - Mr Nigel Hamilton [1656]	Support	Access to high quality and safe green or open spaces. No loss of existing high quality and safe green or open spaces, should be permitted	Not required	Not required

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*HS7 Crime Prevention*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66648 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>There is concern that Policy HS7's current wording asserts that design measures alone will ensure that developments enjoy low crime and antisocial behaviour rates, thereby ensuring community safety.</p> <p>This is not to say Secured by Design measures won't reduce crime levels, they certainly will, as detailed elsewhere in our representations. However even when applied to the maximum possible extent, they can never reduce crime and anti-social behaviour rates in a development to zero. There will always be a necessity for policing and emergency services to deal with those incidents and crimes that occur no matter what design measures are put in place. That is why there is no such thing as a development policed entirely through architectural means.</p> <p>The current wording of HS7 is surprising, not only because of the above reason, but because the Council's 'Draft Infrastructure Delivery Plan - April 2014' recognises that police and emergency services infrastructure will need to be provided if sustainable development in the District is to be achieved. The Plan also implicitly recognises that funding will be needed from Section 106 agreements and the Community Infrastructure Levy (CIL) to deliver this infrastructure.</p> <p><i>To resolve all of our concerns and to ensure that HS7 'Crime Prevention' is effective in soundness terms, we request the following amendments:</i></p> <p><i>HS7 Crime Prevention</i></p> <p><i>Developments will be encouraged to minimise the potential for crime and anti-social behaviour and improve community safety. Development proposals will be expected to demonstrate they:</i></p> <p><i>a) have adopted Secured by Design standards and principles such as by:</i></p>	Agree	<p>Amend policy to suggested wording:</p> <p>'HS7 Crime Prevention</p> <p>Developments will be encouraged to minimise the potential for crime and anti-social behaviour and improve community safety. Development proposals will be expected to demonstrate they:</p> <p>a) have adopted 'Secured by Design' standards and principles such as by:</p> <p>*orientating and designing buildings to enable natural surveillance of public spaces and parking areas;</p> <p>*defining private, public and communal spaces;</p> <p>*creating a sense of ownership of the local environment; and</p> <p>*making provision for appropriate measures such as lighting, landscaping and fencing, as an integral part of the development.</p> <p>b)have provided new or expanded emergency services infrastructure where this is required.'</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><i>*orientating and designing buildings to enable natural surveillance of public spaces and parking areas;</i></p> <p><i>*defining private, public and communal spaces;</i></p> <p><i>*creating a sense of ownership of the local environment; and</i></p> <p><i>*making provision for appropriate measures such as lighting, landscaping and fencing, as an integral part of the development.</i></p> <p><i>b)have provided new or expanded emergency services infrastructure where this is required.</i></p>		
65054 - Emscote Gardens Residents Association (Mr Neil Kenton) [12669]	Object	<p>A deliberate increase in population will draw on existing stretched emergency services.</p> <p>I feel at the moment that the council has not properly considered the representations on the local plan submitted to them by residents and the community.</p> <p>The proposed future community are unable to speak for themselves at present therefore much more thought has to be given to the impact on the existing infrastructure in prospect.</p> <p><i>If you are not willing to increase emergency services, reinstate stations or build new designated stations and strengthen emergency contingency resilience, then do not deliberately increase the population of the Warwickshire Area.</i></p>	The Local Plan will consider the necessary requirements for emergency service provision through the infrastructure delivery plan. Warwick District Council is aware of the needs of the emergency services and has been (and will continue to be ) involved in discussions regarding service provision / re-location of existing depots / emergency service facilities throughout the District.	None required
65553 - Keith Wellsted [8636]	Support	<p>Good idea</p> <p><i>None required</i></p>	None required	none 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>
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*HS8 Protecting Community Facilities*

Representations	Nature Summary of Main Issue/Change to Plan	Council's Assessment	Action
66758 - The Theatres Trust (Rose Freeman) [218]	<p>Object</p> <p>There is no policy to reflect item 70 of the National Planning Policy Framework (NPPF) and protect cultural, leisure and tourism facilities. The policies do not compliment the following aspirations in the text:</p> <p>*para.3.112 states that as cultural assets such as theatres, cinemas, libraries etc enrich people's quality of life, it is appropriate to consider how planning can assist (presumably in their protection and enhancement).</p> <p>*para.3.116 states that culture, leisure and tourism are important for centres to be vibrant and prosperous (i.e. 'valued facilities').</p> <p>*para.3.128 says that 'meeting places, cultural facilities and public art are important features in sustainable communities (i.e. 'valued facilities').'</p> <p>*para.3.129 says that 'new development will inevitably place demands on existing public meeting places such as community halls and public cultural facilities such as theatres, concert halls and libraries (i.e. 'valued facilities').'</p> <p>*para.3.9 repeats para.3.112 regarding the importance of cultural assets with reference to policy PC0 which supports 'the important role of culture and leisure assets.</p> <p>HS8 does protect community facilities but is inadequate in providing a comprehensive description for the term 'community facilities'. Paragraph 5.90 gives some D1 examples and says that other facilities (presumably cultural, leisure and tourism) may be protected, but only in exceptional circumstances. Theatres are sui generis, and all other entertainment facilities are D2 so are not included in this policy.</p> <p><i>There needs to be a clear definition for the term 'community facilities'. It is not adequate for Policy HS8 to only protect some community facilities, it should protect all to reflect item 70 of the NPPF. A comprehensive description for all community facilities should be included in the Glossary which would obviate the need to provide examples: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p> <p><i>If the council wishes to support its cultural, leisure and tourism offer, there must be clearer and more practical guidance in Policies PC0 and CT1.</i></p> <p><i>For PC0 we suggest h) is amended to read to support existing culture and leisure assets for the important role they play in our communities and economy, .....</i></p> <p><i>CT1 only deals with new developments and there is no mention of assessing existing venues and whether there is any requirement for</i></p>	<p>The explanation of Policy HS8 should be adjusted to include the inclusion of an explicit reference to 'valuable' cultural assets within Use Class D1 including museums , art galleries, libraries etc</p>	<p>Amend para 5.90 to read: 5.90 For the purposes of these policies, the reference to community facilities includes a wide range of uses within Use Class D1 such as places of worship, dental and medical surgeries, community halls, local education facilities, crèches and nurseries for the care of children as well as local cultural facilities, local convenience stores (under 500spm gross floorspace), and public houses where there is no alternative provision within the community. In exceptional circumstances, the Council may apply this policy to other facilities that meet a community need where the grant of permission would result in a demonstrable shortfall in the locality.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>new. We suggest there is an additional policy to protect and enhance existing cultural infrastructure if there is no amendment to Policy HS8 because, as stated previously, the document contains no policy to protect its existing successful and important cultural and leisure infrastructure.</i>		
65554 - Keith Wellsted [8636]	Support	Good idea	None necessary	None necessary
<i>Climate Change</i>				
66554 - Friends of the Earth (John Brightley) [1113]	Support	We support these proposals, except for the financial viability proposals in proposed policy CC3.	Noted	No change
<i>CCI Planning for Climate Change Adaptation</i>				
65932 - Woodland Trust (Mr Justin Milward) [132]	Object	Pleased to see the reference to 'planting' but would like to see reference specifically to 'tree' planting in the bracketed wording. Trees and woodland can make a significant contribution to climate change mitigation reducing the urban heat island effect, improving air quality through the absorption of particulates from vehicle emissions and other sources, resolving a range of water management issues particularly caused by extreme weather events.  <i>Add the word 'tree' before planting in the policy. This will enable the local plan to comply with national policy.</i>	The contribution of tree planting is recognised and it is agreed specific reference would acknowledge this.	Amend criteria b) to refer to 'tree' planting
66667 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	The Council recognises the importance of incorporating the impact of climate change and sustainable energy use within all new development in the District. Of equal importance however is the co-existence of new energy conservation and efficiency technologies with the requirements relating to Listed Buildings and Conservation Areas. It is hoped that these sometimes conflicting objectives can be harmonised within a policy which encourages use of energy conservation measures by those living within houses of architectural significance.  <i>none required</i>	Noted. There is provision within the policy (paragraph 5.102) to recognise that the nature of certain developments may mean some of the adaptation measures set out in the policy may not be appropriate. There are however numerous ways that adaptation measures can be successfully incorporated within the historic environment (supported by English Heritage). The merits of any such measures as part of a development proposal would also be carefully balanced against other policies in the plan which protect listed buildings and conservation areas.	No change

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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>
65555 - Keith Wellsted [8636] 66302 - Mr H E Johnson [12846]	Support	Support	Noted	No change

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**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action****Decision on CC1 Planning for Climate Change Adaptation**

Replace Policy CC1 with the following and see proposed modifications table for detail of changes:

## CC1 Planning for Climate Change Adaptation

All development is required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures where appropriate:

- a) using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures;
- b) optimising the use of multi-functional green infrastructure (including water features, green roofs and tree planting) for urban cooling, local flood risk management and to provide access to outdoor space for shading, in accordance with Policy NE1;
- c) incorporating water efficiency measures, encouraging the use of grey water and rainwater recycling, in accordance with Policy FW3;
- d) minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDS in accordance with Policy FW2;
- e) minimising vulnerability to other climate change risks specific to the location (such as subsidence, storm damage resilience)

Applicants will be required to set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.

## Explanation

5.4 It is anticipated that the future climate in Warwick District will be characterised by:

- \* warmer, wetter winters with average temperatures 1.3 C higher by the 2020s and 2.1 C higher by 2050s with 5% more rain;
- \* hotter, drier summers with average temperatures 1.5 C higher by the 2020s and 2.6 C higher by the 2050s with 7% less rain, and;
- \* more frequent extreme weather events

5.5 The effect of these changes on the built environment will include:

- \* heat stress - buildings will be more likely to overheat due to higher summer temperatures requiring the need for cooling;
- \* water stress - decreased water availability and water quality due to less rainfall;
- \* increased risk of subsidence and heave due to hotter summers with less rainfall, affecting buildings and underground infrastructure;
- \* risk to buildings from wind and extreme weather events, and;
- \* more intense rainfall events compromising existing drainage systems resulting in an increased likelihood of flooding.

5.6 The Council recognises the importance of ensuring these impacts are taken into account in the way new buildings are designed and the way we use the built environment. National planning policy acknowledges that planning has a key role to play in minimising vulnerability and providing resilience to the impacts of climate change and that local authorities should adopt proactive strategies to mitigate and adapt to climate change.

5.7 It is important that buildings are designed to ensure resilience not just in the short term but throughout the anticipated lifetime of the building. This should include designing buildings to keep cool without using power through the use of appropriate construction materials, layout and building orientation and the use of green infrastructure for urban cooling and shading. Consideration should also be given to the need for water conservation through a range of water efficiency measures such as the use of water butts through to grey water recycling systems.

5.8 Some of the measures identified in this policy also fulfil other functions. For example, the appropriate provision of green infrastructure also has an important recreational and ecological role. Adapting to the future climate should therefore be seen as important in the delivery of well-designed sustainable communities.

5.9 It is also important to ensure that new development avoids areas of high flood risk and is designed to minimise surface water flooding through the use of Sustainable Urban Drainage Systems (SUDS).

5.10 It is also important to ensure that any vulnerability to climate change risks specific to the location of the development are identified and mitigated. For example topography of a site may increase vulnerability to storm damage. Similarly the geology of an area may increase the risk of subsidence.

5.11 It is recognised that the scale and nature of certain developments may mean some of the adaptation measures listed would not be appropriate. For example, extensions or change of use proposals may not present the opportunity to incorporate green infrastructure. Where this is the case, applicants should demonstrate that they have sought to maximise resilience to the impacts of climate change in other ways.

5.12 The Council will provide more detail on suitable adaptation measures in an updated Sustainable Buildings Supplementary Planning Document. Applicants will be expected to demonstrate how the objectives of this policy have been met in the Sustainable Buildings Statement submitted with the application.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>CC2 Planning for Renewable Energy and Low Carbon Generation</i>				
66068 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>As drafted this criteria is inconsistent with the NPPF. Its core planning principles in para 17 mention both the Government's desire to encourage the use of renewable resources and the need to 'conserve heritage assets in a manner appropriate for their significance'.</p> <p><i>The following alternative text is suggested to accord with the NPPF and paragraph 5.107 in the Explanation to the Policy.</i></p> <p><i>c) the design will ensure that heritage assets including local areas of historical and architectural distinctiveness are conserved in a manner appropriate for their significance</i></p>	Agreed amend criteria c) as proposed by English Heritage	Amend criteria c) the design will ensure that heritage assets including local areas of historical and architectural distinctiveness are conserved in a manner appropriate for their significance

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65546 - Warwickshire Wildlife Trust (Richard Wheat) [3077]	Object	<p>Warwickshire Wildlife Trust believes the Local plan should contain a formal policy position on the recovery of unconventional gas and oil reserves.</p> <p>We propose that this be achieved either through additional wording to policy CC2 or through the inclusion of a separate policy specifically for Unconventional energy generation.</p> <p><i>The Trust recommends that the Local Plan should set out the Local Authority's position on the recovery of unconventional gas and oil reserves in the District. We have no preferred means of how this is integrated in the plan but our recommended options are:</i></p> <p><i>- Integrate the policy position into existing policy CC2 - Planning for Renewable Energy and Low Carbon Generation. However, we are mindful that the processes utilised to extract these energy sources and the energy sources themselves are unlikely to fit into the categories of renewable or low carbon energy generation</i></p> <p><i>- A second option would be to set out an individual policy on the recovery of unconventional gas and oil reserves in the district. At this stage the policy may be brief and resemble policy NE6 - High Speed 2 in acknowledging the issue and in setting how the council will respond to any risks to the district's natural environment and communities.</i></p> <p><i>Warwickshire Wildlife Trust is happy to discuss policy wording with the local authority if required.</i></p> <p><i>Document is not Sound</i></p>	<p>The Council recognises the importance of ensuring that the extraction of unconventional coal and gas reserves is undertaken sensitively. However as a lower tier authority the District Council does not have any specific role in granting planning permission or the licensing of these activities except as a consultee. The County Council as the Minerals and Waste authority will be responsible for assessing such proposals. The Minerals plan which is currently being prepared will include a policy on this, it is anticipated that this will be placed on public consultation later this year.</p> <p>There are other policies in the Local Plan which protect the natural environment and amenity of residents. Any structures requiring planning permission would need to meet the requirements of these policies.</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>
66249 - La Salle Investments [5130]	Support	We welcome the inclusion of a policy that provides guidance on the delivery of renewable energy development. Specifically, we support the reference in the policy to the Local Authority supporting the principle of renewable energy generation technologies.	Noted	No change
65556 - Keith Wellsted [8636]	Support	Support	Noted	No change

### Decision on CC2 Planning for Renewable Energy and Low Carbon Generation

Replace policy CC2 and see proposed modifications table for detail of changes

#### CC2 Planning for Renewable Energy and Low Carbon Generation

Proposals for new low carbon and renewable energy technologies (including associated infrastructure) will be supported in principle subject to all of the following criteria being demonstrated:

- the proposal has been designed, in terms of its location and scale, to minimise any adverse impacts on adjacent land uses and local residential amenity;
- the proposal has been designed to minimise the impact (including any cumulative impacts) on the natural environment in terms of landscape, and ecology and visual impact;
- the design will ensure that heritage assets including local areas of historical and architectural distinctiveness are conserved in a manner appropriate for their significance;
- where appropriate, the scheme can link in with proposals being brought forward through the Council's Low Carbon Action Plan and any other future Climate Change strategies;
- the scheme maximises appropriate opportunities to address the energy needs of neighbouring uses (for example linking to existing or emerging District Heating Systems);
- for biomass, it should be demonstrated that fuel can be obtained from a sustainable source and the need for transportation will be minimised, and;
- for proposals for hydropower the application should normally be accompanied by a flood risk assessment.

### CC3 Buildings Standards Requirements

66477 - Gladman Developments (Peter Dutton) [9149]	Object	<p>Sets out all new dwellings required to achieve Code for Sustainable Homes Level 4 from the date of adoption and Level 5 from 2016. Outlines that Council will expect applicants to consider potential to incorporate large scale decentralised district heating networks on strategic sites identified through the Plan. Applicants will be required to prepare Sustainable Buildings Statement demonstrating how proposals meet requirements of LP's climate change policies.</p> <p>Policy Analysis</p> <p>Submit that requirements set out in Policy CC3 are too onerous. Unclear whether justified by supporting evidence and properly tested for effects on viability. Remind Council of guidance in §173 of the Framework, which states that "Plans should be deliverable. Therefore, the sites and scale of development identified in the Plan should not be subject to such a scale of policy obligations that their ability to be developed viably is threatened".</p> <p>Conclusions on Soundness</p> <p>Whilst recognising aims of this policy, question whether requirements are appropriately justified. Risk that its provisions could threaten viability of development and consequently the delivery of the LP.</p>	<p>Since the Publication Draft was published the Government has signalled its intention to abolish Code for Sustainable Homes and incorporate energy standards fully into building regulations. It is therefore proposed to remove the reference to the 'Code' and instead allow for compliance with any other national equivalent which is introduced and building regulations. This is consistent with national policy.</p>	<p>Amend policy and reason justification as outlined in the overall conclusion</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>
66047 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	Policy CC3 Building Standards Requirements - Residential Buildings requires all new dwellings to achieve Code for Sustainable Homes Level 4 from the date of adoption of the Local Plan and Level 5 from 2016 (or any future national equivalent) unless it can be demonstrated that it is financially unviable. This policy should be reviewed by the Council in response to the Governments recent consultation on the Housing Standards Review and the announcements on planning made in the recent Queen's Speech.	It is accepted that the Government has published its intention to abolish the Code for Sustainable Homes standard and fully incorporate energy standards into building regulations. It is however important that the plan can respond to future changes in policy and reflect the intention to deliver zero carbon homes. It is therefore proposed to remove the reference to the 'Code' and instead allow for compliance with any other national equivalent which is introduced.	Amend policy and reason justification as set out in the overall conclusion
66809 - Gallagher Estates [644]	Object	<p>The policy is generally supported as realistic and achievable and consistent with national guidance. It is considered, however, that the requirement for applicants to consider the incorporation of CHP on the strategic sites goes beyond what is justified. Paragraph 154, NPPF is clear that local plans should be aspirational but realistic. Specific reference to CHP on site is at risk, therefore, of going beyond what might reasonably be achieved. There is certainly no requirement for CHP to be provided on sites in order to meet national targets or standards. It is for the industry to develop cost effective means of delivering carbon reduction. There may well be issues in respect of viability and introducing potential obstacles to meeting housing needs. As such we do not consider it necessary or justified for the Policy to include specific reference to CHP on the strategic sites. This is at risk of being unsound and should be deleted.</p> <p><i>Specific reference to CHP on strategic sites should be deleted, it is at risk of being unsound</i></p>	Agreed. Whilst the Council would like to ensure that potential opportunities for large scale decentralised networks on the strategic sites are explored this does not necessary require CHP.	Amend sentence in policy wording to remove reference to Combined Heat and Power

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66015 - University of Warwick [222]	Object	<p>Policy CC3: Buildings Standards Requirements is considered unsound as presently drafted. In respect of residential buildings, the policy is no longer appropriate following the findings of the Housing Standards Review and publication of the related Ministerial Statement which has signalled the intention of the Government to wind down the Code for Sustainable Homes to coincide with national sustainability standards through the building regulations. Furthermore it is inconsistent with the guidance given in paragraph 95, NPPF.</p> <p>Policy CC3 provides no supporting evidence confirming that it is feasible and viable for all non-residential development over 500 sq.m to meet the BREEAM Very Good standard. In respect of non-residential buildings, the University of Warwick has delivered a number of its buildings to the BREEAM standard and is committed to delivery of its estates strategy to the highest possible environmental sustainability standards. However, the BREEAM standard is not always the most appropriate method to ensure the optimum sustainability performance of non-residential buildings and the policy could be more effective in allowing a greater degree of flexibility particularly for smaller development projects.</p> <p><i>Policy CC3 should be revised with respect to residential development to state:</i>  <i>"All new dwellings are required to be design and constructed in accordance with relevant national sustainability standards for new homes and from 2016 national zero carbon homes policy, unless it can be demonstrated that it is financially unviable."</i></p> <p><i>Policy CC3 should be revised with respect to non-residential development to increase the threshold to at least &gt;1,000 sq.m. and provide more flexibility in allowing the use of alternative sustainability standards and bespoke sustainability plans in lieu of BREEAM assessment where it can be demonstrated to be more appropriate:</i></p> <p><i>"All non-residential development over 1000sq. m is required to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent) unless it can be demonstrated that it is financially unviable. Alternative sustainability standards and bespoke sustainability plans may be used in lieu of BREEAM assessment where it can be demonstrated to be more appropriate."</i></p> <p><i>In meeting the relevant carbon reduction targets set out in the national standards, the Council will expect development to be</i></p>	<p>It is accepted that the Government has published its intention to abolish the Code for Sustainable Homes standard and fully incorporate energy standards into building regulations. Agree with the form of wording suggested for residential development which would allow for future changes in policy and reflect the intention to deliver zero carbon homes.</p> <p>In relation to non residential development it is accepted that based on recent research the threshold for requiring BREEAM should be increased to 1,000 sqm. It is also agreed that the policy could benefit from further wording to allow for instances where it may be more appropriate to use an alternative strategy to BREEAM in order to achieve the most sustainable building. This is set out in Paragraph 5.118</p>	Amend policy and reason justification as outlined in the overall conclusion

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>designed in accordance with the following energy hierarchy:"</i>		
65896 - Centaur Homes [9117]	Object	Centaur Homes object to this policy. As part of the Housing Review, in March 2014 Central government has stated their intention to scrap the Code for Sustainable Homes. Instead the aims of the scheme will be placed into the Building Regulations and become part of this process. Therefore, this policy will soon become unmanageable and will not comply with paragraph 154 of the Framework	<p>It is accepted that the Government has published its intention to abolish the Code for Sustainable Homes standard and fully incorporate energy standards into building regulations. It is however important that the plan can respond to future changes in policy and reflect the intention to deliver zero carbon homes. It is therefore proposed to remove the reference to the 'Code' and instead allow for compliance with any other national equivalent which is introduced.</p> <p>In addition the second part of the policy relates to non residential development for which the government has not expressed any intention of preventing the use of standards such as BREEAM</p>	Amend policy and reason justification as set out in overall conclusion
		<i>Policy should be omitted</i>		
66555 - Friends of the Earth (John Brightley) [1113]	Object	There should be no need to include the viability clause - such clauses do not normally exist in considerations of Code or Building Regulations compliance. Paragraph 5.114 first sentence - we suggest the wording should read 'on all residential developments'. Many of the supporting paragraphs in this section would be better located in Supplementary Planning Guidance as national guidance on the subject is in the process of change at present.	<p>Since the Publication Draft the Government has confirmed its intention to abolish the Code for Sustainable Homes and for energy standards to be fully incorporated into Building Regulations. For this reason the reference to the Code will be removed from the Policy. It is however important that the plan can respond to future changes in policy and reflect the intention to deliver zero carbon homes. It is therefore proposed to allow for compliance with any other national equivalent which is introduced.</p> <p>The second part of the policy deals with non residential development and the Government has not indicated its intention to preclude the use of standards such as BREEAM.</p> <p>Paragraph 96 of the NPPF states that in determining planning applications local authorities should expect new development to comply with local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable. It is therefore considered necessary to refer to viability in the policy.</p>	Amend policy and reason justification as set out in the overall conclusion.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66591 - Catesby Property Group (Mr David Morris) [7776]	Object	<p>There are some imminent changes which are likely to render the policy out of date. This is a consequence of the Housing Standards Review 2013 and the Ministerial Letter outlining proposals for simplification of residential sustainability standards. This involves consolidating requirements into the Building Regulations with amendments to the Planning and energy Act 2008 to remove local authority's ability to set energy standards above Building Regulations. The announcement confirmed the Government's intention to wind down the Code.</p> <p><i>In light of the above, any policy which seeks to control the sustainable design and construction of homes by reference to the Code for Sustainable Homes, will both be quickly out of date and a repetition of the requirements of Building Regulations. Policy CC3 should therefore be deleted from the Local Plan.</i></p>	<p>It is accepted that the Government has published its intention to abolish the Code for Sustainable Homes standard and fully incorporate energy standards into building regulations. It is however important that the plan can respond to future changes in policy and reflect the intention to deliver zero carbon homes. It is therefore proposed to remove the reference to the 'Code' and instead allow for compliance with any other national equivalent which is introduced.</p> <p>In addition the second part of the policy deals with non residential development and the Government has not indicated its intention to preclude the use of standards such as BREEAM</p>	Amend policy and reason justification as set out in the overall conclusion
66111 - CALA Homes (mids) Ltd (Mr Reuben Bellamy) [6991] 66121 - Mr and Mrs Martin [12851]	Object	<p>Recent changes to Building Regulations is seeing the Code being moved from the Planning regime into its rightful place in Building Control. Although there is possibly justification for a policy which sets out the Council's carbon off-setting charge (to meet the difference between Code 4 and 5), it is considered that expecting developments to achieve a designated Code is duplicating separate legislation and is unnecessary.</p>	<p>It is accepted that the Government has published its intention to abolish the Code for Sustainable Homes standard and fully incorporate energy standards into building regulations. It is however important that the plan can respond to future changes in policy and reflect the intention to deliver zero carbon homes. It is therefore proposed to remove the reference to the 'Code' and instead allow for compliance with any other national equivalent which is introduced.</p>	Amend policy and reason justification as set out in the overall summary.
66835 - Europa Way Consortium [197]	Object	<p>the key issue is whether the Council can justify its request for Code Level 4 from plan adoption and Code Level 5 from 2016 given the potential impact on viability. DCLG's latest figures suggest an additional £1.4 - £2.4k per dwelling to achieve Code Level 4, and £14.1k - £16.8k per dwelling for Code Level 5. Therefore the Council needs to demonstrate that this policy is viable, considering the cumulative effect of other policies in the plan.</p> <p><i>If the Council cannot demonstrate this policy is viable then the policy will need to be amended.</i></p>	<p>Since the Publication Draft was published the Government has signalled its intention to abolish Code for Sustainable Homes and incorporate energy standards fully into building regulations. It is however important that the plan can respond to future changes in policy and reflect the intention to deliver zero carbon homes. It is therefore proposed to remove the reference to the 'Code' and instead allow for compliance with any other national equivalent which is introduced.</p>	Amend policy and reason justification as set out in the overall conclusion

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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>
65557 - Keith Wellsted [8636]	Support	Support	Noted	

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<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Decision on CC3 Buildings Standards Requirements</b>	<p>CC3 Buildings Standards Requirements Residential buildings All new dwellings are required to be designed and constructed in accordance with relevant national sustainability standards for new homes and from 2016 (or the date of its introduction) national zero carbon homes policy unless it can be demonstrated that it is financially unviable</p>	<p>Non-residential buildings All non-residential development over 500 sq. m is required to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent) unless it can be demonstrated that it is financially unviable or an alternative approach has been put forward which will provide comparable sustainability gains.</p>	<p>In meeting the carbon reduction targets set out in the Building Regulations and in the above Code for Sustainable Homes and BREEAM standards, the Council will expect development to be designed in accordance with the following energy hierarchy: 1)Reduce energy demand through energy efficiency measures (such as insulation) 2)Supply energy through efficient means (i.e. Combined Heat and Power) 3)Utilise renewable and low carbon energy generation technologies</p>
<p>The Council will expect applicants to consider the potential to incorporate large scale decentralised district heating networks on the Strategic Sites identified in this Plan. Applicants will be required to submit a Sustainable Buildings Statement to demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met.</p>	<p>5.215.22 National targets for achieving zero carbon for residential development by 2016 and for non-residential development by 2019 will be taken forward through the progressive tightening of the Building Regulations. The Council will not require development to exceed national requirements in terms of carbon reduction but is committed to ensuring that other elements of sustainable construction which will not be delivered through building regulations keep pace (for example pollution, ecology, sustainable use of materials in building design). 5.225.23 The Council will apply this policy to all new dwellings on developments of one dwelling or more and non-residential development of 500sqm or over (changes of use are exempt from the policy). The Council would however encourage major refurbishment projects to meet the requirements of the policy due to the benefits of achieving a more sustainable building in terms of energy costs. The threshold set for non-residential development seeks to ensure that the requirements of the policy are not imposed on modest structures and therefore avoids unnecessary burdens being placed on development. Buildings without heating and water will not be required to comply with the policy.</p>	<p>In the event that no national standard is adopted development will still be required to comply with the energy hierarchy in meeting the Building Regulations.</p>	<p>In meeting this policy the Council will encourage new residential development to meet a standard of 90 litres/person/day (lpd) in terms of water efficiency (see Policy FW3). Where possible applicants should consider meeting the minimum water requirements for the code levels specified in the policy. For non-residential development the Council will expect buildings to be designed in line with BREEAM standards which represent best practice in sustainable design for non-residential buildings. It is recognised that in some instances in order to optimise the sustainability of a non-residential building an alternative strategy to BREEAM may be more appropriate. The Council will consider individual cases on merit. Developments exempt from this policy will still be required to meet standards for sustainable construction set out in building regulations and are encouraged where possible to incorporate measures required through this policy. It is accepted that there may be instances where achieving the requirements of this policy will not be financially viable. Where this is the case the Council will expect applicants to set out in the Sustainable Buildings Statement, by way of a financial appraisal, why the requirements of this policy cannot be met. It is important that overall energy demand is reduced before looking to alternative methods of energy generation. Therefore in meeting mandatory carbon reduction targets the Council will expect developments to be designed in line with the energy hierarchy. This seeks to minimise energy use first through efficiency measures then to supply energy through the most efficient means. This relates to methods of conversion such as heat recovery which produce energy in the most efficient way. The Council's Low Carbon Action Plan identifies a series of schemes and initiatives to reduce carbon emissions in the District. These include energy efficiency projects in buildings, the use of low and zero carbon technologies for generating energy locally and ways to address the impact from transport. It is important that any opportunities to support or facilitate the delivery of these projects are taken into account in development proposals and the Council will expect evidence of this as part of any planning application. The scale and mix of uses proposed on the large strategic allocations identified in this plan present an opportunity for the use of decentralised district heating networks including tri-generation</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>(combined cooling, heat and power). The use of these types of technology will become more important during the plan period in order to achieve zero carbon emissions from new dwellings. There is also potential in using such technologies to meet the energy demands of neighbouring uses.</p> <p>The revised definition of zero carbon relates to net regulated emissions within the scope of building regulations (excluding emissions from appliances, lighting etc.). It is accepted that it may be difficult to meet zero carbon emissions on certain sites and therefore once fabric efficiency and low carbon generation have been taken into account the remainder will be made up by what will be known as allowable solutions. The exact nature of what this will involve is still uncertain however one method may be through a carbon offsetting fund collected through building regulations. In such an instance it is anticipated that any payments locally would contribute towards the delivery of the Low Carbon Action Plan.</p> <p>In demonstrating how the requirements of the policy have been met the applicant should demonstrate that any relevant proposals being brought forward through the Council's Low Carbon Action Plan and the Council's mechanism for delivering allowable solutions have been taken into account.</p> <p>The Council already has supplementary guidance on achieving Sustainable Buildings including advice on what should be included in the Sustainable Buildings Statement. This will be revised to set out further guidance on how to demonstrate compliance with the Climate Change policies in this Plan.</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>
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*Flooding and Water*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66464 - Environment Agency (Becky Clarke) [6581]	Object	<p>Suggest that title of this policy is changed as it implies that development in areas of risk of flooding is appropriate, which is contrary to NPPF in which the aim of the Sequential Tests is to steer new development to areas with the lowest probability of flooding. We recommend that an alternative policy title such as „Reducing Flood Risk“ is used instead. Where there are no reasonable available sites in Flood Zone 1, the Sequential Test should be applied; taking into account the flood risk vulnerability of land use and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonable available sites in Flood Zones 1 and 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required. As soon as the need for the Exception test is established, a level 2 SFRA should be undertaken by a suitable qualified technical expert or engineer. We have the following comments on the criteria outlined for this policy in relation to each bullet point within the policy. a) The SFRA level 1 Flood Zone maps are based on our Flood Map (fluvial risk) and the Areas Susceptible to Surface Water Flooding, now known as the Updated Flood Map for Surface Water (surface water risk). Unless there are plans to continually update the SFRA mapping, we suggest that our online Flood Map (now known as "Flood Map for Planning") available on the .GOV.UK website is referred to as this is updated on a quarterly basis and should provide the most up to date information.</p> <p>b) this is essentially the Sequential test, and we would consider this criteria is re-worded to: 'the Sequential test is applied on the site so that the most vulnerable development is located in areas of lowest flood risk'.</p> <p>c) We recommend that the term "flood defence" in this criterion is replaced with the following wording 'development is appropriately flood resistance and resilience' Because the term flood defence suggests formal flood walls etc which will prevent flooding in all circumstances, however even development behind flood defence structures can experience flooding through breach or overtopping. It is far more practicable to direct new development to flood zone 1 rather than in an area benefiting from existing flood defences. This should not be used to justify development in inappropriate locations.</p> <p>e) Request clarification as to how the term "regular flooding" defined, we feel that this should either be removed from the policy, or the wording changed to indicate a likely return period, paying due regard to the NPPF which has a presumption against all development within the functional floodplain unless it can be described as water compatible.</p>	The Council will adopt the changes requested by the Environment Agency to assure compliance with national policy and EA practices	<p>Insert new wording in place of original chapter to provide clarity and compliance with national and EA practices and advice:</p> <p>Flooding and Water 5.127 National planning policy is clear about the approach to be taken by local authorities towards dealing with flooding issues at all stages of the planning process.</p> <p>5.128 Warwick District has a long history of flooding from surface water flows mainly attributed to the many watercourses and main rivers which interconnect across the district. These include the Rivers Avon, Leam, Sowe, Itchen, Finham Brook and Canley Brook among others. In the last thirty years, parts of the district have experienced flooding to various degrees, most notably in the major events of 1998, 2007 and 2012 where district wide flooding was experienced. These events highlighted the many issues associated with development and modern farming practises which including channel capacity issues, the diverting and culverting of watercourses, building within the flood plain, removing natural woodlands and habitat areas.</p> <p>The anticipated implications of climate change will only increase the District's vulnerability to such events and it is important therefore to appraise, manage and reduce the risk of flooding, directing development away from areas at risk of flooding wherever possible and to encourage developments to work with and to harmonise with the natural environment and</p>

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	<p>g) Suggest this is re-worded to the following text: 'the development must be 'safe' over its lifetime, taking into account the effects of climate change. Safe pedestrian and emergency vehicle access routes above the 1:100 year plus climate change flood level must be available. Evacuation plans must be prepared for all new developments in flood risk areas'. Suggest that the paragraph "land that is required for current and future flood management will be safeguarded from development" is added as a continuation of the points (i) rather than a separate paragraph. We recommend that the paragraph "Where development is supported as an exception to this policy..." is removed, as there shouldn't be any exceptions to this policy and all criteria must be complied with. This wording is repeated in paragraph 5.130 and should be removed. This is contrary to the National Planning Policy Framework, and the Environment Agency must object in principal to inappropriate development within the floodplain.</p> <p>We would object to this section policy at a formal review of this plan, and it's inclusion could render the policy as unsound. We recommend the addition of the following criteria to Policy FW1 as supported by the level 1 SFRA: 'j) the functional floodplain is protected from all built development.</p> <p>k) space should specifically be set aside for Sustainable Drainage System (SuDS) and used to inform the overall site layout.</p> <p>l) development proposals must provide a minimum 8m wide development buffer strip from watercourses (culverted or otherwise).</p> <p>m) every opportunity should be taken to de-culvert and re-naturalisation of watercourses. Culverting of existing open watercourses will not be permitted.</p> <p>n) opportunities should be sought to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of SuDS.</p> <p>o)for residential development, finished floor levels are set a minimum of 600mm above the 1% (1 in 100 year) plus climate change flood level.</p> <p>p) developers will be required to contribute towards the cost of planned flood risk management schemes that will benefit the site.</p> <p>q) opportunities should be sought to make space for water within the development to accommodate climate change.</p> <p>r) Development proposals will demonstrate that will not cause deterioration of the waterbodies WFD status and contribute to meeting good status.</p> <p>s) Carry out a WFD Assessment to demonstrate how the waterbody will not deteriorate in status and will be enhanced</p> <p>t) No detrimental impact on priority habitat or designated sites of nature conservation.' With regard to the FRA requirements, we suggest that point (a) is re-worded as</p>		<p>surroundings.</p> <p>FW1 Reducing Flood Risk Planning applications should be submitted in line with the revised validation checklist that has guidance on the national approach to meeting the sequential and exception tests and meeting the requirements of the NPPF.</p> <p>Developers are advised to review the Environment Agency's 'flood map for planning' at the earliest possible opportunity to consider what development would be appropriate for a potential development site to ensure that proposals are in line with the following policy requirements:</p> <p>a. There will be a presumption against development in flood zone 3, and no built development will be allowed in the functional floodplain. Development must be steered to areas with the lowest probability of flooding.</p> <p>b. land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme it will be expected to contribute towards the cost of delivery and/or maintenance of that scheme.</p> <p>c. new development that lies within the floodplain will be required to implement a flood alleviation scheme to reduce the risk of flooding to the proposed development site and deliver significant flood risk reduction</p>

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	<p>'within Flood Zone 2 or 3 or proposals of 1 hectare or greater in Flood zone 1, as defined on the Environment Agency's Flood Map for Planning'.</p> <p>The mapping in Warwick District Council's SFRA level 1 is based on our Flood Map. The SFRA report states that it is a "living" document and should be reviewed on a regular basis. Our Flood Map for Planning is updated on a quarterly basis to incorporate improved river models etc and this should be reflected in the SFRA document. However, if there are no plans to update the SFRA maps on a quarterly basis in line with our Flood Map updates, then we recommend that our Flood Map is considered the best available information or until such time as a level 2 SFRA is produced. Recommend that bullet points are used in this section so as to avoid confusion with the numbering system used in the criteria part of the policy. Paragraph 5.131 Our "Flood Map for Planning" replaced the indicative flood zone maps and should be referred to in this paragraph. FW2 Sustainable Urban Drainage We recommend that the title of this policy is re-worded to 'Sustainable Drainage' as the sustainable drainage applies to both greenfield and brownfield sites. In the first paragraph "Sustainable Urban Drainage Systems (SUDS)" should be replaced with „Sustainable Drainage Systems (SuDS)" as they are now known.</p> <p>The retrofitting of SuDS onto existing drainage systems should be a requirement for developments where it is not possible to install an entirely new system. Recommend that the following text is added to point c):</p> <p>'ecological networks and informal recreation'</p> <p>Suggest that the middle paragraph of this policy is re-worded as follows to make it clearer on the surface water hierarchy and that surface water discharge should be limited to greenfield runoff rate for all points of discharge:</p> <p>„Surface water runoff should be managed as close to its source as possible in line with the following drainage hierarchy: i. Discharge into the ground (infiltration) unless it is demonstrated by infiltration tests and groundwater levels that infiltration is not possible. ii. Discharge to a surface water body. iii. Discharge to a surface water sewer, highway drain or another drainage system. iv. Discharge to a combined sewer. Above ground storage, such as balancing ponds, should be considered in preference to below ground attenuation, due to the water quality and biodiversity benefits they offer. For all sites, surface water discharge rate should be limited to the site-specific greenfield runoff rate for all return periods up to the 1% (1 in 100 year) plus climate change event' We recommend that the paragraph which includes the text "In exceptional circumstances, where a sustainable drainage system....c) contributions will be made to off-site SuDS schemes" is removed.</p>		<p>benefits to the wider community.</p> <p>d. All new development proposals will contribute to meeting 'good status' as defined by the Water Framework Directive (WFD). This will include delivery of geomorphological, chemical and biodiversity enhancements and include a minimum 8 metre buffer strip from the top of bank of all watercourses.</p> <p>Where development lies adjacent to a watercourse the supporting planning application will include a WFD assessment to demonstrate how the waterbody will not deteriorate in status and will be enhanced.</p> <p>* There will be no impact upon priority habitat or designated sites of nature conservation</p> <p>* Modified watercourses will be restored in line with the recommendations of the Severn River Basin Management Plan</p> <p>* Culverting open watercourses will not be allowed.</p> <p>e. New development must be resilient to surface water, fluvial and pluvial flooding. Where new development lies in an area of flood risk it must be designed to be flood resilient with safe dry access for vehicles and pedestrians. Finished floor levels should be 600mm above the predicted flood level and include a freeboard<sup>1</sup> for climate change to ensure new development is safe.</p> <p>Justification: The River Severn Catchment Management Plan has a specific set</p>

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	<p>This wording provides an unnecessary get out clause and could result in the delivery of unsustainable development, sustainable drainage systems take many different forms and there is no reason why a SuDS solution cannot be designed for every site.</p> <p>We welcome the policy requirement for developers undertake groundwater risk assessment to ensure that groundwater quality is protected a result of development proposals. Subsequently any proposal involving infiltration SuDS schemes should be accompanied by contaminated land investigations to endure that site condition is appropriate.</p> <p>For sites that are identified as significantly contaminated EA would require input into any SuDS schemes proposed for new development to determine the most appropriate schemes. This would be to safeguard groundwater quality.</p>		<p>of recommendations for the area covering Warwick District Council within the Upper Avon, and Coventry Cluster sub catchments.</p> <p>The Environment Agency estimates that up to 5000 homes are at risk of flooding within the area managed by Warwick District Council, and many more businesses, roads and other essential infrastructure are already vulnerable to flood risk.</p> <p>The risks above can be managed at the same time as encouraging increased floodwater storage on undeveloped floodplains in order to increase attenuation and reduce flood risk to communities. This sub area presents a good opportunity for storage, as it will benefit communities locally and downstream.</p> <p>The Environment Agency plans to reduce dependence on raised flood defences, as this is unsustainable in the long term, by taking opportunities to restore sustainable natural storage of floodwater on undeveloped floodplains. This would benefit many communities here and elsewhere, for example Yelvertoft, Willoughby, Rugby and Leamington Spa.</p> <p>Development/redevelopment must be managed to minimise flood risks. Methods must be sustainable over the long-term. For example, making more space for rivers through urban areas via 'blue corridors' (i.e. restoring access for floodwater onto key strips of floodplain. This requires redevelopment to be limited to flood-compatible land</p>

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			<p>uses e.g. parkland.)</p> <p><sup>1</sup>Freeboard is the difference between a predicted flood level and a flood defence/ flood risk reduction measure (such as a door step) to take into account any inaccuracies within a flood risk model, and other factors such as vehicle movements that may increase the depth of water against a property</p> <p>In line with the recommendations of the Warwick Water Cycle Study, (page 76) it must be ensured that all new development is 'safe' meaning that dry pedestrian access to and from the development without passing through the 1 in 100 year plus climate change floodplain, and that emergency vehicular access is possible. An appropriate strategy to ensure 'safe' access is provided for areas identified to be at risk of surface water flooding.</p> <p>FW2 Sustainable Drainage</p> <p>a. All new major developments must incorporate SuDS that provide biodiversity, water quality and amenity benefits and be in accordance with the Warwickshire Surface Water Management Plan. There will be a presumption against underground storage of water, and it should support the delivery of green infrastructure.</p> <p>b. All new development sites will discharge at the QBAR<sup>2</sup> Greenfield run off rate including an allowance for climate change, for sites with a life expectancy of less than 60 years</p>

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			<p>a 20% allowance must be applied, for sites with a greater than 60 year life expectancy the allowance must be 30%.</p> <p>c. SuDS schemes must be located outside the floodplain; ideally this should be within the development site or close to the site as part of a master planned drainage scheme. Priority should be given to SuDS that incorporate green infrastructure including green roofs, walls and rain gardens.</p> <p>d. for development sites that are suspected to be contaminated the SuDS scheme will be designed to prevent the mobilisation of contaminants to waterbodies. The Environment Agency must be consulted in relation to sites suspected to be contaminated and will provide advice and guidance to the council and developers on how best to implement SuDS on a site specific basis.</p> <p>Justification: Man-made trends in land management and land-use have increased flood risk over time in this sub catchment</p> <p>Surface water flooding is a growing problem. Local Councils are mainly responsible for managing this, but it often has to be integrated with other organisations' assets, for example their sewers or rivers.</p> <p>New developments should be designed to consider the inherent risks posed by surface water flooding, for example developers should consider the design and</p>

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			<p>layout of new developments to reduce the risk of homes and businesses becoming inundated by surface water.</p> <p>5.134 SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk or adverse effect on water quality. Many existing drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable in the long term. SuDS provide a range of ecosystem services which include:</p> <p><math>Q_{BAR}</math> is the estimated mean annual flood flow rate and is usually calculated for the 1:2 year event 1:30 year event and 1:100 year (plus climate change)</p> <p>a) reducing flood risk;  b) maintaining and restoring natural flow rate and volume of surface runoff to reduce the risk of flooding;  c) improving water resources;  d) enhancing amenity and minimising diffuse pollution;  e) reducing pressure on the sewerage network, and;  f) Improving biodiversity and local amenity and expanding habitat and green routes for biodiversity movement.</p> <p>In line with the recommendations of the Warwick Water Cycle Study (page 25) new development will discharge surface water at the greenfield run off rate, and all new</p>

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			<p>developments must include a detailed assessment of drainage and SuDS requirements.</p> <p>The latest guidance from DCLG promotes that the planning system be the key deliverer of SuDS.</p> <p>5.135 Warwickshire County Council has been the 'lead local flood authority' with responsibility for developing, maintaining and monitoring a Local Flood Risk Management Strategy in partnership with other relevant bodies in the area. The County Council also currently has a duty to prepare preliminary flood risk assessment maps in accordance with the EU Flood Directive.</p> <p>In 2010 Lead Local Flood Authorities were given overall responsibility for local flood risk management under the Flood and Water Management Act 2010. This means they are responsible for managing local sources of flooding from surface water, groundwater and small ("ordinary") watercourses.</p> <p>In relation to local flood risk, the Environment Agency has a strategic overview role, in addition to its operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.</p> <p>In December 2014 the Government announced that it would be amending national planning policy to expect the installation of sustainable drainage systems for all major development where appropriate. This followed a</p>

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			<p>consultation on Delivering Sustainable Drainage Systems between 12 September and 24 October 2014. In response to that consultation, it was noted that local planning authorities would require access to the technical expertise required to assess the surface water drainage proposals as part of planning applications. The Government also noted views expressed that this advice should be provided by a consistent and guaranteed source of advice, and that the Lead Local Flood Authorities were best placed to do this.</p> <p>5.136 Trees and woods can play a positive role in helping to solve water quality and flow issues. They can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and water quality implications caused by extreme weather events. Trees can attenuate water flow reducing the impact of heavy rains.</p> <p>Warwick District Council falls within Avon Rural Operational Sub Catchment for the River Severn Basin Management Plan. This catchment includes the rivers Avon, Swift, Leam, Itchen, Dene and Stour, and the conurbations of Rugby, Warwick and Stratford-upon-Avon. Arable farming is the dominant land use activity and the catchment sits within a Nitrate Vulnerable Zone.</p> <p>There are 33 river water bodies, 6 canal water bodies, 2 lake, 0</p>

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			<p>estuarine &amp; coastal waters and 1 groundwater water bodies in the catchment. The status (health) of the water environment in 2009 was assessed as being generally moderate. In 2014, the status of the water environment had fallen. It can take 5 to 10 years for the positive benefits of actions to be reflected in the ecological status. Our current analysis suggests that 68% of the water bodies in the Avon Rural catchment should have a long term objective of achieving good status.</p> <p>The actions proposed in this catchment focus on reducing the impact of diffuse pollution from rural and urban sources, reducing inputs of phosphate and ammonia from water industry point sources and opening up water bodies for fish movements by removing physical barriers and improving aquatic habitats. Actions to reduce diffuse pollution would involve exploring ways to manage manures, slurry, livestock and pesticides for the benefit of the water environment, incorporating SuDS within the catchment and removing misconnections and car wash effluent from surface water drainage systems.</p> <p><b>FW3 Water Efficiency</b> The Council will require new residential development of one dwelling or more to meet a water efficiency standard of 110 litres/person/day. This includes 5 litres/person/day for external water usage. For non-dwellings, applicants must demonstrate that they have incorporated appropriate water</p>

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			<p>efficiency measures into the building. All new development must incorporate water efficiency measures.</p> <p>Justification: 5.137 The Council is committed to ensuring the creation of well-designed sustainable buildings and considers that water conservation is a key part of this. It is considered that the application of appropriate methods for water conservation in new homes will ensure long term resilience to the future impacts of climate change</p> <p>Currently a water efficiency standard of 125 litres/person/day (lpd) is set in the Building Regulations, but the Government is proposing to allow local authorities to introduce a tighter level of 110 lpd in areas of high water stress. The Water Cycle Study (2010) carried out on behalf of the Council suggested that a water efficiency standard of 105 lpd (exclusive of external water use) should be applied to all new dwellings. When an allowance of 5 lpd for external water use is applied, this figure is equivalent to the Government's proposed higher water efficiency level of 110 lpd.</p> <p>FW4 Water Supply Developers must ensure that there is adequate water supply and waste water infrastructure to serve the existing and proposed developments by:</p>

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			<p>a. minimising the need for new infrastructure by directing development to areas where there is a guaranteed and adequate supply of water having due regard to Severn Trent's Water Resources Management Plan and Strategic Business Plan as well as the finding of the Water Cycle Study</p> <p>b. In accordance with the Water Framework Directive's Objectives, development must not affect the waterbodies ability to reach good status or potential as set out in the River Severn Basin Management Plan (RBMP).</p> <p>Justification: 5.138 Warwick District Council falls within Avon Rural Operational Sub Catchment for the River Severn Basin Management Plan.</p> <p>This catchment includes the rivers Avon, Swift, Leam, Itchen, Dene and Stour, and the conurbations of Rugby, Warwick and Stratford-upon-Avon. Arable farming is the dominant land use activity and the catchment sits within a Nitrate Vulnerable Zone.</p> <p>Draycote Water is part of a designated drinking water protected area whilst the River Leam and the principal aquifers in the catchment are important for public water supply. In the south the River Stour rises in the Cotswolds, an Area of Outstanding Natural Beauty and other designated sites include the River Itchen, a Site of Special Scientific Interest in the Itchen Valley.</p>

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			<p>The main pressures impacting on water bodies in the catchment are physical modifications, wastewater and polluted run-off from rural and urban land. Some water bodies have been modified to accommodate urbanisation or flood defences, which has damaged the physical habitat for wildlife, introduced barriers to fish movements and altered flow regimes. Improving habitats and mitigating low flow problems will be costly, but there may be opportunities to combine solutions with other planned development.</p> <p>Wastewater problems originate from infrastructure associated with the water industry and private domestic facilities, including poorly maintained septic tanks and package sewage treatment plants. Although sewage treatment within the catchment has improved significantly over recent years, further investment, together with new technologies coordinated with action on other phosphate sources, is needed to meet the required river standards.</p> <p>References:  * National Planning Policy Framework (NPPF)  * National Planning Policy Guidance  * Warwick District Strategic Flood Risk Assessment (2013)  * Sustainable Drainage Systems (Anglian Water) (2014)  * Sustainable Drainage Systems (SuDS) (British Geological Survey) (2014)  * National Standards for sustainable</p>

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				<p>drainage systems. Designing, constructing, operating and maintaining drainage for surface runoff (DEFRA) (December 2011)</p> <p>* Warwick District Council 'Stage One' Strategic Flood Risk Assessment, Mouchel (April 2013)</p> <p>* River Basin Management Plan for the River Severn Basin District (December 2009)</p> <p>* Draft Water Resources Management Plan, Severn Trent Water (2013)</p> <p>* Severn Trent AMP5 Delivery programme 2010-2015 (Longbridge)</p> <p>* River Severn Catchment Flood Management Plan, Environment Agency (2009)</p> <p>* Warwickshire sub-regional Water Cycle Study, Warwick District Council March (2010)</p> <p>* Future Water, the Government's Water Strategy for England, DEFRA, (February 2008)</p> <p>* HM Government Water for Life, DEFRA, (December 2011)</p> <p>* The Water Bill, (June 2013)</p> <p>* Conserving Water in Buildings, a practical guide (Environment Agency) (2007)</p> <p>* BREEAM 2011 New Construction standard</p> <p>* Code for sustainable homes: Technical Guidance - November 2010</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/389215/Further_changes_to_statutory_consultee_arrangements_for_the_planning_application_process_-_Consultation.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/389215/Further_changes_to_statutory_consultee_arrangements_for_the_planning_application_process_-_Consultation.pdf</a></p> <p><a href="https://www.gov.uk/government/uplo">https://www.gov.uk/government/uplo</a></p>

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				ads/system/uploads/attachment_data/file/289103/River_Severn_Catchment_Management_Plan.pdf
66220 - NFU (Sarah Faulkner) [1119]	Support	<p>With the exception of FW1 (f) we are broadly supportive of the Councils approach to flooding and water. The paper highlights the importance of resilience and this is a key issue for farmers and growers in the district. Large new developments in urban areas do have the potential to cause downstream impacts, even when new SUDs techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the area's watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.</p> <p><i>Not required</i></p>	Noted	Not required
66557 - Friends of the Earth (John Brightley) [1113]	Support	<p>We support these proposals.</p> <p><i>Not required</i></p>	Not required	Not required

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<i>FW1 Development in Areas at Risk of Flooding</i>	<p>66221 - NFU (Sarah Faulkner) [1119]      Object</p> <p>We are very concerned about Point f "the site is not required for washland creation as part of overall flood defence strategy for river catchments" and the section that says "land that is required for current and future flood management will be safeguarded from development". We can find no justification or explanation for this policy within the plan.</p> <p>We would like more information on the definition of 'washland' as a concept.</p> <p>We would like more information on the definition of 'washland' as a concept. In flood risk management 'washland' is defined both as:</p> <ul style="list-style-type: none"> <li>* an area of the floodplain that is allowed to flood or</li> <li>* where it is deliberately flooded by a river or stream for flood management purposes.</li> </ul> <p>Washland usually refers to an area which is deliberately flooded to protect people property elsewhere and that this requires a project to control the storage of water and its inflow and outflow into that storage area. This would usually be via an agreement with the landowner or if the land was owned by the local authority. We would assume that this policy would require land to be clearly earmarked for a deliberately engineered flood storage scheme rather than more general designation of the floodplain.</p> <p><i>We would wish to see both the definition made clear and for consultation to be undertaken on any affected land (which should be clearly shown on any plan documents). This would give affected landowners given the opportunity to be directly informed and give them sufficient time to present their views on the proposals.</i></p>	<p>The definition of 'washland' and 'floodplain' has been adopted from the Environment Agency document 'The Fluvial Design Guide'. The definitions are:</p> <p>Washland - Low land adjacent to a river or other channel used for the temporary storage of floodwater, often developed for that use by the erection of bunds and control structures</p> <p>Floodplain - Area of land bordering a river which is partly or wholly covered with water during floods</p> <p>Affected landowners would be consulted when planning applications are received.</p>	<p>Include definitions in glossary</p> <p>Washland - Low land adjacent to a river or other channel used for the temporary storage of floodwater, often developed for that use by the erection of bunds and control structures</p> <p>Floodplain - Area of land bordering a river which is partly or wholly covered with water during floods.</p>

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65898 - Centaur Homes [9117]	Support	<p>Centaur Homes support that development should be directed away from areas at flood risk. However, a large amount of the policy is superfluous as it repeats national policy from the Framework and does not need to be duplicated.</p> <p><i>Some of the policy needs to be omitted. The policy also needs to accord with paragraph 104 of the Framework which states:-</i></p> <p><i>"For individual developments on sites allocated in development plans through the Sequential Test, applicants need not apply the Sequential Test. Applications for minor development and changes of use should not be subject to the Sequential or Exception Tests but should still meet the requirements for site-specific flood risk assessments."</i></p>	Advice has been taken from the Environment Agency and superfluous wording has been removed to ensure that there is no repetition and national policy is reflected	Plan has been changed to accommodate advice of the Environment Agency and ensure compliance with national policy
65092 - Sport England (Mr Bob Sharples) [1355]	Support	<p>In principal, I support this policy however for clarification and consistency with reference to Policy HS5, perhaps further bullet point around sport can be added.</p> <p><i>i) Any building proposed in conjunction with water sports, should be designed to accommodate the flooding of the area, and any required social/meeting space should be located above the flood level.</i></p>	This additional bullet point could be added for clarity	Add a bullet point to policy FW1: 'i) Any building proposed in conjunction with water sports, should be designed to accommodate the flooding of the area, and any required social/meeting space should be located above the flood level.'
<i>FW2 Sustainable Urban Drainage</i>				
66427 - Woodland Trust (Mr Justin Milward) [132]	Object	<p>Would like to see a reference to the role that trees and woods can play in helping to solve water quality and flow issues. Believe they can deliver a major contribution to resolving a range of water management issues particularly those resulting from climate change like flooding and water quality implications caused by extreme weather events. Trees can attenuate water flow reducing the impact of heavy rains.</p> <p><i>Would like to see this policy add the words 'such as native woodland' to sub para (d) (provide good quality open space). This will then enable the local plan to comply with national policy.</i></p>	Agree that this would be a useful addition	Add reference to the usefulness of trees in achieving SuDS

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66222 - NFU (Sarah Faulkner) [1119]	Support	We agree that new development sites should have land earmarked for SUDs so that surface water runoff can be captured and managed. It is important that the downstream impacts of schemes are thoroughly investigated. This is particularly important as some local watercourses are suffering from a lack of maintenance which impedes their ability to cope with additional surface water flows. High peak flows and flash floods must also be considered as often the existing infrastructure cannot cope and an increase in impermeable surfaces may make this worse. It is vital that adequate water resources and drainage capacity is available to cope with any new demands placed on the county's natural infrastructure.	Not needed	None
<i>FW3 Water Conservation</i>				
66559 - Friends of the Earth (John Brightley) [1113]	Object	Proposed Policy FW3 - we suggest should be omitted as it duplicates proposed policy CC1 (c). Alternatively the words 'encourage' and 'one dwelling or more' should be omitted to avoid ambiguity and increase clarity.  <i>Policy FW3 should be omitted as it duplicates proposed policy CC1 (c). Alternatively the words 'encourage' and 'one dwelling or more' should be omitted to avoid ambiguity and increase clarity.</i>	Policy FW3 provides additional detail to which Policy CC1 (c) refers. There does not appear to be any ambiguity in either policy. Policies are bound to overlap or meet since they cover all aspects of potential development	Reference has now been added to include 'one dwelling or more' in the policy and the chapter wording amended in line with national policy and the advice and policies of the Environment Agency
65899 - Centaur Homes [9117]	Object	Centaur Homes object to this policy. As set out above, the Code for Sustainable Homes is due to be scrapped and water conservation measures will form part of Building Regulations. These matters do not need to be resolved as part of the planning process.  <i>This policy should be removed</i>	Whilst the Code for Sustainable Homes still applies, it is for the Council to support its principles. This will continue until such time as the above mentioned measures are incorporated into the Buildings Regulations process, therefore the policy should be retained	Not needed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Historic Environment</i>				
67144 - Mr Ray Steele [5886]	Object	'identify land where development would be inappropriate, for instance because of its environmental or historic significance' Warwick Castle - the destruction of the Banbury Road approach. The Ancient connections of Whitnash back to the Domesday Book that will be lost	The principles of the NPPF are reflected in policy HE2 which has been amended in line with advice offered by English Heritage. To be as prescriptive as the respondent suggests would mean making the remainder of the historic environment highly vulnerable. Better to deal with each application on a site by site basis since heritage assets are often totally unique and may require a different approach	
65630 - Cllr Elizabeth Higgins [1080] 66846 - Patricia Hollis [6286] 67020 - John Griffiths [8071]	Object	There is no specific planning policy about conserving and enhancing the Leper Hospital, Warwick. Despite revised planning guidance and measures introduced through the Enterprise and Regulatory Reform Act 2013 provide to address this.	The Local Plan provides the strategic policies for the historic environment and does not deal with individual buildings. There has been a long history of proposals for the Masters House and St Michael's Chapel (commonly known as the Leper Hospital) and the Council is still working to help secure its future. There doesn't appear to be anything helpful in the Enterprise and Regulatory Reform Act 2013 in this regard	Not required
		<i>Not required</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66684 - Save Warwick (MR DAVID WILLIAMS) [4506] 66908 - Colin Sharp [1913] 66916 - Ms Alison Cox [588] 66924 - Alison Kelly [9014] 66932 - Andrew Cliffe [6235] 66940 - Angelo Cugini [12883] 66948 - Barbara Groves [8940] 66956 - Professor Bob Ireland [7882] 66964 - Christopher Paden [8844] 66972 - Elizabeth Cliffe [6234] 66980 - Mrs Kay Cugini [1743] 66988 - Mr David Ramsbottom [2030] 66996 - Mr David Drinkhall [12839] 67004 - Ian Frost [2024] 67012 - Mr Geoff Reynolds [8107] 67028 - Justin Richards [8806] 67036 - Louise Kalus [8998] 67044 - Paul Kalus [8995] 67052 - Mr Bernard Hollis [1810] 67060 - Mr R Komarasinha [6306] 67068 - Caroline Komarasinha [12793] 67076 - Matthew Drinkhall [8910] 67084 - Oliver Lane [8814] 67092 - Ms Helen Maclagan [12783] 67100 - Mr and Mrs J Pennington [600] 67108 - Mr Peter Lamb [3491] 67116 - Sarah Hunt [7309] 67124 - Mr Ben Orme [12882] 67132 - Mr Ray Steele [5886]	Object	<p>The Plan would be seriously damaging to our environmental and heritage assets. The Plan gives insufficient attention to our heritage and is potentially damaging to it (in contravention to the provisions of the NPPF).</p> <p>The Plan is considered unsound for the following reasons:-</p> <p>The Local Plan identifies the valuable heritage assets of the District and the processes required to obtain planning consent for developments within conservation areas and affecting historic buildings. Save Warwick support these policies.</p> <p>The plan correctly identifies the importance of the historic environment of the district's principal towns and that this historic legacy has been carefully guarded, however it fails to mention its contribution to Warwick as the quality of the heritage assets/ historic environment are a driving force behind the visitor economy that supports so many local businesses and is therefore a major source of employment.</p> <p>Save Warwick state that over many years there has been a growing appreciation of the impact of traffic on our heritage assets and on our historic towns. The general response to this has been a wish to remove the bulk of traffic from the vicinity of conservation areas and return the streets to the people, in doing so this protects the historic buildings from the impact of traffic.</p> <p>The Local Plan does not address the need to protect our town centre conservation areas (especially Warwick) from the impact of the developments proposed in the plan itself.</p> <p>There is little or no evidence that the plan has addressed the impacts of traffic created by new allocations (especially those in the south of Warwick) on the character, attractiveness, user-friendliness and fabric of our heritage. The Transport Assessments that form part of the plan predict significant increases in the levels of traffic flowing through Warwick Town Centre as a consequence of the new development areas intended to the south of Warwick. The phase 3 Transport Assessment identifies accepts that this extra traffic can be accommodated on the existing road network with junction improvements and other 'blunt instrument' traffic management measures being proposed to alleviate the effects of traffic in such a way that is inappropriate and damaging to a top quality conservation area crammed with historic buildings.</p> <p>Despite the intended 'mitigation, measures, the assessments admit that congestion and queuing will increase significantly, this will be damaging to the streetscape of what remains substantially a mediaeval town.</p> <p>Increased traffic / congestion levels will compound the levels of pollution and increase pollutants (NO2), particulates and vibration that will all damage health and cause the degradation of our historic buildings and the attractiveness of the very things that so many</p>	See response to traffic representations in relevant chapter	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>people come to see. The centre of Warwick (Jury/High and Swan streets) is all part of a designated AQMA where the Local Authority is obliged to take action to reduce levels of pollution.</p> <p>Save Warwick is aware of correspondence between English Heritage and Warwick District Council in the course of the Local Plan consultation in response to planning applications on land adjoining Gallows Hill and Banbury Road where concerns have been raised about the impacts of development on Warwick Castle, Castle Park, the conservation area and the Listed Buildings located there. A copy of key extracts of the aforementioned letter is attached to the original Save Warwick response. As a consequence Warwick District Council has deleted Strawberry Fields and another area south of Gallows Hill from its intended allocations and this is welcomed by Save Warwick.</p> <p>The plan still does not address the issues faced by the historic buildings and core of Warwick Town centre by the extra traffic to be generated by all the other developments proposed south of Warwick.</p> <p>To conclude / summarise</p> <p>The Plan does not conform to the requirements of the NPPF and the Planning Practice Guidance and neglects to protect our conservation areas, historic buildings and their settings from the harmful consequences of the proposed plan.</p>		
66550 - Friends of the Earth (John Brightley) [1113]	Support	<p>We support these proposals.</p> <p><i>Not required</i></p>	Not required	Not required
66415 - Warwickshire Gardens Trust (Christine Hodgetts) [6580] 66560 - Friends of the Earth (John Brightley) [1113]	Support	<p>We support these proposals.</p> <p>We also suggest that some of the supporting paragraphs in this section could be omitted or transferred to supplementary planning guidance as much of the information is already available elsewhere.</p> <p>The lists of conservation areas and listed gardens could be omitted as the information is available elsewhere and the lists may become out of date during the lifetime of the plan.</p>	There would seem to be no harm in retaining these. Important to keep the working list updated as with national records however	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>HE1 Protection of Statutory Heritage Assets</i>				
66411 - The Warwick Society (James Mackay) [3080]	Object	We suggest the wording of HE1 could be simplified and reduced as it duplicates existing listed building legislation.  <i>The modification necessary to make the Plan sound in respect of the Heritage Environment is for a full assessment to be made of its impacts.</i>	Agree that the wording does not necessarily reflect that specifically used in the NPPF and therefore the policy wording will be changed in line with the suggestion from EH	Refer to changes made under English Heritage representation

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66187 - Hallam Land Management and William Davis [8278]	Object	<p>In general terms, many of the policies dealing with the Historic Environment are worded negatively and restrictively and so conflict with the NPPF, exceeding even the statutory provision.</p> <p>It is particularly the case, in our client's view that Policy HE1 must be extensively revised to ensure compliance with the NPPF and its practical application more generally.</p> <p>In its present form, Policy HE1 does not include the concept of "proportionality" which is essential to delivery of sustainable development which underpins several topic areas of the NPPF. Our clients therefore consider the policy to be unsound and recommend it is redrafted.</p> <p><i>We consider that the policy should be redrafted as follows:</i></p> <p><i>Proposals to alter listed buildings will be assessed in relation to the impact on its cultural significance as variously defined and in proportion to its interest and the degree of change proposed, or setting.</i></p> <p><i>Likewise development in the setting of a listed building will be considered in light of its impact on the asset's significance.</i></p> <p><i>The Council encourages the continuation of the original use of a listed building, unless it can be demonstrated that a proposed new use does not cause material harm to the significance of an asset or unless the original use does not support the asset's long term conservation.</i></p> <p><i>In determining such applications, the Council will consider the impact of any new use on the physical characteristics of the building and on its character, including public access where this contributes to significance.</i></p> <p><i>The Council will encourage the use of traditional materials and techniques in works of alteration/extension to/of listed buildings as appropriate to the nature of the proposals.</i></p>	<p>Policy HE1 has been revised in line with advice from English Heritage and entirely in line with paragraphs 133 and 134 of the NPPF, giving the proportionality suggested therein.</p> <p>Reference to the cultural significance of Listed Buildings is not NPPF compliant so should not be specifically referred to.</p> <p>Changes of use have already been referred to in policy HE1</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66079 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>English Heritage welcomes the inclusion of the Historic Environment Section and the components of a positive strategy for the conservation of the historic environment. However to accord with the provisions of the NPPF the following modifications are recommended.</p> <p>It is unclear why the term Statutory Heritage Asset is used as the policy clearly only relates to listed buildings.</p> <p><i>Rename Policy, Listed Buildings.</i></p>	Agree that the policy refers only to Listed Buildings and therefore accept the suggested change	Rename policy title as 'Listed Buildings'
66562 - Friends of the Earth (John Brightley) [1113]	Object	We suggest the wording of HE1 could be simplified and reduced as it duplicates existing listed building legislation.	Agree that the wording does not necessarily reflect that specifically used in the NPPF and therefore the policy wording will be changed in line with that suggested by EH	<p>Revise the first sentence of the policy HE1 with the following: 'Development will not be permitted if it would result in substantial harm to the historic structure, character, principal components and setting of Listed Buildings included in the English Heritage Register. Development that would cause less than substantial harm to the character, principal components and setting of Listed Buildings in the English Heritage Register should be weighed against the public benefits of the proposal, including securing optimum value use. Development will be strongly resisted if it would cause substantial harm to the historic structure, character, principal components and setting of locally important buildings included in the Warwick District Local List. Development that would cause less than substantial harm to the character, principal components and setting of locally important buildings should be weighed against the public benefits of the proposal, including securing optimum viable use.'</p>
65558 - Keith Wellsted [8636]	Support	<p>Good idea</p> <p><i>None</i></p>	Not required	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>HE2 Protection of Conservation Areas</i>				
66403 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Object	<p>We are pleased to see the reference in HE2 to the protection of the setting of conservation areas and the protection of views in and out of it. The housing proposals which will bring increased traffic into the conservation area and will impinge on the views from Banbury Road do not sit well with this policy Para 5.157 relates to the use of Article 4 directions to maintain areas of high quality townscape. We, of course, support the policy, but would wish the wording to be improved. There is an Article 4 direction on Warwick Castle Park, which could not be considered townscape. We would not wish it to be subject to challenge because of poor wording.</p> <p><i>wish the wording to be improved</i></p>	<p>The Article 4 direction relating to Warwick Castle Park is not relevant in this context since it relates predominantly to the erection of fencing and was invoked to resist the extension of residential gardens into the Park</p> <p>For response to traffic comments please see reply to representations in relevant chapter</p>	Not required
65390 - Mr Nigel Hamilton [1656]	Object	<p>This should include guidance and reference to English Heritages Report "SEEING THE HISTORY IN THE VIEW" 2011, in protecting their setting.</p> <p>Development in conservation areas should be subject to sequential test that there are not alternative sites outside the Conservation area more suitable for development ?</p> <p><i>This should include guidance and reference to English Heritages Report "SEEING THE HISTORY IN THE VIEW" 2011</i></p>	<p>There are several references to the views into and out of the historic environment in the policies and reasoned justification. The English Heritage Report 'Seeing the History in the View' is currently under review since it was published in 2011 and is therefore pre NPPF and needs updating. However, the general principles remain the same and the case studies could be relevant therefore it could be included in the referencing.</p> <p>There is no sequential test for Conservation Areas. An application would have to be dealt with on its merits and refused if the impact was unacceptable whether or not there is an alternative site. To add this to the policy would not be in compliance with the NPPF.</p>	Add reference to 'Seeing the History in View', English Heritage, 2011

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66189 - Hallam Land Management and William Davis [8278]	Object	<p>This policy is inconsistent with many of the principles set out in the NPPF. In seeking to protect unlisted buildings in a Conservation Area, the draft policy blurs the statutory distinction between listed and unlisted structures. In respect of this matter, the policy exceeds the Framework advice in para.138 and gives rise to major inconsistencies.</p> <p>Other parts of the policy operate a draconian presumption against many forms of development, leaving no room for the reasonable and flexible application of policy to deal with a range of circumstances.</p> <p>The policy in our client's view requires extensive redrafting and simplification.</p> <p>The final part of the policy is not clear since it appears as a statement of intent by the Council. Whereas the rest of the policy sets out measures to control development.</p> <p>In our client's view the policy, in its current wording is neither</p> <p><i>We consider that Policy HE2 should be redrafted as follows:</i></p> <p><i>'Development in the setting of Conservation Areas will be expected to preserve their significance.</i></p> <p><i>In determining applications for the change of use for listed buildings , the Council will have regard to the impact of such as use on the significance of the building taking into account the desirability of maintaining listed buildings in active use.</i></p> <p><i>Unsympathetic alterations to or extensions of listed buildings will be discouraged, subject to the desirability of maintaining the building's original use or achieving its optimum viable use.</i></p> <p><i>Consent for total demolition of unlisted buildings will only be granted where the design of the replacemnt either preserves or, where possible, enhances, the character or appearance of the Conservation Area.</i></p> <p><i>New developemnt within Conservation Areas should make a positive contribution to the local character and distinctiveness of the Conservation Area.</i></p>	<p>Agree that it does no harm to add the word 'significance' to the policy.</p> <p>Change of use of Listed Buildings is included in policy HE1.</p> <p>Substantial and less than substantial harm in policy HE1 covers unsympathetic alterations and/or extensions to Listed Buildings.</p> <p>Demolition of unlisted buildings is also covered by policy HE1</p> <p>New development within Conservation Areas has also been addressed in policy HE2</p>	<p>Include 'significance' of the Conservation Area in the policy</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66080 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>English Heritage welcomes the inclusion of the Historic Environment Section and the components of a positive strategy for the conservation of the historic environment. However to accord with the provisions of the NPPF the following modifications are recommended.</p> <p>The components of this policy should be set within an overriding policy statement as some of the policy expectations appear rather exclusive.</p> <p>Again, the title of the policy is perhaps misleading as the Policy is about managing change within conservation areas involving protecting and enhancing.</p> <p><i>At the start of the policy consider including the following Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.</i></p> <p><i>Rename Policy, Conservation Areas.</i></p>	<p>Agree to replace the first sentence of this policy with wording suggested</p> <p>'Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.'</p> <p>Agree to rename the policy 'Conservation Areas'</p>	<p>Rename policy HE2 'Conservation Areas'.</p> <p>Replace the first sentence of the policy with the following:</p> <p>'Development within or which would affect the setting and significance of a Conservation Area will be expected to preserve or, where appropriate, enhance those elements, including views both in and out, which contribute to their special character or appearance.'</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66126 - Methodist Homes (Mr Karl Hallows) [12856]	Object	<p>The wording of Policy HE2 states that there is a presumption in favour of retaining any unlisted building within a conservation unless any replacement building can demonstrate that it will preserve and enhance the conservation area. It further states that the demolition of unlisted buildings will only be granted where any replacement will preserve and enhance the Conservation Area. It finally states that any new development within a Conservation Area shall make a positive contribution to the local character and distinctiveness.</p> <p>These requirements conflict with the national guidance on the basis that the tests are greater than those set out within national planning guidance. It is on this basis that we consider the present wording of the draft policy is unsound in that it is not consistent with national policy.</p> <p><i>In order to address the soundness concerns we would propose that the wording of draft policy HE2 is revised to the following :-</i>  <i>HE2 Protection of Conservation Areas</i>  <i>Development will be expected to respect the setting of Conservation Areas and important views both in and out of them.</i>  <i>Applications for changes of use which cannot be achieved without unsympathetic alterations will not be permitted.</i>  <i>Alterations or extensions to unlisted buildings which will adversely affect the character, appearance or setting of a Conservation Area will not be permitted.</i>  <i>There will be a presumption in favour of the retention of unlisted buildings that make a positive contribution to the character and or appearance of a Conservation Area.</i>  <i>Consent for total demolition of unlisted buildings will only be granted where the detailed design of the replacement can demonstrate that it will preserve and or enhance the Conservation Area.</i>  <i>New development within Conservation Areas should make a positive contribution to the local character and or distinctiveness of the Conservation Area.</i>  <i>Measures will be taken to restore or bring back into use areas that presently make a negative contribution to Conservation Areas.</i>  <i>We consider that the proposed changes to the wording of the draft policy, whilst of a very minor nature and without affecting the general approach of the policy, will ensure that this is compliant with the national tests for considering development within or affecting Conservation Areas. Without the proposed revisions we consider that the policy remains unsound and would provide uncertainty when determining applications due to the conflict between local and national policy.</i></p>	<p>Most of the suggested changes have been incorporated into the policy by including the comments of English Heritage.</p> <p>Measures to restore or bring back into use areas that presently make a negative contribution to Conservation Areas is not compliant with NPPF (paragraphs 128, 129) and therefore cannot be included</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>
66679 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	The Council recognises the importance of incorporating the impact of climate change and sustainable energy use within all new development in the District. Of equal importance however is the co-existence of new energy conservation and efficiency technologies with the requirements relating to Listed Buildings and Conservation Areas. It is hoped that these sometimes conflicting objectives can be harmonised within a policy which encourages use of energy conservation measures by those living within houses of architectural significance.	Reference is made to a low carbon future in a changing climate and supports the use of renewable energy in paragraph 5.152. The inclusion of such technologies is very much on an individual basis and cannot be generalised into a policy.	Not required
65559 - Keith Wellsted [8636]	Support	Good idea	Noted	
<i>HE4 Protecting Historic Parks and Gardens</i>				
67154 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	We note that the Great Mere of Kenilworth Castle, a nationally Listed II* Historic Park and Garden is not identified on the relevant Policies Maps 1 and 5 although Policy HE4 clearly states that such areas are defined on the Policies map. We have not checked to see whether this serious omission is repeated for any other locations	The Registered and Locally Listed Parks and Gardens will not be shown on the policies maps as these are likely to change more frequently than the life of the Plan. In addition, there is so much information already on the policies maps, that this would just cause confusion. Maps available elsewhere do show both nationally registered and locally listed parks and gardens, so there is no need to include this information here.	Reference to the Registered Parks and Gardens being shown on the policies map will be removed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66190 - Hallam Land Management and William Davis [8278]	Object	<p>This policy lists a range of attributes for consideration, these can only ever be partial and so this will lead to uncertainty in the application of the policy.</p> <p>Ultimately the policy seeks to conserve 'significance' which may or may not be expressed in any of the physical characteristics or associations of a site.</p> <p>The NPPF makes clear and is supported in the National Planning Practice Guidance, that setting is not an asset.</p> <p>The policy also exceeds the intention of both statute and paragraph 133 of the Framework in offering a blanket ban on development causing substantial harm. As worded the policy introduces potential conflict and uncertainty in its practical application.</p> <p>Finally, it is considered that the use of the verb 'should' in the second part of the policy is unclear.</p> <p>The policy as worded does not accord with the advice in the NPPF and is therefore unsound. It should be reworded.</p> <p><i>Policy HE4 should be redrafted as follows:</i></p> <p><i>'Development will not normally be permitted if it would result in substantial harm to the significance of Parks and Gardens of Special Historic Interest included in the English Heritage Register, as defined on the Policies Map. Changes in the setting of Registered Parks will be assessed in relation to their impact on their particular significance. Development that would cause less than substantial harm to the significance of these assets either directly or in their setting, will be considered weighed against the public benefits of the proposal, including securing optimum viable use.'</i></p>	<p>The suggestions of English Heritage have now been incorporated into this policy as this would seem to offer the best response to suggestions from other respondents to the policy wording and sentiment. No reference will be made to the policies maps as these will not show the locations of Registered Parks and Gardens.</p>	<p>Remove reference to the locations of Registered Parks and Gardens being shown on the policies map</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66081 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>English Heritage welcomes the inclusion of the Historic Environment Section and the components of a positive strategy for the conservation of the historic environment. However to accord with the provisions of the NPPF the following modifications are recommended.</p> <p>This policy paraphrases NPPF paragraph 132+, setting out how the degrees of harm to significance should be considered. As these are generic national policy criteria for all designated heritage assets it might be argued that all the Warwick Local Plan's HE policies should also refer to such a statement.</p> <p>Alternatively the local authority might consider including the following paragraph in the introductory text of the Historic Environment Policy section, and a revised Policy HE4.</p>	<p>Agree to rename the policy HE4 'Historic Parks and Gardens'</p> <p>Agree to include introductory statement as suggested to the explanation following the policy thus: 'Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.'</p> <p>Agree to add the suggested sentence to the beginning of policy HE4 thus: 'Development will be expected to conserve the design, character, appearance, structure, principal components and setting of the Districts historic parks and gardens on the national and local registers'. Omitting however reference to 'as defined on the Policies Map' as these will not be recorded on such maps.</p>	<p>Rename the policy HE4 'Historic Parks and Gardens'</p> <p>Add the following at the start of the policy: 'Development will be expected to conserve the design, character, appearance, structure, principal components and setting of the Districts historic parks and gardens on the national and local registers.' Add the following at 5.163 under 'Explanation' under policy HE4: 'Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against the public benefit of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.'</p> <p>Add the suggested sentence to the beginning of policy HE4 thus: 'Development will be expected to conserve the design, character, appearance, structure, principal components and setting of the Districts historic parks and gardens on the national and local registers'. Omitting however reference to 'as defined on the Policies Map' as these will not be recorded on such maps.</p>
		<p><i>The following additional text is suggested for the introductory part of the historic environment section.</i></p> <p><i>Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has</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>
		<p><i>been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</i></p> <p><i>HE4 Historic Parks and Gardens.</i></p> <p><i>Development will be expected to conserve the design, character, appearance, structure, principal components and setting of the Districts historic parks and gardens on the national and local registers as defined on the Policies Map.</i></p>		
65534 - Sharba Homes Group [12779]	Object	<p>The garden at Barford House does not represent a logical local list entry as it does not conform to either the currently surviving asset or its former extent.</p> <p>With regard to the surviving asset, which would be the logical extent of the Local List entry, this would encompass the current landholding of Barford House, comprising its immediate extant gardens and grounds. The short-lived parkland-like character that the land to the north and north-east of Barford House had has now been entirely lost. The areas to the east and north of the house, never had a parkland character and are devoid of features and remains worthy of inclusion.</p> <p>If the list entry were to be based on the former extent of the estate, on that basis, it should logically also include land to the west of Wellesbourne Road. there are also other illogical omissions from the proposed boundary.</p> <p><i>It is submitted that either only the current Barford House landholding where extant garden feature survive in included in the Local List entry, or alternatively the entry encompasses the area of "former garden and parkland" covering the entire extent of the area of the estate that exhibited a brief parkland-like character and/or garden usage. It is entirely illogical and unsound to draw the line around a part of the former estate, which in itself is only part of the former extent of the parkland-like area.</i></p>	<p>Strictly speaking this representation relates to a planning application and subsequent appeal. A view was reached on the content of this representation as part of the consultation on the planning application and subsequent appeal and reference should be made to this.</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>
66404 - Warwickshire Gardens Trust (Christine Hodgetts) [6580]	Support	We support this policy. The policy states that the designated parks and gardens are defined on the policies maps. They are not, but it is important that they should be. We would suggest that locally listed parks and gardens should also be defined on the policies maps. We are aware that the boundaries are currently the subject of consultation, but this should be complete before the plan is adopted.	The Registered and Locally Listed Parks and Gardens will not be shown on the policies maps as these are likely to change more frequently than the life of the Plan. In addition, there is so much information already on the policies maps, that this would just cause confusion. Maps available elsewhere do show both nationally registered and locally listed parks and gardens, so there is no need to include this information here.	Remove reference to the Registered Parks and Gardens being shown on the policies map as these will not be included
65560 - Keith Wellsted [8636]	Support	Good idea  <i>Not required</i>	Not required	
<i>HE5 Locally Listed Historic Assets</i>				
66191 - Hallam Land Management and William Davis [8278]	Object	Hallam Land Management and William Davis Limited consider that the wording of this policy is inconsistent with the principles set out in Chapter 12 of the NPPF.  In seeking to protect unlisted buildings, the policy blurs the statutory distinction between listed and unlisted structures. The policy therefore exceeds the advice in paragraph 135 of the NPPF and results in major inconsistencies with it.  Other parts of the policy operate a draconian presumption against the demolition or loss of significance of a non-designated heritage asset.  <i>The policy as worded does not accord with the Framework and so should be amended to read as follows:</i>  <i>"Development that will lead to the demolition or loss of significance of a locally listed historic asset will be assessed in relation to the scale of harm or loss and the significance of the asset."</i>  <i>"The Council will support change to locally listed historic assets using traditional detailing and using traditional methods."</i>	Agree to replace the first sentence of the policy with the suggested sentence to accord with national policy. The suggestion for the second part of the policy does not add anything to the existing wording and therefore will remain as written	Replace the first sentence of policy HE5 with the following: 'Development that will lead to the demolition or loss of significance of a locally listed historic asset will be assessed in relation to the scale of harm or loss of the significance of the asset.'
65561 - Keith Wellsted [8636]	Support	Good idea  <i>Not required</i>	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>HE6 Archaeology</i>				
66497 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>The primary source of information for the historic environment, the Warwickshire Historic Environment Record (HER) , was not consulted. Consultation of the HER would have demonstrated that there are several known heritage assets of as yet unknown significance within several of the proposed strategic sites. In addition, as noted in our previous consultation responses during the development of this local plan, there will also be archaeological sites as yet undiscovered which will not be recorded on the HER, and even in areas where no archaeology has been recorded, evaluation may be required to confirm the presence/absence of remains. Consultation on a site by site basis will remain the best means of identifying archaeologically sensitive areas on the basis of current knowledge, as well as areas where archaeological potential will need to be assessed through more detailed work.</p> <p>Since the individual allocations will need to take account of the impact upon historic environment we recommend that further work (in the form of a historic environment assessment) be undertaken to identify the issues in respect of the historic environment.</p> <p>Whilst we are concerned in principle to the selection criteria, since they do not allow for a proper consideration of Historic Environment, we do not object in principle to the majority of sites selected providing that proper appraisal is undertaken and allowance made where necessary for preservation of sites of national importance (in the sense of the 1979 Ancient Monuments and Archaeological Areas Act and the National Planning Policy Framework).</p> <p><i>Since the individual allocations will need to take account of the impact upon historic environment we recommend that further work (in the form of a historic environment assessment) be undertaken to identify the issues in respect of the historic environment</i></p>	<p>It is the intention of the Council to carry out such historic environment assessments as are required for sites where there is an indication that this should be done.</p> <p>Applicants should be advised to make reference to the Historic Environment Record (HER) and this will be added to the 'Explanation' following policy HE6</p>	<p>Add the following to the end of paragraph 5.172: 'Applicants for planning permission within the strategic sites will be expected to consult the Warwickshire Historic Environment Record (HER) to determine whether there are known heritage assets of as yet unknown significance within their proposed site. Additionally there may be archaeological sites as yet undiscovered which will not be recorded on the HER and even in areas where no archaeology has been recorded, evaluation may be required to confirm the presence/absence of remains.'</p>
65562 - Keith Wellsted [8636]	Support	<p>Good idea</p> <p><i>Not required</i></p>	Not required	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>Natural Environment</i>				
66685 - Save Warwick (MR DAVID WILLIAMS) [4506] 66847 - Patricia Hollis [6286] 66904 - Colin Sharp [1913] 66912 - Ms Alison Cox [588] 66920 - Alison Kelly [9014] 66928 - Andrew Cliffe [6235] 66936 - Angelo Cugini [12883] 66944 - Barbara Groves [8940] 66952 - Professor Bob Ireland [7882] 66960 - Christopher Paden [8844] 66968 - Elizabeth Cliffe [6234] 66976 - Mrs Kay Cugini [1743] 66984 - Mr David Ramsbottom [2030] 66992 - Mr David Drinkhall [12839] 67000 - Ian Frost [2024] 67008 - Mr Geoff Reynolds [8107] 67016 - John Griffiths [8071] 67024 - Justin Richards [8806] 67032 - Louise Kalus [8998] 67040 - Paul Kalus [8995] 67048 - Mr Bernard Hollis [1810] 67056 - Mr R Komarasinha [6306] 67064 - Caroline Komarasinha [12793] 67072 - Matthew Drinkhall [8910] 67080 - Oliver Lane [8814] 67088 - Ms Helen Maclagan [12783] 67096 - Mr and Mrs J Pennington [600] 67104 - Mr Peter Lamb [3491] 67112 - Sarah Hunt [7309] 67120 - Mr Ben Orme [12882]	Object	The Plan would be seriously damaging to our environmental and heritage assets. The Plan gives insufficient attention to our heritage and is potentially damaging to it (in contravention to the provisions of the NPPF).	The plan has been prepared in accordance with the NPPF chiefly to achieve sustainable development. The natural environment policies in the plan provide robust and necessary framework to ensure the conservation and enhancement of habitat biodiversity.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66496 - Warwickshire County Council (Monica Fogarty) [12790]	Object	The council supports the references to biodiversity throughout the Local Plan and particularly supports the Natural Environment Policies NE1 to NE7. It is suggested that the policies would however be improved by the addition of the references set out below in 'changes to the plan'.	Support welcomed and suggested changes noted. The Warwickshire Biological Records Centre is important resource in assessing plans and proposals.	<p>Action (1)</p> <p>Under Para 1.38 add additional bullet point 'Warwickshire Biological Records Centre'</p> <p>Action (2)</p> <p>Amend para 1.16 to reflect upto number of sites at time of submission and refer to these are Local Wildlife Sites instead of Sites of Importance for Nature Conservation.</p>
		<p><i>The County Council suggests that that 'Warwickshire Biological Record Centre (WBRC)' is added to the Evidence list under 1.38 (possibly below the Habitat Biodiversity Audit bullet). This would support the inclusion that the WBRC should be consulted under paragraph 5.191.</i></p> <p><i>The County Council also suggests that with the wording "15 Sites for Nature Conservation" (paragraph 1.16) is reviewed at the time of submission as the number is more than 15 and that these sites are now reference to as Local Wildlife Sites, as you have done throughout the remainder of the Local Plan.</i></p>		
66563 - Friends of the Earth (John Brightley) [1113]	Support	Support	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>NE1 Green Infrastructure</i>				
66223 - NFU (Sarah Faulkner) [1119]	Object	<p>Farmers and landowners must be fully engaged with discussions on Green Infrastructure as they own and manage many of the districts key Green Infrastructure assets.</p> <p>Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride and it does them a disservice to not have this aspect of land management recognised by this document. Farmers who do not (for a variety of reasons) participate in agri-environment schemes also make valid contributions. The work of the Campaign for the Farmed Environment (<a href="http://www.cfeonline.org.uk">www.cfeonline.org.uk</a>) has shown that these farms use a range of voluntary techniques to enhance the options and that this management is funded by farm businesses.</p> <p><i>For many farmers environmental management is a core business activity but this is not acknowledged by the document.</i></p>	<p>Duly noted. The farming and agricultural sector plays a very important role in conserving the natural environment along with other bodies and organisations.</p> <p>The Local Nature Partnership is formed from a wide variety of sectors, including representatives from the farming community and the LNP is identified in policy NE1.</p>	<p>Add the following to the end of paragraph 5.181:</p> <p>The Council acknowledges that the successful management of the natural environment depends upon a range of sectors including farming and agriculture; voluntary and third sector organisations; private landowners and the public sector bodies.</p>
65564 - Keith Wellsted [8636]	Support	Support.	Duly 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>NE2 Protecting Designated Biodiversity and Geodiversity Assets</i>				
66428 - Woodland Trust (Mr Justin Milward) [132]	Object	<p>The caveat about the benefits of development clearly outweigh the nature conservation value removed in respect of ancient woodland, aged and veteran trees.</p> <p>Would like to see the policy or supporting text reference the Forestry commission's standing advice on ancient woodland'</p> <p>Would like to see the policy or supporting text commit to production of a trees and woodland SPD.</p>	<p>The policy as worded is compliant with bullet point 4, para. 118 of the NPPF.</p> <p>Recommendation regarding Forestry Commission and Natural England's standing advice noted.</p> <p>The Council recognises the importance of trees and woodland, however currently it does not wish to commit to the production of a trees and woodland SPD but does not consider that the policy as worded prevents guidance being prepared in future.</p>	<p>Add the following sentence to the end of para 5.188:</p> <p>Where development may have an impact upon ancient woodland or veteran trees. developers should refer to Natural England and the Forestry Commission's Standing Advice on Ancient Woodland and Veteran Trees and its associated Assessment Guide will be used where relevant.</p>
		<p><i>The caveat about the benefits of development clearly outweigh the nature conservation value removed in respect of ancient woodland, aged and veteran trees.</i></p> <p><i>Would like to see the policy or supporting text reference the Forestry commission's standing advice on ancient woodland'</i></p> <p><i>Would like to see the policy or supporting text commit to production of a trees and woodland SPD.</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>
65398 - Warwickshire Wildlife Trust (Richard Wheat) [3077]	Object	<p>Warwickshire Wildlife Trust is broadly supportive of policy NE2 but believes:</p> <p>1) The final paragraph of the policy needs clarifying</p> <p>2) The policy or supporting text needs to outline the status of pLWS and how they will be addressed as part of the ecological assessment.</p> <p>Recommendations are given.</p>	<p>Agree with recommended changes. Revising the final paragraph of the policy as suggested provides clarity as to what is required without substantially changing the meaning.</p> <p>Agree that the status of pLWS needs to be recognised, as it is in the existing adopted development plan.</p>	<p>Action 1) Delete the final paragraph of Policy NE2 and replace with the following:</p> <p>All proposals likely to impact on the above assets will be subject to an Ecological Assessment. The Ecological Assessment should include due consideration of the importance of the natural asset, the nature of the measures proposed (including plans for long term management) and the extent to which they avoid and reduce the impact of the development. Development affecting these sites will only be permitted where:</p> <p>i) the proposal is justified against the above criteria, and ii) where it can be demonstrated that the proposed mitigation or compensatory measures are equivalent to the value assigned to the site/asset in the ecological assessment.</p> <p>Action 2) Revise policy criterion c) to the following:</p> <p>c) Local Wildlife Sites and potential Local Wildlife Sites;</p> <p>Action 3) Add the following sentence to the end of para. 5.187:</p> <p>In addition, potential Local Wildlife Sites (pLWS) can be of equal importance as Local Wildlife Sites (LWS) and thus will be afforded the same status until such a time as they are assessed. Therefore any ecological assessment concerning either LWS or pLWS must be subject to the sub-regionally recognised Warwickshire, Coventry</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><i>Warwickshire Wildlife Trust is in principle supportive of policy NE2 but we recommend the following changes to clarify and strengthen its provisions:</i></p> <p><i>1) Reword the final paragraph of policy NE2 to clarify what it is seeking to achieve. Subject to our correct interpretation of the wording, we recommend the following:</i></p> <p><i>'All proposals likely to impact on the above sites will be subject to an Ecological Assessment. The Ecological Assessment should include due consideration of the importance of the natural asset, the nature of the measures proposed (including plans for long term management) and the extent to which they avoid and reduce the impact of the development. Development affecting these sites will only be permitted where 1) the proposal is justified against the above criteria and 2) where it can be demonstrated that the proposed mitigation or compensatory measures are equivalent to the value assigned to the site/asset in the ecological assessment.'</i></p> <p><i>2) Include a statement in the explanatory text for policy NE2 to outline the status of potential Local Wildlife Sites and detail the requirement for a Local Wildlife Site Criteria assessment as a part of any ecological assessment concerning pLWS.</i></p>		and Solihull Local Wildlife Site Criteria Assessment unless otherwise previously agreed.
65093 - Sport England (Mr Bob Sharples) [1355] 65565 - Keith Wellsted [8636]	Support	Support	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>NE3 Biodiversity</i>				
65863 - Warwickshire County Council Physical Assets Business Unit (Mr Steve Smith) [7542]	Object	Questions whether the Warwick District Habitat Assessment is sufficiently recent to reliably inform the preparation of the Local Plan, particularly given that the analysis for each site recommends that specific additional surveys will be required in the appropriate survey season. The Assessment was also undertaken between August and October, which was not the optimum time of year to carry out comprehensive ecological assessments. WDC has had almost 6 years to address this deficiency and provide more up-to-date evidence. The assessment does not assess all the preferred allocations included within the Publication Draft. The HRA (March 2014) make reference to 10,800 homes rather than 12,860.	<p>The Habitat Assessment was initially undertaken to inform the superseded Core Strategy process. An update to this assessment was prepared in 2012 to include two sites identified at the time as Preferred Options - Land at Blackdown and Land at Kenilworth Wardens. A separate assessment was undertaken for the village allocations, the Landscape Sensitivity, Ecology and Geology Study. Whilst the original Assessment was taken some time ago and not necessarily for each feature the most appropriate time of year to assess, it is still considered sufficiently sound basis on which to inform site allocations. Furthermore, the provisions of adopted and future biodiversity policy are such that detailed ecological appraisals are required during the planning application process which will address the need for further surveys.</p> <p>In addition to this, biodiversity has been considered through the Strategic Housing Land Availability Assessment.</p> <p>The HRA (May 2013) used the Local Plan Preferred Options as the basis of assessment, at this time 10,800 homes was the agreed level growth. It is not considered that the change to 12,860 homes will have any further impact on Natura 2000 sites over and above that identified in the HRA.</p>	None.
<p><i>WDC needs to ensure that the Habitat Assessment evidence base is robust, up-to-date and tests the current Local Plan proposals, incorporating surveys in the appropriate survey periods.</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>
65585 - Warwickshire Wildlife Trust (Richard Wheat) [3077]	Object	<p>Warwickshire Wildlife Trust recommends that the policy wording in NE3 is amended to require net gain for biodiversity in place of the current wording requiring no net loss.</p> <p><i>Warwickshire Wildlife Trust recommends the following changes to policy NE3 to ensure compliance with national policy:</i></p> <p><i>1) Amend the wording of Clause A to state - Development proposals will be expected to ensure that they:</i></p> <p><i>a) lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;</i></p>	<p>Agree with suggestion in part. It still considered important to refer to not net loss and aspire to net gains as stated in the NPPF paras. 9 &amp; 109.</p>	<p>Amend criterion a) of Policy NE3 as follows:</p> <p>a) lead to no net loss of biodiversity AND WHERE POSSIBLE A NET GAIN, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66017 - University of Warwick [222]	Object	<p>The requirement within this policy for new developments to protect or enhance biodiversity assets and avoid negative impacts on existing biodiversity is considered to be contrary to the NPPF which at para. 118 requires development to be refused only when "significant harm" to biodiversity cannot be avoided, mitigated or compensated. Opportunities to incorporate biodiversity in and around developments should be "encouraged" but avoidance of impacts is not a requirement of the NPPF. This policy is considered to be unsound because it is not consistent with national policy.</p> <p><i>Policy NE3 should be revised to: New development will be permitted provided that it incorporates biodiversity within and around the development where possible and does not result in significant harm to biodiversity. Development proposals will be expected to ensure that they: (a) Demonstrate the predicted impact on biodiversity by means of an approved ecological assessment of existing site features and development impacts to determine whether the proposed development will lead to significant harm; (b) protect or enhance biodiversity assets and secure their long term management and maintenance, where possible, including through mitigation or compensatory measures and; (c) avoid negative impacts on existing biodiversity which cannot be mitigated or compensated.</i></p>	<p>The policy as written is not contrary to the NPPF when taken as a whole, which wishes to see planning contributing to conserving and enhancing the natural environment as a core principle (para 17, bullet 7) and specifically aspires for net gains in biodiversity (para 109). Therefore the principle of conserving and enhancing the natural environment applies to all potential development and not only where there may be significant harm. Furthermore, it is considered that the definition of the term 'significant harm' would apply differently to each proposal depending upon a range of factors, therefore an ecological assessment is the most appropriate way of understanding this.</p>	
66429 - Woodland Trust (Mr Justin Milward) [132]	Object	<p>Would like policy to specifically include a reference to EXPANDING biodiversity assets like native woodland. Tree planting can deliver a wide range of benefits and the Council has a statutory duty to protect trees and promote tree planting supported by national policy in the form of the NPPF. Would like to see the wide benefits of woodland creation covered by a dedicated Trees and Woodland SPD</p> <p>Would like to see similar commitment to policy CT5 in seeking green infrastructure like tree planting.</p> <p>Identifies a good example of a positive woodland local plan policy in the Solihull Local Plan.</p> <p><i>Amend sub para (g) to read 'protect or enhance AND EXPAND biodiversity assets such as native woodland...'</i></p>	<p>The Local Plan recognises the importance of trees and their expansion.</p> <p>The policies in the Natural Environment chapter already provide for further green infrastructure provision, it is not considered that an additional separate policy similar to CT5 is necessary.</p> <p>See response to SPD in relation to policy NE2.</p>	<p>Revised policy NE4 Landscape para. (g)</p> <p>...'where possible enhancing and/or EXPANDING these features'....</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65566 - Keith Wellsted [8636]	Support	Support	Support noted	
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<i>NE4 Landscape</i>				
65900 - Centaur Homes [9117]	Object	Centaur Homes object to part h of the policy. This part does not affect the general thrust of the policy, which is landscape character. Additionally the financial viability of an agricultural unit is not a planning matter.	It is considered that the maintenance of viable agricultural units is an important planning consideration in ensuring the ability of a landscape to be maintained. Where a development proposal might threaten the ability of surrounding land impacted by development to be farmed it can further degrade the existing landscape as it may not be viable to be maintained through commercial agricultural practices.	None
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<i>Part h of the policy should be omitted.</i>				
66304 - Mr H E Johnson [12846]	Object	We support the Council's protection of areas of important landscape character and value. However, we object to the apparent requirement in this policy that all development should 'positively contribute to landscape character'. This is not justified or effective and is therefore not sound. There will be occasions where it will not be appropriate or desirable for development proposals to positively contribute to landscape character. In some instances there will be other over-riding material considerations that will take precedence: for example regeneration. The policy should be worded with more flexibility to reflect this in order for it to be sound.	As stated in the explanation to NE4 at para. 5.192 the aim of this policy is to ensure that significant landscape features are protected from and that landscape design is a key consideration in the design of all new development. This policy does not prevent other material considerations from being considered.	
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66565 - Friends of the Earth (John Brightley) [1113]	Object	We suggest that policy NE4 should also say 'new development will not be permitted where it harms landscape character'. In paragraph 5.192 'appropriate cases' needs to be defined.	It is considered that policy criterion f) places sufficient emphasis on avoiding detrimental effects (harm ) on the landscape.  The criteria in policy NE4 help determine whether the submission of evidence is appropriate, which should be on a case by case basis.	
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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>
65971 - Sworders (Angus Hudson) [12808]	Object	This policy proposes that development will only be permitted where it positively contributes to landscape character; the NPPF contains no such requirement. The NPPF is clear that great weight should be placed on conserving landscape and scenic beauty in designated areas (such as National Parks and areas of Outstanding Natural Beauty) and that development should be located in areas of lesser environmental value. Blanket protection on all landscape via the Local Plan would frustrate the delivery of sustainable development to meet the District's needs.	The NPPF states that the planning systems should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes (Para 109). The lack of a designation does not mean a landscape cannot be valued.  The policy as written does not propose blanket protection.	
65488 - The National Trust (Mr Chris Lambart) [591]	Support	We welcome this policy as a whole and in particular the inclusion of the identification of local areas of tranquillity.	Support noted.	
65567 - Keith Wellsted [8636]	Support	Essential given the scale of your housing plans. I doubt you'll enforce them!	Support noted. The Council will continue to apply all development plan policies.	

### *NE5 Protection of Natural Resources*

66566 - Friends of the Earth (John Brightley) [1113]	Object	In policy NE5 it should be highlighted that light pollution is a potentially serious problem which can have effects on wildlife and ecology.  We are particularly grateful that proposed policy NE5 (d) (Agricultural Land), plus the explanatory paragraph 5.198, is included.  <i>However we suggest the wording of paragraph 5.198 does need refinement . We suggest that the words 'Development affecting the best and most versatile agricultural land will be permitted providing that there is an overriding demonstrable need...' should be replaced by 'Development affecting the best and most versatile agricultural land will NOT be permitted unless it is proved that there is an overriding demonstrable need...'</i>	Agree point in relation to light pollution and the effects on wildlife and ecology. Paragraphs 5.195 and 5.196 note this.  Agree point in relation to suggested change. Generally, and where possible, policies in this plan are worded positively, however in this instance it would be clearer worded as suggested.	Amend 4th sentence of paragraph 5.198 to read:  Development affecting the best and most versatile agricultural land will not be permitted unless there is an overriding demonstrable need for the development and it can be shown that development of lower grade land would have adverse sustainability impacts, such as on biodiversity, natural resources, landscape character, conservation of heritage assets or in an unsustainable location.
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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>
64536 - Mr Richard Thwaites [11460]	Object	<p>Development proposals should avoid the best and most versatile agricultural land.</p> <p>The preferred option for development within Hampton Magna, and all other sites except one, is 100% agricultural land and should therefore be protected.</p> <p>The Maple Lodge site is 75% equine 25% previously developed brownfield land</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna.</i></p>	<p>The NPPF requires Local Plans to meet objectively assessed needs unless the adverse impacts of doing so demonstrably outweigh the benefits. It is not possible to meet the District's needs solely on previously development land, therefore a proportion of greenfield land is required. Furthermore it is not considered that the adverse impact of allocating agricultural land demonstrably outweighs the benefits when assessed against the NPPF as a whole.</p> <p>Where possible allocation have sought to avoid the best and most versatile land, however, agricultural land quality is only one factor of many taken into consideration when determining the most sustainable development options.</p>	None required.
66779 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>This policy waters down NPPF para 112 as it does not take in to account the economic and other benefits of agricultural land nor does it require it to be demonstrated that it is necessary and seek to use poorer quality land in preference to it. Para 5.198 alters the sense of the NPPF with a less stringent condition requiring any lower grade land to be excused if it has adverse sustainability impacts such as ..... sustainable patterns of development. This could mean anything to a developer. It may well explain why NE5 conflicts with DS11 where the Local Plan includes a significant number of sites as a first call for the housing required, before brownfield and urban regeneration sites have been fully examined.</p>	<p>It is not considered that the policy needs to change in relation to the first sentence of para 112 of the NPPF. Policy NE5 will be implemented alongside paragraph 112 of the NPPF.</p> <p>Comments in relation to para. 5.198 noted and changes suggested for clarity.</p> <p>Agricultural land quality was considered alongside other environmental constraints in the site assessments for the Strategic Housing Land Availability Assessment and Sustainability Appraisal.</p>	<p>Amend 4th sentence of paragraph 5.198 to read:</p> <p>Development affecting the best and most versatile agricultural land will not be permitted unless there is an overriding demonstrable need for the development and it can be shown that development of lower grade land would have adverse sustainability impacts, such as on biodiversity, natural resources, landscape character, conservation of heritage assets or in an unsustainable location.</p>
65568 - Keith Wellsted [8636]	Support	Good idea.	Noted.	
65645 - The Coal Authority (Miss Rachael A. Bust) [1532]	Support	The Coal Authority supports criterion e) of this policy which addresses the prevention of the sterilisation of mineral resources which reflects paragraphs 143 and 144 of the NPPF.	Duly noted.	None 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>NE6 High Speed Rail 2 (HS2)</i>				
65498 - The National Trust (Mr Chris Lambart) [591]	Object	<p>Policy NE6 'High Speed Rail 2 (HS2)' could be strengthened to seek a 'net biodiversity gain' rather than just 'minimise the impact' in order to align with the Government's own aim to 'improve the quality and increase the value of the natural environment across England'. Again, there is no Green Belt reference, or policy seeking to minimise its potential impact on the Green Belt.</p> <p><i>Change the policy to:</i></p> <p><i>The Council will seek to minimise the impact of HS2 on the natural environment, businesses and residents of the District and will seek a net biodiversity gain through:</i></p> <p><i>i. Suitable mitigation, compensation and ecological improvements within the existing boundary of the limits of land to be acquired; and</i></p> <p><i>ii. Where appropriate in landscape and ecological terms, ensuring measures are also considered beyond the existing boundary in order to better assimilate the scheme into the local landscape and where required to provide replacement habitats and create linkages between these landscape and habitat elements to help achieve the Government's stated aim of creating more, bigger, better and joined spaces for nature.</i></p>	<p>Whilst the Council is generally supportive of ensuring that natural environment is protected in relation to HS2, it is considered that the suggested amendments can not be justified or effective in planning terms given the proposed legislative regime associated with HS2.</p>	
66351 - David Wilson Homes [11681]	Object	<p>We support this policy, however, as mentioned elsewhere, HS2 will have a significant impact on the settlements which the route passes through, specifically Burton Green where the route dissects the village north to south. The Council's preferred site lies to the south of the line and will be segregated from the majority of the village to the north of the route.</p> <p><i>In light of the negative impact the route will have on Burton Green we recommend that the Council re-appraises the site promoted for residential development in the village and identifies where the impacts of HS2 would be less severe.</i></p>	<p>The impact of HS2 does not jeopardise the delivery of the allocated site in Burton Green.</p>	<p>None required.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65485 - HIGH SPEED 2 LTD (Mr John Woodhouse) [12585]	Object	HS2 considers that the draft Local Plan policy relating to HS2 (Policy NE6) and supporting text (paragraphs 5.200 to 5.202) will not be effective or legally compliant. However, HS2 Ltd would welcome the opportunity to work with the Council to develop a policy which is meaningful and deliverable and accurately reflects the planning regime that is likely to be established by the High Speed Rail (London-West Midlands) Bill when enacted.	Suggested changes agreed.	<p>1) Revise Policy NE6 as follows:</p> <p>If the High Speed Rail (London-West Midlands) Bill is enacted, the Council, when considering requests for approval in respect of HS2 works under the special planning provisions established by the Act, will seek appropriate mitigation of any significant environmental effects of HS2 on the natural environment, businesses and residents of the District subject to the requirements of the Act.</p> <p>2) Revise Para 5.200 as follows:</p> <p>The safeguarded route in relation to the proposed High Speed 2 rail link ("HS2") is shown on the Policies Map. Over the duration of the Local Plan, the Department for Transport may make updates to the safeguarding directions for Hs2 in Warwick District details of which will be available on its website.</p> <p>3) Revise Para 5.201 as follows</p> <p>The powers to build and operate High Speed Two are being sought through the High Speed Rail (London - West Midlands) Bill. This Bill seeks deemed planning permission for the railway and associated works and hence the planning authority for HS2 is Parliament. Therefore matters of principle relating to the railway and the mitigation of the effects of construction and operation will be determined by Parliament.</p> <p>The HS2 Bill, when enacted, will establish a special planning regime for the approval of certain details</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p data-bbox="528 882 1173 951"><i>8. To achieve this and in the interests of creating a positive planning framework HS2 Ltd considers that Policy NE6 and its supporting text should either be deleted or amended.</i></p> <p data-bbox="528 983 1173 1051"><i>If the decision is taken to retain a High Speed Two Policy, it is suggested that the policy and supporting text is amended broadly in line with the wording provided below:</i></p> <p data-bbox="528 1083 636 1102"><i>Policy NE6</i></p> <p data-bbox="528 1134 1173 1278"><i>If the High Speed Rail (London-West Midlands) Bill is enacted, the Council, when considering requests for approval in respect of HS2 works under the special planning provisions established by the Act, will seek appropriate mitigation of any significant environmental effects of HS2 on the natural environment, businesses and residents of the District subject to the requirements of the Act.</i></p> <p data-bbox="528 1310 636 1329"><i>Para 5.200</i></p> <p data-bbox="528 1361 1173 1430"><i>The safeguarded route in relation to the proposed High Speed 2 rail link ("HS2") is shown on the Policies Map. Over the duration of the Local Plan, the Department for Transport may make updates to the</i></p>		<p data-bbox="1727 272 2065 663">including the design and external appearance of works including buildings and earthworks. Warwick District Council will be the determining authority for these approvals (subject to appeal) and the Warwick District LDF will be material to their determination insofar as it is material to the matter for approval and the grounds specified in the HS2 Bill for the consideration of that matter. The special planning regime put in place by the HS2 Bill is similar to those contained in the Crossrail Act and Channel Tunnel Rail Link Act.</p> <p data-bbox="1727 695 2065 815">When considering requests for approval under the special planning regime Warwick District will, within the provisions of the HS2 Act, seek appropriate mitigation.</p> <p data-bbox="1727 847 2033 866">4) Para 5.202 should be deleted.</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>safeguarding directions for Hs2 in Warwick District details of which will be available on its website.</p> <p>Para 5.201</p> <p>The powers to build and operate High Speed Two are being sought through the High Speed Rail (London - West Midlands) Bill. This Bill seeks deemed planning permission for the railway and associated works and hence the planning authority for HS2 is Parliament. Therefore matters of principle relating to the railway and the mitigation of the effects of construction and operation will be determined by Parliament.</p> <p>The HS2 Bill, when enacted, will establish a special planning regime for the approval of certain details including the design and external appearance of works including buildings and earthworks. Warwick District Council will be the determining authority for these approvals (subject to appeal) and the Warwick District LDF will be material to their determination insofar as it is material to the matter for approval and the grounds specified in the HS2 Bill for the consideration of that matter. The special planning regime put in place by the HS2 Bill is similar to those contained in the Crossrail Act and Channel Tunnel Rail Link Act.</p> <p>When considering requests for approval under the special planning regime Warwick District will, within the provisions of the HS2 Act, seek appropriate mitigation.</p> <p>Para 5.202 should be deleted.</p>		
65341 - Mr Peter Barclay [12714] 65569 - Keith Wellsted [8636]	Support	<p>I support the plan as drafted, as it avoids the HS2 route as planned. However I am concerned that the recent news in the press regarding Kings Hill may be re-considered as a possible development site for 5,000 homes within the new local plan. This type of development would be unsustainable as it is right in the path of the HS2 route, and a development of this size, combined with HS2 would create untold disruption in the area.</p>	<p>Support noted. However, for point of clarification. The Policies Map illustrates the route of HS2 as proposed. In addition, the Council is not allocating land at Kings Hill for development in this plan.</p>	None required
<i>NE7 Use of Waterways</i>				
65570 - Keith Wellsted [8636]	Support	Good idea	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66517 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	<p>welcome the inclusion of a policy relating to the canals within the District and the policy requirements reflect many of our principles.</p> <p>Any references within the document to us should read Canal &amp; River Trust (with an ampersand "&amp;" not the word "and").</p> <p>We note that the explanation requires the submission of information relating to discharges to the canal with a planning application. We would suggest that ideally a developer should agree with us if a discharge would be acceptable prior to submission of a formal planning application. Our discharge process is separate to our function as a statutory consultee and has timescales which do not necessarily align with the planning process. Planning permission should not be granted for a form of drainage which may not be implementable.</p> <p><i>We would suggest the following changes to the wording:- Detailed information will need to be submitted to the Canal and &amp; River Trust including calculations showing the relevant catchment areas, run off quantities, outfall size(s) and location(s) and the sizing of oil and silt traps that will be required for their assessment. This must be done prior to submitting when a planning application is submitted for development. Advice of the Environment Agency may also be required.</i></p>	Duly noted	<p>Para. 5.203:</p> <p>In second sentence replace: Canal and River Trust with Canal &amp; River Trust</p> <p>Amend penultimate sentence to state:</p> <p>This must be undertaken prior to the submission of a planning application for development.</p>
<hr/>				
<i>Neighbourhood Planning</i>				
66567 - Friends of the Earth (John Brightley) [1113]	Support	<p>We support these proposals.</p> <p><i>Not required</i></p>	Not required	Not required

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*NP1 Neighbourhood Plans*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64537 - Mr Richard Thwaites [11460]	Object	<p>FW1 Development in Areas at Risk of Flooding</p> <p>We suggest that the title of this policy is changed as it implies that development in areas of risk of flooding is appropriate, which is contrary to NPPF in which the aim of the Sequential Tests is to steer new development to areas with the lowest probability of flooding. We recommend that an alternative policy title such as „Reducing Flood Risk“ is used instead. Where there are no reasonable available sites in Flood Zone 1, the Sequential Test should be applied; taking into account the flood risk vulnerability of land use and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonable available sites in Flood Zones 1 and 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required. As soon as the need for the Exception test is established, a level 2 SFRA should be undertaken by a suitable qualified technical expert or engineer. We have the following comments on the criteria outlined for this policy in relation to each bullet point within the policy. a) The SFRA level 1 Flood Zone maps are based on our Flood Map (fluvial risk) and the Areas Susceptible to Surface Water Flooding, now known as the Updated Flood Map for Surface Water (surface water risk). Unless there are plans to continually update the SFRA mapping, we suggest that our online Flood Map (now known as "Flood Map for Planning") available on the .GOV.UK website is referred to as this is updated on a quarterly basis and should provide the most up to date information.</p> <p>b) this is essentially the Sequential test, and we would consider this criteria is re-worded to: 'the Sequential test is applied on the site so that the most vulnerable development is Cont/d.. 8 located in areas of lowest flood risk'.</p> <p>c ) We recommend that the term "flood defence" in this criterion is replaced with the following wording 'development is appropriately flood resistance and resilience' Because the term flood defence suggests formal flood walls etc which will prevent flooding in all circumstances, however even development behind flood defence structures can experience flooding through breach or overtopping. It is far more practicable to direct new development to flood zone 1 rather than in an area benefiting from existing flood defences. This should not be used to justify development in inappropriate locations.</p> <p>e) We request clarification as to how the term "regular flooding" defined, we feel that this should either be removed from the policy,</p>	Please see Flooding and Water Chapter and responses	Not required

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>or the wording changed to indicate a likely return period, paying due regard to the NPPF which has a presumption against all development within the functional floodplain unless it can be described as water compatible.</p> <p>g) We recommend that suggest this is re-worded to the following text:  'the development must be 'safe' over its lifetime, taking into account the effects of climate change. Safe pedestrian and emergency vehicle access routes above the 1:100 year plus climate change flood level must be available. Evacuation plans must be prepared for all new developments in flood risk areas'. We suggest that the paragraph "land that is required for current and future flood management will be safeguarded from development" is added as a continuation of the points (i) rather than a separate paragraph. We recommend that the paragraph "Where development is supported as an exception to this policy..." is removed, as there shouldn't be any exceptions to this policy and all criteria must be complied with. This wording is repeated in paragraph 5.130 and should be removed. This is contrary to the National Planning Policy Framework, and the Environment Agency must object in principal to inappropriate development within the floodplain.  We would object to this section policy at a formal review of this plan, and it's inclusion could render the policy as unsound. We recommend the addition of the following criteria to Policy FW1 as supported by the level 1 SFRA: 'j) the functional floodplain is protected from all built development.  k) space should specifically be set aside for Sustainable Drainage System (SuDS) and used to inform the overall site layout.  l) development proposals must provide a minimum 8m wide development buffer strip from watercourses (culverted or otherwise).  m) every opportunity should be taken to de-culvert and re-naturalisation of watercourses. Culverting of existing open watercourses will not be permitted.  Cont/d..  9  n) opportunities should be sought to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of SuDS.  o)for residential development, finished floor levels are set a minimum of 600mm above the 1% (1 in 100 year) plus climate change flood level.  p) developers will be required to contribute towards the cost of planned flood risk management schemes that will benefit the site.  q) opportunities should be sought to make space for water within the development to accommodate climate change.  r) Development proposals will demonstrate that will not cause</p>		

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>deterioration of the waterbodies WFD status and contribute to meeting good status.</p> <p>s) Carry out a WFD Assessment to demonstrate how the waterbody will not deteriorate in status and will be enhanced</p> <p>t) No detrimental impact on priority habitat or designated sites of nature conservation.' With regard to the FRA requirements, we suggest that point (a) is re-worded as</p> <p>'within Flood Zone 2 or 3 or proposals of 1 hectare or greater in Flood zone 1, as defined on the Environment Agency's Flood Map for Planning'</p> <p>The mapping in Warwick District Council's SFRA level 1 is based on our Flood Map. The SFRA report states that it is a "living" document and should be reviewed on a regular basis. Our Flood Map for Planning is updated on a quarterly basis to incorporate improved river models etc and this should be reflected in the SFRA document. However, if there are no plans to update the SFRA maps on a quarterly basis in line with our Flood Map updates, then we recommend that our Flood Map is considered the best available information or until such time as a level 2 SFRA is produced. We recommend that bullet points are used in this section so as to avoid confusion with the numbering system used in the criteria part of the policy. Paragraph 5.131Our "Flood Map for Planning" replaced the indicative flood zone maps and should be referred to in this paragraph. FW2 Sustainable Urban Drainage We recommend that the title of this policy is re-worded to 'Sustainable Drainage' as the sustainable drainage applies to both greenfield and brownfield sites. In the first paragraph "Sustainable Urban Drainage Systems (SUDS)" should be replaced with „Sustainable Drainage Systems (SuDS)" as they are now known.</p> <p>The retrofitting of SuDS onto existing drainage systems should be a requirement for developments where it is not possible to install an entirely new system. We recommend that the following text is added to point c):</p> <p>'ecological networks and informal recreation'</p> <p>We suggest that the middle paragraph of this policy is re-worded as follows to make it clearer on the surface water hierarchy and that surface water discharge should be limited to greenfield runoff rate for all points of discharge:</p> <p>Cont/d..</p> <p>10</p> <p>„Surface water runoff should be managed as close to its source as possible in line with the following drainage hierarchy: i. Discharge into the ground (infiltration) unless it is demonstrated by infiltration tests and groundwater levels that infiltration is not possible. ii. Discharge to a surface water body. iii. Discharge to a surface water sewer, highway drain or another drainage system. iv. Discharge to a</p>		

Representations	Nature Summary of Main Issue/Change to Plan	Council's Assessment	Action
67138 - Mr Ray Steele [5886]	<p>combined sewer. Above ground storage, such as balancing ponds, should be considered in preference to below ground attenuation, due to the water quality and biodiversity benefits they offer. For all sites, surface water discharge rate should be limited to the site-specific greenfield runoff rate for all return periods up to the 1% (1 in 100 year) plus climate change event' We recommend that the paragraph which includes the text "In exceptional circumstances, where a sustainable drainage system....c) contributions will be made to off-site SuDS schemes" is removed.</p> <p>This wording provides an unnecessary get out clause and could result in the delivery of unsustainable development, sustainable drainage systems take many different forms and there is no reason why a SuDS solution cannot be designed for every site.</p> <p>We welcome the policy requirement for developers undertake groundwater risk assessment to ensure that groundwater quality is protected a result of development proposals. Subsequently any proposal involving infiltration SuDS schemes should be accompanied by contaminated land investigations to endure that site condition is appropriate.</p> <p>For sites that are identified as significantly contaminated the Environment Agency would require input into any SuDS schemes proposed for new development to determine the most appropriate schemes. This would be to safeguard groundwater quality.</p> <p><i>The Maple Lodge site should be the preferred option for development within Hampton Magna.</i></p> <p>Object</p> <p>Neighbourhood Plans are the lowest priority of WDC. In fact they have ensured that we will not be able to achieve our objectives with all land allocated for housing. Whitnash NP is running behind the Local Plan largely due to WDC not informing Whitnash Parish Council in good time. Despite this the steering committee members have made representations to WDC indicating that Green Field open space within the current boundary of Whitnash be set aside for leisure and cultural use of Whitnash and its neighbouring communities of Radford Semele, South Leamington, Warwick and Bishops Tachbrook.</p> <p>Although Whitnash NP is in process and WDC have ben made aware of its aims they will not cooperate in attempts to stop building on identified land that is included in the NP. In addition they have forced through a boundary change that removes more identified land. This has been allocated to Leamington for more houses. It effectively negates anything that the steering committee has in their plans that are taking place</p>	<p>Guidance issued by DCLG in relation to Neighbourhood Planning states 'they must be in line with other laws, if the local planning authority says that an area needs to grow, then communities cannot use neighbourhood planning to block the building of new homes and businesses'. The Government's agenda for economic growth focuses firmly on the development of new homes and economic opportunity and it is clear that those principles must take priority. The Local Plan has therefore been prepared with that agenda in mind. Neighbourhood Plans should be in conformity with the Local Plan and as clearly stated, not seek to prevent growth.</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>
65571 - Keith Wellsted [8636]	Support	Take Neighbourhood Plans into consideration when giving planning permission!!	Provided that Neighbourhood Plans are in conformity with the Local Plan and have been formally adopted following the set procedure, they will be taken into account when planning applications are assessed and decided	Not required
<i>NP2 Community-led Planning</i>				
65573 - Keith Wellsted [8636]	Support	Thank you  <i>Not required</i>	Not required	Not required
<i>Waste</i>				
66568 - Friends of the Earth (John Brightley) [1113]	Support	We support these proposals.  <i>Not required</i>	Not required	Not required
<i>W2 New Waste Disposal Facilities</i>				
66569 - Friends of the Earth (John Brightley) [1113]	Object	Paragraph 5.212 is confusing - the sentence 'As small scale waste sites are to be directed to settlements within 5km of Coventry, it is not envisaged that any new facilities will be located within the plan period in Warwick District' needs explanation. Is a waste site is planned or not ? If so, why should it be within 5km of Coventry?	The policy clearly states that it is not envisaged that a new facility will be required during the plan period. Beyond this, there may be a need, but this is neither known nor relevant to this plan. The 5km distance from Coventry is stated in the Warwickshire Waste Local Plan (2013) and as the strategic document for the whole county, the Warwick Local Plan should be in conformity with it.	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>
<b>6. Delivery and Monitoring</b>				
<i>DM1 Infrastructure Contributions</i>				
66720 - Baginton Parish Council (Mr Steve Williams) [726]	Object	BPC are opposed to the proposal not to provide a levy on industrial warehousing and believes developments such as the Gateway should not be exempt should it proceed. There needs to be a consistent levy across the board to reflect the impact on communities. This policy is therefore unsound.	The Viability demonstrates that charging a levy on employment uses is likely to undermine viability and charging for these cannot therefore be justified	
66390 - Mr John Fletcher [8466]	Object	Does not take into account education Unease about increase in air pollution levels inherent in plan Unacceptable strains on health service at all levels Increase in traffic from south of Warwick and Leamington through town centres. WCC traffic management plans increase congestion in and around towns	Where CIL compliant, the Infrastructure contributions will need to address education, health and transport	
65132 - Mr Tony Robinson [12687]	Object	The infrastructure contributions have been shown to be inadequate leaving at least a £50million shortfall for the people of Warwick to pay.  <i>The infrastructure contributions should be set to provide a zero cost to the people of Warwick - this will have an effect on how much the County Council and Local Charities will receive for the land, and compulsory purchase should be considered</i>	It is not possible to require infrastructure contributions that will threaten the viability of development. The levels being considered for CIL are likely to deliver significant contributions and the infrastructure delivered through this will be prioritised through an agreed Regulation 123 list.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66844 - Patricia Hollis [6286] 66907 - Colin Sharp [1913] 66915 - Ms Alison Cox [588] 66923 - Alison Kelly [9014] 66931 - Andrew Cliffe [6235] 66939 - Angelo Cugini [12883] 66947 - Barbara Groves [8940] 66955 - Professor Bob Ireland [7882] 66963 - Christopher Paden [8844] 66971 - Elizabeth Cliffe [6234] 66979 - Mrs Kay Cugini [1743] 66987 - Mr David Ramsbottom [2030] 66995 - Mr David Drinkhall [12839] 67003 - Ian Frost [2024] 67011 - Mr Geoff Reynolds [8107] 67019 - John Griffiths [8071] 67027 - Justin Richards [8806] 67035 - Louise Kalus [8998] 67043 - Paul Kalus [8995] 67051 - Mr Bernard Hollis [1810] 67059 - Mr R Komarasinha [6306] 67067 - Caroline Komarasinha [12793] 67075 - Matthew Drinkhall [8910] 67083 - Oliver Lane [8814] 67091 - Ms Helen Maclagan [12783] 67099 - Mr and Mrs J Pennington [600] 67107 - Mr Peter Lamb [3491] 67115 - Sarah Hunt [7309] 67123 - Mr Ben Orme [12882]	Object	<p>The plans for the necessary social infrastructure are not ready. Assumptions are made in the Plan that schools, medical centres, hospital beds and other social infrastructure will be provided. We are currently aware that school issues have not been automatically agreed with the County Council. Similarly the successful conclusion of other facilities cannot be assumed.</p> <p>There is a serious funding gap for necessary infrastructure. Work done by Save Warwick indicates that there is a there is a shortfall between the cost of infrastructure and the funding available in the region of 50 million pounds.</p> <p>-The Council is considered not to have published a meaningful local plan viability assessment at the time the representation was submitted, at the end of January 2014 campaign groups were provided with information on the work done to date by officers which indicated that they were far from being able to show the full costs of the plan at that stage.</p> <p>-In the absence of this essential evidence Save Warwick have produced their own assessment which is set out in an appendix to their representation. It shows a significant shortfall in receipts over the potential costs.</p> <p>-Save Warwick Estimate that the infrastructure ' bill' will amount to something over £215 million, and all things considered that there will be a shortfall in required income over costs in the region of £30 million which is going to have to be met by council taxpayers.</p> <p>-It is estimated that the County Council (as a major provider of roads and services) could be faced with a shortfall of around £85 million. Save Warwick have forwarded three solutions to the funding shortfall scenario that they believe is inevitable</p> <p>1 - To economise on infrastructure (which would mean more overcrowded schools and roads) - this is considered unacceptable.</p> <p>2- Load the additional costs on the taxpayer - an average of an extra £500 or so on the tax bills of every household in Warwick District.</p> <p>The final alternative is to change the plan - which is what Save Warwick prefers.</p> <p>The Council should produce and publish their own up to date viability study so that it can be interrogated and provide satisfaction that infrastructure requirements are deliverable. Without this the Local Plan must be assumed to be unsound.</p> <p>To conclude / summarise The Plan does not conform to the NPPF or Planning Practice Guidance. The Council has not published sufficient detail in its financial viability assessments to justify its claims that the plan is viable. Furthermore, assessments undertaken by others demonstrate that it is highly likely that the shortfall in funding will</p>	<p>The proposals for social infrastructure set out in the IDP have been further progressed. Work has been undertaken with WCC with regard to schools and the two Councils are agreed that the proposals set out in the IDP will be effective in providing for the educational requirements of the proposed growth.</p> <p>Work has also been undertaken and agreement reached with other social infrastructure providers, for instance NHS England (regarding GP services), SWFT (regarding Hospital Services) and WCC (regarding libraries).</p> <p>Whilst it is likely that it will not be possible to fund all the infrastructure set out in the IDP through Section 106 or CIL contributions, the IDP does show how all the essential infrastructure required in the earlier phases of the Plan can be provided and funded. Work will continue to identify alternative sources of funding for other infrastructure. The Council is confident that the Plan is viable and that the essential infrastructure to support growth can be provided. It should be noted, that the overall cost of infrastructure is unlikely to be significantly different wherever growth is located. The preferred option proposed in this rep is therefore unlikely to make the infrastructure costs lower - and indeed a more dispersed approach to growth may increase infrastructure costs.</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>cost Council tax payers upwards of £30 million.</p> <p><i>Save Warwick have forwarded three solutions to the funding shortfall scenario that they believe is inevitable</i></p> <p><i>1 - To economise on infrastructure (which would mean more overcrowded schools and roads) - this is considered unacceptable.</i></p> <p><i>2- Load the additional costs on the taxpayer - an average of an extra £500 or so on the tax bills of every household in Warwick District.</i></p> <p><i>The final alternative is to change the plan - which is what Save Warwick prefers.</i></p> <p><i>The Council should produce and publish their own up to date viability study so that it can be interrogated and provide satisfaction that infrastructure requirements are deliverable. Without this the Local Plan must be assumed to be unsound.</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>
66682 - Save Warwick (MR DAVID WILLIAMS) [4506] 66785 - Bishop's Tachbrook Parish Council (Councillor Ray Bullen) [9078]	Object	<p>The plans for the necessary social infrastructure are not ready. Assumptions are made in the Plan that schools, medical centres, hospital beds and other social infrastructure will be provided. We are currently aware that school issues have not been automatically agreed with the County Council. Similarly the successful conclusion of other facilities cannot be assumed.</p> <p>There is a serious funding gap for necessary infrastructure. Work done by save Warwick indicates that there is a there is a shortfall between the cost of infrastructure and the funding available in the region of 50 million pounds.</p> <p>-The Council is considered not to have published a meaningful local plan viability assessment at the time the representation was submitted, at the end of January 2014 campaign groups were provided with information on the work done to date by officers which indicated that they were far from being able to show the full costs of the plan at that stage.</p> <p>-In the absence of this essential evidence Save Warwick have produced their own assessment which is set out in an appendix to their representation. It shows a significant shortfall in receipts over the potential costs.</p> <p>-Save Warwick Estimate that the infrastructure ' bill' will amount to something over £215 million, and all things considered that there will be a shortfall in required income over costs in the region of £30 million which is going to have to be met by council taxpayers.</p> <p>-It is estimated that the County Council (as a major provider of roads and services) could be faced with a shortfall of around £85 million. Save Warwick have forwarded three solutions to the funding shortfall scenario that they believe is inevitable</p> <p>1 - To economise on infrastructure (which would mean more overcrowded schools and roads) - this is considered unacceptable.</p> <p>2- Load the additional costs on the taxpayer - an average of an extra £500 or so on the tax bills of every household in Warwick District.</p> <p>The final alternative is to change the plan - which is what Save Warwick prefers.</p> <p>The Council should produce and publish their own up to date viability study so that it can be interrogated and provide satisfaction that infrastructure requirements are deliverable. Without this the Local Plan must be assumed to be unsound.</p> <p>To conclude / summarise The Plan does not conform to the NPPF or Planning Practice Guidance. The Council has not published sufficient detail in its financial viability assessments to justify its claims that the plan is viable. Furthermore, assessments undertaken by others demonstrate that it is highly likely that the shortfall in funding will</p>	<p>The proposals for social infrastructure set out in the IDP have been further progressed. Work has been undertaken with WCC with regard to schools and the two Councils are agreed that the proposals set out in the IDP will be effective in providing for the educational requirements of the proposed growth.</p> <p>Work has also been undertaken and agreement reached with other social infrastructure providers, for instance NHS England (regarding GP services), SWFT (regarding Hospital Services) and WCC (regarding libraries).</p> <p>Whilst it is likely that it will not be possible to fund all the infrastructure set out in the IDP through Section 106 or CIL contributions, the IDP does show how all the essential infrastructure required in the earlier phases of the Plan can be provided and funded. Work will continue to identify alternative sources of funding for other infrastructure. The Council is confident that the Plan is viable and that the essential infrastructure to support growth can be provided. It should be noted, that the overall cost of infrastructure is unlikely to be significantly different wherever growth is located. The preferred option proposed in this rep is therefore unlikely to make the infrastructure costs lower - and indeed a more dispersed approach to growth may increase infrastructure costs.</p> <p>The Council has undertaken a development viability study looking at the viability of different kinds of development. This has informed the Draft Charging Schedule for CIL.</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>cost Council tax payers upwards of £30 million.</p> <p><i>Save Warwick have forwarded three solutions to the funding shortfall scenario that they believe is inevitable</i></p> <p><i>1 - To economise on infrastructure (which would mean more overcrowded schools and roads) - this is considered unacceptable.</i></p> <p><i>2- Load the additional costs on the taxpayer - an average of an extra £500 or so on the tax bills of every household in Warwick District.</i></p> <p><i>The final alternative is to change the plan - which is what Save Warwick prefers.</i></p> <p><i>The Council should produce and publish their own up to date viability study so that it can be interrogated and provide satisfaction that infrastructure requirements are deliverable. Without this the Local Plan must be assumed to be unsound.</i></p>		
66635 - Warwickshire Police and West Mercia Police (Mr Andrew Morgan) [12066]	Object	<p>Paragraph 6.3 omits to reference the emergency services as one of the infrastructure types that new development puts pressure on. This has the potential to undermine support for the delivery of required emergency services infrastructure, where this is required to ensure sustainable development.</p> <p>As explained at length elsewhere in our representations and as recognised in the Council's 'Draft Infrastructure Delivery Plan - April 2014', new development can place considerable pressure on the police and emergency services. This point is evidenced by the recent representations we have been submitting to major planning applications for housing development in the District, which are enclosed in Appendices 1-5 of these representations. Further evidence is provided by the letter from our consultants WYG, enclosed in Appendix 6.</p> <p><i>To resolve the concerns detailed above, improve the effectiveness of paragraph 6.3 and ensure support is not undermined for the emergency services, we request the following amendment: -</i></p> <p><i>'New development places pressure on existing infrastructure whether it be schools, roads, open spaces, sports facilities, emergency services, health facilities or community halls</i></p>	Proposed amendment accepted	Amend para 6.3 to read "New development places pressure on existing infrastructure whether it be schools, roads, open spaces, sports facilities, emergency services, health facilities or community halls"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66501 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	<p>Currently a £50 million gap in funding to implement infrastructure for these developments. How does Warwick District Council plan to meet deficit or will local taxpayers end up paying for this? NPPF focusses unduly on housing and does not address infrastructure issues sufficiently. Why has Warwick District Council not addressed this problem?</p> <p>Social Infrastructure needs to be addressed. Have adequate provisions been made for health care/education? Will NHS/WCC be able to meet demand for services? Education is major concern. WCC has to make cuts of £92m so where will money come from with 4655 additional dwellings? Schools already oversubscribed.</p>	Where CIL compliant, infrastructure contributions will need to address health and education. the Infrastructure deliver plan shows how infrastructure contributions can be funded	
66318 - A C Lloyd Homes Ltd [5958]	Object	The Council has made no significant progress in producing a CIL charging regime and this is causing difficulties in bringing forward strategic development sites where inappropriate requests for S106 contributions are being sought, e.g. for South Warwick Foundation Trust (SWFT).	The Council is progressing a CIL charging schedule to be adopted alongside the Local Plan. Until that time CIL compliant infrastructure contributions will be expected to through S106 agreements	
66323 - A C Lloyd Homes Ltd and Northern Trust [6105]	Object	The Council has made no significant progress in producing a CIL charging regime and this is causing difficulties in bringing forward strategic development sites where inappropriate requests for S106 contributions are being sought, e.g. for South Warwick Foundation Trust (SWFT).	Noted. The Council intends to bring forward a CIL charging schedule to be adopted alongside the Local Plan	
66810 - Gallagher Estates [644]	Support	Policy DM1 is targeted at delivering necessary infrastructure in association with development. No objection is raised to this approach. Paragraph 157, NPPF is clear that a strategic priority of plan making should be to: "plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework". Subject, therefore, to any requests being reasonable related in scale and kind to the development proposed and CIL compliant, the policy is supported as sound.	noted	
66570 - Friends of the Earth (John Brightley) [1113]	Support	We support the comprehensive proposals in this section, especially the plan review procedure and the preparation of development briefs for the large new sites which are proposed.	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>DM2 Assessing Viability</i>				
66049 - Home Builders Federation Ltd (Ms Sue Green) [7773]	Object	<p>Although this policy has a viability assessment in place to ascertain the extent the Plan's policies are likely to impact a schemes viability.</p> <p>The Council in the first instance should be mindful that it is inappropriate to set unachievable policy obligations. In Paragraph 154 of the NPPF states that "local plans should be aspirational but realistic". It is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.</p> <p>The Council should provide further evidence of whole plan viability assessment to justify the proposed policy requirements of the Warwick Local Plan.</p>	A viability assessment has been undertaken exploring the impacts infrastructure requirements (CIL), affordable housing and sustainable buildings. This study included a significant degree of viability flexibility to take account of changing market circumstances and the minor impacts that other policies may have. The Council is therefore of the view that overall the Plan's proposals are viable.	
66305 - Mr H E Johnson [12846] 66571 - Friends of the Earth (John Brightley) [1113]	Support	Support policy	Noted	
<i>Delivery and Monitoring</i>				
66181 - CWLEP Planning Business Group (Lizzie Beresford) [12841]	Object	There should be a commitment from each Council and the C&W LEP area on monitoring and alignment employment. This monitoring data would identify the needs of business and investment should be based on evidence on revised economic outlook/forecasts and current market conditions. This data will also help to guide the alignment between housing and employment land provision for the sub-region	A Coventry and Warwickshire Monitoring Group has been set up to ensure consistency in collecting and analysing monitoring data so that data can be reliably collated at sub-regional level. This does not require a change to the Plan.	
66757 - Mr Edward Walpole-Brown [7504]	Object	Delivery and Monitoring - we do not feel that adequate information is supplied to show how there will be adequate delivery of housing land sites through the period of the Plan, and how this will be managed from the allocations proposed and how this will be constructively reviewed if change is needed. There is quite a high dependence on larger strategic sites which may not deliver in accordance with the Council's expectations.	This section of the Plan provides the framework for delivery, monitoring and review. Further detail is provided in the annual monitoring reports and the consequences of these will be considered as set out on pages 171 and 172	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66519 - Warwickshire County Council (Monica Fogarty) [12790]	Object	The Health Impact Assessment submitted as a response by Public Health (Warwickshire County Council) considers that the Local Plan should include the monitoring of Health Impacts in the plan's monitoring and evaluation framework - (see page 169 of the submission draft Plan.	The Council would be happy to take part in health impact monitoring, but this would need to be done on a sub-regional basis. It is suggested this could become one of the issues considered by Sub-regional monitoring group. There is no need to amend the Plan as this could be covered by the section on "Monitoring the Local Plan"	
		<i>The Local Plan should include health impacts in the Plan's monitoring and evaluation framework. Where appropriate this should link to existing indicators (e.g. the Public Health Outcomes Framework).</i>		

## 7. Glossary

### 7. Glossary

66494 - Whitnash Town Council (Mrs Jenny Mason) [201]	Object	<p>Local Plan.....'in consultation with the community..... Statement of Community Involvement: A statement setting out the standards which local authorities will achieve in involving local communities in producing Local Development Documents and planning applications</p> <p>Local people have made comments and suggestions, but have had little input into LP. Objections and observations ignored. Alternative suggestions could have been made Council decided to place 4655 of houses on Green field sites in densely packed areas that currently separate closed linked towns/villages. Loss of agricultural land not considered. Not considered any concerns about infrastructure, pollution or loss of greenfield space Failed to adequately consider employment for additional residents of 12900 homes</p>	<p>This is not a comment about the definitions given in the glossary, but rather a comment on whether or not the public were given the opportunity to comment and whether their concerns were addressed.</p> <p>The commitment made in the SCI has been strictly followed with all stages having their own consultation period, often in excess of that required on a statutory basis. Numerous methods of reaching people have been employed and exhibitions and public meetings held. The responses to each of these consultations have been captured, read, summarised, a reply prepared and everything published on the Council's consultation database and on the web site. These have all been reported to Councillors when they have made decisions at each stage. The decisions may not be to the liking of everyone, but they have had the opportunity to have their say and been listened to.</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>
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## *Policies Maps*

### *1. District Wide*

65901 - Centaur Homes [9117]	Object	Centaur Homes object to the Proposals Map. The representative site should be included within the settlement boundary and removed from the green belt. Accordingly, the allocated sites objected to in other representations should be omitted from the Proposals Map, in particular, allocated site H27 should be removed based on its conflict with green belt policy and its importance to this strategic green belt between Hampton Magna and Warwick.	See response elsewhere in relation to housing allocations at Hampton Magna.	
65412 - Cllr George Illingworth [1083]	Object	According to Policy HE4 the Grade II* historic park and garden at Kenilworth Castle is defined on the Policies Map. This does not appear to be so.  <i>Add the the Grade II* historic park and garden at Kenilworth Castle to the Policies Map to define it in accordance with Policy HE4 and the NPPF.</i>	See similar responses under policy HE4 in relation to this matter - 67154 and 66404.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>2. Leamington, Warwick and Whitnash</i>				
66483 - Warwickshire County Council (Monica Fogarty) [12790] 66836 - Europa Way Consortium [197]	Object	<p>In separate written representations to policies DS9, DS11, DS12, and DS14, the Consortium has called for modifications to these policies, specifically changes to land use proposals affecting the site allocation H01 - Land West of Europa Way, and as a consequence we believe that modifications are needed to Policies Map No 2 Leamington, Warwick, and Whitnash as follows:</p> <p>Employment Allocation (Policy DS9) - delete</p> <p>Amended Site Allocation Boundary (Policy DS11 - H01) - to give a clear distinction between the allocated brownfield housing site at the front of Myton School and H01.</p> <p>Amended boundary for proposed education campus focused upon Myton School (Policy DS12) as agreed with the Governing Body of Myton School.</p> <p>Community Hub (Policy DS14) - delete.</p> <p><i>Employment Allocation (Policy DS9) - delete</i></p> <p><i>Amended Site Allocation Boundary (Policy DS11 - H01) - to give a clear distinction between the allocated brownfield housing site at the front of Myton School and H01.</i></p> <p><i>Amended boundary for proposed education campus focuses upon Myton School (Policy DS12) as agreed with the Governing Body of Myton School.</i></p> <p><i>Community Hub (Policy DS14) - delete.</i></p> <p><i>Document is not Sound</i></p>	These amendments have been agreed through the other policies	Not required
66811 - Gallagher Estates [644]	Object	<p>Given the representations made to Policy DS6 and Policy DS11 it is requested that an amendment is made to the Local Plan Proposals Map to allocate land south of Gallows Hill / West of Europa Way (as defined on the Site Location Plan contained at Figure 1.2 of the Background Document) for housing development.</p>	This has not been agreed and therefore the map will remain unaltered in this respect	Not required

## 2. Leamington, Warwick and Whitnash

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64440 - Myton School (Mrs Jane Burrows) [12374]	Support	The Myton school extended site requires to be 17 hectares (including 2 hectares for a 2 form entry plus nursery primary school). The northern boundary of the Myton School site (running parallel to Myton Raod) is defined to ensure the reuse of some of the current Myton School buildings when it expands to become a learning campus for up to 2,400 secondary students (including 425 post-16) and 450 2 form entry primary school (including nursery).	Not required	Not required
66520 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	H11 H16 H13 require any development at these allocations to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. We would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community	Not required	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>3. Leamington Town Centre</i>				
66623 - New River Retail [12814]	Object	To create a successful critical mass of restaurants and café uses the boundary of the proposed restaurant quarter (TC9) should be amended to encompass the units shown on the plan attached - (see original attachment to the rep).	<p>This policy has been drafted following dialogue with the new owners of Regent Court, and their desire to establish the area as a restaurant/café quarter. In 2013, a planning application was submitted, and subsequently approved, to change the use of a number of the units along Livery Street to restaurant/café (A3) uses (W/13/1578). The units contained within the boundary of this policy are those for which A3 consent was obtained in that planning consent. There is a logic to limiting the restaurant/café quarter to Livery Street, and not to expand it to cover buildings fronting onto Regent Grove (as the objector now seeks), as Livery Street is a pedestrianized street where a focus of A3 uses can create the ambience appropriate to a café/restaurant quarter. The units on Regent Grove, although within the same ownership, do not have the same character or form part of the quarter. The objector also considers that the policy imposes restrictions which, by implication, are unreasonable. The only restrictions that the policy imposes relate (a) to a reference to the need to impose reasonable conditions on new A3 uses to protect the residential amenity of local residents, and (b) that changes of use to drinking establishments (A4 uses) are not permitted. Both of these restrictions are considered reasonable in view of the relationship between local residents in Livery Street and the A3 uses below. The objector also considers that "associated operational works" should be permitted. Such proposals should be considered on their merits (having regard to the need to protect residential amenity) when individual proposals come forward, and not given a blanket approval through a policy such as this.</p>	Not Required
		<p><i>The boundary of the proposed restaurant quarter (TC9) should be amended to encompass the units shown on the plan attached - (see original attachment to the rep).</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>
<i>5. Kenilworth</i>				
66379 - Cobalt Estates [12761]	Object	<p>Cobalt Estates has committed considerable resources to the redevelopment of Talisman Square Kenilworth. Much of the planning permission for retail development with flats above (W03/1260) has been implemented (but not all) and it is therefore still extant.</p> <p>Due to a downturn in the economy and a lack of demand for flats part of the development has not been implemented and Cobalt Estates has secured a five year temporary planning permission for car parking as an interim measure. Cobalt Estates remains committed to redeveloping the site once market conditions improve and the demand for additional retail space within Kenilworth town centre increases.</p> <p>It is noted that this car park area is currently identified in the plan on Policy Map 5A as primary retail frontage and subject to the requirements of Policy TCP6 (Primary retail frontages) that restricts the levels of non-A1 uses in this elevation.</p> <p>Cobalt Estates is broadly supportive of this policy's intentions but considers it overly restrictive in this instance/ location as it could impede the future delivery of this town centre redevelopment site. Therefore this part of Talisman Square should not be designated as Primary Frontage.</p> <p><i>The designation (as Primary frontage under Policy TC6) should be removed from this part of Talisman Square and Policy Map 5A. As an addition a paragraph should be added to Policy TC6 recognising that greater flexibility on the mix of uses will be applied to proposals that bring about redevelopment and overall improvements to town centres.</i></p> <p><i>It is suggested that such an alteration to Policy TC6 would be in proper alignment with the NPPF which encourages Local Authorities to plan positively for the future of town centres.</i></p>	See response to Rep ID 65620 under TCP6.	
65413 - Cllr George Illingworth [1083]	Object	<p>According to Policy HE4 the Grade II* historic park and garden at Kenilworth Castle is defined on the Policies Map.</p> <p>This does not appear to be so.</p> <p><i>Add the Grade II* historic park and garden at Kenilworth Castle to the Policies Map 5 to define it in accordance with Policy HE4 and the NPPF.</i></p>	See similar responses under policy HE4 in relation to this matter - 67154 and 66404.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>5a. Kenilworth Town Centre</i>				
67155 - Kenilworth Town Council (Mr G D Symes) [1106]	Object	Approve that the Kenilworth Town Centre Map 5a has been amended to include the Waitrose store within the Retail Area but note that the actual building has not been added to the map and the car park entrance has not been updated. There is also a missing building at the North end of Abbey End where the Almanack and flats are. Although the houses in Harger Court remain outside the Retail area, the houses in Harger Mews have been included together with houses in Bertie Road. We feel the boundary should exclude all these houses unless there is a specific reason to include them. When the map is corrected it would be useful to update the Wilton Court site development as well, although that is not within the Town Centre boundary.	<p>With regards to Waitrose and Abbey End the OS basemap used to draw the plan was out of date. The map will be redrawn to reflect current buildings on the ground.</p> <p>It is agreed that the boundary of the town centre in this area should be amended to reflect the current land uses. The boundary will be re-drawn to exclude all homes on Harger Court and Harger Mews. This area is residential in character and, in common with how the boundary has been defined elsewhere in Kenilworth town centre, residential streets have been excluded from the town centre.</p> <p>No houses in Bertie Road are within the Retail Area as shown on the Policies Map.</p>	<p>Redraw Polcies Map 5a to reflect latest Ordnance Survey basemap.</p> <p>Redraw Kenilworth Town Centre Boundary to exclude all homes on Harger Court and Harger Mews.</p>
<i>6. Burton Green</i>				
65893 - Mrs Valerie Fisher [12796]	Object	<p>The gardens of nos 30,32,34 and 36 Hodgetts Lane should be included in the village envelope boundary.</p> <p><i>The gardens of nos 30,32,34 and 36 Hodgetts Lane should be included in the village envelope boundary.</i></p>	<p>The amendment of the Green Belt boundaries in this location would be a disproportionate incursion into the existing Green Belt given the length of the landholdings and the land to the east continuing to remain in the Green Belt.</p>	
65634 - Mr Mark Gordon [12801]	Object	<p>Currently we have the bizarre situation that Burton Green Farm is in the village envelope, whereas, the farm on the opposite side of the road (Long Meadow Farm) is not. My proposal will rectify this anomaly.</p> <p>I am pleased to see that you have accepted my proposal to include the school within the village envelope as it was previously excluded and trust that you will adopt my proposal above.</p> <p><i>My proposal is to extend the village envelope around my area of brownfield land and along the boundary of Long Meadow Farm to join the boundary of the Burrow Hill Nursery site (the preferred option). As shown on the attached plan.</i></p>	<p>The removal of land at Burton Green Farm, Hob Lane from the Green Belt was a drafting error. It is not considered that land at Long Meadow Farm should be inset within the Green Belt given the size of the area and the openness of the land, especially in the southern part of the land holding. The same principle applies to the land further south identified in the plan proposed.</p>	<p>Amend Policies Map 6. Burton Green to ensure Burton Green Farm, west of Hob Lane, remains in 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>
65931 - Mr Peter Stanworth [11399]	Object	<p>Buildings at Long Meadow Farm have not been included within the Growth Village Envelope Boundary; the adjacent school, housing on Hob Lane and farm buildings opposite have.</p> <p>Long Meadow Farm is no longer a working farm - now a domestic dwelling. Considered to be part of community with village functions held in grounds.</p> <p>Also redundant water tower in same ownership which is excluded. Officers give no reason for exclusion, so cannot find justification.</p> <p><i>The building at Long Meadow Farm should be included in the Burton Green Growth Village Envelope</i></p>	<p>The removal of land at Burton Green Farm, Hob Lane from the Green Belt was a drafting error. It is not considered that land at Long Meadow Farm should be inset within the Green Belt given the size of the area and the openness of the land, especially in the southern part of the land holding.</p>	<p>Amend Policies Map 6. Burton Green to ensure Burton Green Farm, west of Hob Lane, remains in the Green Belt.</p>
65501 - Sarah Palmer [12871]	Object	<p>In line with our representations in relation to other policies in the plan (DS10; DS11; DS19), the Burton Green Policy Map is objected to, in that land at Red Lane (as described more fully in those other representations) remains in the Green Belt (under Policy DS19) and is not an allocated housing site (under Policy DS11).</p> <p><i>The identification of the site in question as a housing allocation and its consequential removal from the Green Belt.</i></p>	<p>See response in relation to Rep ID 65480 under 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>
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*8. Baginton, Bubbenhall and Coventry Airport*

<p>66146 - Baginton Green Ltd [12863]</p>	<p>Object</p>	<p>The Local Plan adopts an unjustified inconsistent approach between the exclusion of land from the Green Belt - and inclusion within the Infill Village Boundary - of land allocated for housing, and maintaining in the Green Belt land adjoining the Infill Village Boundary which has been committed for other forms of urban development, such as the Free School. A consistent approach should be applied within the Plan.</p> <p>The approach taken by the District Council in the identification of a boundary to the village for exclusion from the Green Belt is consistent with national planning policy set out at para 86 of the Framework. These criticisms of the lack of soundness in this aspect of the Local Plan are set out in the representations made on behalf of CGHT.</p> <p>It is considered that the granting of planning permission, Ref: W/13/1763 amounts to an exceptional circumstance (granted for the reasons that very special circumstances had been demonstrated) for the exclusion of the land hatched red from the Green Belt.</p> <p><i>Local Plan policies map 8 should be re-drawn so that the infill boundary encompasses the committed development of the free school , as shown on the enclosed plan.</i></p>	<p>The approach to inseting Green Belt villages has been to remove the built up residential area and any proposed housing allocations from the Green Belt. This will enable the allocation to come forward and also means that in the long term there is a more flexible approach to development within the growth village envelope. The school and playing fields need to continue to reflect the open character afforded by the Green Belt with the land in question still serving the purposes and function of Green Belt. Site 5 (in the village housing options consultation) was assessed as having very limited housing potential in the landscape assessment (possibly less than a site allocation level) and was constrained by site contamination issues, as well as its relationship to the nearby conservation area and scheduled ancient monument. Once this site was discounted (and in line with other villages washed over by Green Belt) a tight inset settlement boundary was drawn around Baginton to support development on the preferred housing option site plus limited infilling. A boundary was established around the existing built form of the village and wrapped tightly around the land to the west of the village hall. The boundary definition work also needs to be read in conjunction with the policy drafting on limited infilling in Green Belt villages. At the villages housing options consultation stage, very limited comments were received about the Baginton site and approach taken to inseting. On this basis and the evidence gathered in the villages sites appraisal matrix, the preferred housing site was allocated and inset for the draft local plan.</p>	<p>Not required</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>
65253 - Deeley Group Ltd [11623]	Object	<p>Deeley Group object to Policies Map 8, as the settlement envelope boundary does not accurately reflect the extent of the village and ignores recent planning permissions and existing buildings. Specifically, it should be redrawn to include the recently approved Free School located off Bosworth Close, as well as the neighbouring church hall.</p> <p>Deeley Group also object to Policies Map 8 on the grounds that it should include the Deeley Group site at Friends Close. The site should be identified for housing and included within the settlement envelope boundary.</p>	<p>The approach to inseting Green Belt villages has been to remove the built up residential area and any proposed housing allocations from the Green Belt. This will enable the allocation to come forward and also means that in the long term there is a more flexible approach to development within the growth village envelope. The school and playing fields need to continue to reflect the open character afforded by the Green Belt with the land in question still serving the purposes and function of Green Belt.</p> <p>Site 5 (in the village housing options consultation) was assessed as having very limited housing potential in the landscape assessment (possibly less than a site allocation level) and was constrained by site contamination issues, as well as its relationship to the nearby conservation area and scheduled ancient monument. Once this site was discounted (and in line with other villages washed over by Green Belt) a tight inset settlement boundary was drawn around Baginton to support development on the preferred housing option site plus limited infilling. A boundary was established around the existing built form of the village and wrapped tightly around the land to the west of the village hall. The boundary definition work also needs to be read in conjunction with the policy drafting on limited infilling in Green Belt villages.</p> <p>At the villages housing options consultation stage, very limited comments were received about the Baginton site and approach taken to inseting. On this basis and the evidence gathered in the villages sites appraisal matrix, the preferred housing site was allocated and inset for the draft local plan.</p>	Not required
		<p><i>Policies Map 8 should be redrawn to include the recently approved Free School located off Bosworth Close, as well as the neighbouring church hall. It should also include the site at Friends Close for housing development as detailed in objections to Policy DS11.</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>
<i>11. Weston-under-Wetherley</i>				
65754 - Cllr Andrew Coles [12740]	Object	<p>The objection focusses on two areas to the north of Weston Under Wetherley that the objector believes have been incorrectly assessed when the Village Infill boundary was marked out. The land north of Bostock Crescent and the land north of St Michaels Close are both under agricultural use as evidenced in the photos attached (see original submission/ attachment). Inclusion of these two areas would appear to be at odds with Policy H11 that stipulates that infilling should comprise of small gaps addressing a public highway / small gaps in largely uninterrupted frontages. The inclusion of these two fields (see plan attached to original submission) is also at odds with Green Belt objectives and is considered 'inappropriate development'.</p> <p><i>The two areas of land itemised above and indicated on the plan submitted (see original representation) should be deleted from the infill boundary and the village boundary redrawn accordingly.</i></p>	Agreed	Amend village boundary to omit two fields to north
<i>12. Leek Wootton, Hill Wootton, Old Milverton and Blackdown</i>				
65047 - Dr D Mirok [6136] 65111 - Martin Atkin [12681]	Object	<p>It's unnecessary and will not benefit the commuters or shoppers or reduce the congestion. A park and ride scheme in the proposed area would a) be unlikely to attract much use and b) would open the door to further development.</p> <p><i>Reconsider the need for, and the location of, the park and ride scheme.</i></p>	<p>The benefits and viability of a park and ride are dependent on a complex range of factors including town centre parking, bus priority measures, bus service availability, potential for commercial use etc. These factors are currently being explored. However at this stage it is not possible to demonstrate whether a park and ride is viable and beneficial. For this reason the proposal is for an area of search to be brought in to effect if the need is justified and the concept and viability are demonstrated. The area is green belt. However para 90 of the NPPF allows for transport infrastructure in the greenbelt where this can be justified and where the character of the green belt is maintained. The area in question is not high landscape value.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
62555 - Deeley Group Ltd [11623]	Object	<p>Deeley Group object to Policies Map 12 on the grounds that it should include the Deeley Group site off Home Farm. The site should be identified for housing and included within the settlement envelope boundary.</p> <p><i>The site at Home Farm, Leek Wootton as detailed in objections to Policy DS11 should be identified for housing and included within the settlement envelope boundary.</i></p>	The site was assessed as part of the Villages Housing Options and considered not suitable and it is situated in an area of high landscape value and has poor access. On this basis there is no reason for the settlement boundary to be amended.	No change required
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<i>15. Radford Semele</i>				
64540 - Mrs Daphne Jean Loveridge [4556] 64876 - Mrs Tracy Pullen [12580] 65295 - A C Lloyd Homes Ltd [5958]	Object	<p>The respondent is dismayed to discover that his property at The Valley , Radford Semele is now within the Growth Village envelope as defined by policy H10 as this has implications for future planning decisions. The objector does not consider that the residents of this locality were consulted on this matter.</p> <p><i>The Valley should not be included within the village envelope and the boundary adjusted accordingly.</i></p>	Agreed	Change the boundary to exclude Tinkers Close
<hr/>				
66532 - Taylor Wimpey (Mrs Sarah Milward) [272]	Object	<p>Seeking agreement to add land to provide residential capacity in Radford Semele in next Plan period or safeguarded to meet longer term. if the Council considers that this additional area is not required or appropriate for future residential development then this land could be used to provide: a landscape buffer and open space; a community use in agreement with the Parish Council; or a combination of these elements.</p> <p><i>Include land within Radford Semele Growth Village boundary.</i></p>	The village boundary needs to be drawn closely around the edge of the built area in order to prevent the spread of the village, particularly to the west where there would be a perception of coalescence with the outer suburbs of Leamington Spa. The potential to use the land as a landscape buffer or open space should be discussed through the Neighbourhood Plan process when it could be promoted for such a use	Not required
<hr/>				
65691 - Mr Brian Loveridge [12789]	Object	<p>The village envelope should be reverted to its original position at Tinkers Close</p> <p><i>Please correct your error and please re-instate the village envelope to where it is now, running alongside number three the valley.</i></p>	Agreed	Change boundary to exclude Tinkers Close

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66492 - Gladman Developments (Peter Dutton) [9149]	Object	Envelope for Radford Semele is not supported since it does not include the land to the east of Church Lane for development  <i>The village envelope should be amended to include the land shown on the attached location plan and masterplan</i>	Updated landscape assessment work was undertaken after the Preferred Options for village sites was drawn up. This assessment work indicated withdrawing the site as a preferred option as the landscape value was upgraded to high value across the whole site where development would reduce the open northern landscape setting of the village. Given this new assessment value, the site is no longer considered to be suitable. Additionally this land is not perceived to be part of the main village. It is a Green Field parcel that plays a significant role in maintaining the separation of Leamington Spa and Radford Semele. It also maintains open views from the north of the village. As the site is unsuitable for development it should be outside the village envelope.	Not required
64877 - James Hodder [1009]	Object	The Draft Local Plan is unsound as it does not meet The National Planning Policy Framework (NPPF) criteria by leaving the boundary in its new position. Failing to reinstate the boundary also renders the Plan unsound as it does not adhere to Policy DS4 in relation to Spatial Strategies; section 2. - the need for new development to be near amenities, and section 6. - High Landscape Value, nor Policy DS11 in relation to Flood Risk and Habitat Assessment.  <i>Reinstate the village boundary, to its original position; i.e. with most of The Valley falling outside the boundary.</i>	Agreed	Change boundary to exclude Tinkers Close
<i>16. Bishop's Tachbrook</i>				
65296 - A C Lloyd Homes Ltd [5958]	Object	A C Lloyd Homes object to the Policy Map for Bishop's Tachbrook. As set out in the objection to Policy DS11, the Map should include the A C Lloyd site at Seven Acre Close and the settlement boundary should be adjusted accordingly  <i>The Map should include the A C Lloyd site at Seven Acre Close and the settlement boundary should be adjusted accordingly.</i>	The site at Seven Acre Close has been considered and has been rejected primarily on the grounds of its impact on landscape.	No change

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

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*17. Wasperton*

<p>65371 - Cadogan &amp; Co [12729]</p>	<p>Object</p>	<p>The Plan is not justified due to the lack of opportunity to enable Wasperton village to function as a Limited Infill Village. Although the policy theme of the RDS is carried through into the Publication Draft Plan, the Infill Village Boundary for Wasperton is drawn so tightly around the existing built development that there appear to be no opportunities for the policy to be implemented.</p>	<p>Wasperton has been classified as one of the 'small/feeder' villages in the village hierarchy report. Small and feeder villages have a limited range of services and may provide a supportive role to larger villages in terms of supporting facilities and services. The lowest grouping essentially consists of very small conurbations or developments with minimal services / facilities. For this reason, development is not considered to be sustainable in such locations. To prevent such development and to protect villages within the Green Belt, village boundaries have been drawn tightly deliberately. The Council considers that sufficient land has been allocated to meet the needs of the District over the plan period. It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated. This site lies within the green belt and given the availability of land outside the green belt, there are no exceptional circumstances for releasing this area from the green belt.</p>	<p>Not required</p>
		<p><i>Amend the Infill Village Boundary to include land fronting the village road between Farriers Court and No. 15, Wasperton.</i></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>
<i>18. Barford</i>				
64685 - MR ROBIN OGG [579]	Object	<p>The line limiting development of the land on the west of the village is not logical. The bypass should mark the limit of development. The land within that boundary is protected from the bypass by bunding and landscaping and is the obvious area to satisfy present and future needs for housing in the village.</p> <p><i>The plan should be changed to show the bypass as the line limiting development on the north and south sides of Westham Lane</i></p>	<p>The village envelope boundary has been drawn to encompass the existing built area and the allocated sites for development. This boundary is designed to protect the remaining open land on the east side of the by-pass from pressure to develop this additional area which is not currently required to meet the needs of either Barford village or the wider needs of the district.</p> <p>It is also considered that assessment of potential development (see site selection methodology) has been thorough and balanced and has led to the most appropriate sites being allocated.</p>	Not required
<i>19. Sherbourne</i>				
66254 - Antoinette Gordon [5052]	Object	<p>a) The village infill boundary includes a building adjacent Vicarage Lane which is an old corrugated iron clad barn. The field is agricultural in character as is an important part of the character of the village and conservation area. The two small spinneys at opposite corners of this field are also important to the local landscape and should also sit outside the village boundary.</p> <p>b) The allotments shown at the most northerly limit of the village no longer exist and have been ploughed back in to agricultural use. This should also be excluded from the village boundary</p> <p>c) the green belt boundary is shown incorrectly</p> <p><i>Amend the village boundary as shown on plan so that it runs along the edge of Vicarage Lane to join the field boundary around Benedict House and excludes the two small spinneys and the former allotments</i></p>	<p>Agreed. This part of the village comprising agricultural land and barn should be removed from the boundary as should the former allotment gardens to the northern boundary. The green belt boundary is correctly drawn. The new roundabout at Sherbourne and the road alignment changes along the A46 mean that it no longer follows the line of the A46 as it did; it is nevertheless in the correct location.</p>	Redraw village boundary to omit agricultural land and barn between 15 Vicarage Lane and Benedict House and the former allotments to the northern boundary
64917 - Barford, Sherbourne and Wasperton Joint Parish Council (Mr John MURPHY) [566]	Object	<p>The Limited Infill Villages boundary for Sherbourne currently includes part of an agricultural field and an agricultural barn. We do not consider that this should be included as land potentially suitable for development under the LIV policy.</p> <p><i>The JPC requests that the Limited Infill Village boundary east of the northern section of Vicarage lane, between benedict House and cottages to the north should be aligned with the eastern edge of Vicarage Lane.</i></p>	<p>Agreed. This part of the village comprising agricultural land and barn should be removed from the boundary</p>	Redraw village boundary to omit agricultural land and barn between 15 Vicarage Lane and Benedict House

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65730 - Mr Tony Reece [9804]	Object	Errors in Green Belt and infill village boundary. Green Belt: southern edge is old A46 roadway Infill boundary: should be along Vicarage Lane excluding dutch barn and agricultural land Allotment gardens: were incorporated into agricultural field 15 - 20 years ago	Agreed that the village boundary should exclude the agricultural land and barn and the allotment gardens. The Green Belt boundary is correct and reflects the current situation. A Green Belt review may alter this in the future to follow the new road, but the boundary as drawn is correct	Redraw village boundary to omit agricultural land and barn between 15 Vicarage Lane and Benedict House and the former allotments at the northern most boundary
65735 - Ms Helen Whiter [9623]	Object	Mistake on the map showing the infill boundary in the wrong position. The line at Vicarage Lane opposite Sherbourne Court should be along the road and not set back in the field behind the barn. Statement about Conservation Area makes clear importance of field and views. Entirely inappropriate for this to appear potential infill <i>Redraw boundary line</i>	Agreed. This part of the village comprising agricultural land and barn should be removed from the boundary	Redraw village boundary to omit agricultural land and barn between 15 Vicarage Lane and Benedict House
<b>20. Hampton Magna and Hampton on the Hill</b>				
65476 - King Henry VIII Endowed Trust (Warwick) [6195]	Object	The capacity of the site at Arras Boulevard could be increased by including small parcel of land outside the current site boundary for SUDs.  <i>The site boundary should be amended</i>	The additional area proposed for inclusion in the site, projects in to the green belt adjacent to an ecologically important area. Whilst it might be suitable for the provision of SUDs (subject to evidence demonstrating that this would appropriate within the green belt and would not adversely impact on landscape or ecology etc) it would not be appropriate to amend the development site boundary in the local plan or the village boundary. It would be for the site owners to justify the inclusion of SUDs here as part of a planning application.	No action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>21. Hatton Park</i>				
65349 - Mrs Laura Teodorczyk [5011]	Object	<p>Hatton Park is NOT suitable for further development.</p> <ul style="list-style-type: none"> <li>-Located within the Green Belt no 'exceptional circumstances' have been identified,</li> <li>-There is already significant traffic congestion on the A4177;</li> <li>-The proposed exit onto the A4177 is an accident blackspot with no safe pedestrian crossing;</li> <li>-Development will ecologically destroy Smith's Covert;</li> <li>-Facilities/amenities and public transport within Hatton Park are insufficient;</li> <li>-Flooding on and around the site is an existing problem;</li> <li>-The local schools are already close to full capacity.</li> </ul> <p>I however support the revised settlement boundary being drawn tightly to provide (and protect) a clear distinction between the settlement and the Green Belt.</p> <p><i>Hatton Park is not suitable for further development it is located within the Green Belt and does not have the services/infrastructure to support further development.</i></p> <p><i>Alternative sites (in particular those not located within the Green Belt - and more specifically brownfield/derelict sites) should be sought.</i></p>	<p>Hatton Park has been assessed as a secondary service village which has the capacity to accommodate some development, and the proposed site has been assessed as suitable.</p>	
65461 - mr mark betker [11526]	Object	<p>I wish to object to the plan as proposed as it does not adhere to government guidelines and is in conflict with green belt policy and cannot be supported by current local infrastructure and is not sustainable. Please refer to my previous detailed objections.</p> <p><i>A more holistic approach to development throughout the county.</i></p>	<p>The site has been assessed as suitable and exceptional circumstances for the release of the land can be justified on the basis of the need to enable the growth of those villages which have the capacity to accommodate further housing. As exceptional circumstances can be justified, the proposal is compliant with national policy.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
64491 - Mr Lee Fellows [5002]	Object	<p>Whilst the latest plan takes into consideration concerns about the wildlife that is resident in Smith's Covert, it does not overcome the issues that additional housing will place on the environs of Hatton Park. I have specific concerns about the lack of an appropriate shop for the estate and the impact of additional traffic on Ebrington Drive and the Birmingham Road which is already contested at peak hours. Other developments in the plan will already be adding traffic to the Birmingham Road so without serious investment in the infrastructure, there is a significant impact on existing residents.</p> <p><i>Investment in transport infrastructure prior to any agreement to add traffic to the Birmingham Road.</i></p>	Resources have been obtained to invest in the Stanks Island at the A46. It is expected that this will relieve congestion on Birmingham Road. Further investment to address localised issues will be addressed through the planning application process	
65354 - Martin Teodorczyk [5004]	Support	<p>Hatton Park is NOT suitable for further development.</p> <p>However should this happen, I support the area as shown:</p> <p>The site as shown now adequately protects Smith's Covert; Development is best accessed primarily from the A4177 as shown; The remaining Settlement Boundary must be drawn tightly to the existing development as shown to protect open Green Belt to the north and west of Hatton Park.</p> <p>The development should contain: Bespoke access from the A4177 to protect the rest of Hatton Park; Improvements to the A4177 / Ugly Bridge Road junction including widening; Traffic calming measures</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>
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*27. Rowington and Rowington Green*

<p>66033 - David Pickering [12849]</p>	<p>Object</p>	<p>It has not been considered in objective depth whether other limited infill villages might benefit from modest further development.</p> <p>Our particular focus is land owned by the Objector next to Lyons Farm in Rowington Green where a limited amount of residential development would both meet the wider identified needs of the community in terms of housing for young families, single people and the elderly would help to redress the balance of population mix, encourage retention or enhancement of services.</p> <p>The strong locational synergy between Kingswood and Rowington would mean that release of this site at Rowington Green would either take the place of at least one of the sites identified at Kingswood to fulfil the number of dwellings required in that settlement.</p> <p>We believe that releasing the Lyons Farm site shown on Policy Proposals Plan 27 for Rowington and Rowington Green could provide up to a dozen mixed dwellings compatible with the character and appearance of the area and will ideally meet the documented local need for Rowington Parish.</p> <p><i>Modify the boundary of the Infill Village to include the Lyons Farm site as hatched red and also the cricket ground. This will allow the village hall car park to expand and the provision of a range of housing to meet the local needs of local families and single people over the full age range, without significant impact on the green belt. The cricket ground would remain a central focus of open land in the centre of the settlement.</i></p>	<p>The Local Plan directs housing in rural areas to the growth villages which are well served by services and facilities in order to encourage sustainable patterns of development. Rowington Green is characterised as a limited infill village where limited development will be allowed within the village boundary according to criteria set out in H11. The area proposed to be put into the village settlement boundary would not constitute infill development.</p>	<p>No change required</p>
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*29. Kingswood*

<p>65687 - Kingswood Homes (Shaun Hussey) [7792]</p>	<p>Object</p>	<p>The Kingswood village boundary should be updated to include my office / garage and extensions (Foremans Cottage). The current village boundary runs directly through the garage and office.</p> <p><i>Boundary should include all of The Mill and associated buildings, along the south boundary of the property (historic tree line).</i></p>	<p>Agreed this would be a more logical boundary</p>	<p>Change village boundary at Broom Hall Lane to include buildings within the curtilage of the property as shown on the policies map.</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>
66522 - Canal & River Trust (Miss Katherine Burnett) [8189]	Support	H29 H30 require any development at these allocations to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. We would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community	Noted	No change 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>
<b><i>Infrastructure Delivery Plan</i></b>				
<i>Infrastructure Delivery Plan</i>				
66361 - Mr Peter Booty [3970]	Object	The transport proposals will lead to more air pollution.	The infrastructure proposals seeks to utilise the routes around the towns, particularly Europa Way/M40 and A46 and revised proposals have improved sustainable transport options for journeys within the towns.	
		<i>Infrastructure should take traffic around the towns rather than through it. Schools should be spread out to reduce congestions. There should be 4 or 5 park and rides not just 1.</i>	Any more than 2 park and rides is likely to be unviable. Viability/feasibility work on the park and rides is ongoing	
66374 - The Leamington Society (Richard Ashworth) [4687]	Object	The Plan is not supported by properly developed and costed infrastructure proposals. The IDP expresses wishes and hopes rather than commitments.  The development sites present real transport difficulties. The mitigation relies on widening and upgrading junction capacity involving considerable expense. This will lead to worsening air quality and health outcomes. Alternative and lower carbon modes of transport have not been addressed through policies and only a tiny proportion of the budget looks at this area. This is not consistent with the NPPF.	The transport mitigation proposals have been demonstrated to be effective and through planning obligations, CIL and other funding sources, there is evidence to shows that funding for these can be achieved.  The IDP shows essential infrastructure requirements relating to health, transport, education etc for which there is clear evidence of need. It does also include some aspirations that are not yet fully funded. The IDP will be revised to reflect this.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
65434 - Colin Quinney [7880]	Object	<p>The supporting Draft Infrastructure Delivery Plan is unsound. It is based on insufficient data on the present demand for and supply of primary care facilities. No strategy exists for the future provision of primary care facilities across the sub-region. Cooperation with GP Practices, patients and other local health and social care bodies has been inadequate. Specifically provision for existing and future primary care in North Leamington and especially the new S Warwick developments seem inadequate. Secondary care &amp; mental health plans are wholly inadequate. No Health Impact assessment has been completed. See patient group attachment.</p> <p><i>Adequate consultation and cooperation with GP's, patients and Local Area Team to agree primary care needs.</i>  <i>Adequate consultation and cooperation with CCG/SWFT and Partnership Trust to agree secondary, community and mental health needs.</i>  <i>Complete full Health Impact assessment</i></p>	<p>The revised IDP takes account of the HIA undertaken by Public Health and includes clearer advice from NHS England on the need for and cost of GP services to support growth.</p>	
65888 - Centaur Homes [9117]	Object	<p>The Infrastructure Delivery Plan is not in accordance with paragraphs 203 and 204 of the Framework</p> <p><i>The IDP should accord with the Framework in that obligations should only be used where they meet the tests in paragraph 204 and 203 states that consideration should be given to whether otherwise unacceptable development could be made acceptable through the use of conditions or obligations</i></p>	<p>the IDP covers a range of infrastructure and funding sources, not just those to be funded through planning obligations. It is accepted that planning obligation should meet the tests of the NPPF</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66485 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>Primary education in Warwick &amp; Leamington needs to be revisited to take into account the sites in the draft local plan and the most recent planning applications for Gallows Hill/Europa Way and the Asps, we calculate the developments will generate approximately 1,600 primary age pupils, requiring a total of 8 forms of entry primary provision. We envisage that yields from small sites such as the former sewage works, the former Ridgeway school and Bishop's Tachbrook can be met within existing provision, thus requiring an additional 6.5 forms of entry of primary accommodation.</p> <p>The draft local plan infrastructure delivery plan identifies that 5 forms of entry are expected to be met from the developments around Europa Way (including one form of entry on the Asps site, if this goes ahead). We support the proposal in the draft plan to expand Whitnash Primary School by 0.5 forms of entry to provide for children expected to come from the Sydenham development site. However, there will still be a requirement for a 1form of entry school in that area to meet demand. This is not currently identified in the draft plan.</p> <p>The Plan appears to require the identification and location of a further one form entry primary school in its infrastructure delivery plan to meet the requirements related to Warwick and Leamington housing allocations.</p> <p><i>The Plan appears to require the identification and location of a further one form entry primary school in its infrastructure delivery plan to meet the requirements related to Warwick and Leamington housing allocations.</i></p>	<p>Since the Draft IDP was published in May 2014, WDC has continued to work with WCC education. As a result the education proposals in the updated IDP have been agreed by both parties.</p>	
66377 - Mrs Elaine Kemp [4935]	Object	<p>There is insufficient planning and financing of infrastructure. This would in any case be constrained by the historic nature of Warwick, the site of the Hospital and the capacity of local schools.</p> <p><i>Show and prove proper planning on how the support infrastructure financially and practically</i></p>	<p>Significant funding towards the required infrastructure as already been secured through section 106 agreements. The Council is planning to bring forward a CIL charging scheme alongside the Local Plan. Together, s106 and CIL provide substantial sources of funding for infrastructure requirement. In addition, other funding streams are being explored and exploited. The IDP has been amended to more clearly demonstrate how essential infrastructure requirements will be funded and prioritised,</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66486 - Warwickshire County Council (Monica Fogarty) [12790]	Object	<p>Primary education in Kenilworth needs further consideration. Warwickshire County Council expects that the 1,300 planned houses will be located on the east side of Kenilworth. They will generate approximately 300 primary age pupils, requiring 1.5 forms of entry of new primary provision which is not currently identified in the draft plan. We do not believe it is possible or educationally desirable to expand the existing local infant or junior schools, so a reserved site, yet to be identified, will be required.</p> <p><i>A reserved site, yet to be identified, will be required.</i></p>	Noted. WDC and WCC have continued to work on education infrastructure since the publication of the draft IDP. The preferred approach for schools in Kenilworth has now been agreed.	
66845 - Patricia Hollis [6286] 66903 - Colin Sharp [1913] 66911 - Ms Alison Cox [588] 66919 - Alison Kelly [9014] 66927 - Andrew Cliffe [6235] 66935 - Angelo Cugini [12883] 66943 - Barbara Groves [8940] 66951 - Professor Bob Ireland [7882] 66959 - Christopher Paden [8844] 66967 - Elizabeth Cliffe [6234] 66975 - Mrs Kay Cugini [1743] 66983 - Mr David Ramsbottom [2030] 66991 - Mr David Drinkhall [12839] 66999 - Ian Frost [2024] 67007 - Mr Geoff Reynolds [8107] 67015 - John Griffiths [8071] 67023 - Justin Richards [8806] 67031 - Louise Kalus [8998] 67039 - Paul Kalus [8995] 67047 - Mr Bernard Hollis [1810] 67055 - Mr R Komarasinha [6306] 67063 - Caroline Komarasinha [12793] 67071 - Matthew Drinkhall [8910] 67079 - Oliver Lane [8814] 67087 - Ms Helen Maclagan [12783] 67095 - Mr and Mrs J Pennington [600] 67103 - Mr Peter Lamb [3491] 67111 - Sarah Hunt [7309] 67119 - Mr Ben Orme [12882]	Object	<p>The plans for the necessary social infrastructure are not ready. Assumptions are made in the Plan that schools, medical centres, hospital beds and other social infrastructure will be provided. We are currently aware that school issues have not been automatically agreed with the County Council. Similarly the successful conclusion of other facilities cannot be assumed.</p> <p>There is a serious funding gap for necessary infrastructure. Work done by save Warwick indicates that there is a there is a shortfall between the cost of infrastructure and the funding available in the region of 50 million pounds.</p>	<p>The Infrastructure Deliver Plan will continue to evolve as the Local Plan moves from preparation to implementation. This is inevitable as new funding opportunities and updated data becomes available. However the IDP prepared in conjunction with the Publication Draft Local Plan shows that the essential infrastructure can realistically be delivered over the Plan period. Further details have been worked up for the IDP to be submitted alongside the submission draft which address some of the gaps in the May 2014 IDP. Further significant funding towards elements of the Infrastructure has now been achieved which will hopefully provide reassurance that the priorities can and will be delivered.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
66359 - Mr & Mrs Peter & Linda Bromley [1086] 66360 - Miss Emma Bromley [3610]	Object	Social infrastructure has not been assessed. Each proposal is stand-alone and will result in small, isolated communities that are unable to contribute sufficiently to the District-wide infrastructure requirements. There is insufficient funding available to deliver the required infrastructure. This will result in traffic problems, inadequate health services and parking problems.	The IDP includes a section on social infrastructure including education, health, sports facilities, cultural facilities, emergency services and community centres.  With regard to funding, further work has been undertaken since the draft was published in May 2014. The IDP is substantially funded and clear funding streams are in place to deliver priority infrastructure for the first 5 years and beyond.	
66382 - Mr Robert Price [11538]	Object	There is insufficient planning (including financial) for the additional infrastructure necessary to support the proposed level of growth. This would in any case be constrained by the historic nature of Warwick centre, the site and size of Warwick Hospital and the capacity of local schools.  <i>WDC should use the ONS statistics to accurately reflect the number of homes required. Show and prove the proper planning on how to support the infrastructure financially and practically. Define and show what the exceptional circumstances are to build on green belt</i>	See DS6 for responses regarding housing numbers. Significant funding towards the required infrastructure as already been secured through section 106 agreements. The Council is planning to bring forward a CIL charging scheme alongside the Local Plan. Together, s106 and CIL provide substantial sources of funding for infrastructure requirement. In addition, other funding streams are being explored and exploited. The IDP has been amended to more clearly demonstrate how essential infrastructure requirements will be funded and prioritised.  There is a substantial evidence base to support the Infrastructure proposals - particularly in relation to transport, but also regarding education, health, sports facilities, green infrastructure, playing pitches etc.	

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65868 - Highways Agency (Mrs Lisa Maric) [12807]	Object	<p>In respect of the proposal for the introduction of "Smart Motorways" on the M40 between J14 and J15, there is less certainty that this will be required within the Plan period or any guarantee that the Highways Agency will be in a position to fund it.</p> <p>Warwickshire County Council has prepared the STA(4) to inform the Local Plan the Highways Agency specifically requested the County Council to remove the term "Smart Motorway" on the M40 from the document and replace it with a more generalised term of "Traffic Management", which could include a range of initiatives to manage traffic in a safe and efficient manner.</p> <p><i>The Highways Agency requests that the term "Smart Motorway" in respect to the M40 in the Draft IDP, which forms Appendix 4 to the Draft Local Plan, be replaced with the term "Traffic Management"</i></p>	proposed amendment accepted	The Highways Agency requests that the term "Smart Motorway" in respect to the M40 in the Draft IDP, which forms Appendix 4 to the Draft Local Plan, be replaced with the term "Traffic Management"
66683 - Save Warwick (MR DAVID WILLIAMS) [4506]	Object	<p>The plans for the necessary social infrastructure are not ready. Assumptions are made in the Plan that schools, medical centres, hospital beds and other social infrastructure will be provided. We are currently aware that school issues have not been automatically agreed with the County Council. Similarly the successful conclusion of other facilities cannot be assumed.</p> <p>There is a serious funding gap for necessary infrastructure. Work done by save Warwick indicates that there is a there is a shortfall between the cost of infrastructure and the funding available in the region of 50 million pounds.</p>	Significant funding towards the required infrastructure as already been secured through section 106 agreements. The Council is planning to bring forward a CIL charging scheme alongside the Local Plan. Together, s106 and CIL provide substantial sources of funding for infrastructure requirement. In addition, other funding streams are being explored and exploited. The IDP has been amended to more clearly demonstrate how essential infrastructure requirements will be funded and prioritised,	

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66021 - University of Warwick [222]	Object	We note that proposals for a Country Park in Kenilworth have been included in the draft Infrastructure Delivery Plan. Whilst the University is not averse to a Country Park in this location, as it would supplement the University's own Jubilee Wood, planted in 2012, its inclusion within the draft IDP is considered to make the Local Plan unsound because it is not justified by a relevant policy requirement within the Local Plan itself. The only policy reference to the creation of Country Parks is in respect of Tachbrook to the south of Leamington.	In contrast to the Tach Brook Country Park, the Plan is not allocating any specific land for a Country Park north of Kenilworth and does not therefore require a specific policy on this. The Council will seek improvements to that area (ecological, access etc) through agreements relating to potential developments (including at the University) as set out in the Infrastructure Delivery Plan.	
<i>If the Kenilworth Country Park proposal is considered to be a viable and necessary part of the infrastructure of Warwick District, there should be a policy in the Local Plan along with a clear justification and evidence of its potential funding.</i>				

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66410 - The Warwick Society (James Mackay) [3080]	Object	<p>The allocation of greenfield sites south of Warwick make it impossible to meet to meet transport needs sustainably as required by the NPPF.</p> <p>The relatively low densities proposed mean more space devoted to roadways and parking. the location will create journeys as few destinations will be within walking distance. The road network is unattractive for cycling and buses cannot provide the quality of service to compete with the car.</p> <p>Sustainable transport policy is paid lip service (paras 5.28 to 5.59) as evidenced by expenditure splits in the IDP.</p> <p>The effects of the proposed mitigation on on traffic flows is questionable and raises doubts about the quality of the modelling. They do however show increased journey times, worse congestion and worse air quality. There are inconsistencies between the IDP and the STA. The STA also appears to indicate that any Plan which depends on increasing the flow of vehicles through Warwick Town Centre is undeliverable.</p> <p>The Strategic Transport Phase 4 and Cumulative Assessments which support the Infrastructure Delivery Plan contain significant flaws. They describe schemes which have not been prepared in detail. Their costs, feasibility, deliverability, and impact are uncertain. Their effect on traffic is questionable: work carried out under the management of the Save Warwick Group, which is making its own representation, raises numerous doubts about the quality of the modelling and the realism of its conclusions.</p> <p>These conclusions nevertheless indicate increased journey times, worse congestion, and air quality within the Warwick and Leamington AQMAs being worse than it would be without the 'mitigation' schemes.</p> <p>There are differences between the schemes contained in the three documents, and these differences emphasise that no coherent traffic plan, let alone a transport strategy, exists.</p> <p>The Plan takes no account of previously well-founded objections.</p> <p><i>The modification necessary to make the Plan sound in respect of sustainable transport is for the allocation of greenfield land to be withdrawn and for a new transport strategy which respects the policy priorities to match the changed pattern of development.</i></p>	<p>The evidence shows that the proposed sites are sustainable locations for development and that the transport impacts can be mitigated.</p> <p>Since the publication draft, further work has been done to explore sustainable transport options and as a result of this, the specific infrastructure proposals have been amended to enable a greater emphasis on sustainable modes of transport.</p>	

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66489 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>The County Council has a statutory duty to provide a 'comprehensive and efficient' library service for the people of Warwickshire. This is laid down in the Local Government Act 1964.</p> <p>The Library and information Service is directly affected by the numbers and characteristics of the populations we serve. The majority of any population uses library services. The Household Library User Survey shows that over 70% of all households are library members.</p> <p>The more people there are in an area, the more pressure there is on Library services. Books, audio visual materials, computers, library buildings and vehicles are in effect the infrastructure of the service. Books and other items are borrowed more often, and computers are used more frequently. Choice and service availability is reduced for both existing and new customers, while wear and tear on stock and equipment increases.</p> <p>The County Council's detailed submission (see representation ) identifies new library infrastructure that will be necessary with an overall cost estimate of £93,553.</p> <p><i>The IDP should be revised to endorse / include the financial requirements necessary to deliver the identified Libraries infrastructure over the Plan period.</i></p>	Noted. This will be reflected in the IDP	Amend IDP to reflect justified library contributions

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66488 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>Most of the County's Household Waste and Recycling Centres (HWRC) are strategically well placed around the county and within Warwick District there are two sites, Prince Drive and Cherry Orchard.</p> <p>With the proposed 12,300 extra properties, it will be necessary to redesign both of the sites facilities to accommodate the increase vehicle movements, but also greatly increase the opening hours of the sites to accommodate the expected 1,419 vehicle movements per week which equates to approximately 73,800 vehicle movements per year. Each household deposits on average 236kgs of waste per year at each HWRC. To cater for this increase we will need to extend Cherry Orchard HWRC onto the old landfill site to accommodate the increased skip provision, costs will be in the region of £241,500. This has been based on 1,500 new households. The baseline used for capital investment is as follows. For the Capital formula we have used the present size of Cherry Orchard HWRC ( 5,184 m2 divided by 10,460 households in Kenilworth = 0.495 m2 per household), so the formula used to work out associated costs:</p> <p>New extension build = 5,184m2 divided by 10,468 households in Kenilworth = 0.495 m2 per household.</p> <p>Spon's Building price per m2 (2012 price, plus 1.5% inflation per m2 = £324.8) Which includes split level sites.</p> <p>Therefore:</p> <p>1500 households * 0.495m2 = 743 m2 * £324.80 = £241,326</p> <p>Prince Drive HWRC will require the provision of an extra waste compactor being installed at £235,000 to accommodate the extra demand of waste. We have just installed a new compactor at Princess Drive at this cost; therefore this is a true cost for the equipment in 2013 prices. The design of the bays will mean further redesign of the skip bays to address the demand of increased recycling estimated to be in the region of £100,000. The same formula would apply, but as we are introducing a compactor, we believe we only need to redesign the skip bays by 310 m2 so would be just above the £100,000 at £324.80 per m2.</p> <p>Total Waste infrastructure requested, to date £576,326.</p> <p><i>The IDP should include the information included in the submission to make provisions for the identified waste disposal plant improvements. Total Waste infrastructure requested, to date amounts to £576,326</i></p>	Noted. The IDP will be adjusted to take account of this	Amend IDP to include waste infrastructure contributions of £576,326

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66487 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>Highways - Warwickshire County Council (WCC) and Warwick District Council (WDC) have worked together over a number of years to undertake testing of the proposed Warwick Core Strategy (CS) allocations. The final submission, April 2014, was the Strategic Transport Assessment Phase 4.</p> <p>The County Council has enclosed a detailed table of mitigation measures (see full submission) that have been identified to -date and should be included in the IDP.</p> <p><i>None required</i></p>	Noted	
65644 - Governors of Champion School (Bob Crowther) [3951]	Support	<p>In the event of decisions to construct a substantial volume of new housing, the school governors have a clear position. We are most willing to increase student number capacity of the school in response to additional demand created by house building.</p> <p>We at Champion School will work closely with our colleagues at Myton School and WCC. This will ensure that additional places can be found by increasing the size of the two schools in an agreed and coordinated fashion. This "two school solution" will meet expected demand, strengthen burgeoning partnerships and help create cohesion in secondary school provision in South Warwick, South Leamington and Whitnash.</p> <p>Our understanding is that the school grounds will be large enough for the development of the new buildings required for an increase in school capacity whilst retaining sufficient playing field space.</p> <p>It is absolutely necessary that school expansion to meet additional demand is supported adequately by basic need funding and payments from S106 and the CIL.</p> <p>We believe that the s106/CIL allocation for Champion modelled in WDC's Draft Infrastructure Plan is in error but also that this can be rectified by further discussion.</p> <p>However, it is necessary to restate that it would be impossible for Champion to expand its capacity by several hundred places without due funding allocation.</p>	Support and concerns about funding noted	