

## Appendix V: Summary of Responses to Consultation

### SA Addendum Report (Feb 2016)

Rep ID	Doc Ref	Consultee Comment Summary	Response	Changes
<b>Mrs Jennifer Bickerstaff; Mr David Bickerstaff; Mr William Campbell; Dr Jonathan M Russ; Mr Les Powell &amp; Budbrooke Parish Council (Mrs Alex Davis)</b>				
70266; 70264; 69826; 69797; 69413 & 69051	Appendix II	The SA is defective in relation to H51 which says the site has not changed since 2015 when it was appraised but not allocated. However this is incorrect because 145 dwellings are now being allocated. The SA should therefore have taken this in to account. The SA should fully address the real problems arising from the allocations. The plan has failed sustainability assessment requirements and is not therefore legally compliant.	Noted and disagree. The Proposed Modifications Document sets out the delivery of 115 dwellings for site H51, please refer to the modifications proposed for Appendix B on Pg. 34.	No further action required.
<b>Mrs E Alexander, Mr M J Alexander &amp; Mr Michael James Edwards</b>				
70233; 70232 & 70230	Appendix VI of the Submission SA Report (Feb 2015)	The content of the matrices are in part generic, contradictory and assessments of sites are dealt with in isolation. The position of Hatton Park and Hampton Magna is unique, they are categorised as separate growth villages in their own right however they rely on the use of the same service.	Noted and disagree. The appraisal of sites are not considered in isolation. The SA considers potential cumulative effects of site options on settlements. The appraisal in Appendix VI of the Submission SA Report (Feb 2015) recognises that, <i>"given the location of the potential allocations within a village, there will be a need to travel either to other villages or towns to obtain access to employment as well as services and facilities to meet peoples' needs."</i>	No further action required.
	Appendix VI of the Submission	The 2014 matrix was generated when the Council was considering an increase of 100 homes to Hampton Magna and 80 homes to Hatton Park rather than the now 245 and 175	Noted. All reasonable site options identified by the Council for the settlement were subject to SA	No further action required.

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	SA Report (Feb 2015) & Appendix II of the SA Addendum Report (Feb 2016)	respectively. The 2016 matrix contains much the same information as this initial exercise and does not make a true assessment of the impact of multiple sites on the sustainability of Hampton Magna.	(Please refer to Appendix VI of the Submission SA Report Feb 2015). Any significant effects for individual sites were identified and the cumulative effect of development at the site options as a whole were also considered. The proposed changes to the plan, including uplift in overall housing requirement and changes to site options, were screened in Appendix II for significance in relation to the SA.	
	Appendix VI of the Submission SA Report (Feb 2015) & Appendix II of the SA Addendum Report (Feb 2016)	<p>An example is the referral to transport problems on the proposed sites:</p> <p>'potential for major negative effects on traffic if all sites are taken forward. Could have the potential for major negative transport effects given that the site has capacity for over 100 dwellings.</p> <p>This is listed against both of the sites in Hampton Magna, it fails to cater for the fact there will be 245 dwellings. If there is potential for a major negative effects on just 100 dwellings it is clear this threat will be realised if 245 homes are built. This is not taken into account.</p> <p>The appraisal also fails to take into account traffic generated by the 175 homes at Hatton Park when they have to use the services at Hampton Magna.</p>	Noted. The appraisal presented in Appendix VI of the Submission SA Report (Feb 2015) considers the cumulative effects of development at all the 6 site options totalling a capacity of over approximately 500 dwellings (based on 30 dwellings per hectare). All proposed site allocations have also been considered through the Council's own site assessment process as well as subject to consultation from the Highways Authority, Warwickshire County Council.	No further action required.
	Appendix VI of the Submission	The appraisal also refers to other infrastructure problems in isolation when considering 100 homes.	Noted. The appraisal presented in Appendix VI of the Submission SA Report (Feb 2015) considers the	No further action required.

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	SA Report (Feb 2015) & Appendix II of the SA Addendum Report (Feb 2016)	Hampton Magna has for some time suffered with water supply, sewerage and draining problems, again these comments relate to individual sites for 100 houses rather than the proposed 245 homes which will make the limited and aged system significantly worse.	cumulative effects of development at all the 6 site options totalling a capacity of over approximately 500 dwellings (based on 30 dwellings per hectare). The Council is not aware of any drainage issues in this area.	
	Appendix VI of the Submission SA Report (Feb 2015)	<p>The matrices also note 'Hampton Magna has been identified as a growth village with a range of services and facilities.'</p> <p>Whilst on paper there is a range of services and facilities, these amount to a small shop which encompasses a post office, beauty salon, café, public house and a GP surgery. There are also two playgrounds and a school.</p> <p>The range is limited. The generic nature of these assessments is also documented in the fact Hatton park is also assessed as having a 'range of services and facilities' when in fact it has one very small village shop.</p> <p>The matrices also note that there 'Might be some options for enhancing community facilities locally' however there are no plans to provide or enhance community facilities.</p>	<p>Noted. The appraisal states for Hampton magna that, "<i>The Draft Village Settlement Hierarchy Report classifies Hampton Magna as a Primary Service Village which has a number of shops and community facilities as well as a nursery school, a primary school and a doctors surgery<sup>1</sup>.</i>"</p> <p>The appraisal states for Hatton park that, "<i>The Draft Village Settlement Hierarchy Report classifies Hatton Park as a secondary service village which is considered to have a good range of services –Village Food Store, Village Hall, a Playground; and a public house nearby<sup>2</sup>.</i>"</p> <p>The appraisal also notes for both</p>	No further action required.

<sup>1</sup> Warwick District Council (June 2013) Draft Village Settlement Hierarchy Report June 2013. Online at <http://www.warwickdc.gov.uk/WDC/Planning/Planning+policy/Local+Development+Framework/Evidence+Base/> [accessed November 2013]

<sup>2</sup> Warwick District Council (June 2013) Draft Village Settlement Hierarchy Report June 2013. Online at <http://www.warwickdc.gov.uk/WDC/Planning/Planning+policy/Local+Development+Framework/Evidence+Base/> [accessed November 2013]

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			settlements that, "The capacity of existing services and facilities is unknown, therefore the effect is considered uncertain on SA Objective 13."	
<b>Malcolm Storer</b>				
70187	Appendix III	<p>OBJECTIVE 2.</p> <p>Your assessment of what constitutes Sustainable Transport links mentions a bus stop on the 538 route through the village. This service runs only on Wednesday, leaving Princethorpe at 0933 for Leamington via many of the villages round about and returns from Leamington Spa at 1245. Hardly a sustainable service I'm afraid.</p>	The appraisal for the Land East of Cubbington states that, "With regard to travel and transport, the Council's assessment of the site identifies that it is within 400m of a bus stop (route no.538), however the site is located over 5km from the closest railway station (Leamington Spa) <sup>3</sup> . Given the capacity of the site, it is considered unlikely that development will deliver any significant improvements in terms of access to sustainable transport modes."	No further action required.
		<p>OBJECTIVE 11.</p> <p>The two fields in question slope down into the valley of the Pingle Brook and, should the fields be concreted over by house footings then, even more waste water will flow into the Pingle. The residents of New Street, Knightley Close, and Ladycroft, adjacent to the Pingle fought a 10 year campaign (1992- 2002) to get a flood alleviation scheme installed along the line of the brook, finally succeeding in getting one installed in 2002 in the grounds of Cubbington C.of E. School This worked admirably</p>	Noted. The appraisal takes mitigation into account and found that there is the potential for a residual neutral effect against SA Objective 11. It should be noted that a secondary flood alleviation scheme was built upstream of Mill lane in Cubbington and this helps to reduce the impact of flooding to	No further action required.

<sup>3</sup> Ibid.

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		<p>until the catastrophic flood of 14 June 2007 when it overflowed, depositing five feet of water into many of the houses in the three streets. As a consequence we were out of our houses for the next seven months. With the waste water of another 95 houses flowing into the Pingle and the Alleviation Scheme this will increase our chances of being flooded again to a near certainty.</p> <p>We have written evidence from Severn Trent Water that the Storm Drains and Foul Sewers running down the middle of New Street are totally inadequate and will need to be replaced when the current five year workplan for the drainage of Cubbington comes to fruition. I cannot foresee the building contractors performing the work, wishing to dig out a whole new sewage/ storm water system to take the effluent away from this part of the village.</p> <p>It will, no doubt, be channelled into the current sewage system, either through the school grounds or into the Austin Court/Church Hill system. In either case this will end up in the already overflowing system in New Street.</p>	<p>the lower parts of Cubbington by intercepting flows from the North eastern parts of Cubbington. There is no evidence to suggest that mitigation will not be possible at the site.</p>	
		<p>OBJECTIVE 13/14.</p> <p>Although I would agree with the current answers to these two objectives it would appear that the closest doctor at the corner of Cubbington Road and Highland Road is, at present, working at close to capacity. The primary school at Cubbington C.of E. is also close to being full, and the only secondary school in the area, North Leamington, is over 2 miles away with no adequate bus service.</p> <p>Although I feel that the issue of public services is very important I would be more certain of the catastrophic impact of the sewage and storm water on the inhabitants of New Street and the other adjacent streets.</p>	<p>Noted.</p>	<p>No further action required.</p>

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		The only other comment I would make is that you will probably have problems getting anyone to live that close to a High Speed Rail line.		
<b>Mr Steve Halliday &amp; Mrs Susan Halliday</b>				
70175 & 70173	Appendix II	The sustainability appraisal for an adjacent site to H28 was considered for Gypsy and Travellers but was assessed as having a major negative impact relating to air, water and soil and the prudent use of land. There were also concerns regarding noise, air quality and light pollution which could have negative impacts on health. The Plan is not legally compliant as the site at Hatton Park has failed the sustainability assessment	Noted. As stated in Appendix II (Pg. 12) of the SA Addendum Report (February 2016), "As noted in the previous appraisal, site specific mitigation is required to address potential contamination on site and avoid negative effects arising on the topic of health. The increase in housing provision however is not considered to significantly affect the overall findings of the 2015 appraisal. No requirement for further SA".	No further action required.
<b>Natural England</b>				
70082	General	As a part of ensuring the increased benefits for the natural environment (as referred to in the report) occur as a result of the uplift in housing in the plans allocations (as detailed in Policy DS New 1), we strongly advise the Coventry Area Action Plan is considered for development close to the Coventry city boundary. We are pleased to see reference to green infrastructure features considered for these larger scale developments. Ensuring these become part of a continued ecological network as far as possible will be important.	Noted.	No further action required.
		We note that increased housing may have a negative effect on Best Most Versatile land in the district. The Local Plan should give appropriate weight to the roles performed by the areas soils.	Noted.	No further action required.

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		These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Please find Natural England's standard guidance on soils and Local plans for your reference as an appendix to this response.		
<b>CPRE WARWICKSHIRE</b>				
70046	General	The Sustainability Appraisal has been updated to reflect the latest modifications to the plan and specifically the huge uplift in housing numbers. However it suffers from a major weakness: that it treats the Strategic Housing Market Assessment and the local authority Memorandum of Understanding as givens, without subjecting them to sustainability appraisal in their own right.	Noted. The SHMA and MoU are evidence base documents that inform plan-making as well as the SA. It is not the purpose of the SA to critically assess the findings and conclusion of all evidence base documents.  All reasonable options for the overall level of growth were considered through the SA process.	No further action required.
	Section 3	In general it gives the latest version of the plan much too easy a ride, placing exaggerated faith in mitigation measures and playing down some negative effects because of uncertainty about the exact form development will take. It makes some very questionable individual assessments – eg that the effect of high growth on public transport and community services and facilities will be positive, when experience suggests that provision of these facilities and services almost invariably lags well behind housing development, particularly when that development takes place as rapidly as is envisaged in this plan. A positive assessment of the high growth options against 'reduce need to travel' also seems fundamentally misguided when such a high proportion of the proposed development involves meeting Coventry's housing needs in Warwick District.	Noted. Please refer to the detailed appraisal matrix presented in Appendix I.	No further action required.
	Green Belt	It is surprising and disappointing to find that impact on the	Noted and disagree. The SA has	No further action

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		Green Belt does not feature as one of the sustainability criteria used to appraise the plan and its policies. Green Belt is simply subsumed within the much wider criterion of 'Prudent Use of Land and Natural Resources' and it tends to get lost in the process. The appraisal frequently pulls its punches, talking for example about the <u>potential</u> for the loss of Green Belt when the strategy entails <u>certainty</u> of massive Green Belt loss.	considered the loss of Green Belt land through the appraisal of alternatives, strategic and site, as well as the consideration of the Plan as a whole.	required.
	Section 3	Nevertheless the Sustainability Appraisal finds that the two high growth options (900 and 1,000 houses per annum) would have negative effects in relation to six of the sustainability criteria used to assess options. This conclusion is effectively ignored in the plan itself and there is no evidence that it has played any part in the development of the strategy. The Council have wrongly assumed that they have no alternative but to meet so-called Objectively Assessed Need in full, plus the huge uplift to meet Coventry's excessive housing needs.	Noted. As stated in Para 3.12, " <i>It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process.</i> "	No further action required.
<b>Place Partnership Limited (PPL) (Mr Andrew Morgan) represented by Bilfinger GVA (Ms Stephenie Hawkins)</b>				
70027		<p>The Alliance finds the refreshed SA for the amended allocation at the Former Warwicks hire Police HQ site unsound, as it is not justified. This is because it is not based on the most up to date evidence.</p> <p>The SA for the Former Police HQ site should take account of the Alliance's Masterplan and its supporting technical evidence base, together with the findings of on-going capacity and viability assessments, all of which will be made available in due course.</p> <p>In particular, the technical assessment on transport found that residential use of the site would generate a significantly lower</p>	Noted. It is still considered that the delivery of approximately 200 dwellings has the potential for a residual minor negative effect against SA Objective 2 through increased traffic.	No further action required.



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		level of traffic than use of the site as a Police HQ. Indeed it found that a scheme of around 200 dwellings would generate less traffic than the observed traffic generated by the former Police HQ. Consequently, the Alliance do not consider that development of the site for housing, in the region of 115 dwellings, will increase the level of traffic on the surrounding road network, as set out at paragraph 8 of the SA for the site, and would not, therefore, have potential for a residual minor long term negative effect against SA Objective 2 (sustainable transport), or Objective 9 (air water & soil quality) and Objective 10 (climate change).		
<b>Taylor Wimpey represented by RPS Planning (Paul Hill)</b>				
69954	Alternatives	<p>Paragraph 2.7 of the Addendum notes that due to the additional Objectively Assessed Need (OAN) it was necessary to consider the options for the delivery of growth and paragraph 2.10 noting this entailed a review of SHLAA sites along with a further call for sites, and paragraph 2.11 noting that new sites options were subject to SA.</p> <p>Our concerns in relation to the SA as addressed below, relates to the lack of an individual site assessment for Taylor Wimpey's land interests at Radford Semele. This relates to the SA Addendum process, which has been undertaken to accommodate the additional up-lift in housing requirement following the Inspector's Interim conclusions. This focuses on the lack of suitable consideration as an identified alternative for Taylor Wimpey's land interests at Radford Semele.</p> <p>A screen print is provided below of the SA assessment from Table 4.20: Summary of Approach to Alternatives Assessment and Selection, which appears to represent the Council's consideration of Alternatives, in the context of Radford Semele.</p>	<p>Noted. The SEA Directive and Regulations require the likely significant effects of the Plan, including any reasonable alternatives, to be identified, described and evaluated. Neither the legislation nor the extant guidance set out a prescribed method for how the appraisal should be carried out.</p> <p>Each reasonable village site option was considered against the full SA Framework. This is explained in paragraphs 2.16 to 2.18 in the Submission SA Report (February 2015). As stated in paragraph 2.17, <i>"Any significant effects relating to individual village site options were identified within the appraisal"</i></p>	No further action required.

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		<p>Taylor Wimpey's land interests relate to their land South of Southam Road (RS1*O). This rejection is confirmed in Appendix VIII of the 2015 SA (page 90) as indicated below.</p> <p>It is noted the site (RS1*O) was considered along with all other potential site allocations at Radford Semele in the 2015 SA (Appendix VI page 47). This provided some commentary on selective aspects of the assessment for the sites in the supporting text. This did not, however, provide an individual assessment for the site within the SA to enable Taylor Wimpey to gain an understanding of why its site was rejected in comparison with alternative locations. Instead it appears to have grouped all such sites under one heading.</p>	<p><i>commentary for each of the villages, thus satisfying the requirement for reporting the "significant" likely effects in accordance with the SEA Directive".</i></p> <p>It is then stated in paragraph 2.18, <i>"The symbols provided in the detailed appraisal matrices relate to the cumulative effect of the potential site options for primary or secondary service village rather than for each individual site option".</i></p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It should be noted that the same method was used to consider reasonable non-strategic site options through the SA process for the South Worcestershire Development Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.</p>	
	Reasons for selection /rejection	The consideration of Alternatives is then referred to in the 2016 SA Addendum (Appendix IV) in the context of the up-lift in housing requirements and the Potential Village Site Allocations. In relation to Radford Semele a screen print is provided below of the Addendum's limited assessment of the site.	Noted. Table 4.20 in the Submission SA Report (Feb 2015) sets out the reasons for selection or rejection of village site options in plan-making. The SA informs the Council's site	No further action required.

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		The above assessments indicate that the site was rejected in 2015 due to its 'high landscape value'. This appears to be (through the SA) the basis for rejection of the site. As indicated through the 2016 Addendum, no further SA work in relation to the site was carried out.	assessment process and decision-making, it is not the sole reason for a decision in terms of what allocations are progressed or rejected.	
	Alternatives	The approach taken is in contrast with the way in which the Council has now undertaken its assessment of its preferred site at Radford Semele. Here the Council has undertaken a detailed assessment (on its own) of the Land at Spring Lane. As extract of the SA assessment of this site is provided in Figure 4 below:	<p>Noted. As stated in Para 2.12, "A number of the previous site allocations have also been subject to amendment, in terms of boundary and/or capacity changes, following the further technical work carried out by the Council. These proposed modifications to site allocations were all subject to a screening process for significance with regard to SA and details are presented in Appendix II of this SA Addendum Report. As a result of this screening a number of the sites were subject to a refreshed site appraisal, and the findings of these are presented in Appendix III of this report."</p> <p>A fresh appraisal of that site was prepared as there had been a significant change since the appraisal of village site options in 2015.</p>	No further action required.
	Alternatives	In relation to the SA and in particular the Modification process, an additional up-lift in housing requirement following the	Noted and disagree. Please refer to previous responses.	No further action required.

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		<p>Inspector's Interim conclusions is required. The Council's preferred option is the focus of growth via Option 5 of the Addendum necessitating the protection of the Green Belt. Given this Option, there does not appear to have been a consistent and appropriate consideration of reasonable alternatives to growth at Radford Semele.</p> <p>Reasonable alternatives and the consideration of them should be fair, equitable and by public scrutiny. Despite Taylor Wimpey's continued promotion of the site over several years through the Development Plan and SHLAA process the site does not appear to have been appraised through the SA on an individual basis at any time now, or historically.</p> <p>In this regard, the Council has failed in its SEA/SA process to appraise the land South of Southam Road as an alternative alongside the selected Land at Spring Lane, Radford Semele. While it is understood that SA/SEA evidence can be compiled within the later stages of plan making<sup>1</sup>, it cannot be undertaken retrospectively where decisions would lead to prejudice. It therefore appears, the Council has failed to meet Article 2 of the SEA Directive. Annex I to Article 5(1) of the SEA Directive requires the environmental assessment to include:</p> <p><b><i>"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical difficulties or lack of know-how) encountered in compiling the information required."</i></b></p>		
<b>Hampton Magna Action Group (Mr. Martin Taylor) and 143 others</b>				
69695	NTS & General	Number of objectives outlined in Non-Technical Summary are not met through modifications to local plan - Objectives 1, 2, 3, 5, 6, 7, 9, 10, 11, 13, 14	Noted. The respondent sets out information about the village against a number of SA Objectives.	No further action required.

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		On behalf of 144 signatories		
	Alternatives	There is an alternative option, to reduce housing allocations in growth villages.	A number of reasonable options for the distribution of growth were considered through the SA process. Please refer to Section 3 of the SA Addendum Report (February 2016).	No further action required.
<b>Gleeson Developments represented by Savills (L&amp;P) Ltd (Mr Robert Linnell)</b>				
69695	Appendix III	It is noted that the Sustainability Appraisal (SA) Addendum Report, February 2016 has assessed the land at Southcrest Farm (site K17) for predominantly an educational use and approximately 70 dwellings. The appraisal for the site refers to the potential for positive and negative changes to the assessment if the sites is considered cumulatively with development at adjoining sites.	Noted.	No further action required.
		If changes identified in representations are accepted then updates to the SA required: Land at Southcrest Farm needs to be reviewed in the context of predominantly residential Wider strategic allocation for land to the East of Kenilworth (including Thickthorn) should be assessed for educational uses.	Noted. This is a matter for plan-making.	No further action required.
<b>Centaur Homes represented by McLoughlin Planning (Mr Nathan McLoughlin)</b>				
69494	Alternatives	An addendum SA has been provided with the modifications to the Local Plan. There is very little content within this addendum regarding the allocated sites beyond the content within the original Submission Local Plan SA Report February 2015. Within the 2015 SA, allocation H51 was rejected based on it having "some connectivity to the main settlement but potentially significant impact on nearby residents and little regenerative impact" There is no justification provided within the modifications	Noted. Table 4.16 in the Submission SA Report sets out the reasons for the selection or rejection of village site options in plan-making. This includes wider issues than just the findings of the SA. The situation has now changed and the site has been reconsidered to help meet the uplift in overall housing requirement.	No further action required.

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		documents to justify how these sustainability concerns have been overcome.		
	Appendix II	<p>Within the justification for the intensification of H27, the SA addendum states that the site has a medium to high landscape value, but that the intensification will save the loss of greenfield land elsewhere and that mitigation can overcome any significant effects. There is no justification for how any significant effects might be overcome, especially against biodiversity, or what the mitigation might be.</p> <p>Referring to the 2015 SA, the reason for the Old Budbrooke Road site being rejected was: "located within a parcel of high landscape value - disconnected from the main village and its core services / facilities."</p> <p>As highlighted above, the landscape assessment for the site is flawed as it has not considered the site itself, but combined it with a land parcel and the analysis of this has focused on the land to the north of the village. The evidence base is silent when regarding this site.</p>	<p>Noted and disagree. Please refer to the appraisal for the Hampton Magna site options presented in Appendix VI of the Submission SA Report (Feb 2015). It states that, <i>"There are no international, national or local nature conservation designations on or adjacent to the potential allocation sites<sup>4</sup>. However, there is a pLWS adjacent to part of site HM1*O and site HM5*O boundaries and the pLWS could potentially be indirectly affected by development at either one of the sites through noise, air and light pollution during the short-term (during construction) and in the long-term. There is also a pLWS in close proximity to HM6*O. All the allocations are considered to be of low to medium and medium ecological value<sup>5</sup> and as a result the presence of protected species is more likely and could mean that development at all sites could lead to minor negative effects on biodiversity in the long-term. It is</i></p>	No further action required.

<sup>4</sup> Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed November 2013].

<sup>5</sup> Warwick County Council Landscape and Ecology Team

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			<p><i>recommended that strong environmental policies are developed to protect and encourage enhancement of the natural environment and include provision for green infrastructure. This would mitigate any negative effects and possibly lead to positive effects being realised in the long-term for this SA Objective."</i></p> <p>The screening found that the an increase of 30 dwellings does not significantly affect the findings of the appraisal presented in Appendix VI of the Submission SA Report (Feb 2015).</p>	
	Appendix VI Submission SA Report (Feb 2015)	<p>As for the site being disconnected from the main village, this analysis has not taken into account the wording within Appendix Vi of the SA. This clearly states: "With regard to travel and transport, the potential allocations have excellent access to public transport with a bus stop within 0 - 400 m and there are pavements which provide safe access for pedestrians into the village centre or to public transport"</p> <p>The distances for this site is less to Warwick Parkway than allocation H51 and the same for the school and shops.</p>	Noted. This is primarily a matter for plan-making, which the SA has informed.	No further action required.
<b>Mr Graham Romer</b>				
69456	Appendix III	<p>Appendix III Site: north of Milverton</p> <p>SHLAA L03/L07 appraisal summary para.7 Biodiversity</p> <p>Over the years the habitat on this land has been progressively destroyed due to intensive agriculture.</p> <p>Reduced hedgerows, fewer trees, filled in and unhealthy ponds.</p>	Noted. The appraisal recommends that any proposal for development should enhance the natural environment, including habitats.	No further action required.

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		There should be a requirement to significantly improve the landscape, trees, ponds, hedges, open land etc. An opportunity exists to improve the landscape especially towards the western end (Old Milverton) and by having a low density village type development, rich in wildlife.		
<b>Mr. David Hall</b>				
69316	Appendix II	<p><b>Reason 9 – Sustainability Assessment Addendum Report (SAAR) site screening of H42 Westwood Heath (425 dwellings):</b></p> <p>With regard to the site screening of H42, the SAAR relies on the site appraisal undertaken for the previously published report in 2015 (referenced on page 69 of Appendix V of the Submission local Plan SA report of February 2015). No new or updated screening of H42 has been carried out. This is not satisfactory because the February 2015 appraisal for Westwood Heath states on page 69 that at this stage little detail is known about existing traffic and transport issues and how the allocation [of housing] will affect them. Suitable infrastructure improvements would be required.</p> <p>This representation against Modification 19 part H42 maintains that the modification is not justified due to the above disclosure in the SAAR that there is a lack of information on fundamental issues such as existing traffic and transport issues.</p>	Noted. Strategic transport assessments indicate that further housing development within the District has the potential to have significant impacts on traffic along key routes and at key junctions, increasing journey times and reducing average speeds <sup>6</sup> . The assessments found that the significant impacts of future growth can be mitigated through a range of proposed measures, but that there is the potential for residual impacts to occur. Submission Local Plan Policies seek to minimise the impact of development on the existing highway network and ensure that a choice of transport modes are available. Policy TR2 requires all large scale developments to be supported by a Transport Assessment and where necessary a Travel Plan. Policy TR3	No further action required.

<sup>6</sup> Strategic Transport Assessments – Local Plan Evidence Base. [http://www.warwickdc.gov.uk/info/20416/evidence\\_base](http://www.warwickdc.gov.uk/info/20416/evidence_base)



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			seeks contributions towards transport improvements from all developments that will lead to an increase in traffic. Taking the evidence into account, the mitigation available as well as the potential capacity of this site, it is considered that the findings of the appraisal presented in Appendix V of the Submission SA Report (Feb 2015) are still valid against SA Objective 2 (sustainable transport) through increased levels of traffic on the surrounding road network and SA Objectives 9 (air, water & soil quality) and 10 (climate change mitigation) through the associated increase in atmospheric emissions.	
	Alternatives	<p><b>Reason 10 - The Sustainability Assessment Addendum Report (SAAR) fails to take into account that a large number of residents in Coventry City commute out of the City to work each day to Warwick, Leamington, Stratford and south Warwickshire generally:</b></p> <p>Because the SAAR does not take into account the fact that a large number of Coventry residents commute to Warwick, Leamington, Stratford and south Warwickshire generally for employment and other reasons the SAAR is not sound. This representation puts forward the proposal that the allocation of 425 houses at Westwood Heath is not justified because there are several reasonable alternative locations identified in the updated SHLAA in places south of Warwick that would be found to be justified and sound on examination.</p>	Opinion noted.	No further action required.

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	Evidence	<p><b>Reason 11 - The Sustainability Assessment Addendum Report (SAAR) does not clearly identify what updated baseline information, if any, has been used:</b></p> <p>It is not possible to ascertain whether the SAAR has been carried out effectively because the baseline information used is not clear. If no updated information has been taken into account then the SAAR is not sound. In particular there appears to be a serious lack of information and the timing of issue of information pertaining to Westwood Heath. It is likely that such information whether baseline or other information was not issued in time to be used constructively in the SAAR, hence making Modification 19 part H42 unsound.</p>	Noted. The respondent does not identify or provide references to any specific evidence that is considered to have not been taken into account. SA is informed by the best available evidence at the time.	No further action required.
	Section 2	<p><b>Reason 12 - The Sustainability Assessment Addendum Report (SAAR) does not identify what professional judgement has been used. Nor does it explain why it has been necessary to use such professional judgement:</b></p> <p>Without knowing what and why professional judgement has been used, as referred to in paragraph 2.8 on page 6/26 of the SAAR it is not known what effect this has (if any) on Westwood Heath. This is another reason why Modification 19 part H42 is not considered to be sound.</p>	Noted.	No further action is required.
	Section 3	<p><b>Reason 13 - The Sustainability Assessment Addendum Report (SAAR) does not appear to justify urban extensions at the edge of Coventry such as at Westwood Heath:</b></p> <p>At paragraph 3.24 on page 18/26 of the SAAR, it is stated that urban extensions at the edge of Coventry has a cumulative and potentially major negative effects on landscape / visual amenity and openness through loss of green belt. It is obvious that this statement does not support housing at Westwood Heath. The statement at paragraph 3.24 continues by stating that provision of urban extensions (with a scale of over 500 dwellings) offers more opportunities for mitigation and</p>	Noted and disagree. Para 3.24 is referring to the strategic distribution options set out under Para 3.20. The reasons for the selection or rejection of options are set out in Table 3.5.	No further action required.

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		enhancement through strong masterplanning and sustainable design. This appears to be a further negative statement as regards housing at Westwood Heath because Westwood Heath is capped at 425 houses and does not fulfil the above criteria of being on a scale of over 500 dwellings. Furthermore, the parties to this representation do not understand how opportunities for mitigation, enhancement through strong masterplanning and the need for sustainable design can be interpreted as reasons to justify additional housing at Westwood Heath. It is therefore put to the Planning Inspector that the SAAR not only fails to justify Modification 19 part H42 but gives reasons why it should not be adopted.		
<b>Mr. Paul Davison</b>				
69325	General	<p>Increase in population would be unsustainable:</p> <p>Transport - Majority would run 2 cars generating an additional 30,000 journeys to work each day.</p> <p>The road network subject to severe congestion at peaks times. An increasing number of children are carried to and from school by car.</p> <p>The road network is inadequate for current traffic illustrated by congestion in and out of towns despite increased area of carriageway at roundabouts linking towns to the M40.</p> <p>Peak times tend to overlap at Myton Road junctions caused in part by heavy flows along Banbury Road created by technology park and industrial estates.</p> <p>The new housing estates will add to this. Proposed dual carriageways make waiting room as routes are considerably constrained by bridges.</p> <p>In the two town centres there is no scope to modify the roads, particularly in the network of medieval streets in Warwick and close network in Leamington.</p> <p>Drainage -The rivers Avon and Leam pass through the towns,</p>	Noted.	No further action required.

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		<p>rising quickly and bursting banks in heavy rainfall, causing flooding.</p> <p>New construction creates impermeable areas increasing flow into watercourses. Drainage ponds will be required to reduce flood risk. Provision for additional flow is required to deal with existing and increased flows.</p> <p>Health and Welfare - No spare capacity at Warwick hospital. Stratford developments will also be served by this hospital. Poor services to the community will be made worse.</p> <p>Emergency services are under pressure to achieve more with less resources.</p> <p>Services need to be enhanced before the additional population arrives - how will that be funded?</p> <p>Education - Schools are full in Warwick and Leamington. Recently children in new developments have had to travel for school. Developers promise new schools but the education authority are slow to deliver, resulting in long journeys. School buses may be provided but parents still drive the children to school.</p> <p>Environment - Proposed development would remove countryside used for agriculture leading to the loss of hedges, trees, ponds and other habitat. There is no guarantee that wildlife will inhabit newly provided areas. Loss of agricultural land resulting in imported food.</p> <p>Air quality is below legal limits in Warwick. Additional slow moving traffic/congestion will add to noxious fumes with negative effect on residents and visitors.</p>		
<b>Caroline Marrow</b>				
69190	Appendix III	<p>Natural Environment and Landscape</p> <ol style="list-style-type: none"> <li>1. Impacts of HS2 not considered</li> <li>2. The H50 sites on rugby road are adjacent to rejected sites which have similar landscape value. Why can H50-</li> </ol>	<p>Noted and disagree.</p> <ol style="list-style-type: none"> <li>1. HS2 considered in para 2 of the appraisal.</li> <li>2. This is a matter for plan-making.</li> </ol>	

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		<p>now be accepted if the rejected sites were found unsuitable.</p> <p>3. CU3*0 &amp; CU4*0 previously rejected as would lead to significant finger of new development into an area of high landscape value.</p>	3. As above.	
		<p>Location, Shops &amp; Community Facilities</p> <p>1. Error- site is not located adjacent to the Rugby Road Local Shopping Centre, which are 1.4 km away. Nearest shops are in Cubbington Village</p> <p>2. There is no GP practice in Cubbington</p> <p>3. No proposals to mitigate expected increased pressure on existing facilities and services.</p>	<p>1. Noted, appraisal will be amended to reflect this. The site is approx 1.2 km from Cubbington Village shops.</p> <p>2. The appraisal does not state that there is GP in Cubbington.</p> <p>3. The appraisal states that, <i>"In line with Submission Local Plan Policy SC0 (Sustainable Communities), any proposal for development at this site will need to ensure that good quality infrastructure and services are provided. Where this cannot be provided on site, provision will be made through off-site contributions provision"</i>.</p>	Amend appraisal in Appendix III to reflect this representation.
		<p>Sustainable Transport and Traffic</p> <p>1. Error, site is not on 538 bus route</p> <p>2. Bus route 69 only runs once a day from Weston and has no return service.</p> <p>3. Nearest bus stop is for No 68 more than 400m away on Rugby Road near Church Lane. This service is unreliable.</p> <p>4. It was recognised in Nov 2013 that local roads A452, A445 and B4453 are identified as being heavily used.</p>	<p>1. Noted, appraisal will be amended to reflect this.</p> <p>2. Noted, appraisal will be amended to reflect this.</p> <p>3. Noted, appraisal will be amended to reflect this. The nearest bus stop for service 68 is approx 665m from a central location for both parts of the site.</p>	Amend appraisal in Appendix III to reflect this representation. SA objective 2 has been revised from a residual minor positive effect (+) to a residual minor negative effect (-). Overall, the change

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			4. Noted.	does not significantly affect the overall SA findings for the site.
		<p>Green Belt and Agricultural Land</p> <ol style="list-style-type: none"> <li>1. Erosion of GB is to be deplored.</li> <li>2. Grade 2 farmland not considered. See also flood risk.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted and disagree. The appraisal states that, <i>"The site contains agricultural land; however it is unknown at this stage whether this is best and most versatile or not. Development will result in the permanent loss of agricultural land with the potential for permanent minor negative effects against SA Objectives 5 and 9. If lower level assessments reveal the presence of best and most versatile agricultural land then this will increase the significance of the potential effects."</i></li> </ol>	No further action required.
		<p>Nature Conservation</p> <ol style="list-style-type: none"> <li>1. North Cubbington Wood is designated Ancient Woodland and Princethorpe Woodlands Living Landscape trust area is a conservation area only a short distance from Cubbington and H50.</li> </ol>	Noted.	No further action required.
		<p>Flood Risk</p> <ol style="list-style-type: none"> <li>1. Some of the serious concerns about flooding have been omitted from the SA Addendum, Pgs. 37/57 (105) and 38/57 (106).</li> </ol>	The appraisal states that, <i>"The site is located adjacent to an area of flood risk in the southern corner of the site, and is also susceptible to</i>	No further action required.

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			surface water flooding along the eastern border <sup>7</sup> . The SHLAA also identifies that surface water drains to the watercourse south of the site. Submission Local Plan Policy FW1 (Development in Areas at Risk of Flooding) steers development towards those areas with the lowest probability of flooding. It ensures any proposal for development must be designed to be resilient to surface water, fluvial and pluvial flooding. It is considered that there is sufficient mitigation available to ensure that there will be a residual neutral effect against SA Objective 11."	
		Water Quality 1. H50 is also in the Surface Drinking Water protected area as well as a Surface Water Safeguarded Zone, which is not referred to in the new report.	Noted. This is not considered to significantly affect the findings of the SA presented in Appendix III.	No further action required.
<b>Lenco Investments represented by RPS Planning &amp; Development (Tim Watton)</b>				
69057	General	In support of the Proposed Modifications, the Council has proposed a revised Sustainability Appraisal (SA) prepared by Enfusion in February 2016.  In many cases, the SA is the principal source of evidence in support of the Proposed Modifications and Lenco Investments remains concerned that the SA is not sufficiently robust as a	Noted. The SA has considered all reasonable site options identified by the Council to the south of Coventry.	No further action required.

<sup>7</sup> Environment Agency Flood Maps - Risk of Flooding from Surface Water Flooding and Flood Risk for Planning.

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		<p>means of evidence.</p> <p>Lenco Investments is particularly concerned with the lack of consideration of new strategic sites south of Coventry, which has only been given cursory assessment through the SA.</p>		
	Alternatives	<p>SA Growth Options</p> <p>The SA has tested four options for growth figures, ascending between 600 and 1,000 dwellings per annum. The final strategy proposed by the SA is a combination of Option 3 (900) and Option 4 (1,000), resulting in the Proposed Modification figure of 932 dwellings per annum.</p> <p>It is unclear from the justification in the SA why the figure of 1,000 dwellings (Option 4) has been discounted, particularly, when it ranks an identical score to Option 3 (900 dwellings) as indicated in Table 3.1 of the SA. This omission becomes clearer when considered against the context of the Coventry and Warwickshire MoU, which it has claimed to consider.</p> <p>Whilst the Council may opt to follow a 18 year plan period, the same period cannot be attributed to need arising from Coventry, as this would lead to a shortfall of 664 dwellings that will remain unmet across the HMA. If Warwick therefore intends to retain the 18 year trajectory, it should do so with the full allowance of need from Coventry (6,640), presenting a requirement of 17,740 (969 dwellings per annum). This is closer to Option 4 (1,000) dwellings per annum and the SA needs to be amended to reflect the fact that the other options below this figure will not be capable of meeting the required housing need from Warwick and Coventry Districts.</p>	Noted. This is primarily a matter for plan-making. Table 3.2 has been amended to make the reasons for rejection more clear.	Table 3.2 amended to make the reasons for selection/rejection clearer.
	Section 3,	Westwood Heath Site Assessment	The proposed modifications were	No further action



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	Table 3.5	<p>Notably, this site is not included as part of the assessment as part of the February 2016 SA Addendum. Pages six and seven of Appendix IV to the SA indicates that this site does not need to be appraised, as it has been considered previously as part of a larger site and due to the reduction of the site to 425 dwellings, there will not be any significant effects. Lenco Investments does not consider this a legitimate approach to take.</p> <p>Though the site has been considered previously, it has not been considered against the strategy for growth in the Proposed Modifications document. In terms of the SA this is important, because there are a number of new sites proposed by the Council, all of which should have been tested for cumulative impacts.</p>	<p>screened, including changes to sites, in Appendix VI. This includes proposed changes to Policy DS15, which introduces new strategic sites for housing development to meet the uplift in the housing requirement figure. The potential effects, including cumulative effects, of the Proposed Modifications with regard to the overall implementation of the Plan against each of the SA Topics are summarised in Section 4, Table 4.1.</p>	required.
		<p>Table 3.5 of the SA details a summary of five growth options for strategic sites to dovetail with the Council's strategy for distribution. Whereas the other policies have detailed justifications in this regard, there is no detailed SA for these options. The justification is instead included within each of the individual sites – not a cumulative assessment.</p> <p>Without this assessment, it is not possible to fully consider the implications of the Council's latest strategy as part of the Proposed Modifications and it cannot be assured that the strategic locations around Coventry are the most sustainable locations for growth.</p> <p>It is therefore contended that the SA is incomplete. It does not fully account for the cumulative effects of the sites proposed and cannot be subjected to further scrutiny as part of public examination until it is demonstrated how the SA has informed the plan development.</p>	<p>Noted and disagree. Reasonable options were considered and likely significant effects identified in Section 3. Please refer to Paras 3.21 to 3.25 in the SA Addendum Report.</p>	No further action required.

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<b>The Richborough Estates Partnership LLP represented by Star Planning and Development (Mr David Barnes)</b>				
68563	Appendix III	<p>The Richborough Estates Partnership LLP support the principle of allocating land east of Warwick Road, Kenilworth for housing purposes (Site H41). However, Richborough has concerns about the 'scoring' of this allocation in the Sustainability Assessment Addendum Report (February 2016) against the criteria contained in the Sustainability Assessment Report (April 2014).</p> <p>This representation should be read alongside the expression of support for the principle of the allocation (ID 68558) but that its capacity should be increased to 130 dwellings (ID 68560)</p>	Noted.	No further action required.
		<p>Sustainable Transport: The scoring of Site H41 should be both '+' as currently stated but with a '?' rather than a '-'.</p> <p>Initial assessments undertaken on behalf of Richborough demonstrate that the erection of up-to 130 dwellings on the site does not represent a scale of development that would place unacceptable pressures on local infrastructure, including highways. As would be expected for a development of the scale proposed, a new access would be required from Warwick Road together with localised improvements. No significant highway improvements would be required as a consequence of the residential development of Site H41. Any localised improvements would not represent an insurmountable constraint.</p> <p>It is the effect of the development on Sites HO6 and H40 which has the greatest impact on the highway network, in particular Thickthorne Roundabout and that part of Leamington Road connecting the roundabout with the St John's Gyratory. Traffic from Site H41 possesses an alternative route to the A46 without the need to utilise these locations where traffic flow problems</p>	Noted. The SA identifies that there is the potential for residual minor negative effects on traffic and this is still considered the case based on the best currently available evidence. As part of the iterative and on-going SA process, if new or updated evidence is submitted it will be taken into account and the SA revised if necessary.	No further action required.

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		might exist in the future because of these other developments at Kenilworth.		
		<p>Natural Environment and Landscape: The scoring of Site H41 should be '=' rather than '-?' and '=?'</p> <p>Landscape and ecological assessment of the site have been undertaken.</p> <p>Other than the boundary vegetation, there are no features of particular biodiversity interest within the site. Other than a gap created to enable access to the site from Warwick Road, the hedgerows would be retained and enhanced. Account has been taken in preparing the Parameters Plan of the local wildlife site associated with the railway. Built development is set back from the railway with a buffer of landscaped greenspace, including swales, to promote biodiversity improvements.</p> <p>The southern boundary is currently formed by a strong hedgerow which would both visually and physically contain any new homes erected on the allocation. The Parameters Plan indicates that built development could be set back from the site's southern, western and eastern boundaries to provide a soft edge and enable these boundaries to be reinforced with additional landscaping. This is not a case where the release of the site from the Green Belt would materially harm the wider visual amenity, character or appearance of the Green Belt.</p>	<p>Noted and disagree. The appraisal states in Appendix III that, "<i>While it is considered that there is suitable mitigation available to ensure that there will not be any major significant effects, the development of previously undeveloped greenfield land has the potential for a residual minor negative effect on SA Objective 6.</i>"</p> <p>It also states that, "<i>It is considered that there is sufficient mitigation provided through Local Plan policies and available at the project level to ensure development at this site will not have significant negative effects on biodiversity; however, there is still an element of uncertainty until the precise location of development is known and lower level assessments have been carried out</i>".</p> <p>The findings are still considered valid and a consistent approach was taken for all reasonable strategic site options. Any new or updated evidence will be taken into account as part of the iterative SA process.</p>	No further action required.

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		<p>Historic Environment: The scoring of Site H41 should be '=' rather than '=?'</p> <p>Initial assessments have not identified any heritage assets which would be adversely affected by the site being developed for housing purposes, including the settings of Kenilworth Conservation Area and the Listed Buildings to the east of Warwick Road. Views towards St John's Church would be retained. A review of archaeological records does not indicate a high likelihood of any significant below ground heritage assets being present on the site.</p>	<p>Noted. The SA identifies that there is the potential for a residual neutral effect on heritage with an element of uncertainty and this is still considered the case based on the best currently available evidence. As part of the iterative and on-going SA process, if new or updated evidence is submitted it will be taken into account and the SA revised if necessary</p>	<p>No further action required.</p>
		<p>Air and Water Quality: The scoring of Site H41 should be '=' rather than '-?'</p> <p>The site is not in a village or a groundwater vulnerability zone which are the only criteria mentioned in the Sustainability Appraisal.</p> <p>There are no air quality management areas adjacent to the site which would either affect future residents or be materially affected by, for example, the emissions from the private vehicles of future residents.</p> <p>Assessments have been made of the potential for noise associated with the Leamington to Coventry railway line. These assessments do not identify that noise would adversely affect the living conditions of the future occupiers, particularly because housing can be set back from the railway.</p>	<p>Noted and disagree. The appraisal states that, "<i>Evidence suggests that the site contains Grade 3 agricultural land; however, at this stage it is not known whether this is Grade 3a or 3b. Development would result in the loss of agricultural land with the potential for a permanent minor negative effect against SA Objective 9. If further studies find that Grade 3a agricultural land is present and development would result in the loss of this land then there is the potential for a negative effect of greater significance; however, at this stage this is unknown</i>".</p>	<p>No further action required.</p>