

Warwick District Council

Local Plan Examination

Response to Inspector's Matters and Issues

Matter 13 – Other Policies

Historic Environment

Policy HE1 – Protection of Statutory Heritage Assets

Policy HE2 – Protection of Conservation Area

Policy HE3 – Control of Advertisements in Conservation Areas

Policy HE4 – Protecting Historic Parks and Gardens

Policy HE5 – Locally Listed Historic Assets

Policy HE6 – Archaeology

Issue

Whether other policies are justified, effective and consistent with national policy.

October 2016

Policy HE1 – Protection of Statutory Heritage Assets

1. What is the basis for the policy? What is it seeking to achieve?

- a) The policy seeks to protect the district's heritage assets whilst allowing certain development to take place which is sensitive to the structures and settings which contribute to the historic environment. It seeks to protect or return Listed Buildings to their original and optimum use in line with national policy whilst ensuring their continued use and maintenance. Changes of use will need to retain the fabric of buildings and not harm setting. Any redevelopment, extensions etc. should be sympathetic to the original and this will be controlled by the design and materials used to execute development

2. How does the policy relate to the evidence base?

- a) A number of evidence base documents have been prepared for the assessment of suitability in terms of historic environment and heritage assets of sites. These documents include specific detailed site assessments for very sensitive sites at Gallows Hill and The Asps (Feb 2014) (HE03 and HE04); Woodcote House, Leek Wootton (Jan 2015) (HE06); Thickthorn, Kenilworth (Jan 2015) (HE05); Hampton Road, Warwick (June 2016) (HE05PM); Longbridge, Warwick (Jan 2015) (HE07).
- b) Additionally there has been a more general assessment made of the sites where there may be an impact on heritage assets: Heritage Assets review (Local Plan Site Allocations) Report (Dec 2015) HE04PM) and Heritage Assets review (Additional Site Allocations) Report (Jan 2016) (HE03PM).
- c) Reference has also been made to the Historic Landscape Characterisation (2010) (HE01) and Historic Farmstead Characterisation documents (2010) (HE02) published by Warwickshire County Council.
- d) Reference is also made to data held on the Council' GIS system relating to Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Historic Parks and Gardens

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) Working with Historic England who has provided some minor amendments/additions to wording which we have accepted, (see modifications set out in LP21 and Appendices 1 and 2 of this statement).
- b) The policy is consistent with the NPPF Core Planning Principles (para 17) and meets the aims and objectives set out in the Local Plan for the historic environment (Policy DS3 para 2.10 – 2.11). The policy is broadly based on that in the existing Local Plan which has been used successfully in decision making during the life of that Plan, but updated to meet the aims and objectives outlined in the NPPF.

4. How will the policy be implemented? Is this clear?

- a) The policy will be implemented when development is proposed in Conservation Areas, affecting Listed Buildings or Scheduled Monuments, Registered Parks and Gardens or where there is evidence that hidden archaeology may be present; anywhere in fact where heritage assets, designated or undesignated may be affected. This is clear by its inclusion in the Historic Environment chapter of the Local Plan and the accompanying text explains further

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) The policy relates to the NPPF (para 126) and is consistent with it. The wording originally proposed did not include the appropriate NPPF phraseology, but this has been corrected by reference to the Historic England consultation responses which the Council accepts and will incorporate into the adopted Plan with the agreement of the Inspector (LP21 and Appendices 1 and 2 attached)

6. In overall terms is the policy justified, effective and consistent with national policy?

- a) The policy is justified as it is needed in order to protect and enhance the heritage assets that make up the unique and valued historic environment of the district. This is consistent with national policy within the NPPF which 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 most at risk through neglect, decay or other threats.’

Policy HE2 – Protection Conservation Areas

1. What is the basis for the policy? What is it seeking to achieve?

- a) The district has 29 Conservation Areas covering 3.9% of the district. The historic environment is of particular importance to Warwick District where there is a substantial number of Listed Buildings and extensive Conservation Areas. These are important not only to the desirability of the area as a place to live and work, but also to the tourism industry, which together with nearby Stratford upon Avon and the Shakespearean connections, form the basis for a year round tourist appeal and positive impact on the local economy.
- b) The policy seeks to protect those factors which are positive in Conservation Areas whilst allowing improvement and replacement where it is beneficial to the designated area. Conservation Areas are designated for their particular character and contribution to the special qualities of that area, but it is accepted that there is a need for progress and this is not stifled by such designation, but allowed in a positive and beneficial way. National policy adds that enhancements should be sought and this policy seeks to encourage that approach. The policy also draws attention to the importance of views into and out of the Conservation

Areas and that proposals should take these into account. This gives the policy a wider perspective and ensures that the setting of the Conservation Areas is also preserved and improved where possible.

2. How does the policy relate to the evidence base?

- a) The Council has a number of specific pieces of evidence which relate to Conservation Areas, including maps of each and -advice documents relating to specific topics within Conservation Areas:
- Listed Buildings and Conservation Areas (Sept 2010)
 - Painting Buildings in Leamington Spa Conservation Area (June 2010)
 - Roofs on Listed Buildings and in Conservation Areas (Sept 2010)
 - Windows in Listed Buildings and Conservation Areas (June 2010)
- b) A guide to each of the Conservation Areas has also been published

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) The policy clearly sets out what is expected when planning applications are made within Conservation Areas and what will and will not be acceptable. It outlines that even non-Listed Buildings within the Conservation Area that make a positive contribution to the character and appearance of a Conservation Area, are to be retained and that only a sensitive replacement will be considered where demolition is proposed.
- b) The policy sets out how the decision maker can judge whether a proposal is to be acceptable in terms of its location within the Conservation Area and what will contribute to improving and enhancing the designated area. The detail is therefore sufficient to allow the decision maker to be clear as to the direction of such a decision given the evidence provided by the proposal.

4. How will the policy be implemented? Is this clear?

- a) The policy will be implemented through the decision making process. The policy is written in such a way that it is clear what is expected of proposals within the Conservation Areas and the expected outcomes which should complement and be sensitive to such designation.

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) The policy is wholly consistent with national policy and the advice of HE has been invaluable in this respect. The Council has taken on board proposed word changes and minor amendments suggested by HE to ensure that this is the case (LP21 and appendices 1 and 2)
- b) The approach to policy making for Local Plans in the NPPF has changed little since it superseded the guidance in PPG15, 'Planning and the Historic Environment'; protection and enhancement and the appropriate use of vacant Listed Buildings to ensure their future being major objectives in both documents. The Local Plan policies similarly reflect such aims.

6. In overall terms is the policy justified, effective and consistent with national policy?

- a) The policy is needed to ensure the future of Conservation Areas and the justification for changes within them. It will also give guidance to the designation of new Conservation Areas and in particular, will assist in the potential designation of Conservation Area(s) along the canalside in conjunction with Local Plan policy DS17 (Supporting Canalside Regeneration). It is wholly consistent with national policy and provides the framework for decision making within Conservation Areas in the district.

Policy HE3 – Control of Advertisements in Conservation Areas

1. What is the basis for the policy? What is it seeking to achieve?

- a) The Council has worked consistently to ensure that advertisement hoardings in Conservation Areas are removed and not replaced and that ‘street furniture’ is reduced to a minimum. In this respect, the Council wishes to ensure that advertising is not only kept to a minimum, but that it is sensitive to its location.
- b) The policy is therefore seeking to prevent advertisements that would have a detrimental impact and allowing only those which contribute to the character of the area and adhere to the locally adopted design guidance (e.g. the District Council’s publication ‘Design Advice, Shopfronts in Warwick’).

2. How does the policy relate to the evidence base?

- a) The District Council has published specific guidance on this topic in ‘Design Advice, Shopfronts in Warwick’ and this together with national guidance forms the basis for the policy.

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) The policy clearly outlines that advertisements in the Conservation Areas are strictly controlled and that in order to be allowed to be displayed will need to make a positive contribution to the designated area. This gives a clear basis on which to make a decision on an application to display an advertisement in a Conservation Area without being prescriptive.

4. How will the policy be implemented? Is this clear?

- a) The policy will be implemented through decision making on applications for advertisement consent. This is clear through the wording of the policy.

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) National policy in Planning Practice Guidance is specific about good design and states that

development should “*respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation*”. (para 58). More specifically the guidance, in addressing the question of advertisement states, “*Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority’s detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.*” (para. 67)

b) Policy HE3 clearly reflects these objectives.

6. In overall terms is the policy justified, effective and consistent with national policy?

a) In view of the specific need to carefully control the display of advertisements within Conservation Areas to take account of the special character of that designated area, the policy is justified and, as described at 5 above, is wholly consistent with the national policy.

Policy HE4 – Protecting Historic Parks and Gardens

1. What is the basis for the policy? What is it seeking to achieve?

- a) Warwick District has 11 nationally registered historic parks and gardens; 6 x Grade II, 4 x Grade II* and 1 x Grade I at Warwick Castle and Castle Park. In addition, there are a further 29 Locally Important parks and gardens currently designated by the Council, although others may be added to this list in future. Protection of these important assets, both in terms of historical significance, as the setting for other heritage assets and as green spaces, is paramount.
- b) In addition to protecting such designated areas, the policy seeks to ensure that planning applications for any proposals that may have an impact on any of these assets are carefully considered by reference to heritage assessments produced by appropriately qualified specialists. In the case of nationally registered parks and gardens, such proposals will be considered in the same way that development involving Listed structures would be assessed i.e. in the resulting level of harm being balanced against the public benefits.

2. How does the policy relate to the evidence base?

- a) With close reference to Historic England’s Register of Historic Parks and Gardens, the Council maintains a list of its registered parks and gardens and provides advice and information through publications:
- Green Infrastructure Study (2010) (G01)

- Warwickshire, Coventry & Solihull Sub-regional Green Infrastructure Study (July 2011) (G03)
- Warwick District Green Infrastructure Delivery Assessment (Feb 2012) (G02)

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) The policy clearly sets out that decisions will be made based on national policy which relates to other elements of the historic environment. It stipulates that proposals that cause substantial harm will not be acceptable but that development that results in less than substantial harm will be weighed against the public benefits of the proposal, including securing optimum viable use. Although protection to locally important parks and gardens is not as strong as that for nationally registered sites, it is nevertheless important that the district Council includes these to give some protection and allow them to be specifically mentioned in the policy that provides that additional protection.
- b) These are all designated areas that are specifically important to the attractiveness of Warwick district and unique to their specific locations and historic importance in much the way of the built environment and therefore require specific mention.

4. How will the policy be implemented? Is this clear?

- a) The policy makes it clear how it will be used in decision making and in balancing the harm of any development against the public benefit. Historic England will assist with applications which have an impact on Grade I and Grade II* registered parks and gardens.
- b) It also directs the decision maker to the expert bodies that advise on locally designated parks and gardens to assist in making those decisions based on specialist knowledge.

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) National policy in the NPPF defines registered parks and gardens as designated heritage assets and as such their conservation should be an objective of all sustainable development. Substantial harm to or total loss of a Grade II registered park or garden should be exceptional and for a Grade II* or I registered park or garden such loss or harm should be wholly exceptional.
- b) Local Plan policy HE4 very much reflects that objective and adds local context by providing a list of where the policy applies to both national and locally identified assets.

6. In overall terms is the policy justified, effective and consistent with national policy?

- a) The importance of the registered parks and gardens and those additionally locally identified, justifies the policy to ensure that development is controlled taking into account the impact it will have on the assets and takes a balanced view as to the level of such impact and how this is weighed against public benefit. As Warwick has a substantial number of such assets, and

especially given the status of Warwick Castle and Castle Park as a Grade I asset, it is particularly important that policies state what is expected and who will be consulted in determining planning applications which affect them. This is wholly in accordance with national policy.

Policy HE5 – Locally Listed Historic Assets

1. What is the basis for the policy? What is it seeking to achieve?

- a) The Council is producing a local list of buildings which, whilst not of national importance, nonetheless deserve to be protected due to their local significance and contribution to the special character of the district.
- b) Planning Practice Guidance at a national level defines such listings as “buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets.”
- c) The Warwick District list is currently in preparation and will be compiled in conjunction with local special interest groups and owners. This policy has been included to support the locally listed buildings on publication of the list and for any which are added to the list in the future. It seeks to offer an extra tier of protection to those locally important buildings to ensure that they are retained and that any modifications or additions are sympathetic in design and materials.

2. How does the policy relate to the evidence base?

- a) The District Council is in the process of setting up a Local List. The Council’s website assists external stakeholders to identify suitable buildings and structures to submit for assessment and possible inclusion:
https://www.warwickdc.gov.uk/info/20377/conservation/706/locally_listed_buildings
- b) This sets out the criteria used for considering inclusion on the list

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) Whilst the policy is succinct it does add the additional layer of protection required and provides the decision maker with a clear indication of what is expected of any modification or enlargement of the building in terms of design and materials.

4. How will the policy be implemented? Is this clear?

- a) The policy will be implemented at the time a planning application affecting a locally listed building is determined. The policy makes clear the circumstances under which permission will be granted dependent upon the potential for loss or unsuitable modifications and clarifies that the demolition or loss will be strongly resisted. This layer of protection could be boosted in Conservation Areas where an Article 4 direction could be considered in addition.

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) There is no national policy which stipulates that a local planning authority should compile a local list, however, it is recognised (Planning Practice Guidance, para 039 Ref ID: 18a-039-20140306) as a way of protecting those assets which do not meet the criteria for national listing but do nonetheless add to the historic context of the local area.
- b) The Local Plan process is the correct platform from which to launch a local list and this is what Warwick District Council intends to do, supported by this policy.

6. In overall terms is the policy justified, effective and consistent with national policy?

- a) The policy is justified in that it sets out how this Council intends to deal with planning applications which have an impact on any building on the local list. This is particularly relevant given the lack of a national policy and demands that a local policy is therefore included in the Local Plan.

Policy HE6 – Archaeology

1. What is the basis for the policy? What is it seeking to achieve?

- a) The policy relates to the need to identify and protect/record archaeological remains, many of which are buried and therefore cannot be easily detected initially other than through records such as the Historic Environment Record (HER) and other evidence including surface finds, local knowledge, aerial photographs etc.
- b) The policy seeks to protect monuments that have been identified, investigated and recorded and possibly also Listed, but also to provide for the potential investigation where evidence exists that archaeology is or may well be, present. This does not necessarily preclude development, but provides the opportunity for further investigation and recording of finds prior to the development taking place or incorporation of the finds into the overall scheme.

2. How does the policy relate to the evidence base?

- a) A number of evidence base documents have been prepared for the assessment of suitability in terms of historic environment and heritage assets of sites. These documents include specific detailed site assessments for very sensitive sites at Gallows Hill and The Asps (Feb 2014) (HE03) and (HE04); Woodcote House, Leek Wootton (Jan 2015) (HE06); Thickthorn, Kenilworth (Jan 2015) (HE05); Hampton Road, Warwick (June 2016) (HE05PM); Longbridge, Warwick (Jan 2015) (HE07).
- b) Additionally there has been a more general assessment made of the sites where there may be an impact on heritage assets Heritage Assets review (Local Plan Site Allocations) Report (Dec 2015) (HE04PM) and Heritage Assets review (Additional Site Allocations) Report (Jan 2016) (HE03PM).
- c) Reference has also been made to the Historic Landscape Characterisation (2010) (HE01) and Historic Farmstead Characterisation documents (2010) (HE02) published by Warwickshire County Council
- d) Specific site reports have been published for certain sensitive sites:
 - i. Station Area, Leamington Spa (Archaeology Constraints Report, June 2008)
 - ii. Longbridge Heritage Assessment (Archaeological Baseline Study and Heritage Impact Statement (Jan 2015)
 - iii. Thickthorn Historic Environment Appraisal (Jan 2015)

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) The policy clearly sets out how planning applications which may have an impact on archaeological remains of value will be dealt with. It explains clearly that
 - development will not be permitted which results in substantial harm to Scheduled Monuments or other archaeological remains of national importance, and their settings unless in wholly exceptional circumstances and
 - that there will be a presumption in favour of the preservation of locally and regionally important sites, except where the applicant can demonstrate that the benefits of development will outweigh the harm to archaeological remains.
- b) Additionally, the Council expects considerable investigation is undertaken and any results which lead to the belief that archaeology can be expected, should lead to a properly organised and supervised investigation to ascertain the importance and how this should be treated within the development if it can proceed. This may involve recording the results before the development proceeds, incorporating the remains into the development in a sympathetic way to preserve them or, in some circumstances, resisting any such development.

4. How will the policy be implemented? Is this clear?

- a) The policy will be implemented at the time of a planning application in an area which has some potential for archaeological remains or there is already a Scheduled Monument. The policy makes this clear by setting out how the application will then proceed and how

applicants may be required to provide more evidence.

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) The NPPF and the Planning Practice Guidance do not apply to the consideration of scheduled monument consents but do apply to the consideration of all other permissions for activities that may affect scheduled monuments (NPPF, paras 132, 133; PPG para 008 Ref ID: 18a-008-20140306).

Those that are of demonstrably of equivalent significance are considered subject to the same policies as those for designated heritage assets (NPPF, para 139). National policy demands that Local Authorities should respond proportionately to non-designated assets requiring an appropriate desk based assessment and field assessment if needed in order to ascertain the potential loss and sensitivity to disturbance of archaeological assets (PPG para 040 Ref ID: 18a-040-20140306).

6. In overall terms is the policy justified, effective and consistent with national policy?

- a) The policy is justified to meet the criteria set out in national policy and policy HE6 fulfils this requirement, setting out for applicants what can be expected when development impacts on such assets, indicating a need for more work and potentially altering proposals to accommodate any significant finds resulting in potential delays to development. It is therefore consistent with national policy and effective in protecting scheduled monuments and previously unidentified assets.

Note of matters agreed with Historic England to date (at 24 October 2016)

Plan ref	Page no.	Relevant extract of the Draft Warwick Local Plan	Historic England (HE) comment	Recommendation to ensure the Plan accords with tests of soundness	Action
1.54 Objectives	12	<i>Protect and enhance high quality landscapes and important heritage and natural assets, ensuring that where adaptation is needed, this is done in a sensitive way.</i>	HE welcomes the principle of this sub objective however suggests a minor clarification to ensure consistency with national planning policy.	The following additional text is suggested. ...in a sensitive way <u>appropriate for their significance.</u>	Agreed
2.8 DS3	15	DS3 : Supporting Sustainable Communities <i>d) protecting areas of significance including high quality landscapes, heritage assets and ecological assets;</i>	Welcome/support/endorse	N/A	N/A
3.135 CT7	72	<i>Development at Warwick Castle or Warwick Racecourse ... will only be permitted where it is brought forward in line with an approved Masterplan.</i>	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, HE would welcome the opportunity be a partner in its preparation. If the masterplan is to be a development plan should its preparation be subject to the same	The following additional text is suggested. To support and inform the masterplan HE and other key local groups will be invited to participate in its preparation.	Agreed

			rigor and discipline of a local plan?		
3.136	73	<i>It is a Grade 1* listed building set within Grade 1 landscaped grounds.</i>	It should also be recognised that Warwick Castle is also a Scheduled Monument.	The following additional text is recommended. It is a Grade 1* listed building and <u>Scheduled Monument</u> set within Grade 1 landscaped grounds.	Agreed
4.40 H4	81	H4 Securing a Mix of Housing <i>d) sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;</i>	Welcome/support/endorse	N/A	N/A
5.0 SCO	104	Overarching Policy SCO: Sustainable Communities. <i>New development should be high quality... It is also important that new development protects and enhances the historic, built and natural features that make Warwick District a great place. To achieve this the development should:</i> <i>k) protect, and where possible enhance, the historic environment and particularly designated heritage assets such as Listed Buildings, Registered Parks and Gardens and Conservation Areas, and;</i>	Welcome/support/endorse	N/A	N/A

5.103	133	<p>CC2 Planning for Renewable Energy and Low Carbon Generation.</p> <p><i>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:</i></p> <p><i>c) the design would not result in substantial harm to any adjacent heritage assets and local areas of historical and architectural distinctiveness;</i></p>	<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>The following alternative text is suggested to accord with the NPPF and paragraph 5.107 in the Explanation to the Policy.</p> <p>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;</p>	Agreed
5.29	113	<p><i>“However, there are significant issues associated with transport that this Plan needs to address. These include safety, air quality, impact on climate change, congestion and the impact that transport infrastructure can have on the historic environment and community cohesion. These impacts need to be managed carefully through this Plan so that the achievement of an efficient and effective transport network is not achieved at the expense of</i></p>	<p>Welcome/support/endorse.</p> <p>However 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>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.</p>	See attached

		<i>health, the environment and community well-being.</i>			
TR1	113	Transport Policy TR1 Access and Choice	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.	Additional criteria - 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.	See attached
5.41	115	<i>All highway infrastructure will be required to comply with national guidance and standards set out in Manual for Streets, Manual for Streets 2 - wider application of the principles, the Design Manual for Roads and Bridges and any subsequent updates to these documents. These provide guidance to applicants on assessing the overall transport requirements for new developments, the types of transport improvements likely to be justified, the layout and design of new accesses and the procedures and agreements</i>	Welcome/support/endorse. However 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.	Apply <i>Manual for Streets and the Design Manual for Roads and Bridges</i> , 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.	See attached

		<i>which will be used.</i>			
5.44		<i>Transport Assessments, prepared in line with the Department for Transport's Guidance on Transport Assessment, are required alongside planning applications for major development to demonstrate that they positively contribute to the objectives of this Plan. Transport Assessments will be required for all large developments in line with Appendix B of the Guidance on Transport Assessment (or any subsequent updates) produced jointly by the Departments for Transport and CLG.</i>	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.	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.	See attached
TR2	116	Policy TR2 Traffic Generation. <i>Any development that results in significant negative impacts on health and wellbeing of people in the area as a result of pollution, noise or vibration caused by traffic generation will not be permitted unless effective mitigation can be achieved.</i>	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.	Add 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	See attached

				achieved.	
DS11	24	<p>DS11 Allocated Housing Sites</p> <p>H01 Land West of Europa Way 1,190 homes</p> <p>H02 Land south of Harbury Lane 1,505 homes</p>	<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 (March 2014) (STA4) 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>Whilst this is a better proposition than previously suggested 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>Might an increasing demand to travel through the town provide the</p>	<p>Can the local authority assure Historic England that :-</p> <ul style="list-style-type: none"> -the direct, indirect and cumulative effects of proposals on the historic environment have been appreciated? -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? -that the principles of good practice in <i>Manual for Streets</i>, and <i>the Design Manual for Roads and Bridges</i> have been applied? <p>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</p>	<p>See attached.</p> <p>Historic England will be involved in the detailed layout and design of these sites and can be assured that the district council will ensure that the historic environment is taken into account</p>

			<p>opportunity to enhance the public realm and streets in the town consistent with NPPF paragraphs 137, 156 and part of the Plans positive strategy for the conservation of the historic environment (NPPF paragraph 126)? I understood this was an objective of the former Warwick Area Action Plan now apparently no longer being prepared.</p>	<p>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).</p> <p>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.</p> <p>A failure to address such concerns may cause the Plan to be considered unsound.</p>	
DS11	24	DS11 Allocated Housing Sites HO6 Thickthorn , Kenilworth	The development affects Thickthorn Manor and the Glasshouse Roman Settlement. There is no evidence to	To accord with NPPF paragraphs 158 and 169, the local authority should gather	This has been done and the contents of the assessment agreed

		<p>760 homes, 8ha employment</p>	<p>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 understood and therefore cannot say whether the objectively assessed development needs of the District will be met or not in accordance with the presumption in favour of sustainable development. One of the core dimensions of sustainable development being the protection and enhancement of the historic environment.</p> <p>It is expected that evidence has been taken into account when considering the impact of the proposal on heritage assets, to avoid or minimise conflict</p>	<p>evidence to assess the significance of the affected heritage assets (including by development affecting the setting of either heritage asset).</p> <p>I would strongly recommend the methodology in The Setting of Heritage Assets (Historic England 2011) is used.</p> <p>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.</p> <p>It should then be applied to inform the principle, location, form and capacity of any strategic allocation.</p> <p>Development will be expected to avoid or minimise conflict between any heritage asset’s conservation and any aspect of the proposal.</p> <p>Consequently Historic England</p>	<p>with Historic England</p> <p>Additionally, Historic England will be involved in the detailed layout and design of these sites and can be assured that the district council will ensure that the historic environment is taken into account</p>
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		<p>between the heritage asset's conservation and any aspect of the proposal (NPPF para 129).</p> <p>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.</p> <p>Consequently Historic England considers the Plan is inconsistent with the provisions of the NPPF and therefore unsound.</p> <p>Historic England has raised this concern formally on more than one occasion.</p>	<p>recommends that the Plan should not progress until this strategic matter is resolved.</p>	
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H19	25	<p>DS11 Allocated Housing Sites</p> <p>Baginton - Rosswood</p> <p>35 new dwellings adjacent to Baginton Conservation Area</p>	<p>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.</p>	<p>Consider including the critical design principles for the site in the Plan.</p>	<p>In allocating the site, we do not consider it necessary to go into this level of detail when it can be dealt with through a planning application and by pre-application discussions between the developer and the Council</p>
H34	25	<p>DS11 Allocated Housing Sites</p> <p>Housing allocation at Leek Wootton</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 with it. 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</p>	<p>The following comments by Historic England (dated 4 Oct 2016) on this proposed allocation are made having regard to national policy, legislation and the evidence provided by the Council (notably the Woodcote House Setting Assessment (WDC 2015) and by the prospective developers (recently submitted Aug/Sept 2016).</p> <p>The proposed removal of unsightly post war development from the site, car parking from the front of the House and the positive</p>	<p>Following HEs recent comments, the Council is discussing an appropriate response with the prospective developers team and will further update the Inspector in due course.</p>

			<p>mitigated (NPPF para 152). This could include measures such as a reduction of the quantum of development of a site.</p> <p>It is expected that evidence is taken into account when considering the impact of the proposal on heritage assets, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal (NPPF para 129)</p>	<p>conservation initiatives provide a welcome opportunity to better reveal the significance of this Grade II Listed Building in accordance with NPPF paragraph 137.</p> <p>Historic England notes the intention to subdivide the house to form several apartments and to replace aforementioned post war development with new housing to the north. Consideration of the details associated with such aspects of development can be assessed at a later stage when further information is submitted with any application for LB Consent and Planning Permission.</p> <p>New housing development is proposed parallel to Woodcote Lane which provides a 'rural' entrance to the village and makes a positive contribution to the setting of the Conservation Area. In accordance with the Planning (Listed Buildings and</p>	
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				<p>Conservation Areas) Act 1990, one needs to be assured that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.</p> <p>The parkland between the house and the South Lodge clearly forms part of the historic grounds to the Listed Building, is a component of the formal setting and contributes positively to its significance. Proposed residential development in this part of the site would remove approximately 1/3 of this historic open landscape and therefore cause harm to the significance of the Listed Building.</p> <p>The Local Authority will need to demonstrate that great weight has been given to the conservation of the Listed Building in accordance with NPPF paragraph 132 and Section 66 of the Planning (Listed Buildings and</p>	
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				<p>Conservation Areas) Act, 1990.</p> <p>To accord with NPPF paragraph 134, a key test will be for the Local Authority to weigh the harm (as described above) against any relevant public benefit. It may be helpful to clearly set this out for the Inspector's consideration.</p>	
BE2	108	Developing Strategic Housing Sites – development briefs	To ensure development briefs are prepared having due regard and consideration of the historic environment an additional criterion is recommended.	<p>Add</p> <ul style="list-style-type: none"> - the historic environment 	Agreed
	145	Historic Environment Section	Historic England welcomes the inclusion of this specific 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.		
HE1	146	HE1 Protection of Statutory Heritage Assets	It is unclear why the term <i>Statutory Heritage Asset</i> is used as the policy clearly only relates to listed buildings.	Rename Policy, Listed Buildings	Agreed

HE2	147	HE2 Protection of Conservation Areas	Again, the title of the policy is perhaps misleading as the Policy is about managing change within conservation areas involving protecting and enhancing.	Rename Policy, Conservation Areas	Agreed
HE2	147	HE2 Protection of Conservation Areas	The components of this policy should be set within an overriding policy statement as some of the policy expectations appear rather exclusive.	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.	Agreed
HE4	150	HE4 Protecting Historic Parks and Gardens	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. Alternatively the local authority might consider including the following paragraph in the introductory text of	The following additional text is suggested for the introductory part of the historic environment section. <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 been demonstrated that all</i>	Agreed

			<p>the Historic Environment Policy section, and a revised Policy HE4.</p> <p>Again, a revised policy title is also suggested.</p>	<p><i>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>HE4 Historic Parks and Gardens</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>	
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Proposed Modifications Consultation Response

<p>Policy DS NEW 1 Directions for Growth South of Coventry (Westwood Heath, Kings Hill) New paragraph 1.09</p>	<p><i>Development proposals for the strategic sites will be expected to address the following as a minimum: Proposals for development must respond positively to natural and heritage assets; wherever possible and viable, development should enhance the settings of such assets.</i></p> <p>The emphasis of the caveat "<i>wherever possible and viable</i>" is inconsistent with the NPPF and should either be deleted or replaced with "where appropriate" (NPPF Glossary – definition of Conservation).</p>	<p>Agreed</p>
<p>H42 Westwood Heath 425 dwellings</p>	<p>The Local Plan Site Allocations Historic Environment Assessment Statement 2015 confirms that the proposed allocation site at Westwood Heath would have a "moderate adverse impact" on the setting of non-designated medieval remains and the overall archaeological potential of the site. Consequently Historic England recommends that the Statement's suggested mitigation is referred to within the Local Plan - perhaps an abbreviated version of the below .</p> <p><i>- a staged programme of investigation and mitigation, including pre determination field evaluation to establish the presence, extent and significance of any unrecorded archaeological remains within the proposed allocation site boundary. The results should influence the design and layout of any development proposals including contributing to the sites green infrastructure provision.</i></p>	<p>Agreed</p>
<p>H43 Kings Hill Lane 1800 dwellings</p>	<p>The Local Plan Site Allocations Historic Environment Assessment Statement 2015 demonstrates the likely harm that would be caused by future development to the significance</p>	<p>Agreed, but the detail will be included within a planning application and it is at this stage that these comments will be taken into account. Historic England is a consultee and</p>

	<p>of the Kings Hill Deserted Mediaeval Village (Scheduled Monument) unless an informed strategic design response is pursued.</p> <p>Historic England recommends that the Local Plan include specific reference to the effected heritage assets within the site and the necessary strategic design response to mitigate/avoid harm.</p>	<p>will be involved in the development of the detailed design of the site taking into account the heritage assets which are in the area</p> <p>The Council's consultant has prepared a report which meets the requirements of HE with regard to assessing the effects of development on the heritage assets.</p>
<p>Policy DS NEW3 Former Police Headquarters, Woodcote House 115 dwellings</p>	<p>In principle, the proposal provides a welcome opportunity to restore this Grade II Listed Building and its setting. However it has not been demonstrated, by the provision of evidence, that 115 new homes can be accommodated on the site in accordance with the DS NEW3 policy criteria, and without causing significant harm to the setting of the Listed Building its associated park/garden and the adjacent Conservation Area.</p> <p>Evidence needs to be provided to illustrate how the quantum of development might be delivered without causing an unacceptable level of harm to the setting of the affected heritage assets.</p> <p>Historic England Guidance on Enabling Development may help to inform any viability issues that may arise.</p>	<p>A Masterplan is in preparation for this site which will address issues around delivery of the development taking into account the heritage assets whilst delivering the quantum of development forecast for the site. Historic England is a consultee</p>
<p>H19 Baginton – Land north of Rosswood Farm. Extended area. 80 dwellings</p>	<p>The Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016) highlights the significant impact of future development on the setting of the Conservation Area. From the report it is not clear if harm can be avoided. WDC should clarify this matter to demonstrate that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent Conservation Area in accordance with S72 of the</p>	<p>See H19 above</p>

	<p>Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>How might development respond to ensure the Conservation Area's significance is sustained and how should appropriate and effective safeguards (if they exist) be reflected in the Local Plan itself?</p>	
<p>H44 North of Milverton 250 dwellings</p>	<p>It is not apparent whether evidence been gathered and applied to inform this allocation and The Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016) highlights the potential impact of future development on the setting of the Leamington Spa Conservation Area.</p> <p>The Local Plan should set out the desired design approach to demonstrate a positive approach, and great weight, to the conservation of heritage assets in the delivery of sustainable development, one of the core dimensions being the protection and enhancement of the historic environment (NPPF Para 132); and that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area in accordance with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 might the Local Plan set out the required design response.</p>	<p>It is considered that the detail of the design approach for the site can be dealt with at the stage of a planning application when the comments made here can be addressed directly. Historic England will be consulted and their input welcomed to ensure that the historic environment is protected and enhanced.</p>
<p>H46A Gallows Hill (Strawberry Field) 630 dwellings</p>	<p>It is widely accepted that that the southern approach to Warwick, including the Gallows Hill site, contributes to the significance of the town (a designated Conservation Area), the Castle (a Grade 1 Listed Building and Scheduled Monument), and Castle Park, a Grade 1 Registered Park and Garden. The site is also 'in itself' a (non-designated) historic landscape of some historic importance and abuts the Grade II Listed Toll House.</p> <p>National policy expects that when considering the impact of a proposed development on the</p>	<p>The developers are currently working on plans for the site taking into account the comments made by Historic England. The plans that are being drawn up are subject to discussion directly with Historic England and therefore will take into account the points raised in this document and agreement will need to be reached before a planning application can progress.</p> <p>A Heritage Assets Assessment document has already been prepared and this can form the</p>

	<p>significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (NPPF paragraph 132). There is also an expectation that local planning authorities set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, recognising that heritage assets are an irreplaceable resource (NPPF paragraph 126). To ensure the Local Plan's soundness it is important to satisfy these national planning policies.</p> <p>In addition it should be recognised that special regard must be given to desirability of preserving the setting of a listed building; and special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas in the exercise of S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990).</p> <p>In relation to the recent Asps appeal case, the Council, the local community, Historic England and others presented a clear and robust case and the Inspector and Secretary of State both acknowledged the likely harm to the significance of affected heritage assets. However the Secretary of State placed great importance on the lack of an adequate housing supply and so granted permission. Nevertheless, that decision taken by the Secretary of State does not alter the case that Gallows Hill contributes to the significance of a number of very important heritage assets and that development of that site would cause harm to that significance contrary to national policy.</p> <p>It could be argued that further development to the south of Warwick on the Gallows Hill site will exacerbate the impact of intrusive development</p>	<p>basis for future negotiation and inform necessary requirements to ensure the retention of as many aspects of the historic environment as possible can be retained and enhanced.</p>
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within the landscape and that the cumulative impact of development to the south of the town reinforces the importance of Gallows Hill.

I note the Council's website statement dated 22 January 2016 following the Asps decision.

Warwick District Council is very disappointed that the Secretary of State has granted planning permission for 1325 dwellings on these two sites following the public inquiries held last year. The decisions have serious consequences because of the impact on the landscape and the setting of one of our most important and unique heritage assets, Castle Park.

Historic England has had no reason to disagree with the conclusion of the Council's own evidence - **The Setting of Heritage Assets Gallows Hill, Warwick (2014)** - *that the harm to highly graded heritage assets could not be adequately mitigated or justified and therefore should not take place.* It is therefore a surprise to note the Council intends to include Gallows Hill as a development site in the Proposed Modification to the Local Plan contrary to its own evidence and previous position, most recently during the Asps public inquiry.

It should be appreciated that only where harm is unavoidable should mitigation be considered (NPPF Para 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm. It is not apparent whether such a case has been made by the Council to justify the allocation of Gallows Hill, or shown how harm might be mitigated.

Modifications to the Local Plan enable the Council to identify suitable sites within the District, and beyond if necessary, to accommodate future growth and the delivery of sustainable development to accord with

	<p>the NPPF, a core principle being the protection and enhancement of the historic environment. Published Modifications to the Plan show the release of extensive development sites to the south of Coventry (Kings Hill and Westwood Heath). This demonstrates the potential availability of a more suitable alternative to the Gallows Hill allocation. Historic England would encourage the consideration of such an alternative spatial strategy (in respect of the Gallows Hill site), and in doing so demonstrate a positively prepared plan, that is technically sound and in accordance with national planning policy.</p>	
<p>H40 East of Kenilworth (Crewe Lane, Southcrest Farm and Woodside Training Centre) 640 dwellings</p>	<p>Historic England has discussed with the Council how the Local Plan, and future development, can positively respond to the Scheduled Roman archaeology within the site, and the Grade II Thickthorn Manor. We anticipate these matters to be fully resolved and form the basis a Statement of Common Ground.</p>	<p>The assessment has been undertaken and Historic England has been consulted upon the findings which are acceptable and which the Council will take into account when a planning application is received and the site developed.</p>
<p>H48 Barford – Land South of West Ham Lane 45 dwellings</p>	<p>It is not apparent whether evidence been gathered and applied to inform this allocation and demonstrate that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent Conservation Area in accordance with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. How should development respond to this context to ensure the Conservation Area’s significance is sustained and how should these safeguards be reflected in the Local Plan itself? The Landscape Sensitivity and Ecological & Geological Study – Landscape Addendum January 2016 makes no reference to the Conservation Area, and the site in not included in the Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016).</p>	<p>The District Council’s Conservation Officer has visited the site and assessed the potential impact upon the Conservation Area and Listed Buildings in the vicinity. In his opinion, the site is located and screened in such a way as to render any impact minimal or non-existent and not of concern</p>

Accepted responses to Highway Questions from Heritage England

WDC (and WCC) Response to questions raised by Historic England (27th July 2015)

1. Clarification of the outputs of the WCC/stakeholder group in developing a Local Warwick Transport Strategy. Is there a tangible Local Warwick Transport Strategy?

The study, *Warwick and Leamington Transport Strategy*, undertaken by Atkins Consultants considered the sustainable transport demands, benefits and requirements over a wider area than just Warwick Town Centre. Warwick Town Centre did however feature as a key area within the study. I attach a copy of the report for reference.

2. Clarification of the stakeholder group membership and whether it included any 'heritage' expertise or relevant interest group and whether and how such matters were considered.

Warwick District Council, Leamington Society, Warwick Society and Warwick Castle were included within the stakeholder group membership. Details of group membership are included in the attached document. Heritage was one factor in a range of issues which were considered.

3. Clarification as to whether and how the transport strategy considered and reflected good practice in other historic towns and cities under similar pressure e.g. Oxford, Canterbury?

The study focuses on Demand Management strategies similar to those adopted in the examples cited.

4. How traffic volumes through Warwick can be reduced?

This is a complex question which the Study has attempted to address and which has fed through in to the Local Plan's IDP. The result may not be a reduction in traffic below existing levels but will certainly mitigate much of the potential impacts resulting from the additional Local Plan housing. The Study and the IDP focus on a combination of

- a) improvements to the Strategic Road Network, thereby reducing journey times travelling around the town
- b) providing better alternatives than travelling through town centre routes (such as improving access to the motorway via Europa Way),
- c) adopting the demand management strategies (such as park and ride; encouraging sustainable transport options and workplace parking levies) identified through the Warwick and Leamington Transport Strategy.

This work will help to mitigate the impact of development in Warwick.

5. Will capacity improvements reduce traffic congestion? What are the implications if they do not?

The Strategic Transport Assessments

(http://www.warwickdc.gov.uk/info/20416/evidence_base) demonstrate the level of impact at each junction. Schemes are being refined as a result of the Warwick and Leamington Strategy outcomes. All schemes will consider the needs of all highway users (see the Corridor approach set out in the appendices to the IDP: [Transport Corridor Strategies](#))

The modelling evidence in the STAs clearly demonstrates a need for mitigation of some form within the town centre. As the Strategic Assessments demonstrate that impacts can be mitigated, we can be confident that when detailed assessments are undertaken and optimised, that the schemes will manage traffic congestion. It should be noted that it is not reasonable to expect Local Plan mitigation to reduce existing traffic congestion, rather NPPF states that the impact from development should not be severe.

It should be noted that traffic growth is 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.

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). The 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:

- 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.
- Priory Rd/Smith St - there is an existing congestion issue at this location which is exacerbated by Local Plan growth. This scheme provides an opportunity to reduce street clutter, improve the public realm in the surrounding area and provide improved facilities for non-motorised users. This would also tie into one of the key sustainable transport corridors identified through the Atkins study.
- Myton Rd/Banbury Rd -, there is already a severe congestion issue mainly linked to the peak in school travel arrivals/departures and commuter travel. This scheme provides the opportunity to introduce pedestrian and cycle crossing facilities where none currently exist, this especially important at this location given the proximity to 2 major schools and the significant pedestrian/cycle footfall between Warwick Tech Park and Warwick. However, the most recent work shows that the footprint of this

scheme will be reduced whilst still providing improved pedestrian and cycling access to the town centre, local schools and businesses

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 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

"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."

All schemes will be designed in adherence to guidance set out in the Design Manual for Roads and Bridges and the Manual for Streets.

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) 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".

It should be noted that due to the robust assessments using micro scale modelling, the County Council has 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 cannot 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, other transport users, AQ etc 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 Strategy (see attached draft Cycle Network Plan).

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 some of these measures are still in development, but others are in detailed design stage as development in this area

begins to come on stream. All the measures are described 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.

6. What public transport improvements are proposed; noting that on its own I understand this does little to reduce car driving unless accompanied by some form of constraint?

The STA and Warwick and Leamington Strategy work has identified the following improvements

- P&R and associated service improvements
- Warwick and Leamington Bus Network Review to ensure comprehensive network coverage to new and existing sites.
- Potential for Bus Priority along Europa Way
- In addition contributions to the provision of a bus service have been required. Even before the recent appeal decisions at the Asps and Gallows Hill, these have totalled over £2m

This will build on the recent improvement to bus services (e.g.X19 extension to Gaydon/JLR major employer), access to rail scheme in Warwick and planned improvements for improved access by road, cycle and pedestrian to Warwick Parkway as part of the A46 Stanks roundabout and corridor improvements.

7. Are there to be initiatives to reduce traffic entering the historic town centre?

There are no plans to reduce traffic entering the town through the implementation of restrictions, such as a congestion charge. There is little political or stakeholder support for such an approach and the WLTS showed that schemes of this nature were unlikely to make a significant impact.

However development impacts can be mitigated through offering improved alternative routes (i.e using SRN) and improved offer for sustainable modes as identified through the STA and Warwick and Leamington Strategy.

8. Will there be restrictions on town centre car parking?

The Atkins study recommended "Development of a joint county and district parking strategy review intended to develop a coherent integrated strategy covering parking standards for new development; park and ride policy; work place parking levy policy/feasibility and other parking related issues." It also stated that consideration should be given to increasing long stay parking charges as part of a wider strategy to secure long term benefits of the sustainable transport strategy and Park and Ride.

It should be noted however, that this is a highly controversial issue and the impacts of increased parking charges or reduced town centre capacity on the economic well-being of the town centres are important. The impact of such an approach on the long-term wellbeing of the historic environment is not understood and would need to be factored in if any significant change were to be proposed. One option being considered is to reduce commuter traffic through work place parking charges and the provision of a park and ride. This would

enable car journeys to the town centre to focus on visitors and shoppers thereby supporting the local economy and environment at the same time.

9. What other forms of transport/movement might be promoted e.g. walking and cycling, and if so, how?

The Warwick and Leamington Strategy work focuses on these movements. WCC is currently exploring 20mph zones and walking and cycling improvements within the town centre. Earlier answers have covered public transport and cycling.

10. How might the constraints of the historic street pattern and urban form promote creative/better responses than traditional engineered solutions?

This is an issue that will be addressed through detailed scheme design and has not been directly addressed through the more strategic work carried out in support of the Local Plan. WCC is currently exploring a number of town centre schemes and how they might fit with/enhance the user's experience of the historic environment. This may extend to a more comprehensive study covering the whole town centre.

11. What are the implications for Warwick's Unique Selling Point (USP) – its heritage; its historic townscape, public realm, conservation area and individual heritage assets?

The key to protecting Warwick's USP is to ensure that its heritage is protected, that it remains vital and prosperous and that it is accessible by a range of transport modes. It is accepted that the additional housing proposed through the Local Plan will have an impact on the town centre, but this is likely to be a mixed blessing.

So there are several parts to answering this question:

- Schemes identified through the STA will help to protect Warwick from the impacts of congestion within Warwick whilst also providing improved non-motorised user facilities.
- The Warwick and Leamington Strategy builds on this approach and provides a holistic view on the approach to provision of sustainable transport facilities. As mentioned previously these can be designed in such a way as to improve the user/visitor experience through improved access and public realm whilst also being sensitive to conservation and heritage needs.
- Specifically the approach outlined in the Local Plan's IDP seeks to improve public transport options; limit journeys to and through the Town Centre by locating housing and improving the highway network to offer alternatives to town centre routes; by providing park and ride facilities and by seeking to address specific areas of congestion through targeted junction improvements which also support other transport modes and which link to a wider corridor approach
- As transport schemes are designed a careful balance will be struck to ensure they are functional for a range of users and they respect the local environment. In this way individual heritage assets will be protected. The most significant scheme may be the one at Myton Road/Banbury Road. WDC have undertaken a study which explores the heritage impacts of signals in

this location and this will be part of the considerations as a detailed scheme is designed.

12. What are the implications on the 'designed' route into Warwick from the south?

Regarding the improvements to the southern approach to Warwick, the following justification for these improvements is provided

- There is an existing congestion issue which already detracts from the historic environment offer.
- The improvement will help to manage congestion outside Warwick School whilst also improving the provision for cyclists and pedestrians
- The impact of the additional housing without these improvements would be unacceptable.
- The improvements complement the strategy of encouraging traffic to go around the town (using the motorway) rather than through.
- With 4000 planned houses to the south of Warwick it is inevitable transport improvements are required, without such improvements the congestion impact would be significant, which in turn would have a significant impact on the historic environment and the visitor experience.

The key is therefore to ensure the improvements are carried out in a way that respects the designed approach. In particular the improvements already discussed will:

- Try to focus traffic along Europa Way rather than Banbury. Europa will become a dual carriageway
- Ensure the recently approved developments at the Asps and Gallows will continue to provide an open buffer between Banbury Road and the new houses
- Ensure the footprint of the Myton Road/Banbury Road junction will be minimised and signals will be avoided if possible (although studies undertaken to date suggest that signals are important in managing the already significant traffic congestion at this junction); further this junction needs to be viewed in the context of the existing junction at Banbury Road/Gallows Hill which is already signalised and provides an urbanised context for the approach.
- Through careful design elsewhere, remove the need for the proposed improvements at Castle Hill thereby protecting this important setting

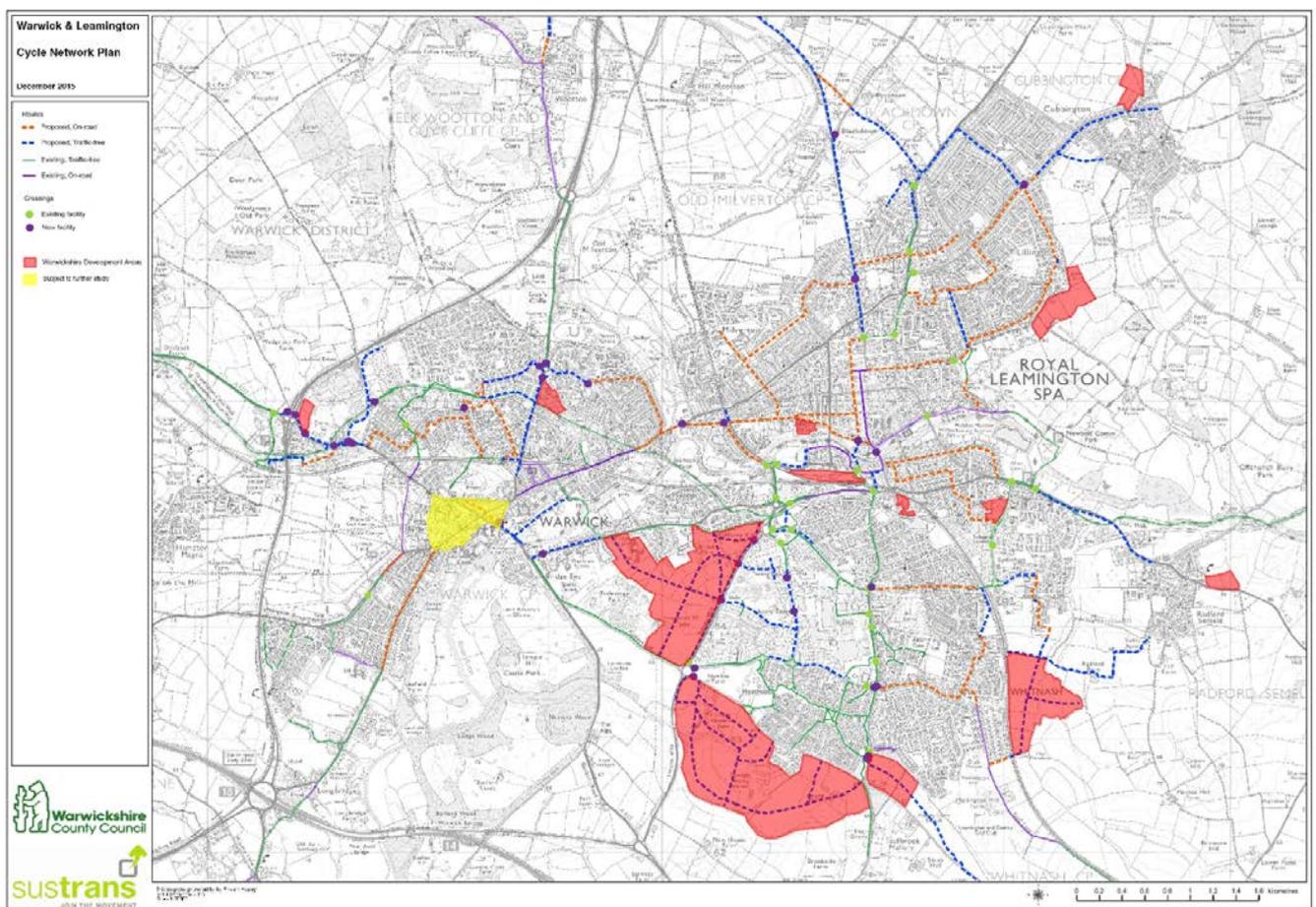
13. How are measures in the local plan /transport strategy to be funded and delivered?

WDC have already secured approximately £13m in association with Local Plan allocated sites via S106. Further contributions will be sought via a number of channels S106, S278 and Community Infrastructure Levy will be used to secure monies from developers. Alongside, WCC is preparing business cases to maximise the potential of securing national funding bids, local funding and Highways England funding. A recent example of this multiple funding source approach is the A46 Stanks/A425 Corridor Improvement which is funded through CWLEP Growth Deal Funding, WCC Growth Fund and S106. The appeal decisions at the Asps and Gallows provide further funding and allow for the dualling of Europa Way and for the provision of park and ride

14. Can the Local Plan and associated transport strategy demonstrate an improvement to historic Warwick? What are the consequences?

As described through the answers above, the Local Plan and associated transport strategy can help to improve historic Warwick through the management of transport impacts, an improved sustainable transport offer creating better access for all and sensitive design approaches and public realm improvements. All of this will provide visitors and residents an improved environment for the appreciation of historic Warwick.

Cycle Network Map for the area follows.



Further comments following meeting between HE and WDC to discuss outstanding issues:

In response to EH reps:

It should be noted that traffic growth is 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.

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:

- 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.
- Priors Rd/Smith St - this scheme actually presents the possibility of reducing existing street clutter.
- 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

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 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.

"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

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".

It should be noted that due to the robust 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, other transport users, AQ etc at a much earlier point in the planning process. This has enabled the County to indentify ways to mitigate these impacts through further study work such as the WLTS and the Cycle Network Review.

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 will be 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 will be used to guide the development process alongside further stakeholder engagement.

SINCE THESE COMMENTS WERE ISSUED WCC HAS PROPOSED NEW MEASURES TO ADDRESS WARWICK TOWN CENTRE TRAFFIC ISSUES AND THESE CAN BE FOUND ON THEIR WEBSITE HERE:

<http://www.warwickshire.gov.uk/warwicktowncentre>