

# **Warwick District Local Plan**

## **Report of Public Consultations**

- 
- **2012 Local Preferred Options (Part 2)**
  - **2013 Local Plan Revised Development Strategy**
  - **2013/14 Village Sites and Settlement Boundaries**
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**May 2014**



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## **1. Introduction**

1.1. This Report of Public Consultation has been prepared to provide a summary of the representations made in relation to the following consultation:

- 2012 Local Plan Preferred Options (part 2)
- 2013 Local Plan Revised Development Strategy
- 2013/14 Village sites and settlement

1.2. The outcomes from these consultations have been used to help to shape the Draft of the Warwick District Local Plan.

1.3. It should be noted that Part 1 of the Report of Public Consultation for the Preferred Options was reported to Executive in May 2013 as part of the process for considering the Revised Development Strategy. This Part 1 report addressed the following aspects of the Preferred Options:

- Preferred Level of Growth
- Broad Location/Distribution of Growth
- Preferred Options for Development Sites
- Housing Policies
- Economy Policies

1.4. The Preferred Options Report of Public Consultation Part 2 covers the representations made in relation to policy areas such as Retailing and Town Centre, Climate Change, Transport and Green Infrastructure.

1.5. The tables in Section 3 of this report summarise the representations received on a range of topics and sites along with the Council’s responses to these comments.

1.6. Full details of the representations received in relation to the consultations are available on the Warwick District Council website:

Preferred Options: <http://warwickdc.jdi-consult.net/ldf/viewreps.php?action=submitsearch&repid=&docid=23&searchtype=Option>

RDS: <http://warwickdc.jdi-consult.net/ldf/viewreps.php?action=submitsearch&repid=&docid=32&searchtype=Option>

1.7. Appendices one to three list organisations that the Council invited to make representations to the Preferred Options, Revised Development Strategy and Villages consultations respectively. This includes specific and general consultation bodies in accordance with regulation 18 of the Local Plans Regulations 2012 and other organisations. In addition, to these lists the Council considered it appropriate to notify individuals who wished to be kept informed of Local Plan consultation stages and previous respondents.

## 2. Consultation Representations: Statistics

2.1. The tables below provide an overall statistical summary of the representations received. It should be noted however that the planning system does not place weight on the quantity of responses received in relation to a site or an issue, but rather gives weight the strengths of the arguments put forward.

### Local Plan Consultations: Statistical Summary

**Table 1: Preferred Options 2012**

Element	No. of Reps	% Support	% Object	Other comments
Introduction, process, vision, objectives etc	153	37	63	
PO1: Level of Growth	506	3	97	
PO2: CIL	207	75	25	
PO3: Broad location of growth	356	65	291	
Location/Distribution of new housing	78	19	81	
<b>Sites</b>				
Brownfield Sites (Warks College; Leamington Fire Station; Former Ridgeway School; Riverside House;	43	56	44	
Myton Garden Suburb	200	16	84	
South of Gallows Hill/West of Europa Way	220	1	99	
North of Milverton	577	1	99	
Blackdown	505	1	99	
Whitnash East	27	22	78	
Woodside Farm	96	3	97	
Red House Farm	11	55	45	
Warwick Gates Employment Land	15	33	67	
Loes Farm	214	1	99	
Fieldgate Lane/Golf Lane	22	36	64	
Thickthorn	83	24	76	
Category 1 Villages	109	26	74	Largest response from Hampton Magna and Radford Semele.

Category 2 Villages	232	23	77	Most responses from Norton Lindsey (70). Also a 112 standard letters from Norton Lindsey
<b>Policies</b>				
Housing (excluding Gypsies and Travellers)	198	41	59	
Gypsies and Travellers	53	43	57	
Economy	90	23	77	
Retailing and Town Centres	74	51	49	
Built Environment	69	35	65	
Historic Environment	69	52	48	
Climate Change	78	35	65	
Inclusive, Safe and Healthy Communities	58	47	53	
Transport Policies	224	26	74	
Green Infrastructure	111	55	45	
Green Belt Policies	210	12	88	
Culture and Tourism	50	64	36	
Flooding and Water	35	51	49	
<b>Total</b>	<b>4973</b>	<b>21</b>	<b>79</b>	

**Table 2: Revised Development Strategy (2013)**

Element	No. of Reqs	% Support	% Object	Other comments
Introduction, process and vision	186	16	84	
RDS1: Interim Level of Growth	332	2	98	
RDS2: Categories to meet level of growth	38	16	84	
RDS3: Spatial approach for broad location	624	38	62	
RDS4: Broad location of growth	146	24	76	
<b>Sites</b>				
Brownfield Sites (Station Approach; Leamington Fire Station; Former Ridgeway School; Riverside House;	29	59	41	
Villages (all together)	444	10	90	Hampton Magna 155 Kingswood 64 Barford 43 B Tachbrook 44
Employment land requirement	64	8	92	
Location of employment land	21	14	86	
South sites (whole areas)	183	3	97	
Myton Garden Suburb	29	3	97	
South Gallows Hill	21	19	81	
West of Warwick Gates (former employment land)	9	56	44	
Lower Heathcote Farm	19	16	84	
Former Sewage Works	15	20	80	
Grove Farm	21	5	95	
Woodside Farm	24	21	79	
Whitnash East	28	11	89	

Fieldgate Lane	21	0	100	
South sites infrastructure	6	50	50	
Red House Farm	12	75	25	
Thickthorn	72	14	86	including employment land
Sub-regional Employment Site	41	10	90	
Transport mitigation proposals	154	9	91	
Employment Area Option 1 (s of Gallows Hill)	4	0	100	
Employment Area Option 2 (n of Gallows Hill)	5	80	20	
<b>Total</b>	<b>2658</b>	<b>18</b>	<b>82</b>	

**Table 3: Village sites and settlement boundaries (2013/14)**

Element	No. of Reps	% Support	% Object	Other comments
Context and Revised Dev Strategy	202	12	88	
Green Belt and exceptional circumstances	160	11	89	
Overall approach	56	16	84	
Site selection methodology	71	10	90	
Village Boundaries -overall approach	22	50	50	
<b>Sites and settlement boundaries</b>				
Baginton Options and Sites	19	42	58	
Baginton settlement boundary	3	67	33	
Barford Options and Sites	49	45	55	
Barford settlement boundary	8	25	75	
Bishops Tachbrook Options and Sites	43	44	56	
Bishops Tachbrook settlement boundary	7	14	86	
Burton Green Options and Sites	155	38	62	
Burton Green settlement boundary	18	44	56	
Cubbington Options and Sites	72	22	78	
Cubbington settlement boundary	4	25	75	
Hampton Magna Options and Sites	409	1	99	
Hampton Magna settlement boundary	123	0	100	
Hatton Park Options and Sites	145	13	87	
Hatton Park settlement boundary	15	27	73	
Hatton Station Options and Sites	119	13	87	
Hatton Station settlement boundary	52	2	98	
Hill Wootton Options and Sites	30	13	87	
Hill Wootton settlement boundary	8	0	100	
Kingswood S Options and Sites	137	47	53	
Kingswood settlement boundary	20	60	40	
Leek Wootton Options and Sites	175	23	77	
Leek Wootton settlement boundary	25	20	80	
Radford Semele Options and Sites	406	20	80	
Radford Semele Settlement Boundary	12	17	83	
Shrewley Common Options and Sites	26	23	77	
Shrewley Common settlement boundary	5	20	80	
Former Aylesbury House Hotel	7	43	57	

Oak Lea Farm, Finham	5	100	0	
<b>Total</b>	<b>2658</b>	<b>18</b>	<b>88</b>	

### 3. Petitions

The following petitions have been received during the consultations:

<b>Subject</b>	<b>Text of the petition</b>	<b>Number of signatories</b>
<b>Preferred Options 2012</b>		
Opposition to development in the Green Belt North of Leamington	The undersigned express their strong objection to any development on the Green Belt between North Leamington and Old Milverton	2036
Opposition to building on Loes Farm	We, the undersigned oppose the planned construction of 180 homes on the Loes Farm site north of the Woodloes	238
<b>Revised Development Strategy 2013</b>		
Opposition to revised housing target	We, the undersigned, object to the revised Local Plan proposals of June 2013 that set a target of 12,300 new households in the District by 2029	69
Opposition to effect proposals will have on Warwick and Bridge End in particular	We the undersigned wish to register our objections to the proposals in the Local Plan for Warwick District for large new development sites to the south of Warwick	35
Opposition to housing development in Hampton Magna	We the undersigned strongly object to the proposal to build the houses as set out in the June 13 Revised Development Strategy Document within Hampton Magna	831
Opposition to development affecting Warwick town	We, the undersigned want the Warwick District Council to withdraw its current plan that would be ruinous to our town and to re-plan for a more modest expansion based on the real future needs and wishes of our community	465
Opposition to proposed Local Plan in the interests of the community	We do not believe that the current proposed Local Plan is in the best interests of our community and we call on Warwick District Council to reconsider this Plan and work with Town and Parish Councils as well as local residents to develop an alternative	2100
<b>Village Sites and Settlement Boundaries 2013/2014</b>		
Opposition to Housing at Rugby Road allotments, Cubbington	We the undersigned petition the Warwick District Council to preserve the Rugby Road Allotment site in Cubbington as allotments and open space	135
Opposition to Housing at	A petition expressing objections for potential planning for development	84

#### **4. Summary of representations made: Preferred Options (Part 2)**

- 4.1. The Local Plan Preferred Options consultation was undertaken during June and July 2012. It included proposals regarding the preferred approach to housing and employment growth, including preferred options for development sites along with alternative options. It also included the proposed policy direction for the Local Plan's policy themes covering themes such as housing, employment, retailing and town centres, green infrastructure and transport.
- 4.2. A Report of Public Consultation relating to the areas described in paragraph 1.3 above was report published in May 2013 to inform the approach set out the Revised Development Strategy (RDS). The RDS was subject to consultation during June and July 2013.
- 4.3. The summary of points raised in relation to Part 2 of the 2012 Preferred Options consultation is set out below.

<b>PO1 – Preferred Level of Growth</b>
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<b>See report of public consultation part 1</b>
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<b>PO2 – Community Infrastructure Levy</b>
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<b>See report of public consultation part 1</b>
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<b>PO3 – Broad Location of Growth</b>
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<b>See report of public consultation part 1</b>
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## PO4 – Distribution of Housing Sites

**See report of public consultation part 1**

### Preferred Options - Spatial Portrait, Issues and Objectives

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
<b>Spatial Portrait</b>	
Spatial portrait and issues section should come before the vision	Taken on board in Draft Local Plan
The 'Population and Spatial Portrait' section should include a fuller description of key social characteristics, together with information presented on other characteristics of the area which are necessary and relevant to the plan	It is contended that the portrait provided in the draft Plan provides sufficient context for the Local Plan policies and proposals
Para 4.7 could also make reference to the canals within Warwick District which are managed by the Trust, comprising nearly 40km of the Grand Union, North Stratford and South Stratford Canals	See policy DS17
Consideration should be given to household growth projections as well as base population.	The Joint SHMA has analysed and updated projections according to the methodology in NPPF and this shows the objectively assessed need for housing which is now the basis of the housing target. A joint SHMA has been carried out for Coventry & Warwickshire and the Council intends to meet the objectively assessed housing need therein
<b>Issues</b>	
May wish to add climate change as a pressure in bullet point 9	Taken on board. See para 1.30(i)
Does not reflect views of residents. Based on assumption that there will be substantial population growth - based on boom years, therefore wrong. Density of people to homes incorrect.	A joint SHMA has been carried out for Coventry & Warwickshire and the Council intends to meet the objectively assessed housing need therein
Global food crisis means we need high quality agricultural land. Does not comply with NPPF.	The importance of agricultural land is not to be underestimated, however, some agricultural land in this district is needed to provide sufficient non green belt sites to meet housing demand.
Greater reference should be made to the excellent locational benefits, strong demand for housing and robust local	Noted – see 1.30 (j)

economy which can support growth of benefit to the wider region and sub-region	
Reference should also be made to the Government's objectives for sustainable development and the three roles of the Local Plan - economic, social and environmental	See policy DS5
Is there a point at which no further growth is possible in the district?	Not during the life of this plan
You are expecting the wealthy currently working age people to stay here on retirement, but with such negative changes to the environment these people are likely to move away, which would make the population forecast inaccurate	A joint SHMA has been carried out for Coventry & Warwickshire and the Council intends to meet the objectively assessed housing need therein
Paragraph 4.8 (3) - Kenilworth currently ranks highly in the UK for High Street retail unit occupancy and has a Waitrose. Where is the threat? Paragraph 4.8 (6) - the Thickthorn development will necessitate major congestion on top of the current congestion	There is a threat to all UK High Street retail uses from out of town retail parks. This is to be addressed through policies in the Local Plan. The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based. However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport
Lack of free parking is biggest threat to town centres	This is a matter for the Parking Strategy
Kenilworth needs better employment opportunities	Agreed
Should also consider restructuring Issues section so that it sets out the problems and challenges facing the District, together with identified opportunities. For instance be made to the excellent locational benefits, strong demand for housing and robust local economy which can support growth of benefit not just to the area but to the sub-region and wider region.	See para 1.30 of Draft Local Plan
<b>Objectives - General</b>	
Paragraph 4.10 should be revised to make reference to the need for the local plan to meet the objectively assessed needs for market and affordable housing	See para 1.42
Paragraph 4 does not mention Places of Worship	See polic yCT1, CT5
Housing for younger people should be a priority – key to prosperity	See policy H4
Why is environment not listed as key priority?	The environment features in the strategy, issues and objectives for both protection and as part of the catalyst to growth
Is leisure included in "Health and Wellbeing"?	It is included within this issue

Must take into account needs of small businesses, focused on town centres. Should be range of affordable local business premises available, to encourage new enterprises and allow existing businesses to grow	See retail and town centres section in draft Local Plan
Should aim for; Local economic stability Reducing car dependency and congestion Provision of infrastructure Easy healthy access Mix of housing to meet local needs A rate of development that allows change to be absorbed Protection of natural and historic environment	Agreed
Stronger reference to sustainable development in line with NPPF (social, economic and environmental)	See policy DS1
<b>Paragraph 4.10: Sustainable Growth</b>	
No reference to balancing sustainable Environmental or Historic factors with Economy, Housing or Retail/Leisure	Noted
Contains a circular argument regarding economic growth and housing growth. In effect it is saying that housing growth is needed to meet economic growth, and economic growth is needed to meet housing growth	New housing development will also attract new economic growth and employment
Should be revised to make reference to the need to ensure that Local Plan meets the full, objectively assessed needs for market and affordable housing as required by the NPPF.	See para 1.44
Commitment to % homes per annum is not flexible and does not reflect aim of proving providing sustainable level of housing growth	This is the best way to present the figures: in reality it is an annual figure
Objective to provide retail and leisure will all be to no avail unless you can persuade a sufficient number of people to do their shopping in the town centres - for which convenient and cheap car parking is key.	Town centre policies will encourage use of the town centres for retail, leisure and other uses
<b>Paragraph 4.11: Well designed and located</b>	
Encourage walking and cycling through correct location of development and a clear strategy for better infrastructure	This is considered in the site selection/sustainability appraisal
Proposed distribution of development inconsistent with Objective 4	This is one of the objectives, however it may not be possible to deliver all sites that meet this objective without encroaching on the green belt for example
Objective 4 is a worthy aim, but unrealistic	
Proposed distribution of development inconsistent with Objective 7, eg green belt and rural character	
Proposals for Thickthorn are not consistent with Objective 9	See Infrastructure Delivery Plan
Objective 9 - Money from new developments (CIL or Section 106 Agreements) should also be used to provide more publicly accessible open space in existing urban areas where there is already a lack of it.	
Objective 10 is not clear enough	This reflects the Councils ambition to

	protect high quality landscapes and is clarified in policy NE4
Objectives s 4 & 5 don't go far enough. Any new development will automatically cause Climate issues, these need to be more fully mitigated	Polices relating to climate change will be included in the Plan
The Local Plan should include a specific tailored policy on the 'presumption in favour of sustainable development'	Noted
<b>Paragraph 4.12: Infrastructure</b>	
Please add to the wording of this paragraph stating 'including free schools' in recognition of the supportive approach taken by the present government.	The Local Plan seeks to provide sufficient school places and makes no preference regarding the nature of the provision
What additional school spaces will be made available to cope with the increase in school age children as a result of the new housing	WDC is continuing to work with WCC education and the education providers to ensure school capacity is expanded and improved where it is needed. See INFRASTRUCTURE DELIVERY PLAN
Objective 11 is not clear enough	The objective is not specific but is a strategic aim. See INFRASTRUCTURE DELIVERY PLAN for more detail
Objective 11 needs to be strengthened by the addition of wording requiring Local Authorities to 'take a proactive and collaborative approach to the development of schools by working with schools promoters to identify and resolve key issues before applications are submitted. In determining planning applications for schools, local planning authorities should attach very significant weight to the desirability of establishing new schools and to enabling local people to do so	
<b>Summary of Matters Raised in Support</b>	
In support of the general principles	
Support the addressing of flood risk- a lot of potential in creating new wildlife sites in this.	
Support for objectives, particularly 7 and 14.	
Sustainable economic growth is vital	
Housing growth is important, but must provide the right mix including G&T and elderly	
Support objective 4	
Support objective 7	
Support objective 8 -more open space, some form of gardens and more spread out	
Support objective 9	
Support objective 11	
Objective 13 is important and needs funding. Public transport is particularly important with ageing population and cycleway are also important	
Support objective 14	
Support objective 15. This objective is in line with advice produced by the Government and Sport England to improve the general health of communities	

## Preferred Options – Local Plan Process

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
Not enough information provided – need to offer a comments option	Information is available on the Council’s website and in paper format at the Council offices, deposit points and for reference at organised events/exhibitions
Public opinion from previous consultations ignored	Public consultation responses form one part of the decision making process together with evidence gathered and assessments undertaken and the advice of experts. These factors are balanced against one another to find the best alternatives
Aims of the consultation not clear – will the Council act on the outcomes?	
The online consultation system is too difficult to use	This has been addressed by provision of instructions on the Council’s website
Not enough account taken of NPPF	The Local Plan must conform to the provisions of the NPPF
Lack of democracy	The Draft Local Plan has been agreed by Warwick District Council. It is evidence based.
Not enough publicity – too many people unaware of the consultation	A wide range of publicity has been afforded to the consultation which is outlined in the adopted Statement of Community Involvement (SCI)
Too much emphasis on academic studies rather than local residents views	Public consultation responses form one part of the decision making process together with evidence gathered and assessments undertaken and the advice of experts. These factors are balanced against one another to find the best alternatives
No alternative options presented – decision already made	The decision is not made at the Preferred Options stage. Any perceived lack of alternatives is due to the Council’s genuine interest in what the public think and any additional ideas they may have for further consideration
Summary of the Plan should have been circulated to all residents – hard copy	This would have had huge cost implications: something that council tax payers are unlikely to have supported
No glossary and published material very confusing	Noted and this will be included in future
Need more explanation about the planning process	The process has been outlined in all documentation and on our website. Additionally, the process is outlined on the relevant Government website as it applies to all planning documents throughout England and Wales
Need to fulfil Duty to Cooperate to meet shortfall in other areas housing needs or for others to meet shortfall in WDC’s need	Agreed
Consultation period not long enough - Council refused requests to extend consultation period	Consultation periods have been extended where there has been genuine hardship in returning consultation responses within the required time due to, for example, the programme of Parish Council meetings being at odds with the end of the

	consultation. Consultation periods are never less than 6 weeks and have extended beyond this in most cases.
Consultation leaflet does not mention the Gateway – therefore public not being given fair opportunity to comment on this	The Gateway will be dealt with as a planning application in the first instance, but will be incorporated into the Local Plan if that is successful or evidence shows it can be justified
Based on weak evidence	Evidence is being gathered and reviewed all the time to ensure that the most up to date and comprehensive evidence base is maintained
No consultation in Norton Lindsey for the area covered by SDC – boundary needs to be revisited	There is not requirement to consult beyond the District’s boundary. The Council has discussed development in Norton Lindsey with Stratford DC.
No positive engagement of public	There have been exhibitions, public meetings and road shows throughout the district attended by officers and Councillors. These have taken place in a range of venues from school halls to supermarkets
Process is landowner/developer led	It is led primarily by the need for a new Local Plan to guide development over the next 15 years. Landowners and developers react to that need by submitting their sites for consideration as development sites to meet that need
Council has made decisions and is then trying to justify them. This is not the correct way round.	No decisions have been made at the Preferred options stage
Some options dismissed too early. Preferred Options is the wrong title – implies no other options	Preferred options are those which the Council has chosen as what it thinks are the best options, but on which it would like to hear the opinions of local people including any ideas which you would like us to consider. Some options do not meet the Government’s criteria and these were dismissed early as they were not going to be acceptable and were therefore not worth spending time on
Process not consistent with NPPF requiring local people to shape their surroundings	The process followed is exactly that laid down by the Government
Process not consistent with the process set out in the NPPF for production of Local Plans	
Process lacked courtesy with people being asked to submit views in writing when they expressed them at public meetings	Public meetings were called to allow questions to be asked which would assist the public to formulate their written response. All responses have to be made formally and in writing to be duly made and therefore admissible as evidence

<b>PO5 Affordable Housing</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>Definition of Affordable Housing</b>	

Clarification needed that affordable housing is defined according to definition in NPPF	Agreed, affordable will be clearly defined as being the definition in Government national planning policy
Better definition of "affordable" is required	Affordable will be clearly defined in the policy
Owner occupied retirement housing (OORH) should be treated as a form of affordable housing in planning terms and given special status to encourage greater provision	Affordable housing must be defined according to national planning policy
Definition of affordable housing needs broadening	Affordable housing will be defined according to national planning policy
How affordable will they really be?	The rents for social rented homes will be in line with target rents for the local area. Rents for affordable rented homes will be no more than 80% of market rents. Rents for shared ownership homes will be determined by the registered housing provider
Policy fails to show sufficient flexibility	There will be a certain amount of flexibility to reflect viability issues
A large proportion of affordable housing will be provided to the south of the towns. Council should consider off-site contributions.	The problem with off-site contributions is the difficulty in finding alternative sites on which to build the affordable homes
<b>Percentage Requirement or Threshold too High/ Low</b>	
Figure of 40% does not reflect the requirement in NPPF for flexibility	There will be a certain amount of flexibility to reflect viability issues
Affordable housing should be related to the needs of the local area not a blanket provision	There is a significant affordability problem in the District. All opportunities will need to be taken to provide affordable homes. Experience shows that there is never a problem in finding tenants for affordable homes
Council should categorise each site according to viability and seek to maximise affordable housing	To do this the Council would need to see the development costs of every scheme. This is impracticable. The Council will, however request to see the development costs of schemes where the applicant claims it will be unviable to provide 40% affordable homes
Conflict between 40% and SHMA estimate of 30% affordable housing a year	The requirement for affordable homes only applies to sites of more than 10 homes in the urban area. Also, some sites of over 10 homes will not be able to provide the full 40%. Taking into account all homes, including those not providing the full quota and sites under 10, the proportion of all homes which are provided as affordable is likely to be in the region of 30%
Premature to set an affordable housing target until the CIL level is known otherwise viability and deliverability could be affected	The reverse approach is being taken – the CIL level takes into account the affordable housing requirements
Policy seeks a percentage in excess of what is really required – this will make market housing less affordable	The policy is likely to achieve around 30% affordable homes overall which aligns with the need identified in the Joint Strategic Housing Market Assessment
Insufficient evidence to justify 40%	The evidence is set out in the Affordable Housing Viability Assessment
Requirement of 40% too ambitious	Where applicants can demonstrate that this level would mean the scheme is unviable, the Council will negotiate for a lower proportion
The threshold should be reduced to 7 in	This was considered but it was concluded that the

urban areas	additional administrative burden would outweigh the benefits
Requirement too high – should be 1-20%. Tenure should be shared equity to ensure property kept in good order	The Affordable Housing Viability Assessment demonstrated that the 40% requirement would ensure that a reasonable level of affordable housing could be achieved since viability on the majority of sites could support this level
Threshold in urban areas should be reduced to 3	The Affordable Housing Viability Assessment demonstrated that in Warwick District sites of less than 7 would generally be unable to support any affordable housing.
Requirement should be by bed spaces not homes	This is difficult to implement due to the need to establish the number of bed spaces in homes, particularly larger homes which may have studies and other incidental rooms which could be classed as bedrooms.
Should be no minimum threshold	The Affordable Housing Viability Assessment demonstrated that in Warwick District sites of less than 7 would generally be unable to support any affordable housing.
How can Blackdown have 40% affordable housing?	This level of affordable housing is commonly delivered on large sites across the country
Evidence in Viability Assessment suggests a level of 35%	A level of 35% might result in fewer sites being able to demonstrate unviability. However it would also miss out on a higher level of affordable housing on those more viable sites
The Viability Assessment failed to take into account all development costs	All development costs were considered
A proportion of 40% would risk the balance of a mixed community	The 40% will consist of a range of tenures including social rented, affordable rented and shared ownership. Along with the 60% owner occupied homes, this will provide a well- balanced community
Affordable housing should be environmentally sustainable housing	The standards for affordable homes currently require Code Level 3
No evidence of financial viability	The Affordable Housing Viability Assessment provides evidence of viability
How will the Council ensure the homes remain affordable and are not sold	This will be secured, where possible, through the section 106 agreement
A higher housing target would deliver more affordable homes	The evidence in the Affordable Housing Viability Assessment suggests that a higher housing target would not be viable on many sites in this District
Site remediation and provision of infrastructure can have a huge effect on viability	Agreed, and this will be taken into account
Support aims of policy but doubt that it is realistic	The policy has been successfully implemented in the District through the existing adopted Local Plan policy
<b>Alternative Approaches to Increasing Affordable Housing</b>	
Increase site densities	This would need to be an additional requirement rather than an alternative requirement
The Council should work innovatively with the private sector to increase affordable housing	The Council currently works innovatively with a Registered Provider of affordable homes to increase the supply of affordable housing and is currently looking at other alternatives in its capacity as a housing landlord.
Policy should prevent low cost housing	The Council has a policy to reduce the concentration of

being converted to HMOs	HMOs and this concentration is in an area where low cost terraced housing predominates
Semi-separated “granny flats” should be classified as affordable to enable young people to stay at home and live independently (multi-generational housing)	The definition of affordable housing is prescribed in national planning policy
Existing stock and tenancies should be better managed	The Council is consistently striving to improve the management of its stock
Better to purchase existing stock	Some Registered landlords purchase existing stock, or additional units over and above the 40%
<b>Rural Affordable Housing &amp; Rural Exception Housing</b>	
Rural affordable housing is expensive	Agreed
Plan should recognise rural exception scheme at Cubbington	The scheme was supported by the Council
Affordable housing in rural areas should reflect local needs in terms of type, size and quantity and those with a local connection should be given priority	Agreed. The policy will include these criteria
Rural affordable housing in villages should not need to be funded by private sector housing	Only rural exception housing in certain circumstances may be part funded in this way where the development will otherwise not be viable
Rural exception housing should be possible in areas without a reasonable level of services – and then those services should be provided	It is not possible to provide services and ensure they are used to a level which keeps them viable
Latest scheme in Norton Lindsey/ Wolverton could only be filled by extending the catchment area beyond the defined parishes	This is sometimes the case but it still ensures that rural affordable homes are provided to those in need.

<b>PO6 Mixed Communities</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>Mix of Housing</b>	
New provision should be mainly small units for younger people rather than family housing	The Strategic Housing Market Assessment demonstrated that the biggest need was for small family homes
First time buyers should be identified as a specific group	First time buyers usually buy 1 or 2 bed homes. The Joint Strategic Housing Market Assessment uses a Housing Model to assess the need for different sizes of homes based on the types and sizes of households which are expected to form within the plan period.
The mix of housing in villages should reflect the need identified in that community	The locally identified need will be provided first and foremost followed by the District-wide need
There is nothing in the plan about the mix of house sizes	This will be included in the draft Plan. See Policy H4.
Need for balance between homes for single occupiers, families, multi-occupation and	The Policy for HMOs and student accommodation will aim to control the concentration of these uses. The Joint

students	Strategic Housing Market Assessment uses a Housing Model to assess the need for different sizes of homes based on the types and sizes of households which are expected to form within the plan period.
Information in SHMA will soon be out of date – mix should be left to the developer	SHMAs will be updated. Developers in Warwick District tend to prefer to build large proportions of 4- and 5-bedroom homes. Leaving it to developers would lead to a shortage of 1, 2 and 3 bedroom homes
Need to address issue of the loss of smaller homes in the rural area through extensions and redevelopment	Extensions and redevelopments will be controlled by the use of maximum limits
There may be justification for a specific mix & type of housing on a specific site or in a particular locality so policy should be sufficiently flexible	Policy H4 sets out the specific circumstances which could affect the mix of housing
New homes should be built at achievable prices and policies should control them in the future.	Except for designated affordable homes, the price of homes cannot be controlled through planning policy
Need a policy to control the size of extensions so that housing mix is retained	It is important that houses are adaptable to meet needs over lifetimes. Extensions will be controlled through other policies such as H14 and BE3
<b>Lifetime Homes and Housing for Older People</b>	
No justification for 25% Lifetime Homes Requirement for Lifetime Homes and Extra Care Housing should be flexible and subject to viability and need	Policy H4 requires 10% of homes are lifetime homes or adaptable. This reflects the 2011 census data regarding long term health and disability
Policy should also refer to homes catering for care/support for older adults and children with disabilities	Noted. Plan will consider this following review of Extra Care Housing by Warwickshire County Council
Need to address C2/C3 issues	The Council makes it clear that where accommodation in continuing care community developments or retirement villages is self-contained, these dwelling units will be considered to be general housing rather than part of a residential institution. This also applies to self-contained units in Supported or Extra care housing schemes.
Little need for extra care accommodation if residential care has reached required numbers	Extra Care accommodation provides a different model of care from residential homes
Homes for older people and Extra Care Housing could be difficult to provide with decline in grant funding from HCA or WCC	Warwickshire County Council and Housing Associations are continuing to provide such accommodation and the County Council is committed to continue to provide Extra Care accommodation
Plan should make provision for smaller units for older people as this will free up larger family housing	See Policy H4 which provides for housing in line with the projected need and H5 which provides for specialist housing
Thickthorn area is a retirement area and should be retained as such	Thickthorn has been allocated to help meet the housing needs of Kenilworth. It will therefore be expected to make provision for a mix of housing in line with Policy H4
Site in Norton Lindsey not suitable for older people or people with disabilities due to sloping nature	No sites are allocated in Norton Lindsey

Extra Care schemes should be provided in villages as well	Whilst there are no sites specifically allocated for Extra Care schemes in villages, such schemes may be provided on allocated sites in the larger villages.
Support for provision of a range of retirement homes - Retirement Villages, upmarket retirement homes, bungalows, high density & well designed accommodation with communal gardens needed in the towns	See Policy H5 which allows for this in line with need.
Plan should include process for consideration of implications of supported/ extra care housing for health & social care	
Plan should consider balance between housing with and without support/care	Policies H2, H4 and H5 seeks to do this.
A “specialist care & clinical services panel” should be set up to consider the resource implications of new developments at planning application stage	The Council consults with the Health Sector and Warwickshire County Council in determining planning applications for care for older people
Extra Care housing cannot be a requirement of planning policy	It is not a requirement to provide Extra Care housing on all housing sites
Extra Care housing has specific requirements in terms of site location and suitability which is different to market housing – the requirement should not be applied rigidly as this would sterilise parcels of land	See policy H5 for the requirements for Extra Care Accommodation
Any plans for Extra Care Housing, retirement housing or nursing homes need to be discussed with Public Health and South Warwickshire Clinical Commissioning Group because of the impact on provision of Health Services	Policy H5 requires the involvement of Warwickshire CC Adult Care Services. The CCG and public health are not required to advise on these, though Adult Care will have links with these organisations.
More than 20% of homes should be adapted for older people	This level cannot easily be justified. The level has been set at 10%
<b>Student accommodation and hmos</b>	
Need for balance between homes for single occupiers, families, multi-occupation and students	Policy H6 seeks to ensure a reasonable balance is achieved
HMOs adversely affecting the community	Noted. See policy H6
Any attempt to locate student accommodation artificially will be doomed to failure	Policy H6 seeks to manage concentrations of HMOs and student accommodation within the towns
More imaginative approach to providing accommodation for students is required	See policy H6
Policy for HMOs seeks to restrict concentrations of HMOs for its own sake. There is no evidence of any harm	There is evidence that concentrations impact on the amenity of residential areas – see para 4.62 of the Draft Local Plan
The tipping point for HMO policy should be based on substantive, objective empirical evidence of local problems	

Insufficient evidence provided for policy	
The University should expand on-site provision – currently they have no plans to do this so students concentrate in south Leamington	The University has recently expanded on site accommodation in line with their materplan. They are expected to prepare an updated masterplan which is likely to include further accommodation.
Article 4 will lead to inability of vulnerable households to access suitable accommodation	The Article 4 is already established
Policy a barrier to students being able to access good quality accommodation	The policy seeks to continue to encourage students to live in the towns, at the same time as avoiding concentrations
Policy will have a negative effect on the economy	
If supply of shared and rented accommodation is restricted, it will be difficult for first time buyers to purchase homes quickly	The Council’s policy will not aim to restrict accommodation but to ensure such accommodation does not concentrate in certain areas. The Council does not agree that this will make it difficult for first time buyers to purchase homes quickly.
The student housing market is detrimental to the ability of families to access affordable market housing	The Local Plan policies (e.g H4, H6) seek to provide for a balance of accommodation so that the needs of students and families are both provided for.

<b>P07 Gypsies and Travellers</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
People wanting to travel by caravan pay to use commercial campsites. No justification for special exemptions for travellers many of whom own permanent homes elsewhere	Gypsies and Travellers would purchase their own sites and pay for their services to be connected. They would also be required to pay for the facilities they use and pay Council Tax for each pitch in the same way as if they were living in a house
Council has to identify site within district but has not done so yet	The work is ongoing and a separate consultation on the options for sites will be undertaken
One unauthorised traveller site exists which is subject to enforcement action and does not meet specification in NPPF, nor criteria in Preferred Options	The site is subject to enforcement action for these reasons. Planning permissions have been refused for this site on the basis that it is in the green belt and in an area of high landscape quality
Whole area, including Coventry and Rugby, which have underused traveller capacity, should be taken into account in identifying potential traveller sites	The Council is working with all adjoining authorities on Gypsy & Traveller issues
Sites should not be offered to travellers who do not contribute to local area and have a reputation of leaving areas untidy	Sites will be purchased in the same way as the settled community purchase their own land/house

Area is of outstanding character within the green belt and totally unsuitable for a gypsy encampment	See above
A fair solution needs to be found by the council	Agreed
Budbrooke is an area of outstanding character situated in green belt and has recently suffered two bad experiences with gypsies and travellers. This is a valid reason for removing Hampton Magna and Hampton-on-the-Hill from the Plan	Sites will be considered that are suitable, achievable and deliverable
Why is council pandering to this community who pay no taxes and offer nothing to the local community	The Council has a responsibility to provide accommodation for all its residents
Crime rate rises when they arrive	There is no evidence to support this
Litter and mess on unauthorised sites	We are allocating permanent authorised sites where residents will pay council tax to have their rubbish removed in the same way as the settled community
People find it intimidating to go close by with their children	This is not a planning matter
People would change their minds if this was at the bottom of their garden	Noted
Should not be giving up anything for trouble makers that make a mess and can't be got rid of	See above
Several of criteria in the policy go beyond NPPF and will render the policy ineffective at delivering new sites since it is too restrictive	The criteria are laid down by Government but it is not expected that sites will be able to meet all criteria
Potential negative impact on Warwick Gates	This is not a planning matter
Locate away from established housing areas to avoid friction	Sites have to be located within reasonable distance of facilities and services. These are located in existing residential areas and towns
Object to use of land at Thickthorn for gypsy and traveller site	There are no sites proposed in this location
Cause local amenities to be shut and shopkeepers threatened by disruptive behaviour	There is no evidence to support this
Previously parked by the river in Warwick causing environmental damage and had to be evicted causing more expense to the taxpayer	The provision of authorised sites will reduce the incidence of such events and the provision of transit pitches in the county will provide a supervised place for those who wish to stop for a short period of time
Will they be paying to use the designated site with facilities?	Yes
Would be difficult to attract anyone and anything to Kenilworth if such a site was set up	There are no sites proposed in this location
Lack of police presence or police station in Kenilworth	This is not relevant to the selection of sites
Will increase the burden on the tax payer. Who will pay for the site?	Sites will be purchased by the Gypsies and Travellers themselves and they will provide their own services. There will be no cost to the tax payer unless the Council has to use CPO powers to bring sites forward
Inappropriate to allow this type of facility where no new houses and no change to green belt allowed	Sites will be considered that are suitable, achievable and deliverable
Detrimental to community and local farmers	
No mention of the location of sites with regard to flood risk	

## Summary of Matters Raised in Support

Proposal brings out worst elements of the NIMBY culture and blights certain areas	
In line with government advice	
Adequate facilities should be available and locations agreed by all concerned parties	
Education of travellers	
Identify a site in consultation with communities which may be affected to prevent travellers taking matters into their own hands plaguing communities with unauthorised occupation of land	
Welcome admission that council has failed to find a site	
A disgrace that a site hasn't been found already. Must be a priority rather than an aspiration	
The sooner the better	
Travellers need a site so we need to be brave and accept that	
Meet needs of genuine gypsies and travellers, on sites which do not interfere with quiet enjoyment of locations, of existing permanent population and do not take up green belt land of outstanding beauty and character	
Statements of the blindingly obvious	
Numbers to be accommodated need reassessment against new policies	
Propose existing site at Siskin Drive be enlarged or re-sited in Middlemarch employment areas so that part meets the needs of Warwick District	
Would town centre/business areas provide sites that are easier to monitor than those on the edges of towns and villages	
Suggest locating a site close to J15 of M40 where there is little by way of existing housing but a good public bus service and good road access	

## Summary of Suggested Changes to the Plan

Make provision for normal commercial campsites	This is not feasible for a Gypsy and Traveller site
Remove sites from Hampton Magna from list of options	See above
The word 'traveller' means moving around. No permanent site	The definition of Traveller includes those who no longer travel. It is a term that relates to ethnic origin and traditions rather than to physically travelling
Criterion 4 is vague - does this relate to neighbouring uses which are incompatible?	It relates to neighbouring uses and physical events which could have a negative impact on caravan dwellers
Criterion 5 is unclear - it should include the word 'significant' before adverse since all development has some level of impact	The wording of the criteria is set out in 'Planning Policy for Traveller Sites'
Criterion 6 could, in practical terms, rule out any site. It	

is a matter of fact and degree and as with any form of development, it is whether the adverse impact is significant.	
Agree that the relationship between gypsies and travellers and residents needs to be addressed, but I think for a good relationship to form you need to carefully consider the location of any proposed site, and ensure that they, as well as existing residents, work within the community in helping it to thrive	Agreed
Keep Gypsy and Traveller sites away from established housing areas	Sites have to be located within reasonable distance of facilities and services. These are located in existing residential areas and towns
Potentially consider detail of site provision, costs and infrastructure	Gypsies and Travellers would purchase their own sites and pay for their services to be connected. They would also be required to pay for the facilities they use and pay Council Tax for each pitch in the same way as if they were living in a house

## PO8 Economy

**See report of public consultation part 1**

## PO9 Retail and Town Centres

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
Other towns in the District (not just Leamington) need new retail investment	Agreed, though the evidence does not support the need for specific sites to be allocated within the other town centres.
Leamington should not attempt to compete with Solihull or Milton Keynes. Its attractions are its architecture and the range of small shops	Agreed
No provisions for future growth are required, future growth is considered 'fanciful' due to the expansion of internet shopping	The Warwick District Retail Study (May 2009) shows that there is a requirement for an increase in retail floorspace in Leamington, even taking into account e-retailing. To respond to this perceived threat however, the town centre offer must be enhanced and expanded. This may mean that the primary retail frontages are reconsidered to allow a greater scope for other uses such as leisure pursuits to be encompassed and a whole day experience be offered

"support for new retail investment on Leamington Town Centre". Why only Leamington?	The Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington but not in the other town centres. Leamington is a shopping destination for the sub region whereas Warwick and Kenilworth serve their local area and there is sufficient floorspace available to fulfil the current and forecast requirement
<b>Town centres first</b>	
Too much out of town shopping already	The policy is therefore for retail development to be located in the town centre first
Need to protect town centre visitor accommodation from competition from further out of centre' budget' hotels	Whilst the policy is to protect and encourage town centre visitor accommodation, the type of accommodation cannot be determined in the same way and planning applications will need to be decided on a case by case basis and assessed on merit
Must resist further out of town centre retail development	The policy is therefore for retail development to be located in the town centre first
Supermarket chains should not be allowed to develop wherever they want (out of centre)	The policy is therefore for retail development, including supermarkets, to be located in the town centre first
There should not be such a strong commitment to the town centres, out of centre retail is popular – give the people what they want	Town centres can be undermined by the out of town shopping centres as evidenced by many towns and cities around the UK. The town centre is a destination accessible to everyone, whereas the out of town centre is far less sustainable being accessible predominantly and sometimes exclusively by car
A policy' commitment to maintain and promote thriving town centres' is at odds with building out of town supermarkets	The policy is therefore for retail development, including supermarkets, to be located in the town centre first for all retailing
Does not include detail as to what Preferred Option is for retail hierarchy and strategies for district centres, or extent of town centres and primary shopping areas	This will be addressed at the next stage of the plan
Fifth 'strategic objective' does not reflect positive approach to economic growth advocated in NPPF	Town centres can be undermined by the out of town shopping centres as evidenced by many towns and cities around the UK. The town centre is a destination accessible to everyone, whereas the out of town centre is far less sustainable being accessible predominantly and sometimes exclusively by car. The policy is therefore for retail development, including supermarkets, to be located in the town centre first and then the sequential approach to be implemented if suitable locations are not available in the town centre
Whilst retail development should be encouraged in existing centres, should be clear that retail developments outside identified centres will be assessed in accordance with sequential approach	Agreed
Reducing through town traffic, is of concern to existing traders in the town centre	There is a difficult balance to achieve between making the town centre pleasant and safe for shoppers and encouraging new trade from those passing through in a vehicle and being persuaded to stop and investigate by what they have seen

Hard to justify "specific support for a major new retail development in Leamington Town Centre" as how will Warwick and Kenilworth prosper?	The Retail shows that there is a requirement for an increase in retail floorspace in Leamington but not in the other town centres. Leamington is a shopping destination for the sub region whereas Warwick and Kenilworth serve their local area and there is sufficient floorspace available to fulfil the current and forecast requirement
Few firm proposals for the plan to bring people into the town centre	By utilising a town centre first approach, making town centres more attractive and vibrant places, people will be encouraged in. This may mean changing the primary retail frontages to accommodate a wider range of uses to encourage shoppers to stay in the centre longer and participate in leisure pursuits for example as well as shopping
Accommodation providers need same level of protection from edge of town Budget Hotels as the retailers referred to in PO3	Policy does protect town centre visitor accommodation
Section 9 is too descriptive and not analytical and fails to see a solution to the problem: - Internet shopping is taking the place of recreational shopping; - Many centres are not customer friendly and the shop offers are limited; - Many centres are not business friendly; - Possibly consider better mixed use developments.	The Council has a Retail study which currently does not take these issues into account fully. It is therefore the intention of the Council to have this study reviewed and to ensure that research is undertaken into the forecast for the retail floorspace requirement as a result of the increase in online shopping for example. It is the intention of the Council to make town centres vibrant, attractive and viable places. In order to do this, businesses will need to be competitive and encourage shoppers to spend more, stay in the town longer and participate in leisure pursuits as well as shopping. This may mean changing some of the primary frontages to ensure a better mix of uses and this will be considered as part of the next stage of the Local Plan
Contradiction over Warwick traffic problems and new development proposals	There is a traffic forum group, separate to this Local Plan, set up specifically to look at the traffic situation in Warwick and any potential solutions to the current and increasing traffic situation as it affects the town centre
More focus should be on the centres and suburbs.	The policy is therefore for retail development to be located in the town centre first with protection for retail in local centres
<b>Frontages</b>	
Should give greater encouragement to A class retail operators to invest / locate in our town centres	The policy is for retail development to be located in the town centre first and primary/secondary frontages restricted to changes of use within this use class and from A class to other uses
Current retail frontage policies are too restrictive banks and financial institutions/ services create footfall/ linked journeys that are beneficial to all in the retail sector	Restricting retail frontage changes of use has proven very successful in maintaining footfall. Banks and financial institutions however, are well represented on our high streets and this provides the opportunity for linked journeys and is convenient for all those working, shopping and utilising all services within the town centres. However it is recognised that the primary frontages may be concentrated into smaller areas to allow a wider range of uses within the town centre to encourage shoppers to stay in the town, spend more and participate in more activity such as leisure pursuits

Current frontage policies are based on arbitrary levels of particular use classes and are unsound	This is an acceptable method of analysing the success of the policies current and future. The use classes are important to levels of footfall and therefore the vitality of the town centre. The previous policy utilises the use classes as a measure of success and experience shows that this has been an accurate barometer of the economic health of the town centres. However it is recognised that the primary frontages may be concentrated into smaller areas to allow a wider range of uses within the town centre to encourage shoppers to stay in the town, spend more and participate in more activity such as leisure pursuits
Current LP policies TCP4 & TCP5 place arbitrary restrictions on non-A1 uses in primary and secondary frontages.	The use classes are important to levels of footfall and therefore the vitality of the town centre. The previous policy utilises the use classes as a measure of success and experience shows that this has been an accurate barometer of the economic health of the town centres. It is recognised however that the primary frontages may be concentrated into smaller areas to allow a wider range of uses within the town centre to encourage shoppers to stay in the town, spend more and participate in more activity such as leisure pursuits
<b>Parking</b>	
People resent parking charges in town centres	Car parking charges are currently subject to a review and issues around the cost and length of stay will be investigated
There is no mention of the role of parking spaces and charges in maintaining the viability of town centres	Encouraging use of public transport is more sustainable than encouraging car use by providing cheap parking during working hours when short stay visitors and shoppers should be encouraged to use the town centres. Charges and length of stay are currently being reviewed
Must hold down parking charges in working hours	Encouraging use of public transport is more sustainable than encouraging car use by providing cheap parking during working hours when short stay visitors and shoppers should be encouraged to use the town centres
As parking becomes increasingly difficult and expensive the provision of safe and efficient public transport, pedestrian and cycle access must become a key factor for the future	Agreed
Town centre car parking should be free for up to 2 hours	Car parking charges are currently subject to a review and issues around the cost and length of stay will be investigated
Discriminatory car park charges result in lack of retail being the heart of the community	Car parking charges are currently subject to a review and issues around the cost and length of stay will be investigated
<b>Future development</b>	
Plan has little detail regarding how town centres will be regenerated	Town centres in Warwick District are thriving and there is little opportunity to regenerate. However there are pockets of vacant units, particularly on the southern section of the Parade in Leamington, where policies may be able to help regenerate an area which has lost much of its A1 retail offer in recent years. This will be considered at the next stage of the plan. Additionally, a Town Centre

	Area Action Plan is included in the programme of work to commence shortly
Policy PO9 fails to facilitate the future management and growth of the town centres	PO9 sets the scene for the future management and growth of the town centres as outlined in the NPPF. It refers to the ways in which the town centres will be supported and how the strength of the town centres will be increased by policies which will ensure that town centre uses are kept within the town centre. The town centres first approach is supported and strategies will include local centres and rural shops as well as town centre businesses. Additional retail floorspace is proposed in Leamington town centre and the successful constraints of uses along primary and secondary frontages retained. Area action plans are proposed as is a review of the town centre opportunity sites
The design of any major retail scheme in Leamington should complement the town (which has not been the case so far)	This will be dealt with through a planning application. The policy is in place to support the delivery of a major new retail scheme
Any new development in central Leamington will be at the cost of reducing the number of shops in South Leamington and other town centres	The Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington. This would not have to be to the detriment of South Leamington and policies will support this part of the town and other town centres where the offer is different and more local in character
The Clarendon Arcade is not suitable for the town centre and should be replaced by a mixed development which would contribute to the evening economy and retain the traditional street pattern	The Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington. In addition the next stage of the plan will look at policies that will address the evening economy
Malls should be avoided as they are locked and dead after about 6pm (as supported by the Mary Portas report)	This depends on the uses within any particular mall. If there are lively eateries and bars, they will remain open beyond normal shop trading hours
Should consider the success of the Priors before we develop another mall in Leamington as too many 'high street names' make us indistinguishable from other centres	The town centres in Warwick District each have their own unique offer. Leamington is a sub-regional destination for retail and as such is very successful in attracting a wide range of 'chains' as well as independent retailers, who are equally successful. The Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington of a similar type to the Royal Priors
No more large chain stores in Leamington as this is impacting on the town centre (detrimentally)	Leamington is a sub-regional destination for retail and as such is very successful in attracting a wide range of 'chains' as well as independent retailers, who are equally successful.
We should not be delivering retail developments that will attract people from other towns outside the District as this is contrary to sustainable travel policy	Leamington is a sub-regional destination for retail and as such is very successful in attracting a wide range of 'chains' as well as independent retailers, who are equally successful. This makes Leamington a very popular place to visit, especially for sustainable combined trips and this contributes greatly to the local economy
Would like to see a policy on where new supermarkets are located and there should be consultation on these matters with local	The policy is therefore for retail development to be located in the town centre first with protection for retail in local centres. When planning applications for new supermarkets

communities	are received there is a set procedure in place for notifying local people and encouraging consultation
Warwick should encourage independent retailers not national retail chains	Leamington is a sub-regional destination for retail and as such is very successful in attracting a wide range of 'chains' as well as independent retailers, who are equally successful. This makes Leamington a very popular place to visit, especially for sustainable combined trips and this contributes greatly to the local economy
Continued support of the development of Clarendon Arcade is mis-guided	The Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington. Clarendon Arcade is considered to be the best location for this increased offer
No mention of the effect of cyber retailing and where are the plans for Wi Fi in our town centres?	This will be considered as part of the next stage of the Plan
Fine balance between having enough "High Street names" to having so many that Leamington becomes indistinguishable from other shopping centre.	Leamington is a sub-regional destination for retail and as such is very successful in attracting a wide range of 'chains' as well as independent retailers, who are equally successful. This makes Leamington a very popular place to visit, especially for sustainable combined trips and this contributes greatly to the local economy. Policies are designed to maintain the balance between national and independent retailers
Courts in Warwick - there is scope for a Museum of Justice to keep these fine buildings and their historic interior, as well as adding to the vitality and attractiveness of Warwick	Noted
Retail study is out of date and is based on demand which assumes growth in population and superseded requirements from the RSS	The retail study is due for review in advance of the publication of the Draft Local Plan and will inform policies within that document
Warwick town centre is not best suited to major development proposals and therefore alternative development locations, such as the racecourse should be considered	The policy is for retail development to be located in the town centre first with protection for retail in local centres. If retail development is allowed outside the town centre, it can lead to the demise of that centre as evidenced by towns and cities throughout the UK. Out of town will be suitable for some uses, but not retail unless a sequential test proves otherwise
Kenilworth needs traffic diversion to achieve a sustainable future	The advice of Warwickshire County Council as the highway authority has been obtained and taken into account throughout with regard to traffic and traffic management
Leisure facilities are increasingly being moved to the fringes of towns as sports facilities are seen as something that can be moved to the countryside, making the old sites available for lucrative housing developments.	Noted
There is significant supply of empty offices or office space in town centres (enough for 22 years growth at current take up). Using this supply first is vital for vibrant community centres - yet there are plans to	Many office developments in town centres are no longer suitable for that use. The size, layout and inappropriateness of buildings for modern technological equipment means that they are no longer suitable for purpose. Additionally, developers are encouraged by

develop more out-of-town business parks	changes in planning law to develop offices for use as dwellings, without the need for planning permission, which gives the local authority no power over such changes of use
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## Summary of Matters Raised in Support

### Town centres first

Encouraged to see that visitor accommodation is to be protected within or adjoining the Districts town centres unless it can be proved to be no longer viable or suitable	Noted
Encouraging to see that a priority is to protect existing visitor accommodation	Noted
Support planning policies that support and sustain the key town centres for the benefit of the sub-region	Noted
Warwick (and Stratford) are international destinations and make a significant contribution to the economy of the region / sub-region therefore there is support for policies that support and sustain the key town centres	Noted
Town centres should be helped to remain successful and there should be resistance to further out of town retail applications/ proposals	Noted
Supports town centre investment – does not consider that a new supermarket north of the town (Green Belt) should be encouraged to fund new development at this location	Noted
Will support people to live independently in their own homes as they will have access to local shops	Noted

### Parking

The town centres first approach is welcomed, provided that car parking and public transport are good enough to support them properly	Noted
We don't need a park and ride as there is adequate car parking in the town centres	The idea of a park and ride site is not just to make more car park spaces available but primarily to reduce the amount of town centre traffic and thus improve air quality and the general environment within the town. By leaving cars on the periphery and using one vehicle to replace many a more sustainable travel pattern can be achieved

### Future development

Retail outlets must be provided in all new residential developments to create sustainable developments and a sense of community	Where there is a quantum of development to support this, developers can be required to provide/contribute toward a local centre
Supports the reference to sustainable growth of retail and leisure offer, as Warwick town centre does not lend itself to new development	Noted

the racecourse should be considered appropriate for re-development including potential for a hotel and expansion of the caravan park	
The value of district and rural centres / retail facilities is recognised and such outlets should be supported as long as they are of an appropriate scale to meet local needs	Noted
Support proposals to resist more out of town retail - especially supermarkets, but recent developments go against this	Noted
As parking becomes increasingly difficult and expensive a key factor must be provision of safe and efficient public transport, pedestrian and cycle access	Noted
<b>Summary of Suggested Changes to the Plan</b>	
<b>Investment</b>	
Leamington town centre needs redeveloping	Although Leamington Town Centre is a successful retail centre, there are areas which could be regenerated and a Town Centre Area Action Plan is included in the programme of work to commence shortly
Should not identify any new areas for retail expansion as it is not needed	The Retail shows that there is a requirement for an increase in retail floorspace in Leamington.
Other towns (not just Leamington ) need new retail investment Plan should support the other towns equally	Whilst there is support for the other towns, the Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington. This would not have to be to the detriment of the other town centres where the offer is different and more local in character
Support the town centres with tangible financial support and place a moratorium on levies on out of town development and levies on existing parks. increase in rental levels is not necessarily healthy for proper retailers	There are no specific grants etc for supporting the town centre businesses other than for Old Town in Leamington which is part of the Portas Pilot scheme. The Council may consider assisting small new businesses in the future, but this is not the case currently
<b>Town centres first</b>	
Give the people the retailing that they want – (out of centre / more convenient/ accessible)	National and local policy is for a ‘town centres first’ approach. Encouraging use of public transport is more sustainable than encouraging car use. Out of centre retailing leads to the demise of the centre as evidenced by towns and cities throughout the UK and is far less accessible to those who do not have access to a car
Policy PO9 should be worded to reflect positive approach to determining applications for main town centre uses outside existing centres, providing they are in accordance with sequential approach/ consideration of impact.	Noted
Include a commitment to retaining leisure facilities within the perimeters of the towns	Noted
<b>Frontages</b>	
A2 (financial and professional)uses should not	Maintaining a balance between A class uses and other

be restricted in town centre frontage policies	uses is important to the health of town centres. Restricting retail frontage changes of use has proven very successful in maintaining footfall. Banks and financial institutions however, are well represented on our high streets and this provides the opportunity for linked journeys and is convenient for all those working, shopping and utilising all services within the town centres
Outdated town centre policies need to be reviewed to facilitate new growth / investment or an unsound plan will not respond to rapid changes taking place in the retail sector	This will be considered at the next stage of the plan
<b>Parking</b>	
Need to introduce car park charges at out of centre locations	These tend to be on privately owned land and therefore car park charges are not subject to the control of the Local Authority
Need to reduce / remove charges for town centre car parking	Car parking charges are currently subject to a review and issues around the cost and length of stay will be investigated
Could give consideration to annual car parking passes for town centres	Season tickets are available for many local authority owned car parks. To view which these are follow this link <a href="http://www.warwickdc.gov.uk/info/20535/car_parks/316/car_park_season_tickets">http://www.warwickdc.gov.uk/info/20535/car_parks/316/car_park_season_tickets</a>
Include a commitment to provide adequate parking for shopper in town centres and to hold down parking charges in normal working hours	New development will be expected to provide car parking at a suitable level as part of a planning application and with reference to the Council's car parking standards. However, encouraging use of public transport is more sustainable than encouraging car use by providing cheap parking during working hours when short stay visitors and shoppers should be encouraged to use the town centres
<b>Future development</b>	
The current Warwickshire County Council Offices (Shire Hall) should be demolished at Warwick and re-located to a business park, new housing should be built in its place to improve the town	This building is a Grade I Listed Building and is therefore a building of exceptional interest sometimes considered to be internationally important with only 2.5% of listed buildings being Grade I. The demolition of such a building, particularly one in constant use and fully maintained, would not be allowed. There is no reason why housing cannot be included in town centre uses however and policies encourage this
The large scale retail proposals for Leamington town centre should be revisited	The Retail Study shows that there is a continuing requirement for an increase in retail floorspace in Leamington.
The Clarendon Arcade is not suitable for the town centre and should be replaced by a mixed development which would contribute to the evening economy and retain the traditional street pattern	The Retail Study shows that there is a requirement for an increase in retail floorspace in Leamington. The Clarendon Arcade site is considered to be the best location for this
Redundant Court buildings in Warwick should be turned into a 'museum of justice' as a major attraction to add vitality to the town centre	The building is owned by Warwickshire County Council and new uses are being considered which preserve its historic content and add to the vitality of the town

	centre
Sites which are coming forward to retail should be re-zoned for housing	Residential uses are also encouraged in town centres, particularly at upper levels where spaces may often remain vacant otherwise
Suggest that the phrase "strongly resist any out of town centre proposals" be replaced with "not allow any out of town proposals"	This would be contrary to the sequential test approach and would stifle new development in cases where no alternative is available
No need to identify areas for future growth	Economic growth is at the top of the Government's agenda and therefore policies have to accord with that objective

<b>PO 10 BUILT ENVIRONMENT</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
These policies should only be incorporated in sites where it is viable to do so	It is expected that all sites address these policies. Where viability is an issue, policy DM2 should be applied
Proposals which do not meet all the aims of his policy should not be refused on sustainability grounds - there is a presumption in favour of development and economic growth which carry weight over other planning matters	These policies could be grounds for refusal if the policies are found sound
Health and wellbeing is integral part of the consideration for high quality built environment. Environments should be created to provide opportunities for healthy lifestyles including lighting, safe environments for children to play and green spaces	See policies HS1, HS2, HS3, HS4, Hs5, HS6, HS7, TR1, TR2, BE1
Parking should be in front of houses, not round the back	Agreed. Part of Garden Towns Prospectus – see policy BE and BE2
3 storey homes are only suitable in an urban environment and will not suit south Warwick or Thichthorn.	This will be a matter to resolve in development briefs and/or specific planning applications
Provision of recycling bins in shopping and leisure areas should be a priority	This has not been addressed and is too specific for the Local Plan
Building mainly on greenfield sites is unnecessary, partly because the housing number is too high and partly because densities are far too low. Should be applying for higher densities for housing	The Local Plan does not set densities (it does however set a minimum – Policy BE2). Densities will be addressed in bespoke way for each site through development briefs or masterplans
WDC should put in place procedures to limit and reduce street clutter	Not specifically addressed, though this is part of good design and would be picked up through Building for Life 12 guidance
Need more clarity on how design codes will be developed and used	Unless part of development briefs, design codes will not be a requirement
Less blanket modern housing which impacts on the built environment -large housing estates create soulless housing which are not appropriate local character and do not	Schemes are required to take account of Garden Towns principles and Building for Life 12. For large sites they need to come

integrate with existing communities	forward within the context of a masterplan which should show how they integrate with existing areas.
Need a definition of good design and Parker Morris standards should be applied	
Need a more proactive policy stance on the reuse of vacant properties and the need to promote 'homes above shops' as part of a comprehensive package to revitalise the urban areas	Policy TC14 and TC15 attempt to protect residential use above shops. Empty homes is not a matter for the local plan – but the Council has developed an empty homes strategy
Design should seek to reduce carbon emissions	See policy BE1, CC2, CC3 and TR2
Design for safe communities is important	See policy HS7
Leamington could be transition town. How about banning car completely in town	This is not practical, nor would it be consistent with the NPPF
More should be done to encourage Self Build	Self-build will be encouraged, although the scale and nature of development sites has meant there is little scope to allocate land for this
Insufficient parking is provided with developments – 1.31 spaces per dwelling is not enough. It should be a minimum of 2 and to take account of visitors, 3 plus a garage	Policy TR4 indicates that parking standards will be reviewed
Parking should be provided for student accommodation. The current parking standards do not address this adequately	
Welcome the intention to set out a framework for subsequent more detailed design guidance to ensure physical access for all groups to the natural environment.	Noted
<b>Garden Towns, Villages and Suburbs</b>	
Garden Towns Prospectus fails to provide any guidance on how to accommodate large numbers of affordable houses	Affordable homes will be integrated into schemes – see policy H2
Garden Towns Prospectus provides a poor model for sensitive handling of landscapes and boundaries with existing communities.	Disagree. The prospectus shows how the urban edge can be sensitively handled
2700 houses cannot be mitigated by calling it a garden suburb.	The mitigation for new housing has many elements including infrastructure, design, layout and landscape.
Garden Towns proposals will lead to unnecessary land take. There are better ways to achieve good design	Design is subjective, but the Council's approach is consistent with NPPF
Trees can be incorporated in to development without applying garden towns principles	This is true
The Garden suburbs proposals encourage car dependency and should take into account climate change. Higher density development would allow for larger green wedges to encourage recreation and wildlife corridors	Garden suburbs need not necessarily be lower density than many schemes recently built in the area. With the right layout of streets, garden suburbs can effectively accommodate cyclists, pedestrians and public transport.
Gardens Towns Prospectus is idealistic and seems to be conventional suburbia with an extravagant use of space	The prospectus has been produced to show it is deliverable. It may need to be applied flexibly according to circumstances
Proposals are poorly presented and suggest development should be based on Hampstead Garden Suburb – this is	Agreed the Hampstead examples are not appropriate for Warwick District

unrealistic and will not deliver the housing this area needs.	
The ideas of the Cohousing Movement should be supported rather than Garden Towns	Cohousing communities would not be excluded from the development proposals, subject to appropriate management options being put in place
Too much emphasis on garden towns - There are many ways in which high quality design can be introduced to an environment and one of the keys is to have carefully assembled variety of design sets. This helps to give a sense of place.	Agreed, but the Garden Towns prospectus shows how high quality design can be delivered in the context of edge of settlements
Transport proposals are not consistent with garden towns prospectus which encourage broad, green approaches to towns	The transport proposals, including sustainable modes, can be accommodated within Garden suburbs
Developers are unlikely to comply with the Garden Towns proposals	Developers are asked to take account of the principles – not to comply with a specific design code. The nature of this will be agreed through development briefs/masterplans
<b>Impact in specific locations</b>	
A large number of houses in Norton Lindsey will damage the character and historic environment (including the conservation area) of the village	The proposals for Norton Lindsey are not included in the Plan
Infill within Barford Conservation Area should be strictly limited	Agreed. See policy HE2 and H11
The proposed development site South of Gallows Hill/The Asps does not protect or enhance the historic environment for the reasons given above.	These sites are not included in the Plan
<b>Summary of Matters Raised in Support</b>	
Objective of higher quality design in development is good	
Support protection and enhancement and link with natural environment as well as secure, safe and accessible places	
Support 'Sustainable Garden towns, suburbs and village' design guide	
Support "link the natural environment through policies to encourage appropriate design of the built environment and set out a framework for subsequent more detailed design guidance to ensure physical access for all groups."	

## PO11 HISTORIC ENVIRONMENT

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
Norton Lindsey is hill top village dating back 1000 years and has ridge and furrow fields, Conservation Area, listed buildings, orchards and historical landmarks, yet could be identified for proposed development. Has grown in ribbon style along main routes and development outside this context/style could adversely impact on historic environment	No specific sites have been considered as yet for any of the villages (at the time the Preferred Options were published), but work is continuing with Parish Councils to identify these sites which will be assessed for, among other things, historic environment before allocations are made
Essential to protect historic environment for future generations – present extent of allocation at Gallows Hill/west of Europa Way will be in conflict	This is one aspect that will need to be taken into account when assessing whether to take this site forward into the Draft Plan. However, there is much pressure on non green belt land for new development and this will need to be balanced against all other factors
Planning for Loes Farm does not protect the historic environment from inappropriate development. Listed hedgerows and green belt land would be destroyed to make way for small quantity of unnecessary housing	This is one aspect that will need to be taken into account when assessing whether to take this site forward into the Draft Plan
Very weak section. Offering help and advice is not very positive. Concrete proposals and financial commitment needed	Noted although advice is a positive response. Financial commitment cannot be offered in terms of anything other than minor grants for work on listed buildings currently
Places too much emphasis on encouraging commercial enterprise rather than on protecting historic assets and associated surroundings for their own sake	The policies aim to strike a balance between conserving and preserving and allowing development for economic growth whilst being mindful of the effects on the historic environment
Strong local protection policies needed to prevent districts assets from becoming just facades	The Local List will afford additional protection for buildings which are of local value but not recognised through the Listing process
Should protect approaches to Warwick and Warwick Castle	Noted
Need to strengthen policy for Conservation Areas	The main protection afforded through Conservation Areas is via the Planning (Listed Buildings and Conservation Areas) Act 1990 supported by NPPF section 12, however, policies within the Local Plan both support and strengthen the legislation and guidance
Grade II listed house (Kenilworth Manor), nearby ancient woodland and Roman site need to be taken into account at Thickthorn. Any development should link to the house and keep history alive	The Listed Building is not within the development proposal, but is adjacent and will therefore be considered when a detailed planning application is received

Should seek to unambiguously protect historic buildings and their settings	The policies are designed to do that
Some vague and bland statements. Needs articulated 'heritage vision' backed up with detailed guidance and enforcement	The Council has, and continues to prepare, a considerable suite of guidance notes covering all aspects of the historic environment to advise and guide developers and owners of land and buildings. This is backed up, should the need arise, with a dedicated team of professionals in the enforcement team
Towns are special but only if key historic/architectural elements and values are protected or risk sprawling new town	Agree. The Plan strives to ensure that coalescence is avoided and polices protect the historic/architectural assets of towns and beyond
Existing open spaces, sports fields, allotments and parklands and their settings should be unambiguously protected from development	This protection appears elsewhere in the Plan (for instance see Policy HS2)
Although there is value from the past, we are living in the present and planning for the future. Important that designations such as Conservation Areas are of sufficient value to justify them being conserved at the cost of compromising other important considerations for the environment	The main protection afforded through Conservation Areas is via the Planning (Listed Buildings and Conservation Areas) Act 1990 supported by NPPF section 12, however, policies within the Local Plan both support and strengthen the legislation and guidance
Would like to see parks and gardens kept in better condition with more money for maintenance as parks give pleasure to those not able to access countryside	Agree, but there are limits on the amount of money available for such maintenance given the current economic climate and this service has to be balanced against provision of all the Council's services and priorities made for those which are the most important to its population
Needs high profile and should include archaeological surveys	Noted
Must commit to protecting existing listed buildings, open public spaces and conservation areas, from encroachment by development. Most development needs will be met by building on greenfield and brown field sites in Plan, therefore less pressure to damage existing historic town buildings.	Noted
The proposed development of Gallows Hill etc would spoil approach to Warwick Castle area	This will be looked at again and the sites will only progress if impact on the historic assets is within reasonable limits.
<b>Summary of Matters Raised in Support</b>	
In favour of protecting heritage assets from inappropriate development but should include surroundings of and approaches to major historic buildings such as Warwick Castle	
Local lists need to be introduced quickly to add protection to landmark buildings and assets	

Policy will help LA "to justify the status given to the historic environment, ensure appropriate significance of an asset is understood, and rectify deliberate neglect and damage"	
PO11 could include the canal network where reference is made to appropriate regeneration of the historic environment and would help demonstrate a positive strategy as advocated by NPPF. In Appropriate development can enhance the character of the canals as a historic asset and should be acknowledged	The Council will produce a DPD which will look at various aspects of the canals, including regeneration and the potential for a Conservation Area covering all or part of the network through the district
Value of assets should be acknowledged and policies dynamic enough to enable enhancement/improvement/development where vital to regional tourism	Noted
Hope policies will be at least as strong as current policies, although integrated protection of heritage assets will require considerable re-drafting	Many of the current policies have been either reproduced or strengthened or replaced to conform with the NPPF
Proper funding needed for professional advice in conservation, planning and archaeology through own staff or subsidies to local bodies providing such services (eg.WCC)	This Council has two dedicated Conservation Officers and utilises the services of WCC, particularly for archaeological advice and Historic Landscape Classification information (HLC)
Saddened that Leper hospital site in Warwick has not been protected and restored	Work is proceeding on finding a suitable use and developer for this site and it is hoped that this will allow for the restoration and reuse of the existing buildings
Section 7 - Welcome reference to need to maintain and develop heritage and cultural infrastructure to support needs of new residents and new communities in developing sense of identity and social cohesion	
Support for blue plaque scheme and Guild of Guides Walks	
Review of Conservation Areas should be done in consultation with elected representatives, residents and voters under framework of Localism Act	This can be looked into separately from the Local Plan
Particularly useful is being flexible about new uses for vacant listed buildings	
Support 'recognising other local assets through Local Lists'. This is long overdue	
300 year old Castle Bridge already carries too many vehicles and cannot sustain an increase in traffic without threat to its structure. We should be reducing traffic to prevent the bridge collapsing. NPPF states that 'as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional'	Such structures are protected by virtue of their listed status, but WCC regularly inspects and reports on the condition of this bridge to ensure it is safe and can carry the amount of traffic expected
Specific historic environment policies should be dynamic enough to enable heritage assets to be enhanced, improved and/ or developed, particularly where they are vital to the regional tourism and cultural offer and the regional economy	Noted

Recognition in Plan of pressure for new development threatening "high quality built and natural environments in the district, particularly historic areas. Reassures that 10,800 new homes (to 2029) will be founded on "best evidence" and located in most suitable locations to help ensure historic environment is protected and enhanced.	
<b>Summary of Suggested Changes to the Plan</b>	
Extend to include 'encourage sympathetic development of historic buildings' – meaning development should be in similar style not contrasting or carbuncle style which is so often demanded	This is a detailed matter of design which is dealt with elsewhere in the Plan, but each case is judged on its merits when a planning application is considered particularly as to the appropriateness of the proposed design when dealing with historic buildings or environment
Areas of restraint should be reintroduced to control activity in areas with little formal protection	Noted
Ensure that any new development does not materially impact on the current setting, layout and character of Norton Lindsey village or any part of it	Noted
Norton Lindsey should be de-classified as Category 2 village and re-categorised to Category 3	The villages will be assessed according to their services, population and facilities and this information will be published alongside the Draft Plan in due course. There may be a case for reclassifying some of the villages.
Remove all plans to build housing at Loes Farm	This will be considered as part of the next stage of the plan and sites carried forward into the draft plan will reflect the best choices
Adequate provision should be made to include built structures in local listing regime to protect some garden structures which are currently vulnerable	This will be a matter for the Local List when it is introduced and will rely to a certain extent on local knowledge to suggest such structures so that they can be assessed
Suggest the Plan also address and target specific environmental improvements; the assets within the area on the heritage at risk register , including the ten monuments, four buildings and two parks and the opportunity afforded by CIL/S106 agreements.	Noted
Might the enhancement of the public realm be linked to creating an attractive environment for businesses and visitors	This can be addressed at the next stage of the plan
Delete the last point (5) in your proposal and do not build on any historic sites	This can be addressed at the next stage of the plan if it is felt that this is likely to be achievable
What does the following statement mean? "This could involve not providing advice to stakeholders by relying on the development management process". Rewrite and clarify	This can be addressed at the next stage of the plan

Contribution of high quality of environment should be specifically stated in policy to maintain role of towns as visitor destinations	Policies to support culture and tourism will be included with the draft Local Plan. These should recognise the importance of heritage assets
Introductory list of cultural venues should include museums and archives	Noted
Recommend that references to 'built and natural environment' throughout document be re-worded to reflect that historic environment is made up of wide range of different types of heritage assets (including archaeological features, historic landscapes etc), rather than just historic structures	Noted, this will be addressed in the Local Plan
Further clarification is needed in PO11 by "support the understanding of the significance of Heritage Assets, by: There should be provision for appropriate research for all applications relating to the historic environment"	This will be clarified in the wording in the Local Plan. This refers to the importance of a good quality evidence base to support applications
Further clarification needed about reference to Planning Authority undertaking research for all applications relating to historic environment, or reference to requiring any planning applications relating to historic environment to be accompanied by appropriate assessment of likely impact proposal will have upon historic environment, as per para. 128, of NPPF. Recommend re-wording of this section of the document and assistance from County's specialists can be provided. Further clarification needed about term 'locally designated historic assets' in PO11. Not clear whether this is referring solely to designated historic assets such as those included on 'Local Lists', or whether this is also referring to historic assets recorded on Warwickshire Historic Environment Record (HER)	This will be clarified in the wording in the Local Plan. This refers to the importance of a good quality evidence base to support applications.  The refer predominantly to Local Lists and will be clarified in the Local Plan
Recommend reference made to appropriately considering (and protecting if appropriate) all heritage assets as part of planning process, whether designated or not, and reference also made to heritage assets recorded on Warwickshire HER. Also recommend this policy acknowledge that there may be as yet unidentified heritage assets across District which may be worthy of conservation, and which may also require protecting during planning process	Noted
Recommend term 'heritage assets' be used in preference to 'historic assets' as this is term used throughout NPPF and other policy documents	Noted. This will be addressed in the Local Plan
Some heritage assets may be better protected by being statutorily protected as Scheduled Monuments or included on English Heritage 'Register of Historic Parks and Gardens of special historic interest in England'. This policy should reflect this	This will be reflected in the Local Plan policies
Suggest indirect impacts of development on heritage assets should also be added to criteria based policy	The impact on the settings of heritage will be added
Chapter 11, Para. 11.6 should read 'putting them to viable uses consistent with their conservation'	Noted

Parts of existing Local Plan should be carried forward:  “A development will not be permitted which has an unacceptable adverse impact on the amenity of nearby users and residents such as loss of privacy, loss of sunlight and daylight and noise disturbance. A development will only be permitted which protects important natural features and positively contributes to the character and quality of its existing environment Developments will help to support the objective of reducing dependence on the private car, avoid excessive levels of car parking and increase the patronage of public transport and encourage walking and cycling”	Noted. A similar policy will be included
Consider the quality of Conservation Area designations	Conservation Areas are reviewed periodically
Consider the implications of development locations and in-commuting on the historic fabric of Warwick	This will be assessed and will impact on site selection
Historic environment policies should recognise the need for Warwick Castle to continuously improve its tourism offer to continue to attract visitors as this (by the generation of income) will ensure ongoing investment and the future economic viability of the Castle / historic environment	Agreed
Policy does not go far enough and should seek to promote development opportunities enabling improvement to setting of assets and enabling development to preserve and enhance in line with NPPF	Agreed

<b>PO12: Climate Change</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
There is little on reducing the carbon footprint of existing buildings. The focus on new buildings implies it is more carbon efficient to knock down existing buildings and replace them with new ones. Change of use applications should be exempt from the policy as it is more sustainable to reuse a building and some schemes would be economically unviable if the requirement was sought.	It is acknowledged that reducing the carbon footprint of the existing building stock is a significant challenge, however the Local Plan can only influence new development which requires planning permission.  The Council does support the reuse of buildings and has sought to direct new development in the first instance to previously developed brown field land.  Changes of use are exempt from the policy
There is no mention of the need to protect agricultural land for food despite increases in population and the associated difficulty in feeding the population of Britain.	The importance of protecting good quality agricultural land for food production is recognised. The highest grades of agricultural

	land known as 'Best and most versatile land' and are protected through the policy on the protection of natural resources (Policy NE5).
Climate change adaptation should include the planting of more woods in order to mitigate the new developments.	Policy CC1 requires that adaptation measures are incorporated into the design of new buildings. Criteria b) specifically refers to green infrastructure (including planting) and this is further set out in Policy NE1.
Disappointed that there is no overall target for reducing carbon emissions. Surely the plan should be in line with the agreed national target in the 2008 Climate Change Act that sets an 80% reduction in emissions by 2050 compared to 1990 levels	The government has set out the trajectory for reducing carbon emissions and achieving zero carbon buildings through the progressive tightening of building regulations. This takes account of the need to meet national targets for reducing carbon emissions. The requirements set out in Policies CC2 and CC3 will assist in meeting these targets.
The role that waterways can play in carbon reduction and sustainability should be recognised and supported. PO12 should in particular refer to utilising canal water for heating / cooling of buildings.	The importance of the District's canals is recognised in DS17. The Council will prepare a Canalside Development Plan Document.
Concern that the entire Warwick Town centre road network is in breach of Nitrogen Dioxide Levels. Large scale housing on the edge of Warwick will increase the number of cars and worsen the public health risk.	The transport mitigation proposals will attempt to support improvements in air quality in AQMAs, although this will not always be possible. Investment in technology (eg electric charging points) to support cleaner vehicles needs to be considered to encourage use of cleaner vehicles (see policy TR2). The air quality study shows that air quality is likely to improve during the Plan Period due to cleaner engines
There is no mention of Leamington being a transition town	Noted.
Suggests banning cars in the town centres completely	It would not be commercially viable or necessary to ban cars in the town centres. The air quality study shows that air quality is likely to improve during the Plan Period due to cleaner engines
The reference to climate change adaptation in paragraphs 12.25 to 12.26 could be expanded within future documents (i.e. a SPD or equivalent) to promote green roofs, wall and other ways to promote cooling	Policy CC1 requires that adaptation measures are incorporated into the design of new buildings.
Need to protect designated landscapes	Policy NE4 ensures that new development positively contributes to landscape character.
Consideration should be given to ensuring linkages to delivering green infrastructure, protecting and enhancing biodiversity and ecological networks and supporting objectives for mitigating and enhancing flooding and water quality as these will support and provide context for delivering climate change adaptations through new development proposals	See policy NE2 and NE3
Climate change policy needs to be the first policies around which the other policies fit	The Local Plan aligns with the Sustainable Community Strategy this has sustainability at its heart.

Highlights the issue of financing the costs of reducing energy costs to all buildings	Noted
Construction is a huge producer of CO2;	It is noted that construction is a significant producer of CO2, although this is not something that will be directly controlled through the Local Plan
Renewable energy projects may be tokenistic and expensive	The cost of renewable technologies is reducing and will continue to do so as the Building Regulations are tightened in order to achieve zero carbon.
Make better use of local initiatives / opportunities - water-power	The Council's Low Carbon Action Plan has identified a range of schemes and programmes
Given recent patterns of heavy rainfall extreme care should be given to the siting of new development. Modelling should be treated with scepticism as reliable data only exists for the last 90 years. In urban areas a conservative approach should be taken to large new buildings and their impact on surface water drainage.	Policy FW2 requires Sustainable Urban Drainage to be incorporated
Consideration should be given to more local flood defences and helping individual flood proof their homes	This is not a matter for the Local Plan
There is no mention of or commitment to reducing light pollution even though this is a key feature of the NPPF.	Policy NE5 on the protection of natural resources deals with light pollution.
To achieve an overall 25% reduction by 2027 new developments will need to contribute more than a 20% reduction	The Council's policy approach has changed to reflect national policy. This means that % reductions are not applied to new developments, but clear and measurable building standards are (see policy CC3)
District Heating systems should be made compulsory for the new developments using CHP systems and ground source heat pumps	
<b>Building standards requirements</b>	
It is unclear what the 20% reduction relates to, as there is no reference to the baseline and how the policy will be applied.	The Council does not propose to exceed requirements for carbon emissions beyond that which will be implemented through the tightening of building regulations. The government is clear that this is the right way to progress towards meeting zero carbon buildings and that local authorities should not accelerate nationally prescribed standards. The Council is committed to ensure that other elements of sustainability keep pace and therefore Policy CC3 requires new development to meet the Code for Sustainable Homes level which corresponds with building regulations
20% requirement is too stringent and should be reduced to 10%. Many developments will not be able to achieve this target in terms of practicality and viability. Concerned about viability of housing for the elderly if this is enforced.	Policy CC3 does not exceed national requirements for the reduction of carbon emissions. It does require other elements of sustainability to be met in line with these levels. However it allows for circumstances where it would not be financially viable to meet the non-building regulations requirements of the Policy.
Locally imposed requirements need to be subject to feasibility and viability testing	
Policy should incorporate an element of flexibility where it is viable, feasible or suitable to reduce carbon	

dioxide emission by a given percentage or development to be carbon zero	
The 20% requirement is not the most appropriate strategy and is not in accordance with paragraph 95 of the NPPF. It is unclear how it has been established.	The Council does not propose to exceed requirements for carbon emissions beyond that which will be implemented through the tightening of building regulations. The government is clear that this is the right way to progress towards meeting zero carbon buildings and that local authorities should not accelerate nationally prescribed standards. The Council is committed to ensure that other elements of sustainability keep pace and therefore Policy CC3 requires new development to meet the Code for Sustainable Homes level which corresponds with building regulations
The requirement should be a 10% reduction in carbon emissions.	
Carbon reduction is enshrined in current and future building regulations so there is no need for a further layer of policy. The market will dictate the level of energy efficiency and carbon reductions over legal requirements. Many developers are looking at a fabric first approach and ways of achieving the 25% reduction in carbon required through future 2013 building regulations at no additional cost.	Agreed. The Council does not propose to exceed requirements for carbon emissions beyond that which will be implemented through the tightening of building regulations. The government is clear that this is the right way to progress towards meeting zero carbon buildings and that local authorities should not accelerate nationally prescribed standards. The Council is committed to ensuring that other elements of sustainability keep pace and therefore Policy CC3 requires new development to meet the Code for Sustainable Homes level which corresponds with building regulations
Increases in population may undermine efforts to reduce carbon emissions so development needs to be minimised and locations selected to minimise the need to travel.	The Council must ensure that sufficient land is allocated to meet the housing needs of the District over the next 15 years. Minimising the need to travel is taken in to account in selecting locations (see Sustainability Appraisal)
The approach needs to be reviewed to ensure that the requirement does not jeopardise the delivery of planned development. This work should be undertaken to ensure that the plan is sound and in consultation with developer interests.	All development must be viable – see policy DM2 regarding assessing viability
Clarification is needed on the standards of Code for Sustainable Homes and BREEAM which will be required.	Policy CC3 requires development of one dwellings or more to meet Code Level 4 from adoption of the plan and Code level 5 from 2016. It does not exceed requirements for carbon emissions beyond that which will be implemented through the tightening of building regulations
Highlights the potentially high carbon emissions associated with implementing greywater recycling systems necessary to achieve code level 5 / 6 suggested in the INFRASTRUCTURE DELIVERY PLAN	Recent evidence suggests that the cost of complying with the water efficiency elements required for higher code levels is reducing.
Housing development at Norton Lindsey will not support the aim of reducing carbon emissions; it would increase the amount of traffic as most households will	No housing is allocated for development at Norton Lindsey

have two vehicles particularly due to the lack of public transport to services. The plans would disproportionately increase the size of the village.	
The intention of the policy is right but the requirements are too small	More stringent requirements may undermine viability and would be hard to justify
Developments should be required to be as carbon neutral as possible	
Plan should be consistent with the Government's zero carbon buildings policy and nationally described standards	
Any new development should be made as carbon neutral as possible	
<b>Summary of Matters Raised in Support</b>	
Welcomes that the importance of climate change adaptation and particularly flood risk are recognised. Minimising the future impacts of climate change such as heat and water stress, increased subsidence and extreme weather events.	Noted
Supports principles set out in PO12 and will seek to ensure that any future development in Whitnash seeks to reduce the Town's overall carbon footprint through the application of sustainable development and design principles	
Supports ensuring flood resistance and resilience in new developments through SUDs schemes	
Supports the use of green space and vegetation (such as street trees) in Para 12.26. Supports planning appropriate infrastructure with regard to water provision and waste water treatment	
The setting up of a Low Carbon Task Force including strategic leaders across Warwick District is welcomed. Climate change mitigation and adaptation remain of the utmost importance	
The Council needs to take a broader view to plan the district, rather than the narrow view in the current consultation which seems to be driven by housing.	This is consistent with the Council's approach
Include a policy on energy saving measures for existing buildings	The Local Plan can only influence new development which requires planning permission. The low carbon action plan has identified a range of measures to reduce carbon emissions in the district some of which include  There may be the opportunity through the implementation of district heating systems
Norton Lindsey should be removed as a preferred development site for housing	See representations for the villages
Make the plan compliant with the 2008 Climate Change	The plan is seeking to reduce carbon emissions

Act	locally supporting overall targets for carbon reduction at the national level.
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<b>PO13 Inclusive, safe and healthy</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
Provision of amenities should not solely be restricted to larger developments. Smaller development should also contribute	Noted, although a quantum of development is needed before developers are required to contribute
More should be done to address para 72 of the NPPF in relation to provision of schools. More weight needs to be given to the provision of schools including Free Schools	The Council is working with Warwickshire County Council on school provision
The proposals for Norton Lindsey undermines the work done locally to provide play facilities	Noted
Accessible green space is important for quality of life – more needs to be done on this including taking account of The Case for Trees' sets out value of trees for people and places. Aim for 'Woodland Access Standard'. Refer to 'Space for People' UK wide assessment and VisitWoods.	Landscaping and ecology reports will deal with this issue
There needs to be a greater focus on cultural facilities such as libraries, museums, cinemas and theatre venues	This would be part of the new community facilities to be considered when masterplans are developed for sites
There is conflict between the proposed level of growth and quality of life. The Plan proposals put too much emphasis on the former and not enough on the latter.	The Joint SHMA has analysed and updated projections according to the methodology in NPPF and this shows the objectively assessed need for housing which is now the basis of the housing target
Policies should do everything possible to encourage the greater use of bicycles	Noted
Policies are inconsistent with the allocation of playing fields at Thickthorn for development	Policies in the Local Plan will consider the need to replace playing fields lost to new development
There should be proposals for an ice rink with the District	This is a detailed matter and not for consideration in a strategic document
Free to use tennis courts should be provided within the proposed housing developments	
Need to do more support provision of Places of Worship in line with para. 72 of the NPPF	Agreed. This is reflected in new policy wording
HGV traffic associated with the Gateway will be noisy and will cause vibration which is damaging to health	The Council, in conjunction with WCC are exploring whether there are better traffic solutions. This will focus on the role of sustainable forms of transport
Development at North Milverton will destroy an area that is enjoyed for walking, cycling and other healthy activities	These proposed sites have now been excluded from further consideration
More needs to be done to support existing deprived areas rather than build new houses	Work will be carried out to decide what the best course of action would be to promote regeneration of such areas

Norton Lindsey proposal would lead to more traffic and would not be consistent with promoting healthy communities	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based. However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport
Should consider installation of “outdoor gym” facilities	This will be considered as part of a detailed planning application
Green belt should be protected to provide access to open space	The proposals seek to protect the green belt, mitigate the worst impacts on Warwick and bring some benefits to the Town
Large development will increase the size of communities and will undermine community safety. Research shows that smaller communities are generally safer	This will be considered as a more detailed issue when planning applications are assessed
We need specific needs analyses from partners all of which directly support/commission services for vulnerable people with a range of health and social care requirements, and these factors need to be considered when looking at overall housing provision	Noted
Should resist proposals like SEVs etc. as these downgrade the cultural offer of the areas	The National Use Classes Order limits the extent to which planning policy can restrict these uses
Must consider fast and reliable broadband within development and growth plans for the District	Noted
Approach not supported by evidence	See evidence base on the website
Developers should ensure good access to health facilities – including for villages	This will be done in conjunction with the relevant authorities and in connection with new development
Transport difficulties caused by river crossing will restrict access to amenities and facilities	The river crossings do provide a particular challenge in thinking about mitigation measures. However the traffic modelling takes account of the limitations of this part of the network and the mitigation is being designed taking this in to account
Proposals do not include enough regarding extra care facilities and GP surgeries are at breaking point	Provision will be considered in conjunction with the relevant authorities and in connection with new development
<b>Summary of Matters Raised in Support</b>	
Proposals to ensure linkages to countryside are supported	
It is right that developments should fund community centres and play areas	
Young people have the right to access a full range of sports facilities and health care in a safe and healthy community, so support these proposals	

Excellent idea - particularly in trying to provide sports facilities, play areas and facilities for young people	
Playing fields should be protected and not turned in to travellers sites and the like	
Supports the desire to deliver community safety services and reduce crime and antisocial behaviour by the appropriate design and location of new development	
Canal towpaths can play an important role in providing links to the wider countryside. Tow paths need to be maintained	Agreed. A DPD will be considered as a possible way forward for this
<b>Suggested Changes to the Plan</b>	
Consider cases for provision of amenities in smaller developments dependant on local community requirements or support	Noted
Remove north Milverton site from the Plan	This site is no longer under consideration
Remove Norton Lindsey proposals from the Plan	There is a commitment in the plan to allow for villages to accommodate some residential development to aid sustainability and to contribute toward the housing need of the district. Villages with services already in place are particularly well placed to do so
Sex clubs or night clubs should only be built in non-residential areas.	This is a licencing, not a planning issue
No new pubs, bars or hotels should be built or change of use in areas of predominately residential nature	This is a detailed issue for a planning application
Natural England promotes an Accessible Natural Greenspace Standard <sup>1</sup> that we encourage local authorities to adopt.	Noted
Would request however that any large planning application/decision is made following consultation with the health service, particularly in relation to maximising linkages and access to the wider countryside for health/recreational purposes e.g. cycle routes, measured miles etc.	Noted
Consideration of an SPD that could include either a moratorium on C2 applications or introduction of a two-stage process	This is not considered to be necessary as policies will deal with all aspects of uses on sites
Policy needs to include following words: As part of the evidence that the sports facility (Built or natural) is surplus for the life of the adopted plan, that the sites marketed in relevant sports journals and on the web for a period of not less than 12 months at a land valuation reflecting the sporting use.	Noted
There needs to be real though and consultation with local clinicians onto the impact of this increase in local population. The current system cannot cope with this growth	Noted

## PO 14 TRANSPORT

Consultation Comment	Response
<h3 style="text-align: center;">Summary of Matters Raised in Objection</h3>	
Not enough information about how road congestion will be addressed. This makes it hard to assess the proposals.	Further details of proposed congestion mitigations are being prepared
Transport is vital to whether the proposals will work. It therefore needs to be given a lot more thought than has been given so far.	Further details of proposed congestion mitigations are being prepared
There are technical flaws in the way the transport modelling has been done. In reality the proposed developments could lead to significantly more traffic.	No modelling can ever be 100% accurate and has to rely on reasonable assumptions. All modelling is done in line with recognised guidance. Having said that, the technical basis for the more recent transport modelling has been amended to address concerns that trip rates/dwelling were based on narrow assumptions.
There should be a limit on the amount of traffic that is reasonable on a road – e.g. on predicted queue lengths.	It would not be possible to set a limit on predicted queue lengths or journey times. The NPPF requires us to provide for objectively assessed growth and even with mitigation measures, there is no guarantee that limits could be met. In reality the extent to which predicted queue lengths are acceptable is a political judgement that needs to be made in the context of many other factors, including the NPPF which states <i>“development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe”</i> (para32)
The proposals will increase commuting between Coventry and Warwick and will increase congestion.	It is possible that commuting will increase, although the modelling suggests this is not a large increase. Efforts will be made to minimise this by locating employment areas close to new housing. Efforts will also be made to minimise congestion problems through mitigation measures along the A46 and in to the urban areas.
The plan aims to reduce the need to travel and to promote sustainable forms of transport, but it will actually do the opposite – extra homes will increase commuting; houses on greenfield sites require more travel than brownfield sites, park and ride increases travel and the proposed mitigation measures will increase traffic and carbon emissions.	By providing services and employment close to where people live, it is hoped that individual households in the District will be able to complete more journeys without a car. However it is recognised that this is likely to be more than offset by the increase in the number of homes in the District and that there will, overall, be more car-based journeys. Offering sustainable alternatives to the car therefore also needs to be part of the plan.
The aspirations for transport are supported, but the proposals fail to deliver.	Once complete, we will need to demonstrate that the proposals are deliverable

Urban extensions (and especially proposals for low density Garden suburbs) will lead to more traffic.	The general point is accepted, although the Garden Towns concept does not have to lead to lower densities if carefully designed
There is too much emphasis on the motorist and shopping by car.	Mitigation has tended to focus on the minimising congestion. We need to ensure the Local Plan strikes a balance between the car and other forms of transport
Transport facilities are not adequate now, let alone adding to the pressure.	It is accepted that parts of the transport network are currently congested and that new development is likely to increase the amount of traffic. However: a) We are required to provide for objectively assessed growth and therefore have to provide additional housing b) The transport mitigation measures will be focused on addressing the most congested part of the network
The proposed road improvements are likely to be very expensive and will be to the detriment of more useful projects such as schools, health facilities and green space.	The Infrastructure Delivery Plan when completed, will need to prioritise infrastructure investment to ensure all essential infrastructure is provided to meet the needs associated with the growing population. The INFRASTRUCTURE DELIVERY PLAN will set out how this infrastructure will be funded.
Suggested improvements will not work as the river crossings will still provide a bottleneck	The river crossings do provide a particular challenge in thinking about mitigation measures. However the traffic modelling takes account of the limitations of this part of the network and the mitigation is being designed taking this in to account
HS2 will have a significant impact on the District and should be addressed more comprehensively	The principle of HS2 is not a matter for the Local Plan, as it is being progressed nationally.
More needs to be done to improve the cycle network across the District.	Agreed. Improvement to the cycle network will be part of the proposals for the Infrastructure Delivery Plan
The Council should support HS2 as it will improve links to the north, create job opportunities and reduce the migration trend towards the south east.	Noted, although the Council does not share this view and believes that HS2 is more likely to undermine the local economy by drawing investment to places close to HS2 transport nodes.
There is unlikely to be enough funding from new development to cover the cost of the improvements required	There are a range of opportunities to access funding for infrastructure, including developers contributions. Viability assessment work is being done to ensure the proposals can be delivered. This will be set out in the Infrastructure Delivery Plan
The towns have a fundamental problem of limited river crossings which restrict north-south cross town capacity	The river crossings do provide a particular challenge in thinking about mitigation measures. However the traffic modelling takes account of the limitations of this part of the network and the mitigation is being designed taking this in to account
Parking in Leamington is already at premium and will not be able to cope with additional demands from new housing. This will result in shoppers staying away and businesses closing down	Parking in all three town centres is an issue and the Council's approach is likely to align with the National Planning Policy Framework in seeking to improve the quality of town centre parking and ensuring the our approach to parking does not undermine the vitality of town centres. The formulation of specific policies

	will involve consultation with local businesses and other interested parties to ensure the right balance is struck.
Garden Towns prospectus does not include enough parking	The prospectus is illustrative only. Parking levels will be set to accommodate anticipated level of car ownership
Need to go further to maximise public transport and in particular railways	Support for Kenilworth Station and Nucle2 will be included in the Plan. Beyond that there is likely to be little scope to justify new rail infrastructure. Other public transport (buses) will be required to support new strategic developments, though the detail of this is still being developed. Allocation of housing in villages will take account of existing bus/rail services and the potential to maintain and improve these.
Need a stronger vision for public transport	Noted. More work will be done on provision of Public Transport
Smaller housing sites close to job provision would enable a more sustainable transport solution	This is noted. However the configuration of available and sustainable sites in the District does not justify multiple smaller sites. There is an alternative view that larger development sites have the potential to support better on site infrastructure thereby minimising the need to travel
Cost of transport is important so that low paid workers can commute quickly and cheaply	This cost of transport is not an issues for the local Plan
Inter-town express bus services are needed – ineffective commuting options compounds inequality	This will be discussed through Duty to Cooperate. Efforts will be made to explore how development in neighbouring districts aligns with proposed development in Warwick District. Where these provide opportunities for inter-town buses, these will be fully explored.
Improvements for cyclists and pedestrians should be top priority	Improvement for pedestrians and cyclists will be integral to the transport proposals
The proposals are inconsistent with the AQMA Action Plans	It is true that there is a tension between reducing air quality and increasing housing (thereby increasing the total number of journeys). The transport mitigation proposals will attempt to support improvements in air quality in AQMAs, although this will not always be possible. Investment in technology and infrastructure (eg electric charging points) to support cleaner vehicles needs to be considered for the Infrastructure Plan to encourage use of cleaner vehicles
Infrastructure is at capacity following the rapid growth in population during the last decade	The transport modelling shows that with mitigation measures, the transport infrastructure is able to cope with the levels of growth proposed.
The transport proposals are not affordable	The transport proposals will be fully costed and funding streams to deliver will be set out in the INFRASTRUCTURE DELIVERY PLAN
Can't use the fact that we have a higher proportion of people who cycle or walk to work as support for high levels of growth attached to the existing town. It is more likely that people who believe in cycling and walking are attracted	This is a complex argument. However, given the shortage of brownfield sites in our main urban areas, the next most sustainable location (and the location most likely to attract walking and cycling) is the edge of the urban area.

to live in pleasant and open surroundings and will move elsewhere if it becomes built up	
<b>Specific Transport Proposals</b>	
Traffic volumes, safety and noise on Woodloes Avenue North are already problems. The proposals will make this worse.	The transport assessment suggests that with the right mitigation the network in this area could work effectively
It is wrong to plan a retail development at Chandos Street when parking is such a big issues for the town centre and Chandos Street is one of the most popular car parks.	The Chandos Street proposals will include parking as well as other town centre access proposals
Proposed link road to the M40 would increase traffic on Barford Road where there are no pavements. This will be a safety concern.	The transport assessment suggests that with the right mitigation the network in this area could work effectively
Development at the Asps/South of Gallows Hill does not cater for pedestrians and cyclists.	This will be addressed in future transport assessments
Development at Thickthorn will increase traffic congestion in Kenilworth and Leamington and proposed mitigation will have limited effect on this.	The transport assessment suggests that with the right mitigation the network in this area could work effectively
Thickthorn offers the opportunity to create an important new link road to the eastern side of Kenilworth.	Agreed
<b>Warwick including Town Centre and Myton Road/Europa Way area</b>	
Congestion on Myton Road, Europa Way and Princes Drive is already a problem and proposals will not address this.	The transport assessment suggests that with the right mitigation the network in this area could work effectively
Job creation in Warwick will lead to congestion in town centres and around Myton Road, Europa Way and Banbury Road.	The transport assessment suggests that with the right mitigation the network in this area could work effectively
Warwick's transport infrastructure will not be able to cope with a 27% increase in traffic.	The transport assessment suggests that with the right mitigation the network in Warwick could work effectively
There have been significant safety problems in and around Warwick and these proposals will exacerbate this.	Safety will be a key component of road improvement schemes
Air quality in Warwick is poor. A 27% increase in traffic will make this worse.	An air quality report will be commissioned
Ensure that the proposals do not have Warwick Town Centre as a route of choice.	Noted. This will be considered
<b>North Leamington and Leamington Northern Relief Road</b>	
Proposed new road is unacceptable and inconsistent with the Local Transport Plan and other policies.	The proposals are not inconsistent with the LTP
The LNRR will destroy the character of Old Milverton village, the surrounding countryside and the historic environment.	This is one of the reasons why the LNRR is not now proposed

The LNRR will bring noise and pollution.	Agreed, but this would be mitigated to ensure levels are acceptable
The LNRR will damage the green belt and agricultural land.	Noted. This is one of the reasons why the LNRR is not now proposed
The LNRR will not help ease traffic congestion on Old Milverton Road or Kenilworth Road.	The proposals seek to provide the best mitigation for the whole of the transport network
The LNRR will damage the setting of Leek Wootton and Hill Wootton.	Noted
The LNRR is not required as journeys tend to be north-south rather than east-west and it's presence will encourage development to take place up to the road.	The transport mitigation showed that it could help in the context of significant development to the north of Leamington
Improvement to the A452 and A46 north of Leamington (e.g. proposals to make A452 a dual carriageway) will not be effective as the bottleneck is from the Northumberland Road junction towards the Town Centre and this cannot be improved	Agreed, but the transport assessment suggests this could be managed
Dualling the A452 will impact further on the green belt.	This is an acceptable use in the green belt if it can be demonstrated it is required.
Development at Blackdown will increase the number of journeys as the area is not well located for shops, town centres or employment.	Agreed, but the transport assessment suggests this could be managed
Concentrating development to the south would mean the LNRR is not required.	Noted. This is one of the reasons why the LNRR is not now proposed
The LNRR will cross the flood plain and damage this wildlife corridor.	Noted. This is one of the reasons why the LNRR is not now proposed
Leicester Lane is already busy and the proposals will make this worse	The transport assessment suggests any increase could be managed
The continual increased traffic congestion from A46 to Warwick University during term time together traffic going on the same road to the Business Park must be solved	There are joint WCC and Coventry City Council proposals to address this area. The sub-regional employment site is expected to provide opportunities to improve junctions along the A46
<b>Park and Ride</b>	
Park and Ride at Blackdown will increase pressure on Kenilworth/Leamington Road.	With supporting traffic mitigation measures, there is potential for a P&R in this area to assist traffic flows
Proposals for park and ride in vicinity of the Harbury Lane roundabout are likely to be unsuccessful and this facility should be located closer to the M40 (e.g at Greys Mallory).	This option will be considered
Value of north Lamington park and ride is questionable	Agreed that more work needs to be done on this. The feasibility of this will be considered in future studies
Warwick Parkway could be used as a Park and Ride	This option will be considered
<b>Parking</b>	

Need to be specific about the parking standards	The parking standards will be amended following the adoption of the local plan
Sufficient parking on town centres should not mean that additional spaces are provided and that parking is free	Noted
Business parking should not be free	There is a need to strike a careful balance between providing enough parking so that environmental problems do not result and providing too much so that sustainable modes are not used. The standards, combined with Travel Plans, will try to strike this balance
Increased parking for residential areas should be encouraged	Noted, but care must be taken not to over-provide as this result in inefficient use of land. Levels should be set in line with current and projected car ownership
Parking policy should be consistent with delivering sustainable development	Agreed
Parking should support town centres in favour of out of town retail	Agreed
Parking provision should take account of specific events which take place and cause major problems for a short period of time	This is hard to manage through the local plan. The Council's events team will work with events organisers to ensure that parking issues are minimised
More underground parking should be considered	Whilst this has real benefits, it is very expensive to provide and is likely to make most schemes unviable
Sufficient free parking should be provided at destinations.	This depends on what is meant by "sufficient". The parking policy will seek to limit parking at destinations to encourage sustainable modes of transport in conjunction with a travel plan.
<b>Villages and rural transport</b>	
Norton Lindsey has very limited public transport. The proposed housing in the area will increase traffic problems and bring safety concerns. The village has narrow roads that are not equipped to deal with high volumes of traffic and there are no effective alternatives to car travel.	There are no longer specific proposals for growth in Norton Lindsey
Speeding traffic in villages is already a problem. These proposals will exacerbate this.	We will seek to address this through investment in road safety and through any development proposals that come forward in villages
Roads through Hampton Magna and Hampton on the Hill are already busy. Action needs to be taken to reduce pressure on roads through Budbrooke as a result of the Parkway and to address safety concerns in villages.	This will be considered as part of specific development proposals in the area
Every house built in the villages (e.g Norton Lindsey) will lead to one or two more cars on the road and will therefore be in conflict with the idea of reducing the need to travel.	New houses are required, but the need to travel needs to be addressed for each of these
The proposals create a transport gap between rural and urban areas by not investing in rural public transport	The proposals for development in and around villages seek to support the viability rural public transport and other rural services. Unless viable bus services can be

	provided, this transport gap will continue
<b>Abbey Fields Cycleway</b>	
This is an historic area. A cycleway will change the character.	The Local Plan makes no proposals for a cycleway through Abbey Fields
The cycle way will put safety at risk – especially children.	
There is no need for a cycleway through Abbey Fields and such a proposals would not be in keeping with the character.	
A cycle track through Abbey Fields would need to be widened, fenced and would also need to be supported by a no cycling policy elsewhere.	
There are alternative cycle routes that could be improved without using Abbey Fields.	
<b>HS2</b>	
High Speed Rail has no benefits to the people of Warwickshire and should be fought	This is the Council's view too
It is perverse that the preferred options do not support HS2 (a sustainable mode of transport) yet propose a new road when all the strategy and policy documents talk about encouraging sustainable travel	HS2 provide few benefits to the local economy or local infrastructure, whereas investment in the local highway network can bring economic and social benefits
the HS2 construction works and subsequent downgrading of Coventry railway would have a detrimental effect on Kenilworth	Noted
HS2 will have detrimental impact but cannot be ignored in the Local Plan	The Local Plan will safeguard the land for HS2. Although it will have significant environmental and social impacts it is unlikely to significant change forecasts for employment and population. It's impact on the rest of the Local Plan is therefore limited
Impact of HS2 will be minimal in comparison to the national benefits.	This is a complex issue which goes beyond the Local Plan. However the local impacts of HS2 will be significant for some local communities
Objections to HS2 are a waste of government money	This is not an issue for the Local Plan
HS2 will have an impact on local infrastructure such as traffic hotspots and should be looked at in conjunction with other proposals	Consideration has been given to HS2 in the transport planning for the whole local plan
HS2 provide opportunities for better connections to Europe and should be supported for that reason and the station at Birmingham Airport should be seen as an opportunity	Agreed that if HS2 goes ahead the opportunities provided by the station at Birmingham Airport should be considered.
If implemented HS2 will have an impact on population and employment forecasts	This in unlikely to be the case

## Summary of Matters Raised in Support

The transport provisions are broadly supported but need to go further in some aspects, particularly public transport facilities	
Proposals to reduce carbon emissions and encourage reduction in car usage should be encouraged	
Active encouragement of cycle routes safe for all ages	
The proposals are supported subject to being able to deal with the increased traffic along Europa Way	
Support objection to HS2. Investment should be in local rail schemes rather than HS2	
Support aim of reducing the need to travel and promoting sustainable forms of transport – including access to better rail facilities	
Support plans for a station at Kenilworth	
Support proposals to review parking standards and specifically the level of parking provided with residential units	

## Summary of Suggested Changes to the Plan

Housing should be located close to employment areas to minimise the need to travel. This may mean less development in villages	The principle is agreed. Some housing in villages can help support local services which in turn can also reduce the need to travel
All proposed sites should be accompanied by travel plans	See Policy TR2 which sets out the approach to Travel Plans
More work should be done to develop proposals to integrate different modes of transport	This is explored in the Strategic Transport Assessments but will be covered in more detail in a Demand Management Transport Study undertaken in 2014
Site at Arras Way, Hampton Magna, should be included in the sites as this fit in well with the aspiration of locating housing close to facilities and sustainable transport options	This site is included
Concentrate development in the south of the towns close to facilities and employment	A significant quantum if development is proposed in this area.
Link park and rides to rail network and motorway	See park and ride areas of search
Build a 3km tunnel between Europa Way and Guys Cliffe	This is not viable
Consider banning cars completely from the town	This is not consistent with national policy
There needs to be park and rides on all three road in to Warwick (Birmingham Road; Banbury Road and Stratford Road). These could be used for school children too and would reduce traffic in the town centre	It is unlikely that this number of the Park and Rides would be viable to operate
Electrification of existing rail lines to improve	This is not a matter for the Local Plan

accessibility and reliability	
More work to look at public transport – especially buses – across boundaries, thinking about journey to work areas	This will be done as part of the Demand Management Transport Study in 2014
Prompt release of sites for development can deliver transport improvements more quickly. The plan needs to encourage this	Noted
Inter-town express bus services are needed – ineffective commuting options compounds inequality	This will be considered in the context of development proposals for neighbouring districts

## PO15 Green Infrastructure

Consultation Comment	Response
<b>Summary of Matters Raised in Objections</b>	
GI in direct contradiction to proposals to develop on green field land, the countryside should be protected. Green space and the Green Belt need to be respected and natural habitats protected for wildlife and support healthy lifestyles. Proposals to allocate land is incompatible with this option.	The Council has sought to minimise the use of greenfield land in the plan, whilst meeting its development needs. In addition, the Natural Environment policies in the plan seek to protect and enhance existing ecological assets.
Need to increase open space provision within Kenilworth as below District average.	As set out in Policy HS4 of the Draft Local Plan new development will be expected to provide well designed open space in accordance with local requirements.
Abbey Fields should be protected no encroachment or cycle path.	This is a detailed matter and not for consideration in a strategic document.
Concern that not all ecological constraints identified [WWT] (Warwick District Habitat Assessment 2008 should be updated to include Blackdown, Warwick Gates Employment Land and a site that forms part of the Thickthorn allocation.	Noted. An update to the Habitat Assessment has been prepared for additional land at Thickthorn (Kenilworth Wardens). It should be noted that Blackdown is no longer part of the Draft Plan. Furthermore, Warwick Gates Employment Land is now a committed housing site, having been granted outline planning permission in 2013.
Instead of considering the Gateway scheme for employment uses it should be as a GI scheme.	An assessment has identified a need for a sub-regional employment site, and the Council consider Land in the Vicinity of Coventry Airport to be the most appropriate site, as set out in policy DS16 of the Draft Local Plan.
Policy is insufficiently robust to protect semi-natural habitats like ancient woodland that has no full statutory protection and ancient and veteran trees that are not formally recorded. [Woodland Trust – Rep ID 47900]	Noted. Policy NE2 of the Draft Local Plan has been updated to strengthen protection for Ancient Woodland and aged and veteran trees.
Existing open space, sports and recreational land and facilities should not be built on.	Noted. Policy HS2 of the Draft Local Plan seeks to protect Open Space, Sport and Recreational land in accordance with national policy.

Any new development should have additional public space.	As set out in Policy HS4 of the Draft Local Plan new development will be expected to provide well designed open space in accordance with local requirements.
Supports the concept of GI, in particular because of the benefits the outdoors can have on mental wellbeing.	Noted.
Green Wedges a meaningless concept.	The proposal for Green Wedges as the preferred options stage has not been carried forward into the Draft Local Plan. Policies protecting the natural environment have been prepared that are cognate to the aims of this approach.
Major lack of access to countryside on south of towns. Need for public access to Warwick Castle Park.	Access to the countryside is an issue identified in the Green Infrastructure Study 2010. The Council proposes Tachbrook Country Park, to help address this.
Access to the Grand Union canal need to be improved.	Noted. Policy DS17 of the Draft Local Plan seeks to regenerate and enhance the canalside.
Development proposals would provide unattractive entry to Warwick's historic centre from the south (Asps and Gallows Hill).	These proposed sites have now been excluded from further consideration.
If housing built along Banbury Road, essential that 30m wide shelter belt planted on eastern side of road to preserve green approach.	These proposed sites have now been excluded from further consideration.
There is no reference in the plan to para. 123 of the NPPF – minimising the impact of light pollution on local amenity and intrinsically dark landscapes. This also allows local authorities to identify and protect Areas of Tranquillity.	Noted. Policy NE4 (Landscape) of the Draft Local Plan sets out the Council' approach to addressing landscape character, including tranquillity.
Farmers already undertake a range of conservation management measures in order to improve environment quality and enhance biodiversity. Concerns about green infrastructure and green wedges should not stifle rural and agricultural development.	Noted. The proposal for Green Wedges as the preferred options stage has not been carried forward into the Draft Local Plan. Policies protecting the natural environment have been prepared that are cognate to the aims of this approach.
<b>District Wide Green Infrastructure</b>	
Concern for interfering with the River Leam borders unless already in a well-used managed area.	Noted.
Object to the restoration of the Mere around Kenilworth Castle as it would remove the network of paths and destroy the rural setting. Outline feasibility study showed that any viable scheme could have a massive impact on a large area of countryside.  The Mere should not be treated as an addition to public open space – it will likely destroy some well used paths.	This proposal has now been excluded from further consideration through the Local Plan.
Enhancement proposals north of Bishop's Tachbrook welcome.	Noted.

<p>The proposed park between Kenilworth and the University is encroachment into the green Belt as it will lead to the urbanisation in the way that the cycle track has done. Only two fields between Kenilworth and Coventry. It will be inaccessible to most Kenilworth residents unless they use their cars.</p> <p>The parks appear to be semi urbanisation of rural areas and a substitute for the provision of green space in urban areas. The concept is also unrealistic, as it relies on developer co-operation.</p> <p>Includes University of Warwick Land outside of campus development areas. Unclear how the peri urban park would be delivered in the absence of nearby development which could fund it.</p>	<p>The Strategic Green Infrastructure Delivery Assessment 2012 sets out the approach to the delivery of the country park north of Kenilworth. The park is proposed a series of enhancements to existing green infrastructure assets and improving connectivity between them, which would not result in significantly altering the landscape.</p>
<p>Questions why there are not 4 opportunities included in the plan.</p>	<p>The Green Infrastructure Delivery Assessment 2012 identified opportunities where a Local Plan or infrastructure delivery plan could have a meaningful influence, consequently several of the projects were discounted at the early stages of the process.</p>
<p><b>Local Green Infrastructure</b></p>	
<p>There is no provision in the plan for allotments of developments of 1000 units or over, despite it being assured. Allotments can provide areas for habitat and community facilities.</p>	<p>As set out in Policy HS4 of the Draft Local Plan new development will be expected to provide well designed open space, including allotments, in accordance with local requirements. The current Open Space SPD requires 0.42ha of allotment provision per 1000 people for all development proposal of 100 units or over.</p>
<p><b>Development Proposals</b></p>	
<p>There is compelling evidence that when landscape is placed at the heart of the development process, developers can profit, while businesses and communities reap the environmental, social and economic benefits. This needs to consider landscape planning well in advance of development, should be emphasised in the GI section of the Plan.</p>	<p>Noted. The natural environment policies in the Draft Local Plan in particular address this.</p>
<p><b>Biodiversity Offsetting</b></p>	
<p>Concerned by offsetting where off site mitigation measures are required.</p>	<p>As stated in the explanation to Policy NE3 of the Draft Local Plan development proposals should be guided by the Council's approach to biodiversity offsetting as set out in the Warwickshire, Coventry and Solihull Green Infrastructure Strategy and national policy.</p>
<p>Why is the plan proposing to destroy Glasshouse Spinney, Kenilworth but offset with a new plantation somewhere. This is an important natural feature of Eastern Kenilworth.</p>	<p>The Council is not proposing to destroy Glasshouse Spinney. In estimating the number of houses proposed at Thickthorn the SHLAA has excluded this area. Furthermore, any planning application would have to comply with relevant policies of the new Local Plan, including protecting the natural environment.</p>

<b>Green Wedges</b>	
Do not believe that land west of Warwick Racecourse accords with the stated purpose and should not be designated as a 'Green Wedge'.	The proposal for Green Wedges as the preferred options stage has not been carried forward into the Draft Local Plan. Policies protecting the natural environment have been prepared that are cognate to the aims of this approach.
Map 6 proposes that Warwick Racecourse be designated as Public Parks and Gardens. It is unclear from PO15 what the intention of this is and what implications this might have for the operation of the racecourse and its business.	
Loes Farm is a natural Green Wedge which deserves protection and enhancement.	
Green wedges effectively provide no protection as they are not permanent and are subject to review each time a development plan is revised. The Green Wedge is effectively the first step to permitting the land to be used for future development at land around Old Milverton.	
Neither Areas of restraint or green wedges are necessary, including the area between Lillington and Cubbington as identified on Map 6.	
There is sufficient protection of the countryside with Green Belt and nature conservation policies.	
Support in principle but object to the inclusion of the playing fields to the rear of Myton and Warwick Schools, land which does not meet the stated policy objectives of the designation.	
Proposing Green Wedges does not compensate for the loss of green belt.	
Green wedges are a red herring as they are reliant upon private landowners to permit their development. Funding for this type of infrastructure would be dependent upon contributions, which may be diverted to more essential infrastructure.	
There is no basis in the NPPF for adding a layer of protection or restriction over development in addition to the Green Belt, nature conservation designations or above such areas which local communities may seek to identify as Local Green Space.	
<b>Summary of Matters Raised in Support</b>	
Consistent with the NPPF and welcome the recognition of the need to support GI at a variety of spatial scales. [Natural England – Rep ID 49642]	Noted
Support in principle there should be more emphasis on connectivity, habitat corridors, tree and hedge planting. [Barford JPC - 566]	Noted, the policies in the Draft Plan have been updated to emphasise connectivity.

Protection and enhancement of natural environment supported acknowledging development should take an integrated approach to designing GI in new development.	Noted
Mere at Castle would bring increased economic benefits and enhance open space.	This proposal has now been excluded from further consideration through the Local Plan.
Support thrust of the policy including seeking to provide additional assets where there is currently a shortage.	Noted
Well balanced and supports approach, additional references to Ecosystem Services, Warwickshire Biological Record Centre and importance of using up-to-date ecological and geological / geomorphological data is used in assessment of development proposals. Reference to the forthcoming Sub Regional GI Strategy as mechanism to deliver objectives. {WCC – 7263}	Noted. Reference to the Sub Regional GI Strategy has been made in the natural environment policies of the Draft Local Plan.
Local Plan should make reference to Warwickshire County Council’s Minerals Safeguarding Areas.	Noted. Policy NE5 addresses this.
Support protection for land south of Harbury Lane as essential green space and strategic green wedge.	The Draft Plan proposes South of Harbury Lane as a housing allocation whilst providing for strategic green infrastructure through a the creation of a Country Park.  The proposal for Green Wedges as the preferred options stage has not been carried forward into the Draft Local Plan. Policies protecting the natural environment have been prepared that are cognate to the aims of this approach.
Support positive approach being taken by the Council can see a lot of potential in the Warwick for improvement including returning the Water Vole to Warwick Avon [Rep ID 47028] suggesting some specific proposals.	Noted, however this is a detailed matter and not for consideration in a strategic document.
Broadly support GI and seeking to establish new GI network as part of Myton Garden Suburbs.	Noted
Welcome commitment to enhance and protect GI network. Supplementary work required to identify projects. Link with other topics resulting in Good Design.	Noted
NPPF supports the need for the creation of more native woodland, as one of the priority habitats set out in the England Biodiversity Strategy.	Noted
Welcome reference to the Historic Environment Record, this should also be referred to in the Historic Environment Chapter.	Noted

Support this proposed policy and would encourage the Council to continue to use studies of the landscape character and biodiversity value to inform the location of potential development sites - it is important that areas of high landscape value are conserved for the future.	Noted
Open space should be carefully incorporated into new developments.	Noted
<b>District Wide Green Infrastructure</b>	
Support for urban tree planting and greening neighbourhoods.	Noted
The findings and recommendations of Trees in Towns II (DEFRA 2008) still represents the best overview of the subject and relevant concept to GI. Street trees need to be championed to avoid attitudes driven by cost and maintenance. Street widths need to be appropriate. Strategy should include large trees and not confining to native species.	Noted, however this is a detailed matter and not for consideration in a strategic document.
<p>Support the idea of a country park north of Kenilworth and Coventry. This would build on the success of C2K Green Way route in opening up an important piece of the local countryside.</p> <p>However, it needs a greater consideration and detailed assessment, including collaboration with all stakeholder groups.</p> <p>The terminology of peri-urban park needs to be reconsidered. Concern about the downgrading of important Green Belt gap.</p> <p>Paths in the area are currently being improved to allow cycle and pedestrian access from Kenilworth and Coventry, designation of the area as a park would make it easier to extend the network.</p> <p>Burton Green PC in support of proposal.</p>	Noted.
The National Trust would like to be involved in a partnership approach to green infrastructure and consider that there may be new landscape enhancement zones identified.	Noted.
Support plans for the creation of Kenilworth Mere.	This proposal has now been excluded from further consideration through the Local Plan.

Strong support for a country park and green wedge south of Leamington and Whitnash as well as support for improvements to Whitnash Brook.	Noted. The Draft Plan proposes South of Harbury Lane as a housing allocation whilst providing for strategic green infrastructure through a the creation of a Country Park.  The proposal for Green Wedges as the preferred options stage has not been carried forward into the Draft Local Plan. Policies protecting the natural environment have been prepared that are cognate to the aims of this approach.
<b>Local Green Infrastructure</b>	
The permitting of a cycle route (shared with pedestrians) east/west across Abbey Fields, Kenilworth, to link the Connect2 Greenway with the Sustrans NCN route at Castle Farm.	Noted, however this is a detailed matter and not for consideration in a strategic document.
There is potential to use a path through Thickthorn and buffer zone between Thickthorn and A46 as a w walkway from Stoneleigh and for the Conccect2Kenilworth.	Noted, however this is a detailed matter and not for consideration in a strategic document.
<b>Development Proposals</b>	
Ecological management plans should be sought from applicants for sports which take place in natural environments so that disturbance is minimised.	Noted, all development will be expected to comply with policy NE3.
Any large development should include green channels such as persists on Woodloes Park.	Noted.
<b>Green Wedges</b>	
Support Green Wedges as an alternative to areas of restraint [RLS Town Council Rep ID 48915]. Vital part of protecting air quality, environment and quality of life.	The proposal for Green Wedges as the preferred options stage has not been carried forward into the Draft Local Plan. Policies protecting the natural environment have been prepared that are cognate to the aims of this approach.
Support identification on Map 6 of Jephson's Farm as part of the green network. Complete the line of parks from central Warwick to Newbold Comyn.	
Welcome the change of emphasis away from areas of restraint into areas of strategic environmental importance. Concern however that this might in the longer term offer less protection than current designation.	
Support in principle, especially for those areas outside of the Green Belt. They should improve access to the countryside and improve habitat connectivity.	
This will hopefully preserve some green in what might otherwise progressively become a concrete jungle.	

<p>Provides an appropriate separation settlements and recognises the intrinsic character and beauty of the countryside and supports thriving rural communities within it and ensures that valuable farming land is safeguarded from development. Opportunities for woodland creation and footpaths should be promoted whilst ensure agricultural function is retained.</p>	
<p><b>Summary of Suggested Changes to the Plan</b></p>	
<p>Include a policy to specifically outlining the protection of the district's biodiversity assets (WWT – 3077) based on approach set out in NPPF. Statutory and non-statutory sites provide fundamental building blocks for establishing ecological networks. Strong protection of statutory and non-statutory sites and other features of ecological importance should form integral part of biodiversity policy based on criteria in NPPF.</p>	<p>Noted. Policy NE2 of the Draft Local Plan addresses this.</p>
<p>The National Trust recommends that the Plan supports the identification and protection of 'Areas of Tranquillity' in partnership with the local community. [591]</p>	<p>Noted, however this is a detailed matter and not for consideration in a strategic document.</p>
<p>Amend policy to reflect working of NPPF para 118 with a separate bullet point specifically for ancient woodland: 'The Council will not permit any development proposal which would result in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'.</p>	<p>Noted. Policy NE2 of the Draft Local Plan addresses this.</p>
<p>We would expect the final plan to include more specific detailed policies on certain aspect of green infrastructure. For instance, we trust that policies for biodiversity will extend beyond offsetting to cover the landscape scale approach, net gain, ecological networks, designated sites and priority and protected species.</p> <p>References to geology, soils and ecosystem services are welcome and should translate into robust policy content within the final plan [Natural England – Rep ID 49642]</p>	<p>Noted, policies set out in the Natural Environment section of the Draft Local Plan address this.</p>
<p>In addition to identifying river corridors as opportunities for creation and/or enhancement of GI, the canal network should be recognised as well.</p>	<p>Noted. Policy DS17 of the Draft Local Plan seeks to regenerate and enhance the canalside.</p>
<p><b>District Wide Green Infrastructure</b></p>	

Change the terminology of the peri urban park north of Kenilworth to a positive feature that promotes natural and social capital enhancement.	Noted.
A policy that provides for public open space in urban areas that can be accessed by residents on foot.	Noted
Delete reference to the Kenilworth Mere.	This proposal has now been excluded from further consideration through the Local Plan.
<b>Development Proposals</b>	
Proposals in Policy PO15 amended (upper case) to read: 'Development proposals should take a positive, integrated approach to designing green infrastructure on site, particularly urban extensions, utilising the Council's preferred approach to new sustainable garden suburbs with enhancements to key landscape features INCLUDING NATIVE WOODLAND CREATION and the wider GI network. [Woodland Trust – Rep ID 47901]	Noted. Policy PO15 has been superseded by policies set out in the Natural Environment section of the Draft Local Plan. However, types of Green Infrastructure Assets have not been specified.
The policy should emphasise the need for landscape planning well in advance of development.	Noted.

<b>PO16 Green Belt</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>NPPF &amp; Exceptional Circumstances</b>	
Green Belt boundaries should not be changed, they are there to prevent merging of settlements and urban sprawl which would be compromised by the allocations	Given the identified development needs of the District, the availability of non-green belt land and the Council's spatial strategy, exceptional circumstances can be demonstrated to amend Green Belt boundaries, as proposed in the Local Plan. These amendments are in accordance with national policy whilst recognises the essential characteristics and purposes of maintaining the Green Belt. Consequently policy DS19, reaffirms protection for the remaining Green Belt.  It should be noted that the proposed amendments to Green Belt boundaries have altered significantly between the Preferred Options and the Draft Local Plan, these includes the no longer proposing Land North of Milverton and Blackdown as housing allocations.
Exceptional circumstances have not been demonstrated, predictable growth is not an EC, the Preferred Options would result in an over provision which negates EC	
'Spreading the pain' of development is not an exceptional circumstance	
Boundary alterations should be kept to a minimum and undertaken in consultation with local communities.	Noted.

Concerns with concentrating development south of Leamington appear to be contrary to the SHLAA. It is not unsustainable to focus growth in this area, where there are greater employment opportunities, accessibility and infrastructure.	Noted. Policy DS4 of the Draft Local Plan sets out the Spatial strategy for the District.
There is no planning policy which would suggest that closing the gap between Warwick/Whitnash and Bishop's Tachbrook that is either unacceptable or unsuitable.	Policy NE4 Landscape sets out the Council's approach, including preventing the coalition of settlements.
The need for housing is not an exceptional circumstance.	Through planning case law has deemed that meeting housing need is capable being an exceptional circumstance, justifying the alteration of Green Belt boundaries.
There is no economic argument for building in the Green Belt in area that needs no or little economic stimulation.	The Council's there is a case for the alteration of Green Belt boundaries to accommodate employment development needs in certain specific locations which are set out in the Draft Local Plan.
Evidence put forward suggest the level of growth is significantly lower therefore alteration of the Green Belt is unnecessary and EC cannot be demonstrated [BTPC – 182]	The Joint SHMA 2013 identifies Warwick District's housing needs as 12,900 homes. Given this it is not possible to only allocated land for development outside of the green belt.
Question whether the level of growth for Category 2 villages can be deemed 'exceptional circumstances	The approach to village development has changed since the Preferred Options consultation. Development in Growth Villages will help meet the village and District's housing needs and sustain village services. Category 2 villages are no longer defined as such.
NPPF states Green Belt boundaries must meet needs beyond plan period – this has not been done, given the amount of land that is Green Belt in the District, some should be safeguarded.	The Council considers that the land allocated in the Local Plan is sufficient to housing needs within the plan period.
Land should be judged on whether it is quality agricultural land rather than whether it is designated green belt or not.	Agricultural land quality is only one factor of many taken into consideration when determining the most sustainable development options.
The plan does not identify key previously developed sites in the Green Belt, which replace MDS which is no longer specified in the NPPF	The Draft Plan identifies three Major Sites in the Green Belt at Former Honiley Airfield, Stoneleigh Park, and Stoneleigh Deer Park as these areas play an important role in delivery the objectives of the Strategic Economic Plan.
There is no justification for amending Green Belt boundaries in villages, appropriate development, in scale and character, can be undertaken in villages without redrawing boundaries where it meets a real local need.	The approach to village development has changed since the Preferred Options consultation. Development in Growth Villages (where alterations to Green Belt boundaries will take place) will help meet the village and District's housing needs and sustain village services
<b>Previous Plans, Strategy &amp; Evidence</b>	
The previous plan (Core Strategy) recognised the integrity of the Green Belt around north Leamington.	These previously proposed sites have now been excluded from further consideration.
Preferred Options have been presented without alternatives to consider	Other options were set out at the end of the chapter in the preferred options. Further options appraisal was available in the sustainability appraisal report.

The JGBS suggested that Blackdown was not suitable for development.	This previously proposed site has now been excluded from further consideration.
The scoring system of the JGBS is not consistent with upto date guidance set out in the NPPF.	The JGBS utilised the 5 Purposes of Green Belt for assessing parcels of land. These purposes are the same in the NPPF as previous policy (PPG2). The NPPF does not provide guidance on the methodology for Green Belt review.
Irrational to have a contrary to position on Green Belt land to HS2.	The Draft Local Plan has changed from the Preferred Options consultation. Less development is proposed in the Green Belt. The plan has safeguarded land for HS2 according to the statutory HS2 Safeguarding Directions (July 2013).
By removing some of the Green Belt a future precedent is set for nibbling away it in the future.	The approach to village development has changed since the Preferred Options consultation. Development in Growth Villages (where alterations to Green Belt boundaries will take place) will help meet the village and District's housing needs and sustain village services
PO16 (b) appears to be contrary to PO16(c)	
Section C is not consistent with the NPPF which allows for limited infilling of previously developed sites in Green Belt and for the provision of facilities for outdoor recreation.	The Draft Local Plan sets out the approach to Green Belt which accords with national policy.
IT is not clear whether Part C only applies to PDL in category 3 villages or to all PDL.	The Draft Local Plan sets out the approach to Green Belt which accords with national policy. The Draft Local plan clarifies this matter.
Other forms of diversification need to be considered and further clarification on para. 16.9	Policy EC2 addresses Farm Diversification, it states for Green Belt areas, proposals will be permitted in accordance with national policy.
Careful review of the Green Belt boundary around Kenilworth is required.	Noted.
<b>Precedents</b>	
The plan will lead to the eventual merging of Warwick, Leamington & Kenilworth.	Given the identified development needs of the District, the availability of non-green belt land and the Council's spatial strategy, exceptional circumstances can be demonstrated to amend Green Belt boundaries, as proposed in the Local Plan. These amendments are in accordance with national policy whilst recognises the essential characteristics and purposes of maintaining the Green Belt. Consequently policy DS19, reaffirms protection for the remaining Green Belt.  It should be noted that the proposed amendments to Green Belt boundaries have altered significantly between the Preferred Options and the Draft Local Plan, these includes the no longer proposing Land North of Milverton and Blackdown as housing allocations.
Likely to lead to the future coalescence with Old Milverton village.	This previously proposed site has now been excluded from further consideration.
Existing Green Belt should be protected, by removing some a precedent is set to future 'nibbling away' until much of it will be lost.	Allocations currently in the Green Belt

No point in designation if it can be changed when it suits.	Green Belt designation can only be changed in exceptional circumstances through a development plan process.
Will completely change the rural character of the district, which the Green Belt has contributed to creating.	Given the identified development needs of the District, the availability of non-green belt land and the Council's spatial strategy, exceptional circumstances can be demonstrated to amend Green Belt boundaries, as proposed in the Local Plan. These amendments are in accordance with national policy whilst recognises the essential characteristics and purposes of maintaining the Green Belt. Consequently policy DS19, reaffirms protection for the remaining Green Belt.  Housing allocations in villages have been chosen, in part, because the impact on landscape and local character would be less than alternative options.
Concern that if village envelopes are created in accordance with NPPF to accommodate development beyond 15 years that it could expose areas to premature development.	The Draft Local Plan sets out the policy where development will be directed and in what, limited, circumstances it may be permitted in limited infill villages.
Village envelopes need to be put forward for consideration before the Local Plan progresses.	Village envelopes and boundaries have been identified in the Draft Local Plan.
<b>Existing Benefits of Green Belt</b>	
Area to the north of Leamington is a recreational and wildlife asset used widely and the only local amenity in the area, the nearest large scale alternative is Newbold Comyn which is too far away.	This previously proposed site has now been excluded from further consideration.
Green belt provides clean air and are the 'Green Lungs' of the towns.	Providing clean air is not one of the five purposes of Green Belt as prescribed in the NPPF.
Green Belt land provides space for wildlife, the proposed amendments will have a significant impact on the ecology.	The draft Local Plan seeks to protect and enhance the natural environment irrespective of whether land is designated as Green Belt or not.
Some areas are of high landscape value.	Landscape value is only one factor in assessing site suitability.
Green Belt is a valuable asset and well used locally (land north of Milverton).	This previously proposed site has now been excluded from further consideration.
The continued need for the provision of areas for recreation seems to have been ignored (land north of Milverton).	This previously proposed site has now been excluded from further consideration.
Green Belt land should be retained for agricultural purposes to meet the needs of a growing world population and ensure food security.	Agricultural land quality is only one factor of many taken into consideration when determining the most sustainable development options.
<b>Enhancing the beneficial use of the Green Belt</b>	
Object to any facility in the Green Belt such as sports clubs or golf clubs where a need for buildings and hard standing or any replacement of natural features occurs.	The Draft Local Plan is consistent with the NPPF which considers that the provision of appropriate facilities for outdoor sport is not inappropriate as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it
<b>Specific Proposals</b>	

Inappropriate to propose P&R in Green Belt.	
Development of East Milverton does not comply with NPPF as it fails to provide clearly defined permanent boundaries	This previously proposed site has now been excluded from further consideration.
Essential to preserve the rural character of the villages of Budbrooke.	
Green Belt has successfully protected Norton Lindsey without restricting limited development, the village makes an important contribution to the Green Belt's openness (NPPF para 79 – 86)	Norton Lindsey is no longer identified as a Growth Village and consequently Green Belt boundaries are not proposed to be amended in the Draft Local Plan.
Concern the Northern Relief road would have substantial negative impacts for the Green Belt and Old Milverton and incompatible with policies PO12, PO13 & PO14.	This previous proposal has now been excluded from further consideration.
From Hatton Parish Plan 80% favour the Green Belt remaining the same, ¼ consider there could be some review of boundaries.	The views of local people are important element in the plan making process, however development at Hatton (and consequent amendment of Green Belt boundaries) will help meet the village and District's housing needs and sustain village services.
Creating envelopes for the each village along the Birmingham Road corridor would threaten the integrity of the Green Belt.	The Green Belt and Green Field Review (November 2013) assesses the Green Belt in village locations in the District and this evidence has informed both village housing allocations and limited infill boundaries.
Concern about redefining boundaries around rural parishes, local councils should be involved in this (Cubbington PC [3443]).	Noted. The process of determining village boundaries has been through formal and informal consultation with relevant parish councils.
Careful consultation with villages affected is necessary to inform redrawing of boundaries.	
Amending Green Belt boundary is contrary to recently adopted Parish plan in Leek Wootton, thus opposed to any change (Leek Wootton PC [1057]).	The views of local people are important element in the plan making process, however development at Leek Wootton (and consequent amendment of Green Belt boundaries) will help meet the village and District's housing needs and sustain village services.
Green Belt between Lillington and Cubbington should be preserved at all costs.	Given the identified development needs of the District, the availability of non-green belt land and the Council's spatial strategy, exceptional circumstances can be demonstrated to amend Green Belt boundaries, as proposed in the Local Plan. These amendments are in accordance with national policy whilst recognises the essential characteristics and purposes of maintaining the Green Belt. Consequently policy DS19, reaffirms protection for the remaining Green Belt. The majority of the Green Belt between Lillington and Cubbington remains in the Draft Local Plan, with Red House Farm proposed to be removed from the Green Belt.

Green Belt is serving its purpose in Kenilworth	Alteration of Green Belt boundaries at Kenilworth are necessary to help meet its development needs. Areas that perform less well in meeting the purposes of Green Belt have been allocated.
Hampton Manga should not be removed from the Green Belt, current residents have been attracted to the village because it is in the Green Belt, could have the effect of merging with Hampton on the Hill, which has significantly different rural character.	Hampton Magna has been identified as a Growth Village. Development at Hampton Magna will help meet the village and District's housing needs and sustain village services.
Clarification is required on the proposals to redraw the Green Belt boundaries for Rowington, which includes several settlements.	This previous proposal has now been excluded from further consideration.
University of Warwick should be removed from the Green Belt, exceptional circumstances can be demonstrated, development permitted on the Green Belt element of the campus will further intensify the urban character. Change in policy in NPPF means the designation as a MDS is inappropriate. Does not contribute to any of the purposes of Green Belt. Removal would allow the University to plan with more confidence. The designation of Green Belt at the University of Warwick campus is contrary to the aims of the NPPF.	Noted. Land at the University of Warwick is excluded from the Green Belt in the Draft Local Plan.
<b>Other Options Suggested</b>	
The plan means 43% of land used will be Green Belt when 'white land' is still available.	The proposals in the Draft Local Plan alter to those put forward in the Preferred Options. More greenfield land outside of the Green Belt ('white land') has been allocated than land currently in the Green Belt.
Greenbelt to the west of Kenilworth should be developed as it is a short walk to town and there is no risk of coalescence.	This does not comply with the Council's spatial strategy. Furthermore, this area of Kenilworth meets the purposes of Green Belt compared to elsewhere.
14,400 homes are required for Warwick District. Green Belt boundaries should be altered to reflect this.	The Joint SHMA 2013 identifies Warwick District's housing needs as 12,900 homes.
Object to the exclusion of land south of Coventry from the list of locations where Green Belt is to be altered	The Draft Plan proposes alterations to Green Belt boundaries adjacent to existing settlements and to meet the economic needs of the District and sub region.
Objection to the omission of reference to Retirement and Continuing Care Schemes required to meet local need and not suitable development outside of the Green Belt.	Housing policies in the Draft Local Plan set out the approach to specialist housing for older people, in particular policy H5.

Coventry City cannot meet their housing needs within their boundary, therefore Green Belt sites on the edge of Coventry should be identified for large scale urban extensions.	At the time of writing Coventry City Council have not demonstrated that they cannot meet their housing needs within their boundary.
Land South of Baginton is more sustainable location for green belt release than North of Milverton, relating to Coventry City and the proposed Gateway scheme.	The spatial strategy and consequently housing allocations have changed in the Draft Local Plan. It is not considered that Land South of Baginton would help best meet the housing needs compared to other sites proposed in the plan, which support the District's existing settlements. Land North of Milverton has now been excluded from further consideration.

## Summary of Matters Raised in Support

### General

Support the maintenance of the Green Belt and the proposed reductions [Barford JPC 566] [Baddesley Clinton 704] to create a more balanced area and urban form [Whitnash TC – 201]	Noted, however the proposals in the Draft Local Plan alter to those put forward in the Preferred Options. More greenfield land outside of the Green Belt has been allocated than land currently in the Green Belt.
Housing delivery is a priority – including variety of locations. Reviewing Green Belt boundaries facilitates this.	Noted, however the proposals in the Draft Local Plan alter to those put forward in the Preferred Options. More greenfield land outside of the Green Belt has been allocated than land currently in the Green Belt.
Whilst in principle there is the possibility to meet Warwick's housing needs without using greenbelt land this would result in an undeliverable, unsustainable and ultimately unsound plan.	Noted, however the proposals in the Draft Local Plan alter to those put forward in the Preferred Options. More greenfield land outside of the Green Belt has been allocated than land currently in the Green Belt.
The alternative strategy for development places an unacceptable burden on those living outside it.	Noted, however the proposals in the Draft Local Plan alter to those put forward in the Preferred Options. More greenfield land outside of the Green Belt has been allocated than land currently in the Green Belt.
Should be noted that Green Belt was created to protect the area around Coventry from overdevelopment and does not extend to the south of the district.	Noted.
The policy set out in section C is a positive step which will help revitalise some communities which are losing their character.	Noted.

### Specific Areas

Removing Green Belt status from villages would allow infill, making a significant contribution to housing numbers and improving the sustainability of those villages.	Noted
Support the alteration of Cubbington boundary to allow development which should be done as part of the Local Plan and not a subsequent site allocations DPD.	Noted

NFU [1119] support for farm diversification and rural affordable housing policy. Businesses have an essential role in maintaining local landscape.	Noted
Infill in category 3 villages should be undertaken on a case by case basis.	Noted, the Council's approach to limited infilling in villages is set out in policy H11 of the Draft Local Plan.
Support the redrawing of Green Belt boundaries around Burton Green to allow proposed development in the Local Plan only.	Noted.
Although the green belt study suggested the Blackdown was not suitable for further study, it has similar characteristics to the land to west and is contained by an established road network which provide defensible boundaries. Removing this land is consistent with NPPF.	This previously proposed site has now been excluded from further consideration.
Support the redrawing of Green Belt boundaries to the east of Kenilworth to allow proposed development in the Local Plan only	Noted.
Amending Green Belt boundaries will deliver more sustainable sites such as land north of Milverton, this site would not lead to significant adverse impacts as the site has strong defensible boundaries.	This previously proposed site has now been excluded from further consideration.
Identification of Lapworth as a village to be removed from the Green Belt is supported, the revised boundaries should allow for the longer-term development needs of Lapworth, beyond the plan period.	Noted.
<b>Enhancing the beneficial use of the Green Belt</b>	
Access and amenities in Green Belt land should be enhanced so all can enjoy the benefits to physical and mental health of open green spaces, including building more footpaths and circular walks.	Noted.
<b>Summary of Suggested Changes to the Plan</b>	
<b>Specific Areas</b>	
Develop Green Belt sites in Kenilworth at Crewe Lane and Woodside Training Centre before land East Milverton has this has a lower landscape score in the Joint Green Belt Study.	Landscape is only when factor to consider when proposing altering Green Belt boundaries. Land East of Milverton was a previous proposal and has now been excluded from further consideration.
A review of Green Belt land to the east of Kenilworth is undertaken, focussing on areas of land that contribute least the aims and objectives of Green Belts. Southcrest Farm and Woodside Training Centre should be safeguarded as a minimum.	Southcrest Farm is allocated in the Draft Plan as a Major Education Allocation.
Amend Green Belt boundaries in Kenilworth to allow for development in south Kenilworth, east of Kenilworth Road. This will provide long term protection and accommodate levels of growth.	The Council does not consider that there exceptional circumstances to justify this proposed alteration to the Green Belt boundary.

The north corner of Crewe Lane adjacent to Reservoir House should be removed from the Green Belt as it does not serve any useful Green Belt purpose.	The Council does not consider that there exceptional circumstances to justify this proposed alteration to the Green Belt boundary.
Maintain existing Green Belt boundaries in the vicinity of Norton Lindsey, Hampton on the Hill and Hampton Magna, only current amenities and infrastructure issues should be addressed.	The proposals put forward in the Preferred Options have altered in the Draft Local Plan. Only Hampton Magna has been identified as a Growth Village. Development at Hampton Magna will help meet the village and District's housing needs and sustain village services.
Add land to the south of Coventry to the list of areas where Green Belt is to be altered.	The Draft Plan proposes alterations to Green Belt boundaries adjacent to existing settlements and to meet the economic needs of the District and sub region.
The Local Plan should identify key previously developed sites to replace the 'major developed sites' such as the Hatton Estate.	The Draft Plan identifies three Major Sites in the Green Belt at Former Honiley Airfield, Stoneleigh Park, and Stoneleigh Deer Park as these areas play an important role in delivery the objectives of the Strategic Economic Plan.
Policy should be revised to include alterations to the Green Belt south of Coventry.	The Draft Plan proposes alterations to Green Belt boundaries adjacent to existing settlements and to meet the economic needs of the District and sub region.
Cancel the proposals for the development north of Leamington Spa	These proposed sites have now been excluded from further consideration.
<b>Alternative Green Belt Policy Wording</b>	
Maintain existing Green Belt boundaries.	The Joint SHMA 2013 identifies Warwick District's housing needs as 12,900 homes. Given this it is not possible to only allocated land for development outside of the green belt.
Apply the proposed policy for category 3 villages to all Green Belt	The Draft Plan sets out a different approach to villages to that which was proposed in the Preferred Options, including the removal of the term category 3 village.
Consider revising policing wording to protect productive agricultural land, it is usually preferable that Grade 3 or below is identified for development.	The Draft Plan seeks to protect the best and most versatile agricultural land through Policy NE5.
The justification section has little to say about agriculture and food production, the importance of this should be highlighted.	The Draft Plan seeks to protect the best and most versatile agricultural land through Policy NE5.
Include a specific reference to areas of land that could revert back to Green Belt as compensation for those areas 'lost', this should include the Crackley Triangle.	The Council does not consider that exceptional circumstances can be demonstrated to alter Green Belt boundaries to further the extent of the Green Belt. Crackley Triangle is allocated for housing in the Draft Plan.
Delete reference to Major Developed Sites in the Green Belt – no longer exist in NPPF.	Noted. The Draft Plan identifies three Major Sites in the Green Belt at Former Honiley Airfield, Stoneleigh Park, and Stoneleigh Deer Park as these areas play an important role in delivery the objectives of the Strategic Economic Plan.

In Section C: Add additional bullet point stating: "Development in accordance with a Development Plan policy guiding the development of a specific site within the Green Belt." This would refer to a plan to provide guidance on the development of Stoneleigh Park.	The Draft Plan identifies three Major Sites in the Green Belt at Former Honiley Airfield, Stoneleigh Park, and Stoneleigh Deer Park as these areas play an important role in delivery the objectives of the Strategic Economic Plan.
In Section C: Replace final bullet point with "Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development"	The Draft Local Plan sets out the approach to Green Belt which accords with national policy, which this suggested amendment is taken from.
In Section C: Recommend that policy sets out ability for affordable housing to be brought forward, including through a Neighbourhood Plan, or otherwise where there is evidence of need.	Policy H3 of the Draft Plan sets out the Council's approach to affordable housing on rural exception sites.
In Section C: replace final bullet point with: "Limited infilling on (i) previously-developed land, (ii) in Category 3 villages, and (iii) on identified existing previously developed sites in the Green Belt."	Policy DS19 and other related policies of the Draft Plan set out the Council's approach to Green Belt, which accords with national policy.
That Green Belt lost should be replaced with new Green Belt elsewhere to minimise sprawl [Barford JPC]	The Council does not consider that exceptional circumstances can be demonstrated to alter Green Belt boundaries to further the extent of the Green Belt.
<b>Non Green Belt Option and Strategy</b>	
Develop a strategy that preserves Leamington's identity and green areas.	The Council's spatial strategy in the Draft Local Plan aims to support prosperity and meet the district's housing needs whilst supporting sustainable communities, including the protection and enhancement of the natural and historic environment.
Develop elsewhere at a higher density	The Draft Plan aims to strike the balance between high quality design within the Garden Towns, Villages and Suburbs principles at the same time reducing the amount of greenfield land required for development. New development on greenfield sites should be provided at a density of at least 30 dwellings per hectare.
Only develop on brownfield sites once supply is exhausted	It would not be possible to meet the District's development needs only on brownfield sites.
Grants should be available to encourage older people to smaller accommodation	This is a detailed matter and not for consideration in a strategic planning document.
Develop brownfield sites and windfall sites, large gardens should be built upon	It would not be possible to meet the District's development needs only on brownfield sites.
Halt out of town supermarkets on land that could be used for housing.	Noted. The draft Local Plan reiterates the town centre first approach to retail development

Areas not designated as Green Belt should be developed first, such as Bishops Tachbrook and land south of Harbury Lane.	It would not be possible to develop all non green belt areas first that are allocated, the Council has to ensure that development is deliverable within the plan period.
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<b>PO17: Culture and Tourism</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Matters Raised in Objection</b>	
Culture is of value in itself, not just a means to promote tourism	Agreed
The policy should refer to place of worship as these are important in enriching people's quality of life and are included in NPPF	Agreed. This is reflected in new policy wording
The suggested policy is unclear in relation to the enhancement of existing tourist and cultural attractions and tourist facilities. It may unduly restrict such proposals	The policies seek to support existing tourist facilities where they are in sustainable locations
These policies need to be consistent with and supported by good information, public transport, booking systems, parking, safety	Agree, although not all of these are matters for the Local Plan. Policies on parking and public transport need to support culture and tourism
Policy should include an item to protect and enhance existing cultural (other than visitor attractions), arts facilities and entertainment venues (where appropriate) as stated in the NPPF para. 70	Agreed. This is reflected in new policy wording
The Plan should support visitor accommodation in town centres	Agreed. This is reflected in new policy wording
The Local Plan should place a greater emphasis on the retention, enhancement and expansion of existing tourist attractions/visitor accommodation. It is considered necessary to include a policy on existing visitor attractions as part of the tourism strategy	Agreed. This is reflected in new policy wording
Hatton Estate should be identified as a major site in GB. Should be recognised as an important visitor attraction and provides accommodation	It is recognised that this is a tourist attraction in the Green Belt. However, the no site specific policy will be prepared as the Council does not wish to encourage growth at this location
Hatton estate should be part of strategy to support rural businesses	
Suggested policy wording: "Hatton Estate: The Council will consider applications for tourism-related development at the Hatton Estate favourably, where such development would upgrade and improve the viability of the attraction; are appropriate to its function as a major tourism destination; make a positive contribution to the local economy; and are acceptable taking into account its location in the Green Belt."	
New visitor accommodation which is over a small number of bedrooms should be examined for negative impact on existing providers locally as material planning	It is not possible to consider this within the planning system. In this case market forces have to decide whether there is a need

<p>consideration. Small independent providers of accommodation tend to support more local jobs and have bigger local economic impact by their use of local suppliers.</p>	<p>Agreed</p>
<p>Warwick TC not best suited for new visitor accommodation and therefore alternative locations should be considered (eg Racecourse)</p>	<p>The Racecourse could be appropriate for visitor accommodation if it can be demonstrated that it meets the sequential tests and addresses other relevant issues</p>
<p>Policy should include proactive support for the Racecourse: 'The Borough Council supports the role of Warwick Racecourse, within the area defined on the proposals map, in providing a recreation, leisure and entertainment facility, within the Borough, in order to ensure the continuing vitality and viability of this facility for the benefit of the local economy.</p>	<p>See Policy CT7</p>
<p>There is scope for improving the visual impact for visitors to Leamington who arrive by rail or canal</p>	<p>Agreed. Work will be undertaken on the regeneration potential of the canal and its environs</p>
<p>Suggested policy wording: Rural broadband policies and policies for Culture and tourism should be cross referenced to promote quality of offer in District.</p> <p>"The Council will work with partners to support the development and retention of new and existing tourism facilities, for both business and leisure markets and promote their sustainable expansion across the District, whilst maximising their co-locational and cumulative benefits to:</p> <ul style="list-style-type: none"> <li>* assist in regenerating our town centres by supporting growth of their retail, evening and night time economies by offering facilities and functions that could encourage spending within the wider areas;</li> <li>* assist with development of green infrastructure corridors linking destinations and attractions for the benefit of both residents and visitors;</li> <li>* improve the range, quality and distinctiveness of the District's tourism destination;</li> <li>* provide high quality hotels and serviced and non-serviced accommodation formats and conferencing facilities;</li> </ul> <p>promote the image and reputation of the District to attract visitors and secure investment."</p> <p>Town centre tourist accommodation - Support "town centre first" sequential approach for further hotel accommodation. Recommended that Council consider following policy wording:</p> <p>Within the existing urban settlements of Warwick, Kenilworth and Leamington Spa, proposals that would result in the change of use hotels and tourist accommodation will be permitted unless:</p> <ul style="list-style-type: none"> <li>* the proposed use or uses would reduce the overall capacity and attractiveness of Warwick, Kenilworth and</li> </ul>	<p>See policies CT1 to CT7</p>

<p>Leamington Spa as tourism hubs and result in the loss of an otherwise viable hotel or tourist facility which would consequently harm the provision of tourist accommodation;</p> <p>* the proposed use or uses would be incompatible with the surrounding area and businesses and would harm the character of the town centre;</p> <p>* there would be no clear, additional benefits from the proposal in terms of improving the character of the area, the vitality and viability of the town centre and the economic and, cultural and environmental impact on the town as a whole.</p> <p>Applicants seeking change of use away from existing hotel or tourist accommodation use will need to submit detailed evidence relating to the viability of the business and details of how the business has been marketed.</p> <p>Rural accommodation - Support tourism in rural areas and recommend that LP should have specific policy to address expansion and re-development of existing tourism accommodation and tourism facilities within Green Belt.</p> <p>Accommodation not in permanent buildings - District Council may wish to consider additional policy to cover accommodation not in permanent buildings (i.e. camping, caravan and chalet parks). This type of accommodation can be damaging to character of landscapes, and in rural areas added light pollution can be intrusive. Recommended that small scale developments should be supported in areas of open countryside or next to small settlements provided they are not prominent in landscape and have high quality landscaping. Policy may choose to exclude locations in sensitive landscapes and areas prone to flooding.</p>	
<p>The policy should encourage Free Schools</p>	<p>The County Council is the education authority and their advice is sought with regard to all matters regarding educational establishments</p>
<p>Place of worship should be included within n Infrastructure Delivery Plan</p>	<p>The INFRASTRUCTURE DELIVERY PLAN supports community facilities and meeting places but does not specify any particular type, though places of worship would certainly be included within this.</p>
<p>Policies should protect town centre accommodation and resist out of centre accommodation in the same way as retail policies</p>	<p>Agreed. The policy will take a town centre first approach</p>
<p>Should cross reference to economy policies</p>	<p>Noted</p>
<p>Warwick TC needs better visitor accommodation</p>	<p>Noted</p>
<p>Should not control how people travel to attractions and accommodation – making policies for rural businesses too restrictive</p>	<p>It is national policy to provide sustainable means of transport as an alternative to the use of private vehicles and the Local Plan must support this</p>
<p>If HS2 was to be built much of the current land used for</p>	<p>This is a national issue and the Council has</p>

walking would be lost	objected to HS2
<b>Summary of Matters Raised in Support</b>	
Proposals would support small business	
Important policies as they are integral to quality of life	
Support the proposals to carry forward RAP13, 14 and 15	
Supportive of the policy but would not wish to see development jeopardise the attraction of Norton Lindsey village to visitors.	
Wish to support plan for provision and integration community facilities	
Policies supporting sustainable tourism should be encouraged providing they reflect principles of sustainable development – eg enhance biodiversity assets	
Support inclusion of canal as an historic and cultural asset	
Support the wording 'the development of new buildings for visitor accommodation will be considered favourably in locations which are accessible to visitors by means other than the private car and can be developed sensitively in the rural area. Outside of these locations, new visitor accommodation will not be permitted	

<b>PO18 Flooding and Water</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
Part of site (East Milverton) falls within flood zone 3A and implicitly should not be developed. Contains Water Source Protection Zone and an area of groundwater vulnerability which would require permission from Environment Agency before encroaching. Would result in loss of Grade 2 agricultural land	Sites that have flooding issues will be designed in such a way that the extent and limit of flooding will be avoided and buildings located on land outside this area with mitigation measures to ensure that the risk of flooding is not increased by the new development.
Past pollution incident from Nuffield Hospital - EA view this Zone 3A with extreme seriousness	EA flood maps do not show this site as being in Zone 3A, nor do the Council's SFRA maps
Risk of flooding caused by more hard surfaces giving instant run off	This will need to be mitigated against with SUDS schemes and the use of porous surfaces. Section 2 of Part H of the Building Regulations deals with this
Drains overflow and have not been maintained	If this comment relates to road drains, Warwickshire County Council should be contacted as this is a highway issue and WCC is the responsible authority
Common sense not to build on land liable to flood	This is supported by NPPF section 12 and by utilising the sequential test
All housing should have sustainable drainage	Agree. This has been included

Planning permission should be sought by someone wanting to pave/concrete over garden as it contributes to flooding	Planning permission is required for anyone wishing to hard surface their front garden with non-porous materials
Rural parish has no provision of storm drains to alleviate maintenance of ditches and gullies	If this comment relates to road drains, Warwickshire County Council should be contacted as this is a highway issue and WCC is the responsible authority
Ensure landowner responsibility is enforced	This is not an issue for the Local Plan
Approach needs to be reviewed and amended to ensure delivery of planned development is not jeopardised (NPPF para173 and 174). This must be done to ensure that the plan is sound and should be done in consultation with developer interests	Noted
Recommend use of LHDG document 'Viability Testing Local Plans – Advice for Planning Practitioners'. Further work and amendments will be required to PO5, PO6, PO12 and PO18 as a result	Noted
PO18 makes no reference to wastewater, sewerage capacity and sewage treatment capacity at local treatment works.	Noted
Support efficient use of water but plan should include specific targets i.e. the level of Code for Sustainable Homes and BREEAM to be achieved	This will be included in the Climate Change policies (see Policy CC3)
The infrastructure delivery plan should consider the impact of growth in Coventry and other authorities discharging into the River Avon when examining capacity at Finham and Longbridge sewage works	This is something for the Infrastructure Delivery Plan rather than the policy. It will therefore be dealt with through that process on the advice of Severn Trent Water
Flooding can be a natural process but in the majority of cases it results from poor planning and development	New schemes will be designed to reduce these risks
Development in area of restraint threatens houses with increased risk of flooding	New schemes will be designed to reduce these risks
PO18 says that "New development will take place on sites outside flood risk zones as far as practicable" There should be no development in flood risk areas. Much flooding is man-made resulting from past development and inappropriate places	There will be some circumstances where this is inevitable and the policy deals with such instances
Property in Myton Crescent was flooded when development was carried out on the Trinity School site. Developing the Myton side of the site would threaten all of the houses south of Myton Road.	Further advice will be sought of the relevant authorities before the Plan progresses
Wording of PO18 should be amended in line with the NPPF to state "no development in Flood Zone 3 unless it is water compatible." The plan should also include a commitment to ensure all new development achieves greenfield rates of surface drainage. In addition no development should take place without provision of infrastructure to ensure there is no deterioration of the local water bodies and should seek any opportunities to contribute to WFD objectives. PO18 makes no reference to wastewater, sewerage capacity and sewage treatment capacity at local treatment works. Supports efficient use of water but plan should include specific targets i.e. the level of Code for	Noted

<p>Sustainable Homes and BREEAM to be achieved. The infrastructure delivery plan should consider the impact of growth in Coventry and other authorities discharging into the River Avon when examining capacity at Finham and Longbridge sewage works. Highlights the potentially high carbon emissions associated with implementing greywater recycling systems necessary to achieve code level 5 / 6 suggested in the INFRASTRUCTURE DELIVERY PLAN. Supports the comments in the INFRASTRUCTURE DELIVERY PLAN to ensure that appropriate infrastructure is in place to meet demand for waste collection services in accordance with the waste hierarchy.</p>	
<p>The requirement that all new developments include SUDS is unfeasible. There are some instances where SUDS schemes are not feasible or viable and this should be recognised within the policy</p>	<p>This will be addressed at the next stage of the Plan</p>
<p><b>Summary of Matters Raised in Support</b></p>	
<p>Approve PO18 if it stops approval of development of housing, offices, retail, gravel extraction on the flood plain</p>	
<p>Recommend a reference to safeguarding or promotion of natural flood alleviation areas at strategic site for short medium and long term aspirations to assist with flood risk measures</p>	
<p>Aware that this may form part of Catchment Flood Risk Management Plan (18.9) or fall within Sustainable Urban Drainage Approving Body's remit, but suggest that these strategic potentials should be particularly noted within future policy. Sites could then be potentially delivered through biodiversity offsetting metrics (15.16)</p>	
<p>Support the requirement for SUDS schemes as part of all new developments</p>	
<p>Support the comments in the INFRASTRUCTURE DELIVERY PLAN to ensure that appropriate infrastructure is in place to meet demand for waste collection services in accordance with the waste hierarchy</p>	
<p>Unauthorised development is currently underway within the parish in a Flood Zone 3 location, and such potential impact on life and property should and can be avoided through stricter planning and management controls</p>	<p>This is being dealt with outside the Plan as it is an enforcement matter</p>
<p>Cubbington and Offcurch are already prone to flooding as are areas around the RASC and developments in these areas would exaggerate the current problems encouraging run off which would cause flooding</p>	<p>Plans are afoot to deal with flooding issues at Cubbington through a flood alleviation scheme</p>
<p>in seeking to resist inappropriate development in flood zones, the locational requirements of canals as non-footloose assets (ie their location and alignment are fixed) means that the options for the location of associated facilities and development is limited, and this should be taken into account when balancing wider benefits of waterway-related development against flood risk considerations.</p>	<p>Noted</p>

New development sites should have land earmarked for SUDs and green space so that runoff can be captured and managed.	Noted
Lacking in detailed provisions for safeguarding and enhancing water quality and optimising opportunities to reduce flood risk by linking with themes such as green infrastructure, biodiversity and built development. Need for stronger controls on protecting and enhancing water quality. Must employ an ambitious approach to tackling water quality issues within local plan if to achieve objectives of Water Framework Directive by 2015.	Water quality will be dealt with elsewhere in the Plan. Objectives will be re-assessed in line with changes to codes and building regulations
Recommended that there is future reference to safeguarding or promotion of natural flood alleviation areas at strategic sites within the district as short, medium and long term aspirations to assist with flood risk measure. Suggest that strategic potentials should be noted within future policy. These sites could then be potential delivered through the biodiversity offsetting metrics	Noted
Supports all moves to require fully sustainable drainage and would hope that the plan could encourage retrospective changes to buildings to reduce the amounts of surface water currently going through the foul drainage system	Noted
Water use is becoming a major issue and future developments must consider the impact on current communities and also consider using flood water storage	Noted
<b>Summary of Suggested Changes to the Plan</b>	
Recommended that there is future reference to safeguarding or promotion of natural flood alleviation areas at strategic sites within the district as short, medium and long term aspirations to assist with flood risk measures. Suggest that strategic potentials should be noted within future policy. These sites could then be potentially delivered through the biodiversity offsetting metrics (15.16)	Noted
Recommended that a further discussion be held regarding the assessment of allocated sites using latest modelling of habitat data	This will be done as part of the assessment of sites going forward into the next stage of the Plan
Suggest second point in paragraph 18.5 pg 97 reads "To ensure new development does not increase flooding from pluvial (surface water, run off) and fluvial (river) sources	Noted
Suggest that taking a catchment based approach would identify upstream and downstream issues with neighbouring authorities supporting the duty to cooperate requirement	Noted
The wording of PO18 on pg 98 should be amended in line with the NPPF to state "no development in Flood Zone 3 unless it is water compatible."	Noted
The plan should include a commitment to ensure all new development achieves greenfield rates of surface drainage	Environment Agency advice states that rates of surface water runoff should not exceed those existing but not that of Greenfield rates

No development should take place without provision of infrastructure to ensure there is no deterioration of the local water bodies and should seek any opportunities to contribute to Water Framework Directive objectives	This is something for the Infrastructure Delivery Plan and individual planning applications rather than the policy. It will therefore be dealt with through those processes
State that flooding has resulted because of past development and poor maintenance of the infrastructure . Delete "as far as practicable" from PO18.	This will be looked at as part of the next stage of the plan
The area between Tachbrook Road and Harbury Road could be liable to flooding from the Tachbrook. Remove from the plan	This will be considered at the next stage of the plan
suggest that "ensure that new development can be provided with adequate water supply" should read "sustainable water supply".	Noted

## 5. Revised Development Strategy

5.1 The Revised Development Strategy (RDS) was subject to consultation during June and July 2013. The RDS set out revised proposals regarding the level of growth, distribution of housing and employment land and included revisions to the Preferred Options for sites to be allocated for development. The scope of the RDS was narrower than the Preferred Options in that it did not cover the Local Plan policy themes that had been included in the Preferred Options. The RDS proposals sought to take account of new evidence and the Preferred Options consultation report (part 1).

5.2 The tables below set out the matters raised as representations during the RDS consultation.

<b>RDS Introduction, Process and Strategic Vision</b>	
<b>Comments</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
The Plan Period is confusing and needs to be clarified (is it 15 years or 18 years?)	The Plan period is 18 year: 2011 to 2029. Reference to 15 years is only made to clarify that from the proposed submission date in 2014, the plan will look forward for 15 years
Duty to cooperate needs to be demonstrated	Agreed
The plan is not all-encompassing and misses key developments such as: <ul style="list-style-type: none"> <li>• The land-take of HS2</li> </ul>	These matters will be addressed in the Submission Draft Local Plan

<ul style="list-style-type: none"> <li>Changes to Stoneleigh Park access.</li> </ul> <p>This will make it hard to show a fully joined-up approach to the document</p>	
<p>Work on the evidence base is on-going, which casts doubt on the proposals. It is not clear what additional evidence is being prepared. For instance, it is critical the population projections are accurate</p>	<p>The RDS is a consultation document. The Submission draft Local Plan will be based on comprehensive and up to date evidence, including the most up to date population projections</p>
<p>How can a plan be formulated when not all the evidence is available (such as the Joint SHMA?) No decision should be made until all the evidence is available</p>	<p>The RDS is a consultation document. The Submission Draft Local Plan will be based on comprehensive and up to date evidence</p>
<p>There needs to be proper communication with health providers regarding doctors surgeries and the local hospital</p>	<p>Agreed, the infrastructure delivery plan being prepared to accompany the Submission Draft Local Plan will include proposals and funding for GP surgeries and improvements to enhance hospital capacity</p>
<p>Although the RDS says it should take account of proposals in neighbouring areas, no account is taken of the proposals by Stratford DC for housing at Gaydon/Lighthorne Heath</p>	<p>The Gaydon/Lighthorne Heath proposals had not been published at the time the RDS was published. However since then, regular meetings and detailed work has been undertaken to assess and address the cumulative impacts of development across the two Districts</p>
<p>Flood risk is not adequately addressed</p>	<p>The Environment Agency has been consulted on the Local Plan proposals and flood risk mapping has been used to help shape the development proposals</p>
<p>The Council has not taken account a previous representations regarding deliverability of the Thickthorn site.</p>	<p>The Council is satisfied that there are no impediments to delivery of the Thickthorn site that cannot be overcome during the Plan period</p>
<p>The RDS takes no account of the possibility that the District will need to accommodate growth from neighbouring areas.</p>	<p>This will be addressed in the Submission Draft Local Plan</p>
<p>National priorities seem to take precedence over local priorities</p>	<p>The Local Plan must be aligned with the National Planning Policy Framework.</p>
<p><b>Introduction - Support</b></p>	
<p>Pleased that the plan has been revised since the Preferred Options taking account of objections</p>	<p>Noted</p>
<p>Stagecoach Midlands welcomes the opportunity to help deliver sustainable development through this Plan</p>	<p>Noted</p>
<p><b>The Local Plan and Consultation process - Objections</b></p>	
<p>The process has not been handled well. In particular the 2011 consultation set expectation about levels of growth being low which have since been disregarded. Issues identified as important in this consultation have also been set aside – such as road congestion and air pollution. What was the point of the consultation?</p>	<p>This point is understood. However, it is not always possible align the evidence with local views</p>
<p>Declarations of pecuniary interests should be published online before the consultation began</p>	<p>Declarations of pecuniary interests are made by Warwick District Councillors at the start of formal meetings to involving decision on the local plan. These are contained within the minutes of meetings</p>

There is a lack of information provided. All information should be published online	The RDS document was published in full online along with all the supporting evidence
The consultation event at Budbrooke was only 2 hours with long queues	Noted
The online consultation system is not easy to use and favours developers and landowners	Alternative means of responding by post and email were also publicised.
Information regarding potential sites in Budbrooke was not published	The RDS did not include any proposals for specific sites in Budbrooke. The District Council did not publish details of any specific proposals at the time of the consultation. The RDS set out the Council's intention for a village sites consultation later in 2013. This commenced in November 2013 and ended in January 2014.
Previous consultations responses are being disregarded or ignored. Proper consultation need to be undertaken.	The development strategy has been changed to take account of material planning considerations arising from previous consultations. It should be noted that the Strategy can only be changed where there is evidence to support that change
There were problems with the Councils website which delayed responses	Noted. Responses were accepted beyond the deadline
The consultation meeting did not allow sufficient time for questions and discussion (e.g. Whitnash Community Forum). Meetings felt like a marketing event rather than a consultation event	The main purpose of the consultation is to enable people to be better informed about the proposals so that they can make stronger representations. There were a significant number of question raised during at the Whitnash Community Forum, although time limitations did mean the meeting had to be concluded.
The consultation process has been poor and WDC has appeared as though it does not want to listen and that the proposals are "a done deal"	It is sometimes difficult to balance the objective evidence with the opinions expressed in representations. Ultimately the Local Plan must be soundly based on evidence and this can lead to a perception that the Council is not listening. However, where salient planning points are raised in a representation, this is taken in to account and there are examples of where this has influenced the shape of the Local Plan
Proposals should not be developed to suit landowners and developers	None of the proposals have been developed to favour landowners and developers. All proposals seek to draw on objective evidence arising from the Council's own work or through the consultation processes.
It is inappropriate that applications have been submitted before the Local Plan has been agreed. WDC should not approve planning applications until the Local Plan is progressed – to ensure infrastructure is properly planned for.	The Council has no control over when developers choose to submit planning applications and has a duty to determine planning applications on their merits. It would not be possible to have a blanket approach along the lines suggested. However, provision of adequate infrastructure is a requirement and if this requirement is not met, this could provide a valid reason for refusal
WDC's proposals have led to a race for developers to get applications in. This should not lead to a first come, first serve approach	The Council has no control over when developers choose to submit planning applications and has a duty to determine planning applications on their merits at the time they are submitted.

Exhibitions undertaken by developers have been “economical with the truth”. This has led to distrust of developers and planners	Noted. The exhibition referred to was not undertaken by the Council, so it is not possible to comment on that. The Council seeks to provide clear and balanced information to enable well informed representations to be made
WDC does not have the right to ask that people only object to sites adjacent to their homes, this is an issue for the community and not just those closest to the sites	Agreed. The Local Plan consultation process has not attempted to limit the scope of anyone’s representations
Kingswood Nurseries and Kingswood Farm are in Rowington Parish not Lapworth as stated	The RDS did not make any site specific proposals for Kingswood (whether it be in Lapworth Parish or Rowington Parish)
Resident’s objections to development are being ignored (for instance objections have been raised about the Europa Way area in several consultations dating back to 2009)	Whilst it is understood that many residents object to development on this site, the Council is required to identify the most suitable sites to deliver the local housing requirement. The evidence base to support this site suggests that this is one of the most suitable and sustainable locations available in the District. In this context it is difficult to change the Plan purely on the basis of weight of local opinion
The Council seems to be concealing its proposals for villages	This is not the case. The Council’s preferred options for villages were not intended to be included in the RDS. However detailed proposals were published and consulted on in November 2013.
The response form produced by the Council is inadequate	It is accepted that the response form will not provide an ideal format for some representations. However there was not a requirement to use the form and alternative methods (letter formats etc)submitted as representations have been given an equal weight
This is not consultation. Civil rights are being ignored	The consultation process is consistent with the planning regulations and the Councils Statement of Community Involvement. All representations have been read and have been summarised in this document so that the elected representatives of the Council can take these in to account in reaching a decision on the Submission Draft Local Plan
The RDS is not consistent with the Council’s own vision and ignore previous promises to local residents.	The RDS seeks to support the Council’s vision, though it is accepted that there are inevitable tensions between growth and some environmental concerns. It is not clear what promises have been made and broken
From views expressed at various public meetings, residents do not feel that there was adequate, sufficiently well publicised consultation on the Local Plan in the early stages. WDC should not, therefore, assume that the relatively low level of response to previous consultations implied tacit acceptance of their proposals.	Noted.
Many accompanying documents been issued simultaneously, giving interested parties only six weeks during the summer holiday period to understand, discuss and respond to them.	It is recognised that there is a substantial amount of information to absorb. However, 6 weeks is consistent with the Planning Regulations and the Council’s Statement of Community Involvement

Warwick Society offers assistance in devising a better alternative to the RDS	This is noted.
Duty to Cooperate must be demonstrated and is particularly important given the situation with Coventry's housing requirement. Further work should be done regard DtC and the potential to accommodate some of Coventry's growth	Duty to Cooperate is an on-going process. The Council will prepare a Duty to Cooperate Statement to accompany the Submission Draft Local Plan. The potential to accommodate some of Coventry's growth will need to be addressed through DtC and in the Submission Draft Local Plan
The scope of the RDS does not include policies. Would like to be consulted on these in the future.	There will be opportunities to make representation on policies in the Submission Draft Local Plan
The decision to consult on a housing requirement when the supporting evidence has not yet been completed is questioned – the interim figure in the RDS must be unsound	The RDS was based on an interim figure. The Submission Draft will be based on comprehensive up to date evidence
The proposal to increase the housing requirement to 12300 is undemocratic and conflicts with Localism	The democratic process was properly followed in gaining approval to consult on the level of growth proposed in the RDS (discussion by Council, formal approval by the Executive). That this decision was taken at District level rather than regional level is consistent with the Localism Act 2011
The Planning Authority should not be influenced by specific development proposals (eg Fieldgate Lane) when assessing responses to the consultation	The planning application process was undertaken separately from the development of the Local Plan. The application was assessed on its merits. As this application has been approved in advance of the Submission Draft Local Plan, this site will be included as a commitment
The RDS should have addressed the consequences of the development proposals on other matters such as other vitality of town centres. The retail frontage policy should be revisited to encourage investment. Current policies are too restrictive	Town Centre and retail policies will be addressed in the submission draft of the Local Plan, including policies relating to retail frontages.
Most residents are unaware of the Local Plan	Information relating the RDS and the consultation events was delivered to almost every household and local newspapers and radio stations have covered the RDS consultation
There is a lack of understanding about the connection between planning applications and the local plan	This is an issue. However the Council has no control over when planning applications are submitted and is Duty bound to assess them when they are.
There is no clearly defined map showing the boundary of Warwick DC and also showing enough detail to identify every village and settlement	The RDS does include a map showing the District boundary and the villages most affected by proposed development. The Council has attempted to keep map relatively simple to facilitate clarity. It is not clear what the purpose of a more detailed District-wide map would be
The RDS does not address the intentions of the Localism Act or Para' 17 of the NPPF in respect to "empowering local people to shape their surroundings."	The RDS was shaped, partially in response to the 2012 consultation responses. However the overriding drivers for the shape of the RDS proposals were the NPPF and the evidence base which help to ensure the proposals are likely to be sound
RDS lacks transparency in terms of methodology employed. The methodology has weaknesses in terms of robustness	The methodology (such as the site selection methodology and the Sustainability Appraisal) are available on the website. It is however correct that the Joint SHMA was not complete at the time of the

	RDS.
It is not clear how the Council intends to use information gathered from public meetings. The Council should inform people how their views will be considered. More openness would help with support and trust	The Planning Regulations only allow written comments to be taken in to account. The primary purpose of the public meetings is to provide information so that better informed comments can be made. There is therefore no formal account taken of comments at public meetings – although of course officers do listen to views expressed
The Council's Executive has no representation from Warwick South where the development is focused	Noted. However the Local Plan proposals are based on the evidence available.
The community should not have these plans forced on them by bureaucrats and big business without regard for local wishes	The proposals have been developed in line with National Policy
Duty to Cooperate should not just apply to Councils involved in the Joint SHMA, but also other areas such as Stratford and Solihull. Records of engagement with neighbouring authorities need to be made	Agreed
The SHMA and any resulting changes should be fully consulted on	The SHMA will be taken in to account in the Submission Draft Local Plan. There will be an opportunity to make representations on this following approval by Council
None of the issues identified by Budbrooke Parish Council in 2012 have been addressed	The issues have been considered.
Concerned that politics may have been involved in the decision making	The Council has sought to ensure that the proposals are based on the best available evidence. However it is correct that the decision to consult on the proposals was made by elected members
The RDS did not include any alternative options and is therefore not a consultation, but a statement of intent.	Alternative options have been consulted on in the past (most recently in 2012). Information on alternative sites is published in the Strategic Housing Land Availability Assessment, available on the Council's website and referred to directly
Cumulative impacts of developments (especially co-joining sites) need to be addressed.	Agreed. This is being addressed through the Infrastructure Delivery Plan
This is a developers charter not a plan for the benefit of the citizens of Warwick and as such requires an independent investigation into how this plan was put together, the involvement of all concerned in the council and the Henry VIII trust and the real reasons for stopping any development in the North.	Although the proposals for growth set out in the RDS have the potential to benefit specific developers, this is not a driver for the proposals. The requirement for growth is set out the National Planning Policy Framework and is backed up by the objective evidence of the District Council. Whilst it is understood that there are significant issues associated with growth that give rise to concern amongst many residents, it should also be recognised that there are social and economic benefits associated with growth.
Concerned over the ethical / political questions raised by this planning process. There seems to be a lack of fair representation. There also seem to be a number of cases of conflict of interest. I feel that it should be raised to your compliance officer and	It is not clear what the nature of the ethical/political issues is or what the conflicts of interest are. Declarations of pecuniary interests are made by Warwick District Councillors at the start of formal meetings to involving decision on the local plan. These are contained within the minutes of meetings

an independent enquiry held.	
The consultation process combined with the way planning applications are being submitted is undermining trust in WDC and the process for the New Local Plan	This point is understood. It is unfortunate that applications have been submitted and are being consulted on at the same time as the RDS consultation. However, this is not entirely in the Council's control.
There is a lack of consultation with rural communities which are quite separate from the urban areas	Noted. Hopefully this point has been partly addressed through the village sites consultation process which involved consultation events in 12 rural communities
The Local Plan consultation process is very complex and too difficult for the public to follow. The amount of documents to be completed on line is extremely difficult as one has to familiarise themselves with numerous documents before they can submit meaningful responses.	This point is understood. It is a difficult balance to strike to ensure that comprehensive information is provided at the same time as making the information easily accessible. We will seek to improve this in future consultations
<b>The Local Plan and Consultation process - Support</b>	
Very much support and endorse the approach of the District, as set out in paragraph 1.3 of the RDS, to ensure that there is a robust and up to date evidence base and, welcome the acknowledgement that there will be a need to take account of the as yet unavailable findings of the Joint Strategic Housing Market Assessment (JSHMA)	Noted
Welcome the fact that Warwick District is now recognising its statutory obligations with regard to the Duty to Co-Operate with neighbouring authorities in the preparation of the Warwick Local plan in order to maximise its effectiveness with regard, in particular, to the strategic planning matter of housing provision.	Noted
<b>Strategic Vision - Objections</b>	
Transport proposals – such as traffic signals etc. will undermine the character and historic environment of our towns. This is inconsistent with the vision of making the District "a great place to Live Work and Visit"	There are inevitable contradictions between delivering a vibrant and prosperous future for the District (a key part of the vision) and protecting the best of what we currently have. Where this is the case, the Plan seeks to find the best balance by delivering growth at the same time as protecting the character of our settlements
The vision for eco-friendly /low carbon/zero carbon housing will be very hard to achieve in the context of developer profits	Noted. The Council will seek to enforce the Policy set out in CC3
Car parking charges are too high and are undermining town centres which is inconsistent with the Council's vision	The Local Plan does not set parking charges.
The vision has too much emphasis on growing the Local Economy. However the local economy is already relatively vibrant and growth will come at a huge cost in terms of environment and quality of life.	The Local Plan seeks achieve a balance between environmental, social and economic factors in line with the presumption in favour of sustainable development as set out in the NPPF.

Loss of green land and impacts of air quality are not consistent with the Council's vision	There are inevitable contradictions between delivering a vibrant and prosperous future for the District (a key part of the vision) and protecting the best of what we currently have. Where this is the case, the Plan seeks to find the best balance, protecting the most highly valued green land and finding way to minimise/reduce pollution.
The mistakes of Chase Meadow should be used to ensure new housing areas deliver a better living environment	See built environment chapter and infrastructure deliver plan
Warwick is already a great place to live work and visit. So much housing in a concentrated area will spoil it.	The Plan seeks to ensure Warwick remains a great place to live work and visit by providing new homes and jobs for those who need them at the same time and looking after the best aspects of the District
Economic development is not required and will drive unnecessary development	The evidence shows that economic development is required both locally and nationally. It does drive development needs, but the purposes of the Local Plan is to balance how best to deliver this.
Communities are not just about homes and infrastructure but also about many years of support and fellowship. The Plan fails to address this	This point is accepted, however it is an extremely hard issue to address through the Local Plan which is a spatial plan (setting out what uses should go where)
The Plan fails to support self-builders and focuses too much on "developers". This in turn leads to a lack of innovation.	Noted. The potential for a policy to support self-build will be considered.
The objective of providing for gypsies and travellers is not achieved in this document	The RDS was not intended to deliver this. A separate consultation process is underway looking specifically at where Gypsy and Traveller sites should be located.
Housing numbers are too high	See the responses in RDS1
Object to the proposals for 'garden towns' because of densities of development proposed.	The gardens towns approach seeks to ensure high quality development, without significantly compromising on densities
Should be a stronger emphasis on brownfield	The Draft Local Plan includes a significantly higher number on Brownfield land (see policy DS7 and DS10)
Should be a clear commitment to need for more homes	See Policy DS2 and DS6
Need commitment to diverse range of dwellings	See policies H2, H4, H5, and H7
550 homes should be deleted from vision – too prescriptive	This is not referenced in the Draft Local plan
The vision for 550 homes per annum is not followed through in the proposals	
This is a fantastic opportunity to build quality, well designed homes achieving high levels of energy efficiency i.e. Passive housing, but will instead focus on profit.	The focus is on quality – see policies BE1, BE2, CC3 etc
Doesn't distribute development as set out in the vision	Within the constraints (such as national green belt policy, sustainable development etc.) development is distributed - see policy DS10
Transport package doesn't provide for sustainable	See response on Transport mitigation

transport and will make air quality worse	
Proposals are damaging to the areas built heritage	See Heritage Assets Settings assessment
More homes for first time buyers needed	See policy H4
Vision is indeed a vision. This is a mega suburb which will hang around towns like a heavy weight. Whole plan is uncaring and kills the vision	The Council believes this plan will support a sustainable and prosperous future for the District
Should include sports and leisure facilities within the vision	See Para 1.59 and the IDP
RDS not developed from public consultation	The Local Plan takes account of public consultations, but has not been able to change to address all the points raised
Safety and security should be a priority	See Para 1.52
Plan period should be extended to 2031	The Plan period is to 2029. This is consistent with NPPF
We seek a commitment to a vision of the district as a rural area containing a number of towns, with major historic centres. The New Local Plan would lead to Warwick District becoming a significant urban sprawl with a rural fringe at risk of development and decline.	The character of the rural area will largely be protected by allocations and policies. The location, layout and design of urban fringe developments will seek to ensure developments are not “sprawling” in nature (see policy BE1 and BE2)
Concerned that traffic impacts of the proposals will undermine our ability to provide effective, attractive bus services to both existing residents and new development	Noted. The Demand Management Transport study currently being undertaken will explore whether there are better solutions for sustainable forms of transport
Proposals will damage ecology	Sites have been selected to limit impact on ecology. See also policies NE2, NE3, NE5
This a mish-mash of isolated ideas and unconnected thoughts without any joined up thinking	The Policies and proposals are aligned with the vision and objectives
Gateway is inconsistent with vision of protecting green belt	The proposals for a sub-regional employment site requires exceptional circumstances to be justified. The potential quantum of jobs is the main element in the justification.
The coalescence of Warwick and Leamington does not seem to support a better environment.	The town are already conjoined and the sites proposed offer the most sustainable patterns of development
Spatial vision not consistent with the Plan’s vision	Policy DS4 is consistent with the Vision for the district
Strategic vision needs to do more to take account of the growing elderly population – needs a policy for specialist accommodation	See Para 1.46
Vision needs to say more about the importance of connectivity – not just about infrastructure	This is also about the location of development – see DS4
Would like to see the aim relating to biodiversity and landscape specified in more detail in this Strategy – protection of ancient woodland and trees	See policy NE1, NE2, NE3
<b>Vision - Support</b>	
Very laudable aims and objectives. Pleased to read	Noted

positive statements regarding need to promote and support development growth, the local economy, create new jobs, and deliver new homes in district's main settlements.	
Highly encouraged to read positive statements regarding need to deliver new 'infrastructure' locally.	Noted
Supports the requirement to ensure that the growth of the local population is provided for.	Noted
Supports proposals for regeneration	Noted
Providing for diversity, including affordable homes, homes for the elderly and vulnerable and other specialised needs	Noted
Support avoidance of coalescence	Noted
Support protection of heritage assets	Noted
We support the intention to create a District that is a sustainable mixture of housing, with 'neighbourhoods that are well designed and distinctive'	Noted
Consider sport as a robust and sustainable economic option	Noted

## **RDS1: The Council is adopting an Interim Level of Growth of 12,300 homes between 2011 and 2029**

<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>Evidence Base – Housing</b>	
Warwick District Council's own consultant G.L.Hearn made an Economic and Demographic Forecast Study in December 2012 and their option PROJ 5 stated that only 4,405 new homes are required.	<p>The level of housing growth proposed is based on the Joint Strategic Housing Market Assessment undertaken in 2013. This was undertaken in conjunction with the other Districts in Coventry and Warwickshire and in accordance with the draft National Planning Practice Guidance published in 2013.</p> <p>The Council is of the view that this provides a robust and sound evidence base for the housing requirement for Warwick District and the Local Plan proposals therefore</p>
It is wrong to forecast as far into the future as 2029 and allocate greenfield land now. It is akin to having no Local Plan at all, allowing uncontrolled growth and leaving developers in control.	
Based on factual information derived from ONS and allowing for migration, the actual number of homes required to meet the projected population growth of 11,300 is 5,400. These homes could be provided for on brownfield sites and via the normal planning process.	
The number of homes proposed is too high and other proposals for home numbers based on natural population growth and allowing for migration (i.e. Ray Bullen) must be considered.	

<p>Since a significant proportion of the Local Plan is based on the Interim Level of Growth estimate, it is important that the estimate is accurate and takes account of the estimates of adjoining Districts.</p>	<p>accord with this closely</p> <p>This was completed after the publication of the Revised Development Strategy and so was not reflect in the RDS proposals.</p> <p>The ONS projections are the starting point for this study and delivery in previous plan periods, vacant properties, changing household sizes, the impact of the economy and affordability were all considered as part of this study</p>
<p>When you balance housing with employment growth forecasts vs. the housing market, it appears that a realistic forecast of need would indicate the District already has the five year supply of sites.</p>	
<p>The Interim Level of Growth is forecast using past house building numbers from a boom period when mortgages were easy to obtain and therefore the proposals is not representative of actual demand in the current economic climate.</p>	
<p>No consideration has been made within the forecast for vacant properties or for the 1,224 undeveloped sites with planning permission, which equates to a two year supply.</p>	
<p>'Meeting housing needs' (Para 3.5) has not been adequately defined.</p>	
<p>The 2011 Interim Household Projections suggested 624 households per annum are needed between 2011 and 2021. This period included a period of economic recession and therefore cannot be used as justification for the low housing level proposed, that fails to meet the needs of the current economic climate.</p>	
<p>Household projects extending beyond 2021 are based on 2008 household projects and suggest the need for the provision of 15,500 households over the period of 2011 to 2029, equalling 861 dwellings per annum. This is contrary to the 2011 projections.</p>	
<p>From the RDS indicating a growth in employment of 9,500 and the additional 9,500 jobs created by the Gateway development, the objectively assessed housing need underpinning the New Local Plan is 726 – 772 dwellings per annum.</p>	
<p>The RDS is assuming a rapid increase in demand for single occupancy households when the actual demographic trend is away from this. Greater emphasis should be given for multi-generational living with semi-independent adults who occupy 'Granny flats' or semi-separated apartments within houses. These should go towards fulfilling affordable housing targets.</p>	
<p>Evidence put forward by planning, legal and conservation experts will justify a substantial reduced proposal.</p>	
<p>No sufficient evidence base has been provided for the 14% increase in the level of homes proposed in the RDS compared to the 2012 Preferred Options.</p>	
<p>New planning laws allow unused office space to be converted to housing and this must be considered in the housing projections.</p>	
<p>Including Small Urban SHLAA Sites (300) and 'Consolidation of Existing Employment Areas' (450), almost 29% of the housing requirement proposed is unidentified.</p>	
<p>The proposal at Gaydon by Stratford District Council will provide homes for Jaguar Land Rover. This was part of Warwick District Council's plan and therefore housing needs have been double counted.</p>	

<p>The 2011 Based Projections show a slower growth in households compared to the 2008 projections. As economic conditions improve it is unlikely that the reduced household formation rate identified will continue and therefore there will be increased growth beyond 2021.</p>	
<p>The under supply of housing against the RSS target of 550 dwelling per annum in Warwick District equates to a shortfall of 1,281 units for the period 2006/07-2010/11. It is not clear as to whether WDC have considered this shortfall in the interim projections. The shortfall should be made up for as soon as possible and should be caught up within the first five years of the Plan.</p>	
<p>To identify the dwellings required there is the need to consider unmet need, backlog, second homes and vacancy rates. The Warwick District Housing Market Assessment (2012) is instructive and identifies an unmet net affordable housing need of 1,144 households which must be added to the projections. This would present a figure in excess of the 11,500 new homes proposed in Paragraph 4.1.5.</p>	
<p>There are already 1,150 permissions for housing granted by WDC and the developers have built no more than 200 per year at the most.</p>	
<p><b>Evidence Base – Demographics</b></p>	
<p>The Council’s population forecast is out of date and over optimistic.</p>	<p>The population forecast is based on the most recent demographic data from the Office for National Statistics</p>
<p>The proposal references an aging population but provides no detail on the proportion of housing to meet elderly needs which are indefinitely different to young professional and families. Understand there are a number of developments to address some of these needs but it is not clear what shortfall exists.</p>	<p>The level of housing growth proposed is based on the Joint Strategic Housing Market Assessment undertaken in 2013. This was undertaken in conjunction with the other Districts in Coventry and Warwickshire and in accordance with the draft National Planning Practice Guidance published in 2013.</p>
<p>Census shows steady increase in population numbers but proposed housing growth is exponential.</p>	
<p>The population forecast cannot be justified by the evidence. It extends far beyond the period covered by the original researched report.</p>	
<p>Economists suggest that the UK population will start to decrease mid-century and therefore a population forecast for 2030 and 2050 is needed.</p>	<p>The Council is of the view that this provides and robust and sound evidence base for the housing</p>

<p>The 2011 based population projections are incomplete and therefore the Interim Level of housing is based on interim projections, contains historic data and is prone to sensitivity swings. The 2008 projections are the most reliable source until more up to date and complete population projections are published.</p>	<p>requirement for Warwick District and the Local Plan proposals therefore accord with this closely</p> <p>This was completed after the publication of the Revised Development Strategy and so was not reflect in the RDS proposals.</p> <p>The ONS projections are the starting point for this study and delivery in previous plan periods, vacant properties, changing household sizes, the impact of the economy and affordability were all considered as part of this study</p>
<p><b>Evidence Base – Economic</b></p>	
<p>Housing demand is not solely related to employment prospects. Other Districts attempt to justify their housing demands based not only on the change in demographic but the estimates for growth in employment in the area and what the plans will do to stimulate that growth.</p>	<p>The starting point for the JSHMA is demographic forecasting undertaken by ONS. However the Joint SHMA as looked at the impact of the economy and as adjusted the requirements accordingly.</p>
<p>Level of housing growth is strongly linked to the growth in employment. Some forecasters are now saying that the country will not see significant growth until 2020. Forecasts should therefore be revisited and revised.</p>	<p>The JSHMA and the employment land review 2013 have been aligned to ensure the housing growth and employment growth are within a similar range. This will help to retain an approximate balance between employment and working age people within the District</p>
<p>Growth of local employment will be less than forecasted.</p>	
<p>Disagree with the statement in Paragraph 4.1.6 that economic growth cannot happen without inward migration. Controlled growth is required and not imposed additional expansion.</p>	
<p>WDC should not be certain that a massive economic recovery is coming anytime soon. The Local Plan is only for fifteen years.</p>	
<p>The assumption of business growth is unrealistic given there are a number of vacant business units in both Leamington and Warwick.</p>	
<p>The low rate of unemployment in the District implies that new housing for people filling job vacancies is not needed.</p>	
<p>The employment growth has not required new employment land and there has been minimal rebuilding of existing office accommodation. There is a surplus of employment land some of which is not used and therefore no case has been made to justify the release of any greenfield land for employment over the use of that already available.</p>	
<p>To fulfil the 10,200 new jobs projected by Warwick District Council, it will be necessary to import people from outside the District as the current unemployment count is less than 1,500.</p>	
<p>Even with the current low unemployment rate there are vacant units. Only a modest improvement in the economy would absorb most of the people.</p>	
<p>According to the Prime Minister the impact of the prolonged recession could continue for another decade which would impact on the ability of individuals to afford housing, and this raises question as to who will occupy the new homes.</p>	

<p>The Council are relying on the recession which is contrary to the Government's 'Policy for Growth Agenda' by which the planning system should foster increased levels of growth.</p>	
<p>The forecast for homes is based on a GVA increase of 2.4% without any reference to quality of life.</p>	
<p>The GVA forecasts are incorrect and predicted to be in the range of 2.9% and at least 3% as a result of the Gateway Development.</p>	
<p>The Council are planning to build for more homes than required by Central Government on the speculative grounds that it will bring new jobs to the area.</p>	
<p>The planned employment area will not provide a sufficient number of jobs to sustain the additional residents or local unemployment and it is therefore inappropriate to allocate greenfield land for housing that is not required by the local population.</p>	
<p>Allocations of employment land from the last and previous Local Plans are still not being taken up and are being canvassed for a change in allocation from employment to housing. The ratio of housing to employment land is being reduced and will lead to Warwick and Leamington becoming dormitory towns.</p>	
<p>Employment opportunities for residents do not exist in the local area.</p>	
<p>Council should give weight to documents and statements that highlight the significant role that residential development can have in assisting with the economic recovery of the country (i.e. Laying the Foundations: A Housing Strategy for England, 2011; Get Britain Building Fund, 2011 and Housing and Growth, 2012).</p>	
<p>More dwellings should be provided in relation to the creation of 10,200 jobs.</p>	
<p>The aim appears to be to encourage in-migration by providing more housing to create more employment in the area to create more GVA.</p>	
<p>The incorrect employment land requirements put additional strain on housing numbers which are not justified and would damage the local environment.</p>	
<p>The Council need to consider the 'Choice of Assumptions in Forecasting Housing Requirements Methodological Notes' (CCHPR report, March 2013) as this advises against the downward revision of projected population/household figures.</p>	
<p>The UK is working at a low economic capacity and because of debt this will continue and therefore the level of houses, based on attracting people to work in the District are too much.</p>	
<p>The assumptions about GVA are incorrect according to the Council's own evidence. The GVA evidence indicates that GVA for Warwick will outperform the West Midlands (2.9% by 2025 compared to figure of 2.6% for the West Midlands). Considering the strategy consistently refers to the District outperforming the West Midlands, it would appear logical to plan on the basis of at least 2.9% not 2.4%.</p>	
<p><b>Interim Level of Growth</b></p>	
<p>The area has already experience significant growth over the past few years.</p>	<p>The interim level of growth has been superseded by the Joint Strategic</p>

The Interim Level of Growth of 12,300 homes is too high and over cautious.	Housing Market assessment 2013
There has been no mention of the Empty Homes Strategy. There are a number of empty homes in Warwick and Leamington which have the potential to be used prior to building new houses.	
Development and investment should be concentrated in major urban centres of the region (e.g. Birmingham) and therefore local growth rate for the District should be much lower and not higher than that of the forecast growth rate for the region.	
The number of homes proposed could be reduced by renovating existing homes. This would help to regenerate the town and restore its character.	
The level of growth is being forced on the District by external pressures and government targets.	
A new Local Plan is required based on a low growth strategy.	
Sites for 550 new homes per annum over an 18 year period totals 9,900 homes, not 12,300.	
The Council should use the 'What Homes Where' toolkit as the Interim Level of Growth is under estimation.	
Cannot forecast to 2029 in light of changes in social and economic conditions over the past 15 year period.	
A purpose built student housing unit or relocation of students to Warwick and Coventry University sites would release more homes in Leamington Spa for use by families.	
Calculations needs to be made available, verified and cross checked with other external bodies.	
There are a number of residential developments that have been recently built or started within close proximity to the proposed development and many are still not occupied or sold. Not enough is being done to ensure that started developments are delivered.	
Half the number of homes proposed would meet local needs and homes that people can afford should be provided.	
The increase in housing estimates from 10,800 to 12,300 is excessive, highlights the uncertainty over the housing requirement and needs to be challenged.	
Warwick District Council originally objected to the 10,800 homes proposed in the Core Strategy and therefore an increase to 12,300 is nonsensical.	
The proposed homes will not be affordable to the majority and such mid to upper price range homes are not in current demand.	
The SHLAA indicates the District's maximum capacity for expansion by 2029 is approximately 13,000. Figures from the Local Plan would account for 90% of this capacity.	
The annual house building rate proposed has not been achieved in the past and is unrealistic. In the period 2006/7 to 2010/11 only 1,400 dwellings, an average of 280 per annum were completed.	
The housing proposals do not constitute sustainable development unlike the three brownfield site proposals within Leamington Spa.	

The use of infill sites close to existing services and facilities should be priority.	
The increase in the proposed level of homes required is above the Regional Spatial Strategy target.	
The Interim figure is not accepted until the Gateway Project has been finalised. If the Gateway proposals did not go ahead then less housing would be needed in the District.	
Empty industrial units should be used as brownfield land for housing.	
There has been no justification for deviating from the housing need figures for the period 2011 to 2029 identified in the 2012 SHMA (11,300 to 14,300 homes) or the 2012 Economic and Demographic Forecasts Study (13,300 to 13,800 homes).	
Planning permission for 1,150 homes has been granted by Warwick District Council and the developers have not built more than 200 per year.	
Warwick District Council should plan for the growth of 13,300 dwellings as the number of homes required will increase following further reviews.	
The Council should not have to accommodate a certain amount of housing. The Government should be looking for appropriate sites for house building.	
Further greenfield and Green Belt sites should be allocated in sustainable locations to meet the additional housing need and this should be distributed across the District including in the villages.	
The employment-led and household projections pointed to the need for between 13,300 and 13,800 additional homes depending upon whether the Gateway Scheme was built and its effect in displaying jobs from elsewhere. The Gateway Scheme was granted planning permission on 12 <sup>th</sup> June 2013 suggesting that a housing requirement at the upper end of this range is more appropriate.	
There are only vague expectations and requirements from Central Government.	
The 50% level of social housing is proposed is excessive.	
The Council has not demonstrated that there would be any adverse impacts of delivering a higher housing requirement to ensure it meets its objectively assessed housing need.	
If new homes are provided at Gaydon for Jaguar Land Rover and considering its proximity to Banbury, then Warwick will need to grow less.	
More than 550 new homes per annum are required to meet local housing needs. Should the Interim Level of Growth forecast be correct, more land needs to be allocated to ensure housing needs are met.	
Warwick District Council should not be planning for a greater level of growth over the next 15 years than it has experienced in the recent past.	

<p>The Council is being cautious in its assumption for future housing need. 12,300 homes will not meet the District needs aside of cross boundary requirements. The SHMA target of 15,141 dwellings by 2029 should be the target and figures should be increased beyond this to account for cross boundary needs.</p>	
<p>The need for such level of growth is inconceivable given the level of expansion in Warwick District that has already taken place.</p>	
<p>There has already been significant population increase which in recent years has been higher than Warwickshire, the National average and overall figures for the West Midlands. The additional population will swamp the existing.</p>	
<p>Such numbers of homes contradicts the vision that Warwick District Council has in ‘providing a mix of historic towns and villages set within a rural landscape of open farmland and parklands’.</p>	
<p><b>Local Housing Need</b></p>	
<p>Current home owners wishing to move or upsize cannot afford to due to Government spending cuts. The only solution is to extend which is restricted due to costs and planning restrictions</p>	<p>Local Housing needs have been taken in to account in identifying the locations to meet the District’s overall housing requirement. For instance the proposals t release green belt at Kenilworth are justified on the basis of meeting the needs of the town.</p> <p>Similarly, village housing needs have been taken in to account in assessing the level f development appropriate in rural areas. At times the level of need identified in local housing needs assessments has been exceeded due to other factors such as meeting the District’s housing requirement, the need to support local facilities and the availability of suitable and sustainable sites</p>
<p>Estate agents are overflowing with homes for sale but only a few are affordable.</p>	
<p>There should be a slower phasing of home delivery based on estimated local demand with the releasing of land as demand grows.</p>	
<p>There are many large houses in single occupancy because there is no suitable accommodation for existing residents.</p>	
<p>A recent Housing Needs Survey in Bishop’s Tachbrook identified a much lower housing requirement than the 100 – 150 specified in the RDS.</p>	
<p>The Local Plan must support local builders and not utilise the workforces of developers.</p>	
<p>The Plan is proposed to benefit developers and landowners willing to sell and is not in the interest of local need or the delivery of affordable housing.</p>	
<p>The Council are building for what they believe would sell rather than the local requirement.</p>	
<p>Many of the residents of Warwick Gates commute long distances and the vast majority of homes are privately owned and not affordable to first time buyers.</p>	
<p>Barford, Sherbourne and Wasperton have carried out several housing needs surveys in recent years, none of which gets genuine need to anywhere near the levels proposed in the initial consultation.</p>	
<p>Some housing maybe needed for organic growth within individual communities but it should be decided at a local level not via top-down approach.</p>	
<p><b>Location of Housing</b></p>	
<p>There is a concentration of proposed homes to the south of Warwick and Leamington and these should be more evenly spread. Such a large extension should not be allocated to a small town.</p>	<p>See responses to RDS 4, RDS 5 and section relating to specific site allocations</p>

The existing population do not want to see the ruination of the southerly approaches to Warwick.	
The proposed homes to the south of Leamington will transform the community and damage the appeal of the area.	
The Green Belt is of equal importance to the south of Leamington and Warwick as the Green Belt to the north and it is unjust that no homes are proposed on greenfield sites north of the towns.	
No information has been provided on the location of the other 6,000 homes proposed.	
Development of 2000 homes south of Harbury Lane and 100 on Myton Gardens are in an Area Restraint.	
Development on prime agricultural land south of Harbury Lane and Hallows Hill is not needed and is unnecessary. It will lead to the coalescence of Bishop's Tachbrook with Warwick and Whitnash.	
<b>Duty to Cooperate</b>	
No consideration has been made for the proposal by Stratford District Council to build a new village near Gaydon, which is nearer to Warwick than Stratford. This development along with development proposed to the south of Warwick District would put extra pressure on the infrastructure and the Local Plan does not account for this.	<p>The Joint SHMA has explored the housing requirement across the whole housing market area. Further the authorities within the sub-region have agreed an approach to address any possible shortfall in housing land availability. This is set out in Policy DS20.</p> <p>Ongoing Duty to Cooperate discussion are taking place to ensure housing requirements are met in full. This include Cooperation with Birmingham and other authorities within the West Midlands conurbation</p>
Many people from outside the area may choose to live at the dwellings proposed at Gaydon rather than within the District.	
Warwick District Council has not effectively exercised its Duty to Cooperate with Coventry in cross-boundary housing provision or any other neighbouring authorities and therefore has not conformed to the NPPF (Paragraph 47).	
It would be more cost effective to develop on one site such as the New Town proposed at Gaydon.	
Joined up thinking across the County is required for both policy and capacity.	
If new homes are provided at Gaydon for Jaguar Land Rover and considering its proximity to Banbury, then Warwick will need to grow less.	
Should not be competing with neighbouring local authorities for development.	
Until the publication of the JSHMA, the Council cannot fulfil its Duty to Cooperate.	
Other adjoining authorities are progressing plans which do not meet all of their own objectively assessed needs.	
Stratford is not part of the JSHMA and the proposal at Gaydon will invalidate their plan and potentially Warwick District JSHMA.	
The development proposed by Stratford District Council at Gaydon will provide homes for workers at Jaguar Land Rover. This is part of Warwick District Council's plan and therefore housing needs have been double counted. Taking account of these homes could reduce Warwick District Council's proposed level of growth.	

<p>If the Council cannot meet its objectively assessed housing need through its plan, it will need to ensure that these needs can be met elsewhere within the District but the draft Local Plan makes no reference to this issue.</p>	
<p>People in the villages of Gaydon and Lighthorne Heath travel to Leamington to use the retail services. This is beneficial for the economy and can continue without new homes.</p>	
<p>Kenilworth is well placed to accommodate some of the housing needs expected to be identified by Coventry. The Warwickshire Gateway and development at Coventry would be well related to additional housing at Kenilworth.</p>	
<p>The legal requirement to liaise with Coventry and other surrounding towns does not extend to a legal requirement to agree to developing land within Warwick District.</p>	
<p>The extent to which Warwick District Council should meet national and regional housing need depends on a host of environmental considerations (e.g. transport, Green Belt) and therefore there are circularities in the reasons because these factors are policy variables. It is reasonable to argue that environmental considerations should be given heavier weight than elsewhere and therefore the appropriate contribution of Warwick District to meeting national need is very small or even zero.</p>	
<p>Coventry cannot meet their housing targets within their own administrative boundary and therefore development is necessary adjacent to the urban areas into Warwick, Nuneaton and Bedworth. Warwick District Council should work with Coventry to assist in providing a proportion of Coventry's housing requirement.</p>	
<p>Under the NPPF (paragraph 47), Warwick District Council must address their own market and affordable housing need before any need associated with Coventry is considered.</p>	
<p>The outcome of the Joint SHMA could conclude that the housing need in Coventry will be higher than that which can be accommodate within its administrative boundaries and therefore Warwick District may need to identify a higher level of growth.</p>	
<p>The West Midlands RSS Revision Phase 2, which was not adopted, proposed that WDC allocate 3,500 dwellings within its boundaries to the south of Coventry to accommodate Coventry overflow. Should Warwick District be required to accommodate a proportion of Coventry's growth, a Green Belt review would be required since Coventry City is surrounded by Green Belt.</p>	
<p><b>Consultation</b></p>	
<p>Previous consultation feedback has been disregarded such as; in 2011, 58% of respondents were in favour of low growth and 97% of the respondents objected to the level of growth proposed in the Preferred Options Report 2012. The increase in proposed housing numbers since public consultation proves that the consultation process is undemocratic, bureaucratic and localism is an ideal which is not being practiced.</p>	<p>It has not been possible to match the evidence regarding housing requirements with the majority of public opinion. As the Plan has to be soundly and proactively prepared, the Council has based proposals on a level of growth that is consistent with the evidence.</p>
<p>The various lower housing needs proposals that have come forward are similar to those which the public support in the 2011 consultation.</p>	

<p>The Council have already decided on the housing numbers and therefore the consultation makes no impact.</p>	
<p>Our Council only has two councillors in its Executive that will be affected by this Local Plan and therefore politically they cannot make local opinion count.</p>	
<p>Unsure as to why the Council have consulted at this stage on the basis of interim housing figures rather than waiting for the SHMA to be completed.</p>	
<p>Given the publication of the JSHMA in 2014 and its importance to the Local Plan, the Council need to deliver a further round of consultation on the output of the SHMA prior to publishing a Submission Draft Plan.</p>	
<p><b>JSHMA and SHMA</b></p>	
<p>The Council cannot use the 2012 SHMA Final Report as the main evidence source as it is not compliant with the NPPF.</p>	<p>See comments above regarding the Joint SHMA and duty to Cooperate.</p>
<p>Should not build more homes that required if the neighbouring districts cannot fill their quota.</p>	
<p>The District must not become the repository for numbers not wanted elsewhere.</p>	
<p>The JSHMA is only at the start of its process and will have a significant bearing on the overall figures and therefore the 12,300 estimate should not inform the remainder of the RDS.</p>	
<p>The 2012 SHMA said that overall Warwick District had a 'very good jobs-home balance'.</p>	
<p>The Interim Growth Level proposed is not robust without the results of the JSHMA and the results of the JSHMA will provide a more accurate profile of the objectively assessed housing need.</p>	
<p>The 2012 SHMA is not compliant with the NPPF as it only assesses housing and employment growth within Warwick District and not the wider housing market area. The identification of the Warwick District final housing figure needs to be delayed until the findings of the 2013 SHMA.</p>	
<p>The SHMA does not address what the market need will be in the District in addition to the need for 696 affordable dwellings per annum and therefore the SHMA does not satisfy the NPPF requirements (Paragraph 159).</p>	
<p>Until the completion of the JSHMA and the implications of the study are discussed between authorities, Rugby Borough Council and Nuneaton and Bedworth Borough Council cannot make any comments regarding the soundness of the RDS [REP ID:55332; 55131].</p>	
<p>The 2012 SHMA identifies a net affordable housing need of 698 units per annum which is above the need for new market housing. The Council has an acute need for more affordable housing.</p>	
<p>The 2012 SHMA was published in advance of the publication of the final NPPF.</p>	
<p>The 2012 SHMA identified a net affordable housing need within the District of 698 units per annum which is above the need for new market housing. Despite the requirement for affordable housing, the SHMA figure is above likely and realistic levels of housing delivery.</p>	

<p>Following the Joint Housing Market Assessment, the number of homes required in the District should be stated more clearly. Figures in the consultation document are confusing.</p>	
<p><b>Green Belt</b></p>	
<p>The area has already experience huge growth which has largely been to accommodate people moving from Coventry and Birmingham. Continued expansion at the rate proposed will draw others in on a self-fulfilling circle of growth and cause further degradation of Green Belt land.</p>	<p>See responses to RDS4 and “Whole Area (paragraph 5.1)</p>
<p>If housing numbers were reduced then the destruction of the villages and Green Belt that characterise the District and make it an attractive environment could be avoided.</p>	
<p>The allocation of homes on greenfield sites would have a negative effect on the Green Belt and destroy valuable agricultural land. This is not a sustainable approach and therefore contradicts the vision of the Local Plan.</p>	
<p>Proposed level of growth would damage an attractive part of countryside.</p>	
<p>Greenfield land should not be allocated for development based on inaccurate projections as once used it cannot be recovered.</p>	
<p>The proposed homes would encourage an urban to rural migration and rural areas would eventually become urban.</p>	
<p>Other Councils have overcome their Green Belt and made modifications to development proposals.</p>	
<p>The use of the term ‘Garden Suburb’ does not justify building on greenfield land.</p>	
<p>The Green Belt needs to be respected despite the Government being more flexible on this principle.</p>	
<p>A local planning team with an understanding of the local area would not have suggested such a large development on greenfield land.</p>	
<p>The RDS states that high quality landscape should be protected and therefore the land south of Warwick should be removed from the plan.</p>	
<p><b>Economic Impact</b></p>	
<p>The Jaguar Land Rover expansion will provide residents of Stratford and housing proposals at Gaydon and Lighthorne Heath with employment opportunities not residents of any Warwick District developments.</p>	<p>See employment land review, the Joint SHMA and policies DS1, DS2, DS6, DS7, DS8, DS9 and DS16</p>
<p>Current local business in industrial estates will suffer due to the increased volume of traffic.</p>	
<p>The local economy needs re-organisation and adjustment to changing technologies. 12,300 homes are not needed for this happen.</p>	
<p>Should sources of employment to meet the additional population not be provided then there will be a need to commute. This will put further pressures upon public transport and the road networks, particularly at Warwick and Leamington railway stations.</p>	
<p>Such a large quantity of extra homes would depress the value of existing properties.</p>	

<p>The provision of an excessive level of homes will encourage people to move into the area from Birmingham and Coventry. The new influx will commute to their place of work, contributing to the dormitory effect and creating additional car movements and congestion which does not support sustainable development.</p>	
<p>The proposed development would impact the attractiveness of the District's towns, villages and countryside and reduce the strict control on development, all factors which make the area economically successful.</p>	
<p>Increasing the population would increase the Council Tax Base for the District but it would undermine the viability of the town centre and old suburbs leading to neglect and loss of attraction of the town.</p>	
<p><b>Infrastructure impact</b></p>	
<p>Even with the planned infrastructure changes, there is not sufficient infrastructure to support such a growth in population.</p>	<p>See IDP and responses regarding RDS4 and "Whole Area", Para 5.1</p>
<p>Appendix E of the Transport Assessment shows that traffic queues will be worse. Further studies on the potential transport impacts need to be undertaken.</p>	
<p>The total number of houses proposed in the Plan would require considerably more money from CIL to finance the infrastructure. There are no details as to where this investment would be sourced. The RDS is therefore unsustainable.</p>	
<p>Large amounts of farmland will be lost with the construction of the new HS2 rail line. The cumulative effect of this land loss has to be recognised.</p>	
<p>Any upgrades to infrastructure would put additional strain on surrounding infrastructure and cause considerable inconvenience for local residents and businesses.</p>	
<p>There has been a lack of consideration for the impact development such as that at Gaydon will have on Warwick and Leamington's infrastructure.</p>	
<p>An integrated improved local transport policy has not been put forward.</p>	
<p>The increase in traffic will impact on the health and safety of pedestrians and cyclist and the Council do not have the ability to provide safe and acceptable cycling and walking facilities which will be needed.</p>	
<p>Uncertain as to whether the Council will have the funding to expand the needed infrastructure to support 12,300 homes.</p>	
<p>Development of this scale will make Warwick less pedestrian friendly.</p>	
<p>Traffic mitigation measures will not resolve the problem of traffic congestion especially given the District is constrained by natural barriers such as rivers and the railway and bridges at these crossing points will become a bottleneck.</p>	
<p>Emergency services have problems reaching destinations because of cars parked on narrow roads.</p>	
<p>Uncertain as to whether bridges used by traffic can withstand the weight and volume of vehicles.</p>	

Development could cause risks to water supply, drainage and sewage systems.	
The infrastructure requirements will make the development financially unviable.	
The timescales for infrastructure delivery need to be more realistic than those of Chase Meadow.	
Traffic lights at the roundabout near Campion School Whitnash are needed as many cars fail to stop for children crossing the road.	
Local schools, doctors and hospitals are already at capacity. The local hospital cannot expand as it is constrained.	
The Local Plan needs to demonstrate how infrastructure will cope and how improvements can be delivered.	
Traffic congestion will be worsened at; Warwick High Street/Jury Street, Avon Bridge, Europa Way, Banbury Road, Myton Road and Emscote Road.	
The infrastructure improvements required will be unaffordable and make the proposed developments unsustainable. The WDC Infrastructure Plan published May 2012 allows for only 8250 new homes over the 18 years to 2029. The new Local Plan proposes another 50% on top of this.	
<b>Migration</b>	
Suspect the proposed level of housing is required for immigration from the EU, rather than our future generations. Influx of Eastern European migrants has had a big impact on the local area.	Migration assumptions are covered by the ONS projections. This in turn is reflected in the Joint SHMA and the level of growth identified in DS6
More than 50% of national growth over the last two decades is from immigration. As the Government wants to reduce net immigration, Warwick District should not be planning for a greater level of growth over the next 15 years. Recent Government figures have shown a decrease in migration numbers.	
The forecasts anticipate a repeat of migration into the area which has been associated with the particular circumstance of recent years.	
Local Development Framework Annual Monitoring Report 2011 noted that a high rate of house building is fuelling migration to the District.	
Building the high level of homes proposed will encourage more migration to an area. This appears to be meeting demand but the demand is a response to supply.	
The SHMA Final Report (March 2012) acknowledged that past migration trends have been influenced in part by the past levels of housing delivery.	
Warwick District Council aims to achieve the economic growth rates in line with national forecasts by taking other areas working age population. Importing extra people will not increase the wealth and wellbeing of the overall population and it is more likely to have the reverse effect.	

<p>Any level of housing above 5,400 indicates that the Council are more concerned with attracting people from outside of the District rather than supporting its existing population. The level of growth proposed therefore is not planning for objectively assessed needs of the District making the Local Plan is unsound.</p>	
<p>Warwick District Council are adopting a similar case to Stratford-upon-Avon by supplying housing for people that want to live in the area rather than building where current infrastructure could support such homes.</p>	
<p>The Council need to cater for affluent incomers from Birmingham and Coventry and increase the overall level of housing supply to accommodate those on low to medium incomes to prevent them being priced out of the market.</p>	
<p>Estimating housing need in Warwick District involves forecasting migrating within the West Midlands including outward migration from Coventry and Birmingham. The methodology is completely unsound in that migration into Warwick District will depend on the availability of housing in the District and elsewhere are so the reasoning is circular. This problem affects every aspect of the forecasting.</p>	
<p><b>Environmental Impact</b></p>	
<p>As a result of increased congestions, the level of homes proposed will create more pollution and subsequent reduction in air quality. These are factors which have not been considered in the RDS.</p>	<p>Landscape and ecology studies have been undertaken and although there impacts, the studies indicate that these can mitigated and that the location proposed for development are suitable. Areas of high landscape value have been avoided as have areas of the highest ecological significance. Policies NE3 and NE4 further address ecological impacts</p>
<p>A 40% increase in Warwick's population over 15 years is unsustainable and will cause irreversible damage to the character and heritage of the town and impact tourism.</p>	
<p>There will be a loss of wildlife and agricultural land as a result of building on greenfield land. Farmland provides us with food security which should never be compromised.</p>	
<p>The land being proposed for development should be defended in line with the Richard Morrish Landscape Assessment.</p>	
<p>Should the proposed levels of homes be built they will impact on the quality of life of residents in the town and its suburbs and people will move out of the area.</p>	
<p><b>Windfall Projections</b></p>	
<p>Policy RDS2 includes a large windfall allowance of 2,800 dwellings equal to 23% of total housing requirement. Such a windfall allowance is not justified in Paragraph 49 of the NPPF. In adopting this approach the authority are unable to demonstrate a supply of 12,300 dwellings.</p>	<p>The windfalls paper has been reviewed and the Local Plan proposals include a reduce amount of windfalls (2485)</p>
<p>The windfall allowance ignores the evidence from the SHLAA which identifies the need for 300 dwellings on small urban sites.</p>	
<p>The evidence for the windfall allowance is based on a subjective manipulation of past trends rather than consideration for the potential capacity of urban areas to accommodate such a level of windfall development.</p>	
<p>The inclusion of significant windfall provision through the Local Plan period should not exclude the contribution that can be made within larger settlements in the Green Belt.</p>	

<p>According to the NPPF (Paragraph 48) the Council can make allowance for windfall sites in the five-year supply providing they have evidence that sites have consistently become available and will continue to provide a reliable source of supply. Warwick District currently has only a 2.6 year supply of housing land.</p>	
<p>The Council need to bring forward a number of smaller and more deliverable sites in the short term to boost its five-year supply.</p>	
<p><b>NPPF</b></p>	
<p>The NPPF seeks development at all costs.</p>	<p>The preparation of the Joint SHMA has been undertaken to comply with the NPPF.</p> <p>All the plan's proposals seek to be consistent with the NPPF.</p>
<p>The level of growth proposed would be such that 'the adverse impacts would significantly and demonstrably outweigh the benefits' (NPPF, Paragraph 14).</p>	
<p>The Interim Level of Growth fails to address the requirement of a 5% or 20% buffer on the overall housing figures and is therefore contrary to the NPPF (Paragraph 47).</p>	
<p>An insufficient number of empty homes have been identified by the Council (NPPF 51).</p>	
<p>As provided by Paragraph 86 of the NPPF, nucleated and compact settlements which make no contribution to the openness of the Green Belt should no longer be washed over by Green Belt policy.</p>	
<p>The selection of a housing figure which fails to meet the identified housing need of the area and includes the current five year land supply shortfall will create an unsound Plan. The NPPF requires a flexible approach to respond to an increase in housing demand which the Council does not currently have.</p>	
<p>The Council should seek to meet Paragraph 14 of the NPPF and deliver a strategy which meets the full objectively assessed needs for market and affordable homes. The Interim Housing figure does not meet this requirement.</p>	
<p>NPPF requires the approval of sustainable development which meets an established housing need, but planning applications already made or imminent for much of the land meet neither of these criteria.</p>	
<p>The NPPF is only part of a broad pro-growth strategy. The NPPF states that 'significant weight should be placed on the need to support economic growth through the planning system'.</p>	
<p>To comply with the NPPF, development should not be subject to such a scale of obligations that threaten viability. The Council need to justify the infrastructure requirements via an Infrastructure Delivery Plan.</p>	
<p>If submitted for Examination, the RDS would fail all tests of soundness set out in the NPPF (Paragraph 182).</p>	
<p>To make provision for longer term development needs, the Local Plan should identify 'Safeguarded Lane' (NPPF, Paragraph 85). If a site is not required to meet housing needs arising within the Local Plan period then it should be excluded from the Green Belt to meet possible future development requirements beyond the Plan period.</p>	

As the RDS states that there is not a five year supply of land for housing within the District as required by the NPPF, the Council need to release more development land in wider locations and bring forward sites sooner that were to be delivered later in the Plan period.	
The NPPF fails to mention or highlight the need for food security. At this uncertain time, the protection and maintaining of all available farmland is crucial.	
<b>Other</b>	
The assumptions used in the Council's Viability Assessment do not correlate with the recommendations of the Harman Report and therefore there is a significant under estimation of actual costs.	The viability Assessment was undertaken by an experienced consultant. The Council believes this was a robust piece of work
Committing to a Local Plan that extends to 2029 and spans many future elections removes rights to show disapproval through the ballot box.	The Plan must be prepared with a 15 year time horizon
The Plan should be legally challenged immediately to avoid tax payer's money being spent on plans that are likely to be legally challenged.	No comment required
Using exaggerated housing figures in support of short term expedient planning applications would override the plan process before it reaches Examination in Public would open the Council to legal challenge.	The housing figures are not exaggerated – see Joint SHMA
Security and the economic and social wellbeing of our country is now under threat from over-population. Crucial to any housing strategy is a population strategy.	The NPPF requires us to meet objectively assessed housing need in full
Once the new homes are given planning permission, it is difficult to stop development leaving the developers in control.	Planning permission is intended to enable development to come forward
The Local Plan period is not clear as the 2012 SHMA refers to the period between 2011 and 2031; the RDS refers to a period between 2011 and 2029 and the RDS Introduction, a 15 year time period	The Local Plan has clarified this. The Plan period is 2011 to 2029
Some prioritisation or a hierarchy of sites is needed to allow a balanced scaling back if less homes are needed in the final analysis.	The Council has decided to leave phasing to market forces.
All of the desirable social, economic and environmental targets are unobtainable together.	The Local Plan seeks to maximise these three, but inevitably a balance needs to be struck to reflect local and national aspirations.
The proposed Country Park is an irrelevance as it does not ease local concerns or oppositions.	It seeks to provide a valuable facility that will hopefully be appreciated by many people
The RDS contradicts WDC's strategic vision 'to make Warwick District a great place to live, work and visit'. 12,300 homes will not achieve this vision; it will have the opposite effect.	Growth is an important part of this vision.
Need to consider the context of other policies which could restrict development such as Birds and Habitats, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty. These are areas of 'development restraint' where the presumption in favour of sustainable development does not apply.	See policy NE3
There should be no conflict of interest in those who own the land	Noted

and those who are involved in the planning process.	
Given the on-going delays in the production of the Local Plan, the plan period should be extended accordingly and in turn there should be an increase in the housing figures.	The plan period is deemed to be appropriate within the context of the wording of the NPPF
The definition of affordable housing needs broadening.	See policy H2
The Council should not respond to individual applications but create hierarchy of priorities to achieve the District's housing needs, with sequential chose assigned to key objectives.	We have to determine applications that are considered. Policy DS15 seeks to encourage comprehensive proposals
Only between 0 – 25% affordable housing provision was possible on Sustainable Urban Extension Sites. The Council need to recognise that it is inappropriate to set unachievable policy obligations.	The viability assessment indicates that 40% is achievable on most sites
-Viability assessments demonstrate that even with underestimated cost inputs, at the Baseline Market Position no development is viable at 40% affordable housing level.	
Warwick District Council need to consider the conversion of Riverside House and the Fire Station to student blocks and the Council could retain 51% ownership of the sites for future revenue.	Student accommodation could be developed o these sites if proposals come forward
Based on their impact on the area, Houses in Multiple Occupation and students are not given sufficient examination and the Local Plan should address how it expects to balance the town between long-term residents and students.	See policy H6
The Local Plan should include a policy which approves proposals for housing which are submitted in respect to the allocations specified, are in accordance with the phasing periods identified and where the proposed scheme is in accordance with the Plan.	See policy DS15

## **RDS2: The housing requirement of 12,300 homes will be met from the following categories of sites**

<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>Overall Numbers</b>	
The process for assessing the housing target is flawed and will lead to the Plan being found unsound.	The level of housing growth proposed is based on the Joint Strategic Housing Market Assessment undertaken in 2013. This was undertaken in conjunction with the other Districts in Coventry and Warwickshire and in accordance with the draft National Planning Practice Guidance published in 2013.
Table 1 is premature as work is continuing on the Strategic Housing Market Assessment. The figures should be in line with ONS 2008 projections.	
Table 1 should be amended indicating a total of 13,300. The table should reflect the need to provide sites to accommodate extra dwellings.	
The proposal for 12,300 homes exceeds local need which is approximately 6,000 homes. There is no need for further allocation of development.	
6,000 homes would provide for natural growth and can be	
	The Council is of the view that this provides a robust and sound evidence base for the housing requirement for Warwick District

accommodated without massive infrastructural changes.	and the Local Plan proposals therefore accord with this closely
The increase in housing estimates from 10,800 to 12,300 is without foundation and is still subject to review. 5,400 houses would equate to more than an additional 10,000 people and 15,000 vehicles, which will result in extra traffic congestion and air pollution.	This was completed after the publication of the Revised Development Strategy and so was not reflected in the RDS proposals.
The number of homes required is not representative of local needs.	The ONS projections are the starting point for this study and delivery in previous plan periods, vacant properties, changing household sizes, the impact of the economy and affordability were all considered as part of this study
The WDC Empty Homes Strategy should be taken into account in the identification of new homes. There are number of empty homes in the District which need to be utilised first.	
The whole strategy is based on a false set of figures which do not reflect the population growth of the resident population and this could lead to consequences for the Council and Plan.	
It is unclear as to how the Council has arrived at the figure for 300 small urban SHLAA sites as being deliverable since these sites usually have complex ownership and assembly issues. It is unclear as to whether these sites can be developed.	These sites have been individually assessed. All are deliverable within the Plan period
The local plan needs to demonstrate maximum flexibility to ensure delivery of an objectively assessed housing need in accordance with NPPF. The provision of a 5% or 20% buffer in its land supply must be addressed to be compliant with the NPPF.	The buffer applies to the 5 year land supply, not to the allocation of sites for objectively assessed need. The Draft Local Plan includes some provision for flexibility. See below for comments on the 5 year supply
The recent appeal decision on land south of St Fremund Way demonstrated that the Council could only account for a 2.6 year supply of housing land.	Until the sites allocated in the Local Plan can be included in the 5 year supply it is likely that there will continue to be a shortfall.
Warwick District Council is unable to demonstrate a five year housing land supply and this is contrary to the NPPF (Paragraph 47) and therefore more land for housing needs to be released beyond those locations in RDS5.	The Council has applied a 5% buffer. See the 5 year Land Supply paper on the website for details regarding previous supply of housing
The RDS makes no reference to identify whether the Council will apply a 5% or 20% buffer.	
The Council has consistently underperformed in meeting its housing delivery, which is not recognised with the document and accordingly there should be a 20% buffer applied.	
There is a lack of suitable, sustainable and deliverable land proposed to meet even this severely under-estimated need.	The SHLAA demonstrates that this is not the case
<b>Potential Impact</b>	
Warwick District Council should liaise with Stratford District Council about the proposed development at Gaydon/Lighthorne and recognise the impact this will have on Warwick.	Regular liaison meetings have taken place at a senior level since August 2013.
The impact these plans have on of Warwick, a Conservation Area have not been considered.	These impacts have been considered. See paper on website regarding assessment of the impact on the setting of historic assets.
The infrastructure is not capable of supporting development even with highway changes there will still be traffic congestion.	The Strategic Transport Assessment phase 4 indicates that the level of growth can be accommodated

<b>Allowance for windfall sites coming forward in the plan period</b>	
There is a lack of clarity over the level of windfall sites and where these would be. They would have a significant impact on village sites in addition to the numbers proposed for villages.	The windfalls paper has been reviewed in March 2014. It sets out the justification for the level of windfalls allowed for, including looking at past levels of windfalls in different categories and making an assessment as to how each of these categories is likely to change in the future
There is a large increase in the number of units being added through windfalls between the original and revised Local Plan. These amendments suggest that the infill development requirement may have been understated.	
The GL Hearn Employment Land Review Update 2013 identified that the vast majority of employment sites will be protected by the Council for such uses in the future and therefore rates of redevelopment of large sites for residential development are not likely to return to previous levels.	
Insufficient numbers of windfall developments are allowed in the new Local Plan. Considering past trends an average of 377 new homes per year came forward on windfall sites between 2011 and 2011. The new Local Plan only allows 142 per year between 2011 and 2029.	
The Council need to remember that they can make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and continue to provide a reliable source of supply (NPPF, Paragraph 48).	
The evidence based to support the assumptions about windfall rates does not justify the level of growth indicated as it is primarily informed by past trends in strong economic climate with more relax planning policy.	
Windfall level is too high and should not constitute any more than 10% of the outstanding level of housing provision and therefore the Plan is 2,523 dwellings short of meeting this requirement.	
<b>Other</b>	
HS2 has not been considered adequately.	HS2 will have only a marginal impact on housing demand and supply
There have been recent decisions which have indicated that some of the major sites proposed are not deliverable.	All allocated sites have been assessed as being deliverable – see SHLAA
The number of houses in the Primary and Secondary Villages should be increased with less reliance on Strategic Urban Extensions.	Many villages have significant environmental constraints which limits the quantum of development. It is also important to ensure patterns of development are sustainable and placing new development on the edge of urban areas generally provides the best access to facilities.
Existing business/office buildings can be converted into residential properties. Additional office spaces should not be being considered given there is existing office space empty.	This permitted development is for three years only. The extent to which conversions will take place during this time is unknown and in general this relates to those areas where the office accommodation does not meet modern requirements very well.
The proposed Plan supports developers and not the local population.	The proposals seek to support sustainable development as set out in the NPPF.

The number of empty properties in the area needs to be identified.	This has been accounted for in the housing requirements
Student housing continues to be an issues within the area. If more purpose built accommodation like Station House was created then current student occupied housing could be made available to rent or on the open market.	The Local Plan policies allow for this
Should not have to meet the changes in housing requirements within the Green Belt north of Leamington as a result of the joint SHMA.	This is not proposed
New developments at Warwick Gates and Chase Meadow have proved unsustainable.	This is not necessarily the case, even though there are certainly lessons to learn from these developments
The proposal is significantly reliant on sites not identified or allocated within the final plan (i.e. windfalls) and this is not consistent with the NPPF.	The level of windfall are justified – see windfalls paper

### Summary of Matters Raised in Support

Table 1 shows a sensible mix of what is required across the District.	<b>Noted</b>
Alternative site at Common Lane, Kenilworth is consistent with RDS2 and would contribute to a windfall target of 2,800.	
There is some understanding that the interim housing target is subject to change as a result of the joint SHMA and Duty to Cooperate.	
Question whether the windfall sites allowance is optimistic but anticipate this issue will be resolved by the joint SHMA.	
The Council should consider the relationship between the committed employment schemes of Friargate in Coventry City Centre, Warwickshire Gateway and the office allocation at Thickthorn, Kenilworth.	
The development in the Thickthorn area is supported but this may put reliance on this site to produce the majority of Kenilworth’s needs. Further adjustment to the Green Belt in the area north of Crew Lane and east of Glasshouse Lane would bring two smaller parcels of land into the equation.	

### RDS3 Preferred Option for the Broad Location of development

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
<b>Green Belt/Rural issues</b>	
The downside of maintaining the Green Belt is addition development in the south, allowing Warwick and Leamington to spread and encouraging them to coalesce with villages.	The Local Plan Spatial Strategy (see Policy DS4) seeks to protect green belt land unless exceptional circumstances

Green field sites should not be built upon where there are brownfield options. If brownfield sites cannot meet the housing needs the location of additional housing must be sympathetic to the existing settlements and infrastructure issues.	<p>can be justified. This is consistent with the National Planning Policy Framework. This includes locations around Kenilworth, eastern Leamington and a number of villages.</p> <p>As there is insufficient brownfield land to provide for the required level of growth, this means that greenfield sites need to be used. The Strategy seeks to ensure these greenfield sites are in the most sustainable locations – e.g close to services and employment whilst limiting impact on the environment and existing communities.</p> <p>This means that many of the sites are on the urban fringe in areas outside the green belt.</p> <p>The Draft Local Plan includes a much greater emphasis on brownfield sites with brownfield allocations providing for 1330 dwellings.</p> <p>To support sustainable villages, 763 dwellings are also proposed on sites in or adjacent to the District’s main villages. The services, character and size of villages has been assessed to develop a village hierarchy. This turn has shaped the level of housing that could be accommodated in each village. The final stage for village allocations has been to look at site capacity. This has meant the quantum for each village has been adjusted to take account of environmental constraints.</p>
The Green Belt is merely an excuse- It has been overridden in the case of Hampton on the Hill and it seems it is acceptable to build on the Green Belt as long as it is not in the north.	
Green Belt and green field should be regarded in the same light and the same considerations applied to all rural areas.	
WDC needs to challenge the Green Belt.	
Development areas to the north of Leamington should be reinstated following a review of the green belt land around Warwick and Leamington.	
The Green Belt should be relaxed if need be to allow more development to go north.	
Difficult to see why houses should be built on greenfield when brownfield land in Coventry and Birmingham is available.	
70% of housing is concentrated in the south to protect the Green Belt but there is insufficient provision for the green field sites in the south.	
There are occasions when small Green Belt releases are more beneficial to the development of the District than the development of non-Green Belt sites due to the likely landscape impact. There are sites on the edge of Coventry where this would apply including land of Howes Lane which has previously been promoted by the owner.	
I dispute that no building can take part on the green belt to the north as the council have already allowed green belt land to be included in the Gateway project.	
The exceptions given in the NPPF 89 and 90 to development of Green Belt do not apply to the Local Plan.	
The proposed Country Park at Bishop’s Tachbrook would be ineffective as the excessive new homes would be highly visible and the beautiful views we currently enjoy would disappear.	
The revised plan seems to imply Green Belt areas are more important than the heritage and historic value of Warwick.	
The Council has to date rigorously resisted any development that reduced the gap between Bishop’s Tachbrook and Whitnash/Warwick. The NPPF requires the district to continue to implement those policies.	
WDC should revisit its Green Belt policy and release sites to the north which would reduce the pressure for all forms of development.	
In respect of the large more sustainable Primary Service Villages Green Belt release should be considered a necessary requirement of the Plan in order to deliver housing to meet needs in the location where it arises, and in order to underpin the sustainability and viability of such settlements.	
Green Belt designation should not influence the direction of urbanisation in one area of the City.	
The Green Belt is an arbitrary line. The A46, which runs through it, would provide infrastructure to accommodate new	

development.	
Stratford have stated that there are exceptional circumstances to develop on certain areas of the Green Belt, WDC should take the same view and build on land in the north of the district nearer employment.	
The Plan has not adequately demonstrated that all non-Green Belt sites have been exhausted.	
Concern is expressed in relation to proposals for large scale Green Belt release at Kenilworth. since the proposed allocation comprises a significant tract of land fully within the Green Belt which, to some extent, performs a Green Wedge and assists in avoiding coalescence between settlements.	
The loss of green land is being dictated by the apparently willingness to provide developers with land to develop and to massively over provide for the housing needs of the Warwick District and that in order to achieve maximum funding from development it needs to be allocated in large blocks.	
It is important to note that Chapter 9 of the NPPF makes it clear that the Green Belt, which covers the northern 80% of the District, does not represent an insuperable barrier to development.	
If WDC decides to ignore the views of the electorate and to proceed with an overlarge number of new houses, it should undertake a strategic review of the Green Belt to determine whether exceptional circumstances prevail to justify redrawing green belt boundaries to distribute the new housing in a balanced way around the district (In accordance with requirements of NPPF para 83).	
The Low Carbon Action Plan in 2012 is not reflected in the local plan document.	See policy CC3
Housing on green field sites should be at level 5 of the code for sustainable homes.	See policy CC3
The Council has an overall target for affordable housing of 40%, but green field developments, should have a higher percentage of affordable homes - 50% than brownfield sites, to encourage brownfield development. This would strengthen the hand of the Council in negotiation with construction companies.	The Affordable Housing Viability Assessment indicates that 40% is an appropriate level for affordable housing
Farmland that is being earmarked for development is medium to high grade and should be retained.	The allocation of housing sites has balanced a number of factors including agricultural land quality. The Council considers that the need for housing and the protection of the green belt should override this.
The District is 85% Green Belt but 45% of this is to be built on.	The vast majority of the green belt is to be retained (much higher than 55%)
There is no reference to the Joint Green Belt Review, 2009.	This has provided evidence to assess which urban fringe green belt sites should be brought forward
Land south of Warwick including Warwick Castle Park, The Asps and proposed G & T Sites 5,6,9 and 10 should be allocated as Green belt.	Extending the green belt requires the purposes of the green belt to me and the circumstances to be justified. This has been considered and the Council believes that it cannot be justified.
WDC should consider allocating an area of land to the south of Warwick and Leamington, including the Asps and several of the	

possible Gypsy sites as green belt to provide a buffer to proposed development to the south of Warwick and Leamington or extend the Tachbrook Country park as far as Banbury Road.	Sites that are not allocated in the Plan have protection through the Local Policies
The identity and boundaries of the villages should be protected by green belt including proposed G & T Sites 12, 16, 20.	
The environment in the Crackley Gap will be devastated by HS2.	Noted
<b>Transport</b>	
<b>Specific roads mentioned due to either traffic or pollution: The Butts, Smith Street, Myton Road, Bridge End, Avon Bridge, Banbury Road, St Nicholas Street, Mill Street</b>	
The traffic proposals provided may ease junctions but are unlikely to lighten traffic in any meaningful way and will significantly urbanise the rural fringes out of all recognition - see Tachbrook Road/Fosse intersection if in doubt.	The character of some areas close to strategic housing allocations will inevitably change
Town centre car parking will be put under further pressure.	There is capacity in all three towns to accommodate this. Further work will be done as part of the demand management transport study.
Transport issues connecting the north to the south need addressing or risk splitting the town in two with Leamington losing out to Stratford and Solihull	See transport mitigation responses (including Strategic Transport Assessment Phase 4 and the Air Quality Assessment)
Traffic lights and signage will be an eyesore especially around Castle Bridge.	
The transportation strategy is car based and will simply be squeezing more congested traffic onto the existing road network which is already totally inadequate. The transport strategy needs revising.	
The location of the housing is inappropriate. The new developments by Coventry Airport, as well as the economic centre of gravity north and northwest of Warwick will attract travel north from Warwick and Leamington, so putting homes south of those towns would generate traffic trying to go through them both, making both towns busier.	
There is no evidence to suggest that the proposed infrastructure changes will provide significant improvements to ease congestion.	
The widening of junctions, greater use of traffic lights and the addition of wider lanes can only make Warwick appear to be a few buildings in the middle of a traffic-centred sprawl.	
The traffic plan will push tourists away.	
Cycle routes are mentioned only on passing. They should be a key factor in new transport planning to / from town centres and stations / transport hubs.	
There is a lack of road infrastructure which could support such numbers of homes around Warwick and Leamington.	
The two towns are very unusual in that they have three barriers to the passage of people and traffic. From north to south and vice versa: a railway, a river and a canal. As such, in Leamington, there are just three narrow single carriageway routes joining the two halves. They will not be able to support any increase in traffic. And in Warwick there is the medieval town and castle to navigate around. What is already a nightmare for pollution will only become worse.	

Transport and adequate road provision is far from satisfactory which will affect the air pollution and general environment.	
RDS would require a very substantial increase in car journeys.	
The increase would mean at least 12,000 more cars on the road and the road network wouldn't cope.	
Pollution from car exhausts in many streets in Warwick and Leamington is already worse than legally permitted. More cars will worsen this and worsen noise and vibration which will damage business, tourism and health.	
Delay decisions on development land allocations where traffic assessments are currently inadequate.	
The multi lanes in Banbury Road and Myton Road will not be successful in overcoming the overall mass impact of thousands of additional vehicles especially during rush hour.	
Children won't be able to walk to school due to raised pollution levels and it being too dangerous.	
Roads are currently gridlocked at peak times despite recent improvements to Princes Drive.	
What recognisance has been made for the high increase of air pollution that will occur if the planned number of dwellings proceeds?	
There are not enough river crossings for more cars.	
Warwick was designed to deal with 17 <sup>th</sup> and 18 <sup>th</sup> century traffic and is already choked by congestion and grid lock.	
Theatre Street in Warwick is already polluted with traffic.	
The majority of housing will have a massive impact on congestion making it even more severe at crossing over the canal, river and railway in the area.	
The location of the housing would encourage greater car dependency.	
12,000 homes will overload the traffic system for Warwick and the surrounding areas out create unacceptable levels of pollution around the Warwick and surrounding areas leading to poor health for residents.	
The increased traffic would mean that the Avon Bridge would be at risk of failing.	
The County Councils past traffic management schemes such as in Warwick and at Princes Drive do not give confidence.	
Warwick will not cope with additional traffic if Gallows Hill development is built.	
An increase in traffic will be dangerous for those going to Myton School, Warwick Prep School, King's High School, Warwick School and at least 2 nurseries. The pollution will also increase asthma here.	
The expansion of Europa Way is much easier than expanding Kenilworth Road.	
The NPPF states that development will not be permitted where it generates significant road traffic movements. I do not see how this can be achieved.	
Appendix E of the Warwick Strategic Transport Phase 3 Assessment shows traffic speeds of only 0-10 mph in large parts of Warwick. Any increase in traffic will make this situation worse.	

Rather than increasing trade in the town centre it is likely that people would be put off visiting the shops because of the volume of traffic.	
Concerned in particular about capacity of the Princes Drive bridge.	
Modern development ought to have green transport solutions built into it from the start but the plans for new houses as they appear to be set out at the moment seem to assume high car usage.	An alternative based on managing demand from cars in urban areas is being explored alongside the Local Plan proposals
The approach to traffic assessments should be modified so that they are no longer geared to development areas that achieve a critical mass that would fund costly road proposals and this traffic assessment should take into account impact on historic buildings and conservation areas.	Historic environment has been taken in to account in site selection and will be considered in detailed junction design
Introduce measures in the traffic assessment that will implement agree policies to reduce the level of traffic in and through Warwick Town Centre.	To supplement the work done in the Strategic Transport Assessment, WDC and WCC are working together to undertake a Demand Management Transport Study which will look at options to reduce traffic in the towns and reallocate space to sustainable form of transport. This will include the role of park and ride
The implications of such major developments will have on current transport networks and the feasibility of how this will cope and the scope of developing alternative networks should be reviewed.	
When establishing a park and ride site take greater account of the predominant patters of journeys to work affecting Warwick and Leamington and provide a location that captures traffic and reduces cross town flows by giving priority to a location north of Leamington.	
We are concerned that the RDS doesn't take best advantage of the opportunities available to rebalance towards more sustainable modes.	
The HS2 route passing through the Crackley Gap and on to Burton Green will have a dramatic effect on the town.	
The construction phase and completed railway will potentially affect thousands of homes.	Whilst not directly an issue for the Local Plan, it is important that the traffic impacts of construction traffic is understood
A survey by Salford University of the Warwick Castle Bridge has found it wouldn't cope with the extra burden of traffic.	WCC engineers have indicated otherwise
Apart from pollution and associated health issues, fire and ambulance services would also face delays.	This would only be the case if congestion was significantly worse. There are opportunities to relocate fire and ambulance services as part of the proposals
There is no allowance in the Local Plan for the needs of pedestrians.	The Local Plan (policy TR1) and the IDP make reference to pedestrians
The Strategic Transport Assessment deals with the highway network as a purely traffic management problem but the network relates to a historic, living and dynamic town and which has not been considered for example, the daily needs of pedestrians, businesses and their customers and supplies, residents' parking and the health of residents.	The STA is a focused piece of work. The Local Plan as a whole seeks to address these other considerations
Would like to see developers making more effort to add traffic free zones where it is safe to cycle. At present the cycle path system is very disjointed and difficult to follow.	This is included in the Local Plan (policies TR1, TR2 and TR3) and the IDP. The Demand Management

A lack of integrated provision for enhanced cycling, walking and bus travel is a major deficit for the whole plan.	Transport Study which will look at further options.
The Local Plan should ensure that housing, employment and community facilities and in line with the Low Carbon Action Plan Appendix V point 4.1- Walkable Communities.	See policies to encourage sustainable transport and Policy CC3
The provision of effective high quality bus services is undermined by the relatively low housing densities involved and likely stock mix. The large development footprint proposed south of Harbury Lane will not be easy to serve by a single high frequency bus route.	A scheme for buses to serve this area is put forward and costed in the IDP. The detail of this should be worked up as part of the detailed comprehensive planning of this area.
Higher densities might be justified in Myton Garden Suburb adjoining this bus corridor, either on the eastern flank if the service uses Europa Way, or, if a bus priority corridor were delivered within the scheme, within 250-300m of that.	
<b>General</b>	
A new doctors surgery will be needed.	See IDP
Warwick Hospital will not cope.	
The nature of the town and the castle will be irreversibly damaged.	The proposals seek to retain the best of the town's features and to deliver a sustainable and prosperous future for the District
12,000 houses is too many. It will ruin the local area.	
The plans will ruin the visual look of Warwick forever. We need to conserve the beauty of Warwick, not destroy it.	The retail study and Town Centre policies address this.
The proposal does not take into account the shift in commercial demands. There are many commercial properties in the centre of Leamington and Warwick that lay empty as retailers shift their focus to out of town shopping centres.	
The Local Plan could be improved by spreading development into areas with already established communities and places of work. E.g. Heathcote, Hatton Park and north Leamington	See policy DS4 which sets out the Development Strategy and policies DS7, DS10, DS11 and DS19 which set out how this overarching spatial strategy will be delivered
12,000 homes will increase the population by 29,520, doubling the size of Warwick this will have a massive impact on local communities.	
4,500 new homes south of Warwick is disproportionate to the overall needs of the area.	
Ability of North Leamington residents to lobby against the first plan option of building between Milverton and Blackdown should not mean that there is no development north of the district.	
Contrary to the NPPF (76) in respect of protection of green space. 37% of the 11,000 homes proposed for Warwick District are to be built on the land south-east of Warwick, covering nearly all of the green space between the Banbury Road, Greys Mallory, Europa Way, Myton and the Technology Park	
All rural communities should accept growth of up to %5 of their current housing stock rather than have 70% of new growth in one location.	
There are better alternatives such as lower housing numbers, a gradual releasing of land for development, priority given to use of brown field sites nearer schools, shops and railway stations, homes being built close to jobs and cooperating with other councils.	
The council must ensure housing is distributed to larger villages, smaller villages and hamlets.	

The scale is too high and there will be a significant overdevelopment of the area.	
The building of all these houses in one area will mean the area will effectively become one big building site which is unfair on local residents.	
Proposals are funnelled into the same limited area.	
Proposed New Local Plan is deeply flawed and fundamentally not in the best interest of Warwick or District.	
The overall target for housing needs to be reduced to a more moderate level and to cater for modest expansion.	
The areas for development are unbalanced.	
The land earmarked for development should be reviewed and alternative areas identified.	
The local area only needs about 6,000 which can mostly be put onto brownfield sites.	The JSHMA indicates a requirement of 12860 homes over the plan period
The NPPF states that development will not be permitted where it has an unacceptable adverse impact on the amenity of nearby residents. Primary Schools are already oversubscribed.	See IDP for proposals for new primary school places
Why were brownfield sites that are now supermarkets not used for housing sites?	National and local planning policy did not enable this
Why wasn't the new Morrison's site used for housing?	
Coventry has room for expansion. Development should be concentrated here.	Coventry has a significant housing requirement to meet
There is no evidence that WDC is co-ordinating with local plans of adjacent district councils.	See policy DS20
Should there be a slower phasing in of housing based on estimated local demand releasing land as demand grows rather than an optimistic estimate so far into the future.	In general the approach is to allow sites to come forward according to market forces
The Local Plan should identify 'safeguarded land'	In the local context this is not required and the location of housing beyond 2029 will be dependent on a range of factors which make safeguarding impossible at present
Provision for an independent stadium in South Town that would in due course cater for the Club become professional should be considered.	This is being considered, subject to viability
How will the Plan be funded?	See IDP
What are the timescales for implementation?	See housing trajectory (para 2.23) and the IDP
What employment opportunities will these developments bring?	See policies DS8 and DS9
The field at the bottom of Gallows Hill currently floods, the proposed development would create more concrete and more flood risks.	This site is no longer allocated
There is no policy to protect our parks.	See policy HS2
It would be more sensible to wait until HS2 is finalised and locate housing in the areas close to the line.	As HS2 does not stop in the District, this would not represent a sustainable pattern of development
Increased pollution will be detrimental to many historic buildings in Warwick.	Air quality is forecast to improve during the Plan Period
Serious concerns over the potential impact upon health and wellbeing due to extra pollution especially in the Smith Street and Myton area. Warwick already has poor air quality.	

There pressure on local infrastructure which will be generated by Stratford District Council's plan to build 1500 new houses in the Gaydon/Lighthorne Heath area.	This is being considered through Duty to Cooperate
There are only 4 options presented and each is exclusive of the other; there are no options presented which are simple or complex hybrids. This is narrowing the choice unnecessarily when a hybrid plan may present the best compromise / optimum mix for all. The options do not fully consider the needs across district or borough boundaries. By looking at numbers individually by District or Borough, the choice of options is dramatically reduced and does not consider the impacts on surrounding areas. These artificial political and authority boundaries are not considered by business or residents.	Suggestions for hybrid options would have been taken into account
New open space in the Warwick Gates area did not materialise, what guarantees are there that green space in the new plans will happen?	This will be required through S106 agreements
Effect on the town of Warwick seems to have had very little thought.	This has been given substantial thought – for example assessments of transport, town centres, open space, historic environment, landscape etc
Where is predicted growth coming from?	See Joint SHMA
We should be looking at how to improve the amenities of the town rather than add to its problems.	See IDP, plus policies for town centres, employment, open space, retail, housing, culture and tourism etc
Raises concerns over increasing student/teacher ratios at local schools and the increased pressure schools will be put under is not discussed.	See IDP for school capacity proposals
Increasing waiting time in hospitals and pressure on doctors and nurses but nothing in RDS about building hospitals and recruiting doctors.	See IDP for hospital expansion plans
Do not build on agricultural land- it is precious.	In balancing competing factors WDC (supported by the NPPF) believes the need for housing is more important
There will be a loss of significant open space, countryside and agricultural land.	
Who will repair the Gypsy and Traveller Sites when they move on?	The proposals for G&T sites are for permanent pitches
We shouldn't have to lose Green Belt to Gypsy sites.	Green belt sites will be avoided unless there are exceptional circumstances
Further consultation should go ahead before any planning decisions are made.	There will be an opportunity to make representations on the Publication Draft
There has been no mention or account five to churches. Consideration needs to be given for Church buildings even if they are satellites to the current Parish Churches.	See policies CT1 and CT5
The view from Warwick Castle will be greatly disturbed.	See historic assets settings assessment (on website)
There is a danger to public health as a result of exposure to high N02 levels. Air Quality Plan (2008) identified the entire road network within Warwick centre as exceeding maximum levels. This will worsen problems.	Air quality is forecast to improve during the plan period
Should consider sites already within the towns and regeneration areas, where infrastructure is already in place and could	Brownfield sites are included within the proposals see policy DS7 and DS11

accommodate a large number of dwellings.	
Build student accommodation near Warwick University in Coventry and reclaim the hundreds of dwellings in the south of Leamington to private affordable starter flats, homes and family homes.	The University of Warwick will be bringing forward a Masterplan for increasing student accommodation. This may have an impact on HIMO's in Leamington, but this impact cannot be assessed until the proposals have been detailed
Villages should be expanded with affordable housing supporting the village schools and shops. The towns should remain separate.	See policy DS4 and DS11
Concerned about the house prices in the area. Affordable housing for people is important, however, concerned the proposed development in the south of Leamington and the proposed Gypsy and Traveller Sites will mean an increase in crime and therefore a drop in house prices and increase in home insurance.	House prices are not a matter for the local plan. For affordable housing policy see policy H3
Would stop us moving if our standard of living dropped due to over population and crime increase.	Noted
There will be risks to water supply, sewage and drainage.	See policies FW1, FW2. Flooding has been considered in the site selection methodology.
It will discourage tourists to come to Warwick and therefore destroy local business.	The proposals seek to continue to encourage tourism – see Culture and Tourism section
WDC should be urging and supporting every parish to create their own Neighbourhood Development Plan.	See policy NP1
The plan replicates all the worst planning schemes of the 1960s.	This is disputed
The whole concept of community is being eroded and will be worsened by proposed development.	The Local Plan seeks to support strong communities and contains policies to do this (e.g. DS15, H4, SC0, BE1, BE2, HS1)
More community facilities are needed in the provision.	See IDP
New housing developments are generally too dense.	See Policy BE2
If new houses are required to support the Gateway then they should be provided close to the employment otherwise it will result in pollution and congestion.	The sub-regional employment site is allocated to meet sub-regional, rather than local employment needs. The housing catchments area is therefore beyond Warwick District
All empty properties should be developed before Green field options are looked at.	Empty properties have been accounted for in assessing the housing requirement
There should be consideration of a new settlement in the District.	This option has been considered (see sustainability appraisal)
There will be a big increase in crime.	There is no evidence for this
How will local business be maintained?	See policies EC1, EC2, EC3
Growth targets will place considerable demands on the natural resources of the area.	See policy NE5
The council should thoroughly investigate the impacts on surrounding agricultural land to ensure adequate water resources and drainage capacity is available to cope with the new demands placed on the districts natural infrastructure.	See site selection methodology which has examined these issues at a strategic level. Detail will be covered through planning applications.
The RDS will fundamentally conflict with the NPPF's approach	The Local Plan does address para 84 –

[set out in paras 83 and 84 in respect to the Green Belt] since it does not channel development to the type of areas set out in paragraph 84 of the NPPF.	see policies DS4, DS11, DS19, H10, H11
Priority should be given to lower grade agricultural land.	Agreed
Over half of the village development is channelled towards washed over villages in green belt despite more capacity work is needed and other village capacities are ignored.	See village hierarchy and Policy H10
The Strategy is unsound as it has not been demonstrated to be the most appropriate strategy, it is not consistent with national policy specifically sustainable development and Green Belt Policies.	The Council believes the strategy represents sustainable development and is soundly based
RDS outlines that up to 1,000 homes will be distributed amongst primary and secondary villages in the district. The baseline ecological data for each of these listed villages should therefore be reviewed and updated to ensure that, in accordance with NPPF, any development that comes forward in these areas is justified and informed by up-to-date information about the local natural environment.	Ecology and landscape has been assessed for all growth villages
Why hasn't the empty homes strategy been included in the 5 year plan as there are approximately 1350 empty homes in the district.	This will be considered in the 2014 review of 5 year supply.
All of the strategic development sites detailed in the Local Plan will require the proportional growth of police infrastructures to maintain equivalent levels of service in these areas and we request that the Local Plan includes specific policy recognition of the need for additional police infrastructures.	See IDP
Warwick Councillors asked that development would be equitably distributed over the District.	Given environmental and national policy constraints, development cannot be equitably distributed. This would not align with the NPPF
All homes should be designed and built to the Associated of Chief Police Officers Secured By Design Standard and achieving the best traffic safety should involve consultation with the Warwickshire Police Road Safety Unit.	See policy HS7
Strategic development sites are available to meet the District's needs in neighbouring Districts such as a site in Southam in Stratford District which could deliver 1,200 houses in a mixed use village.	These sites are not required for WDC's needs
If there is demand for Industrial Units why have the planned units on the Ford Foundry site been abandoned?	The remainder of Ford Foundry site has been retained for employment
The RDS provides no guidance for negotiating an agreement on affordable housing. Affordability at 40% will surely depend on the design and we doubt this policy can be sustained without firmer guidance.	See policy H2
The SHMA fails to address the diversity of varying accommodation requirements over modern lifetimes and social choices. It also ignores the potential for an imaginative range of design. The function of a plan is not to simply align with the 'low hanging fruit' most attractive to developers.	See policies H5, H6, H7
The plan should give a much stronger lead in challenging developers to be more ambitious.	See policies DS15 and BE2
The Garden Suburbs prospectus is inadequate as a policy document and misleading.	It is not a policy document nor is it guidance. We have described it as a

	prospectus – something to trigger a certain way of thinking about design and layout
The Plan lacks any emphasis on Brownfield sites.	See policy DS7
Development should not be prevented from coming forward in lower order, sustainable settlements which could also help to sustain existing facilities and services.	See village hierarchy and Policy DS11 which allocates housing to growth village. Also policies H10 and H11
Would welcome further clarification on the decision making criteria that will be used to choose sites.	See site selection methodology
Placing too much emphasis on SUEs can result in an under supply of housing.	Sites have been assessed as deliverable within plan period
If the Council cannot demonstrate a five-year housing land supply upon adoption of its Local Plan there's a risk that its housing policies will be out-of-date as soon as the Plan comes into effect.	5 year land supply expected to be achieved upon adoption. Full assessment due to be undertaken in May/June 2014
The district does not have a 5 year housing supply and the local plan is relying on a limited number of large allocation which take time to deliver.	
Every Ward should have the same level of housing growth.	This would not result in a sustainable pattern of development
1,000 houses in the villages over 15 years is inadequate to meet their housing needs.	See updated village hierarchy (2014) and village site allocations consultation document (2013).
Limited growth now proportioned for the smaller villages and hamlets is unjustified and does not fully recognise the importance that such settlements could play in significantly boosting housing land supply.	
The Settlement Hierarchy is unsound and is neither justified or effective.	
The Council's Draft Settlement Hierarchy Report isn't robust enough and the report should have been completed before any settlements were identified to accommodate the District's growth.	
Why have Bagington, Radford Semele and Lapworth have been overlooked.	Each of these villages is a growth village with housing allocated
Concerned that the Council had chosen only to note the advice given by Andrew Langley MP in answer to issues raised by Chris White MP in the House of Commons, that residents of his constituency felt that their voice was not being respected.	Local views have been taken into account where possible, but plan must be sound and must be based on evidence
The Council risks building housing simply to increase inward migration without solving the housing problems in the district. The Council accepts the Affordable Housing Viability Assessment (AHVA) assessment that it is possible to have up to 50% affordable housing, yet it is not willing to take a flexible approach and categorise sites by level of viability i.e. insist many sites have more than 40% affordable housing.	The AHVA suggests that on many sites 40% is achievable and this is backed up by past developments. A site by site approach is open to prolonged discussions and potentially a lower level of affordable housing
The RDS does not constitute a basis for a 'sound' Local Plan as defined by the NPPF paragraph 182.	The Council believes the Draft Local Plan meets the criteria of para 182. However we are seeking representations regarding this during the May/June 2014 consultation
In the RDS the categorisation of Norton Lindsey and its role in delivering new housing growth has been reduced further although it is noted at para 4.4.6 that some growth will be	See village envelope for Norton Lindsey (map 22)

acceptable where it is practical and also avoids compromising the character of the Green Belt, new Village envelopes will be established to accommodate infill or small groups of dwellings, subject to detailed form, scale and character considerations.	
The 12,300 number should be objectively assessed for the District.	The Joint SHMA (2013) provided an update of objectively assessed needs.
Applying NPPF paragraph 55 would extend the current Local Plan rural policies.	See policies H10 and H11 which set out the Council's approach to this
The sites selected for development to the south of Warwick and Leamington do not appear to meet the requirements of the NPPF paragraph 110, 111, 112 or 156.	The air quality assessment indicates that air quality will improve during the Plan period due to cleaner engines; the Draft Local Plan includes all suitable, available and achievable brownfield sites; whilst there will be an impact on agricultural land Warwick District believes the delivery of housing outweighs this issue
It is vital, particularly in the context of the recent approach taken by the Inspector at Coventry City's examination that WDC is proactive in considering the needs arising in the wider housing market area, and is able to demonstrate effective cooperation and joint working to meet development needs across the local authority boundary.	See Joint SHMA and Policy DS20
<b>Urban Sprawl</b>	
The proposals are preposterous and are another step in our area becoming swamped with suburban sprawl.	The strategy seeks to enable the growth of the District in the most sustainable way.
Mid-Warwickshire will end up like Sutton Coldfield.	
The proposals will lead to significant urban sprawl.	
Further development increases the urban sprawl into the countryside.	
The RDS fails to achieve the 'avoiding coalescence' principle set out in the NPPF, especially around Baginton and Thickthorn.	Towns and villages that are currently separate and distinctive will be retained as such
Building in the South of the district will fill a vast area of rural and agricultural land and merge Warwick, Whitnash and Bishop's Tachbrook.	
Overbuilding in the area. There is not enough parking, play areas and houses are too small for families.	See policies TR4, HS1, HS2, HS3, HS4, HS5
It will impact on flood risk.	Assessment of strategic flood risk has been taken into account in site selection
<b>Infrastructure</b>	
It will affect school catchment areas and applications from siblings of children already in a school.	See IDP
Warwick Gates development did not include the Primary School initially promised so there is little assurance that the school and healthcare facilities will be provided for this development.	
New schools are not "guaranteed" to be built.	
There is limited access to doctors and dentists surgeries in the Whitnash, Warwick Gates and Myton areas already.	
Not enough infrastructure south of the river to support proposed number of housing.	
Water supply, sewage and drainage are not adequate.	

	consulted
<b>Suggestions</b>	
Local villages where there are good transport links and potential to improve road access should be developed such as Hatton Station.	See village hierarchy report which categorises all villages according to service availability, size and character
Hatton which has a station and access to the A46 and Barford which has immediate access to the M40 and A46.	
Radford Semele and Lapworth both already have the infrastructure in place to deal with large scale housing provision	
The level of homes proposed is too much for Barford on top of the amount proposed for the village.	
Land to the west of Bishop's Tachbrook which avoids gas pipelines.	150 dwellings proposed for Bishops Tachbrook to the south of the village. Development beyond this would represent a very significant increase for the village within the plan period.
A more forward thinking plan and one fit for the future might be to ask government to consider the idea of creating a New Town, as they have done in the past, with towns like Milton Keynes, which was specifically designed with the future in mind. In this way we create something new and exciting, whilst preserving places of historical importance.	This was considered, see sustainability appraisal
The A46 corridor and further development in Sydenham where most of the commercial units have mostly closed and would be ideal for brownfield development.	Proposals include housing and consolidation at Sydenham. Sites along A46 only included where green belt exceptional circumstances can be justified (e.g Thickthorn)
There is a non-Green Belt area to the left of the racecourse in Warwick that is near schools, the A46 and has a park and ride facility.	This is an area of high landscape impact. Important in the setting of Warwick. Also a significant part of this area is high risk flood zone
There are pockets of space around the new estate near to Aylesford School that could be used.	This is already committed for development and is accounted for
The allocation for Radford Semele should be increased to 200-250. As the area south-west of the settlement is suitable. This is supported by Richard Morrish Associates report.	There is concern about perception of coalescence with Sydenham for this site
At least 3,500 of the 12,800 houses should be developed in the village areas, spread evenly across the district.	This would not provide for a sustainable pattern of development
Low paid workers will need to be able to commute quickly and cheaply to where the jobs actually are. This can be achieved, by developing inter town express bus routes, integrated with mini bus services which will then serve the local housing areas, funded by the CIL.	Noted.
Student accommodation should be built near Warwick University and dwellings students are currently in in south of Leamington put up for private sale.	The University is likely to propose further accommodation close to the campus. Once these proposals are understood, the impact on Leamington can be considered.
The release of land north of Milverton would also assist the Council in progressing a more deliverable strategy which would provide greater geographic choice for future residents of Warwick District.	Exceptional circumstances for development in the green belt here have not been justified.

<b>Specific Sites/Paragraphs/Documents</b>	
Bishop's Tachbrook will struggle to cope with the amount of development in the plan.	Policy H10 requires this development to be phased across the Plan period for this reason
Paragraph 4.3.4 should be concentration in the SMALL non-greenbelt area, not outside the green belt, I have little confidence that the RMA work protects our area in any meaningful way.	The Richard Moorish Associates report provides an objective landscape assessment
Daw Mill Coalmine could be a major brownfield development area for houses and Industry in the future.	This is too remote from Warwick District to provide for local needs. It is being considered for development through the SEP
Following planning applications should not even be considered until the Local Plan has been clarified and the public consultation completed: W/13/0036 -200 homes on Grove Farm fields; W/13/0603 -370 homes on land west of Europa Way / South of Gallows Hill; W/13/0606 -720 homes on Lower Heathcote Farm land, south of Harbury Lane; W/13/0607 - 220 homes on Hawkes Farm fields; W/13/0776 -280 homes at Woodside Farm fields; W/13/0858 -up to 100 homes at Fieldgate Lane/Golf Lane, Whitnash; W/13/1016 -800 homes at Myton Garden Suburb. Hopes the council would also refuse any new applications relating to the following: Further development South of Gallows Hill - up to 260 homes; Former Severn Trent Sewage Works - 225 homes; Further development at Grove Farm - 375 homes; Whitnash East/South of Sydenham - 500 homes. These applications fall within part of the consultation on the new Local Plan and to decide/grant planning permission whilst consultation is ongoing is wholly inappropriate and unjust.	Each of these applications has been considered on merit at the time, as will any further applications that are submitted for these sites.
Brookhurst School are already having to turn away pupils.	The IDP provides for additional primary school places
Is there evidence that Kenilworth will need the amount of housing proposed?	The 2012 SHMA indicates that there is a housing need in Kenilworth
Concerns regarding infrastructure planning and education provision in the Kenilworth area and adequate provision of 16-18 places. Kenilworth School Sixth Form is already oversubscribed and will not be accessible to large numbers of children if the proposed housing goes ahead.	See IDP and policy DS12
The agricultural land between Warwick, Whitnash and Bishop's Tachbrook is an 'Area of Restraint'. Building on it would merge our built up areas.	Area of Restraint Policy no longer applies. The areas to be developed or protected have been assessed according to a range of factors including landscape. Coalescence will be avoided.
The character of Whitnash has already been greatly scarred with the development of Warwick Gates, Dobson Lane and recent Chesterton Heights/Sydenham encroachment on the countryside and extension of the South Farm development.	This view is noted. The character of settlements may change, though the aim is to ensure that by locating the right development in the right locations, the benefits will outweigh any negative impacts
The development will completely alter the nature of Old Milverton. The fields by the allotments off Old Milverton Road are regularly used. Any building would dominate the landscape	This are is not proposed for development

and render the town less attractive.	
The allotments at Old Milverton must remain.	Noted
There needs to be a protective landscape strip along the eastern side of Banbury Road. Such a strip is required by the Ribbon Development Act of 1935.	This area is no longer proposed for development
Protect the southern approach to Warwick along the Banbury Road from visually and environmentally intrusive development.	
The 3,420 dwellings planned for the greenfield land to the south of Warwick would join up with Warwick Gates and this would have serious health impacts and the loss of green land and additional vehicles on the road will lead to a decline in the quality of life.	The development would adjoin Warwick Gates. Air quality is predicted to improve during the plan period. Other health impacts to be addressed through policies HS1 to HS8. Impact on landscape assessed through landscape evidence and site selected to reflect this. Strategic Transport assessments show traffic can be accommodated
The impact of the proposed site between Harbury Lane and Bishop's Tachbrook is unreasonable as it will have visual impact on the countryside, traffic and infrastructure issues and coalescence of settlements.	
Routes from south Leamington through to the north and to Warwick are always busy, buses although not overpriced are often overcrowded.	Bus services will need to be improved. See IDP
Objects that Loes Farm is not allocated within the Local Plan as the land is suitable and available.	Green belt exceptional circumstances not justified for these sites
Site off Bamburgh Grove, Northumberland Road should be excluded from the green belt for housing development.	
Paragraphs 4.3.4, 5 and 6 attempts to support the fact that WDC claim to be distributing the development across the district- this of course means across 20% of the district as the Green Belt is not being revised.	See policy DS19 for green belt revisions. National green belt policy limits the potential for development within the green belt
The Thickthorn development will create difficulties on a key junction and will be hard to serve by bus.	STA shows traffic can be accommodated. Detail will be considered at planning application stage
There is better opportunity for development to support better bus services in Hatton Park or Hampton Magna.	Noted
Would like to see a 'HYBRID 5' option being proposed that included elements of options 2, 3 and 4.	Sustainability appraisal shows how options have been considered and either rejected, modified or taken forward
The Chase Meadow Estate and Tournament Fields Business Park has already added burden on the pre-existing infrastructure which is barely sustainable now.	See IDP
Can 700 houses planned for Thickthorn, nearly 5 miles away by road and already has been designated employment area be deemed as sustainable?	The Thickthorn site has been identified through the site selection methodology
Coventry & Warwickshire Gateway development does not show any additional residential development in the local area to cater for the persons requiring accommodation to fill the 10,000 jobs.	The sub-regional employment seeks to service the wider sub-region – including Coventry. It is close to many residential areas in Coventry
Makes no sense to propose a major sub-regional employment site in the north-east of the district but no housing nearby.	
An additional reason to re-consider some development in the north of the district is with the successful Coventry/Warwick Gateway developments application which officers stated will	

open up jobs for Coventry more than Warwick District residents. However, believes many will come from and/or want to live in Warwickshire.	
The notion of the primary employment site being planned at Baginton / Coventry Airport whilst 70% of new housing is proposed south of Warwick and Leamington doesn't seem to make sense "The apportionment of housing was guided by the principle of....avoidance of coalescence of settlements". The option proposed for suburban peripheral development to Warwick and Leamington would guarantee that the two in fact would become symbiotic twins with no green buffer separating them.	
Houses should be built nearer the jobs created by the Coventry Gateway scheme.	
The idea that the council do not have a case to use green belt land is not founded as they have passed plans for the Gateway Business Park.	The very special circumstances regarding that application are very different and cannot be directly compared
The plan is contrary to the NPPF Policy DC7.	The Council believes the Draft Local Plan is consistent with the NPPF, but is seeking representations regarding this
Objects to houses on Gallagher land south of Warwick.	With the exception of south of Gallows Hill, these sites have been identified as suitable through the site selection methodology.
Development on prime agricultural land south of Harbury Lane and Gallows Hill is not needed and unnecessary, only Heathcote Farm should be considered. It	
The planning inspector who reviewed the current Local Plan in 2006 stated Woodside Farm should not be built on.	
Regarding paragraph 4.3.10 the County Council policy endorsed by the District Council through the Traffic Forum, agreed at the Area Committee in Jan 2008 is to reduce the volume of traffic in Warwick. The idea that additional traffic can be tolerated and 'mitigate' is contrary to this existing policy agreed by both Councils.	The evidence shows the traffic can be accommodated. However, alternatives to reduce traffic are being considered through the Demand Management Transport Study
There will be an increase in the traffic on the minor road of Mallory Road through Bishop's Tachbrook.	The Strategic Transport Assessment has not identified this as an issue. This would need to be considered at Planning Application stage
There will be increased risk of crossing busier roads whilst trying to access the village's facilities in Bishop's Tachbrook.	
Barford has already been affected by increased traffic at peak times from commuting to the employment in and around Warwick. A further 4,000 cars within 1 mile of the village will further increase traffic and danger to pedestrians and motorists.	
It is already very difficult to get out of Ashford Road, more houses will worsen this.	
Agricultural land south of Leamington is the same as in the north however its description and degree of protection differs leading to more development being proposed in the south around Whitnash.	This reflects NPPF green belt policy
If houses are a priority, the Fords Site would have filled the criteria of being close to the town centre.	This area is either developed or identified for development
Warwick Racecourse is an important leisure and recreational facility and should have a site specific policy.	See policy CT7
The proposed new employment site close to Gallows Hill is not	See policies DS8 and DS9 which show

needed, There are numerous empty office blocks available for new businesses already existing on various technology parks or other areas around the district.	employment land is needed
Reading paragraph 4.3.12 of the RDS it is accepted that there are limited opportunities for growth within Kenilworth, so growth will have to take place on the edge of the town within the Green Belt. In the Joint Green Belt Review, 2009 it is recognised that land to the east and north east of Kenilworth is the least constrained.	Noted. This is one of the reasons why Thickthorn is allocated within the Draft Local Plan
<b>Wildlife</b>	
Increased pollution and noise pollution will affect wildlife and plants in the park and wood at the top of Bridge End.	The ecological evidence has not identified this issue. If there is an impact, it is likely to be very minor and would not outweigh the benefits of the proposals
This rural and agricultural land is important to the country and provides habitats for species of special interest, such as the great crested newt.	The ecological studies support the proposed site allocations. Nationally protected species will be protected through planning applications
The sprawl of Leamington and Warwick will have a detrimental effect on local wildlife as it will push it out of the towns having a negative effect on the eco-systems and peoples enjoyment of the wildlife.	
Housing should not be allowed if they are In close proximity to livestock.	Proximity to livestock is not a strategic matter for consideration in allocating sites for development
<b>Employment</b>	
Regardless of GL Hearn's report the majority of the employment provision 16.5 of 17.5 hectares appears to provide only for 'flexibility of implementation' rather than predicted need – it should therefore carry little weight.	The employment land review shows new employment allocations are required. Some of this is to support flexibility of supply as required by Para 21 of NPPF
The Council should allow for a flexible policy approach which considered a wider array of uses in industrial/commercial estates.	
There should be identification of potential employers before significant urban sprawl is planned as the north of the county needs employment land as well as the south.	Employment land review considers growing employment sectors as part of identifying employment land requirements.
There is unused space at Tournament Fields and Warwick Technology Park that should be used before land in the proposed business area.	This is taken into account in considering the requirements for new employment allocations
Rebalance the provision of employment sites within the area to provide local jobs for the new residents rather than having to commute.	The location of new employment and housing seeks to ensure jobs and housing are provided in reasonably close proximity to one another
Most facilities and employment opportunities lie to the north.	This is not the case. There are very significant employment areas to the south of Warwick
Few jobs will be created in south of Warwick so the volume of commuting traffic will increase.	The allocation of employment land and availability of existing employment land indicates to the contrary
The number of empty businesses in town should be addressed before other development.	Vacancy rates on traditional industrial areas and vacant land have been

	taken into account in preparing the Local Plan proposals
The plan seems to be based not on local need but an assumed forecast of future economic growth.	Future employment growth potential has been taken in to account in both housing requirement (see the Joint SHMA) and employment land allocations (see employment land review 2013)
<b>General Development</b>	
The low density nature of development in the key strategic development areas and the difficulty in serving these areas by public transport is a concern.	Through the IDP and planning application process work will be done to ensure that new communities can be served by public transport
The development of a new town in the mould of an Eco-Town once proposed near Ettington a few years ago, in South-central Warwickshire would be the best solution. Sites such as the former Royal Engineers depot at Long Marston would be perfect	A new settlement was considered and rejected - see sustainability appraisal
Further expansion of Southam would make sense.	Not in Warwick District
The area around Warwick has undergone significant development over the past 20 years with various large housing estates, retail, industrial and Business Parks which is already placing an overburden on the local area.	Noted. The IDP indicates how further development could be accommodated
Disappointed that the estates are being designed with no thought for neighbouring communities.	See policies BE1 and BE2
It is likely that the new residents will work at Gateway scheme and will have to commute via Warwick Grade II listed bridge.	There are also employment opportunities to the south of the towns and the District. For north south journeys the use of the M40 and A46 will be encouraged
One key reason for building affordable family homes in the north was to re-invigorate an ageing community. Neighbourhoods and villages work best with a good spread of community - old and young sharing services and supporting each other.	Noted
<b>Housing location non green belt related</b>	
Most new homes should be within or adjacent to the main urban areas. Too much is focused south of Leamington/Warwick, more should go north, relaxing the green belt if need be.	The national green belt policy requires exceptional circumstances for this. These have been justified for some specific sites
There are vast amounts of land which has been designated for Commercial Property which have been lying fallow for many years now. Any proposal must address this waste of land by re-designating it for Residential Properties. Where necessary, Compulsory Purchase Orders should be made.	Opportunities for development on brownfield sites have been taken to account
<b>Summary of Matters Raised in Support</b>	
<b>Green Belt issues</b>	
Pleased to see that the Council has issued a Revised Development Plan which acknowledges that the exceptional circumstances needed for major development in the N. Leamington Green Belt area do not exist	
Support the absence of development on the North Leamington	

Green Belt around Old Milverton and Blackdown as this land meets the 5 key roles of the Green Belt and is a well-used cultural and exercise related resource.	
If the joint Strategic Housing Needs Analysis identifies an increase in the number of houses above those currently proposed, there is sufficient non-Green Belt land to accommodate this additional development.	
The exclusion of development in North Leamington green belt enables the plan to comply with the NPPF.	
Support the fact that the RDS protects the Green Belt north of Leamington.	
It's very important to preserve the Green Belt.	
No justification exists to use the Green Belt land North of Leamington as development land for roads or housing.	
No exceptional circumstances exist to develop the Green Belt north of Leamington.	
Residents of North Leamington have campaigned hard to save the area of Green Belt adjacent to our homes.	
The area North of Leamington supports a valuable eco system.	
If the Green Belt is destroyed Leamington will never recover.	
There is unlimited green space to the south of Leamington where the nearest town is Banbury.	
The RDS removes the proposal to build 2,000 houses on the North Leamington Green Belt and through better use of brownfield sites results in only 325 further houses on Greenfield south of Leamington.	
The surrounding areas of North Leamington are desperately needed because they give wildlife much needed sanctuary.	
No Green field sites should be developed until all existing brown field sites have been developed first.	
Pleased to learn the integrity of the Green Belt is to be preserved between Northumberland Road and Old Milverton and we further assume that no overspill from Coventry will be contemplated in this area.	
Pleased the council are no longer pursuing the option of building on green belt land north of Leamington.	
The council has chosen brownfield sites to provide most of the proposed housing development over building in the very limited green belt between Leamington and Kenilworth.	
There has never been any exceptional circumstances to release the green belt in Blackdown and Milverton and while there is still going to be some development in Thickthorn/ Lillington and other green belt areas, this is a far lower number than originally planned and seems fairer than the original scheme.	
Crucial to preserve green space between Leamington, Kenilworth, Warwick and Coventry as a failure to do so would merge these areas with the larger West Midlands conurbation to their detriment.	
Green belt land around Milverton and Blackdown is prime farming land and there are alternatives available.	
Agrees that the sites currently identified by WDC as being able to develop on are not in the green belt area.	

Due to the plans of Coventry City Council the greenbelt land of Old Milverton and Blackdown may still be at risk of development. Urges council to safeguard the greenbelt land north of Leamington and prevent it being built on. Urges the Council not to concede any green belt land to Coventry during the SHN analysis. If more land is needed it must be from non-green belt land.	
Councillors should be doing their utmost to protect their constituents and Green Belt is one of their significant interests.	
Hopes and trusts that future draft plans will be treated with such due diligence as the consideration of location residents views over development on Green Belt land around Leamington.	
Strong support for the retention of open spaces (Green Belt and Special Landscape Areas) but difficult to comment further without information regarding potential changes to green belt boundaries.	
Large scale development near the River Avon could have increased and disastrous effects on flooding and will make selling existing houses very difficult.	
Accept that it is generally more appropriate to be directed towards the non-Green Belt locations except where there is no alternative.	
Pleased that the new plan no longer includes building on Green Belt Land, well done the Planning Department on the efforts on what must have been an incredibly difficult task.	
Leamington Parks are unusually accessible and the green belt is a major factor behind the appeal of the area across a wide spectrum of people including those who commute to places of work but support local businesses which create the Town's charm and appeal.	
Development on the North Leamington Green Belt would pose a risk to the coalescence with Kenilworth and Coventry, be detrimental to a very well used public footpath and would be in direct contravention with the NPPF.	
<b>Transport</b>	
The transport assessment clearly shows that development in the North would generate more traffic congestion in the district.	
It is possible that mitigation methods may need to be employed in the Southern areas to reduce pollution and congestion but the work needed to do this would be less than that needed for the north.	
The transport assessment shows development in the North would generate more traffic congestion.	
RDS provides for improvement to the road network in the South of Leamington to relieve congestion and cater for new development.	
It makes sense to improve the existing infrastructure and road network already in place including the M40, J13 & J14 without causing more congestion in the town centre.	
The Strategy will improve transport links and particularly cycle routes across the area.	
Support with the proviso that the area to be occupied by new	

housing is allowed suitable provision for the increased traffic flow.	
It is important that road improvements are carried out as part of a coordinated plan.	
Traffic surveys show that road improvements can cope with the planned new development and that locating the majority of the development South of Leamington will reduce traffic movements, ease congestion and reduce pollution.	
Improving road networks south of Leamington makes more sense than cutting through the beautiful open greenbelt in Blackdown and Milverton.	
Locating most new development to the south will reduce commuting, road use, congestion and noise and fuel pollution.	
Providing for improvement to the road network south of Leamington will undoubtedly reduce existing congestion and will obviously cater for new development to be welcomed.	
<b>General</b>	
Controlled housing in villages is important to ensure the survival of existing services and communities.	
The redevelopment of existing commercial to provide more employment would be preferred rather than being used for residential expansion.	
What work has been carried out to work out what proportion of the local population works within and outside the immediate area and what their mode of transport is?	
Proposals represent a fair distribution of housing.	
Commuting, pollution and infrastructure can be minimised as most of the new development is located close to where employment opportunities already exist and also maximises the opportunity for people to live close to their place of work, improving quality of life.	
There is ample space to build to the south of Leamington and focussing in one broad area ensures adequate public services can be provided and developed to meet the needs of the new population.	
RDS proposes a fairer distribution of housing across the district.	
The council should keep the housing requirement to a minimum and if more houses are required there is sufficient non Green Belt land to accommodate this.	
Development in the south of Leamington gives more healthcare, schools and employment opportunities.	
The RDS provides for the necessary schools and other infrastructure to support new development	
Expresses thanks that common sense has prevailed and a new town/village will be built near the M40, the station and major supermarkets, this can develop its own sense of community and identity.	
Proposals represent a fair distribution of housing.	
The Strategy will have positive impacts on the provision and scope of housing needs in the area.	
Hope that development South Leamington will include necessary	

supporting facilities such as adequate road layout, schools etc.	
Important that most development is located close to where there are employment opportunities, reducing or eliminating commuting for many people which will have a positive impact on the environment and their quality of life.	
Supports the revisions made as they are important improvements to the original plan.	
There is more space to build south of Leamington and it is nearer employment opportunities.	
The Council should keep housing requirements to a minimum and should more houses be required because of the Joint SHMA being performed with Coventry CC there is sufficient non green belt land to accommodate this additions development.	
The RDS will retain the few beauty spots left to us.	
Utilises the recent infrastructure improvements around Princes Drive meaning that a further inconvenience to the district's tax payers is avoided and additional land does not need to be used unnecessarily.	
Supports the greater focus placed on the redevelopment of brownfield land to meet the identified housing target. In this respect, it is noted that the Employment Land Review 2013 has identified poor quality employment sites which may be suitable for housing development and acknowledges that there has been a lack of speculative development activity in the district over 12 years. If take up of employment land continues at a similar rate as it has over the last 5 years the existing supply of available employment land has capacity to provide approximately 15 years' worth of supply.	
Plans for some new houses in the Green Belt at Thickthorn and Lillington as well as proposed development in villages is fairer, however further use of the Green Belt beyond this would be unsustainable and unacceptable.	
With the majority of development in the South it will enable the concentration of the majority of CIL funds to be in one area and thus providing better value for money allowing a better result from the spending of CIL for more residents.	
The draft policy is supported since it is consistent with the advice given in the NPPF which supports a prosperous rural economy and the need to retain and develop local services and community facilities in villages and which advises that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality or rural communities.	
This is rational and environmentally friendly solution to housing requirements.	
Following original consultation process and further studies undertaken, the Council have produced a plan which has a sound basis. Trusts that the finalised plan will now be completed and submitted at an early date.	
Support the general thrust to concentrate development within and on the edge of the existing urban areas, but also to distribute some growth across the district to meet the needs of the rural population.	

The creation of hierarchy of villages to ensure the level of growth is appropriate to the size of the settlement is considered to be the most appropriate approach, with higher levels of growth to the larger, more sustainable villages and this hierarchy clearly takes into account the importance of various local services and facilities.	
RDS fulfills objectives, reduces threat of traffic congestion and pollution and delivers improved facilities. Benefits such as these would not have been achieved in the green belt north of Leamington.	
Support the recognition that not all needs can be met on non-Green Belt sites which is particularly the case in large, more sustainable villages located within the Green Belt.	
Supports the focus of development within and on the edges of existing urban areas and in doing so protecting the Green Belt and where there are non Green Belt options available to seek to avoid the coalescence of settlements.	
The NPPF, at paragraph 85, is clear that Green Belt boundaries should only be altered in exceptional circumstances. It is the case that the updated evidence base provided by the Council (summarised at 4.3.4 to 4.3.12) demonstrates that the previous perception that additional development should be accommodated in the Green Belt to the north west of Leamington as an exceptional circumstance cannot be substantiated.	
<b>Urban Sprawl</b>	
Vital to preserve the limited green space between Leamington and Kenilworth as there is a risk that the area will merge into the West Midlands conurbation	
The countryside to the North of Leamington provides an essential buffer between Leamington and Kenilworth and the West Midlands conurbation.	
The district should not have to use its land to fulfil the housing requirements of Coventry City Council.	
It is not Leamington's duty to provide houses for Coventry.	
Aware of appeal of parts of Coventry but the need to avoid urban sprawl merging the identity of south Coventry Kenilworth and North Leamington to the detriment of all three must surely be apparent to residents.	
<b>Specific Sites/Paragraphs/Documents</b>	
Putting the country park in the south next to existing housing would make the green-park more accessible, crossed by cycleways and acting as a green-lung to reduce air pollution.	
The new Country Park to the South of Warwick and Whitnash should be relocated to allow easier access for the residents from both sides of the parkland rather than just benefiting the new development, thus creating a green lung and reducing pollution. Moving it would encourage more residents to benefit from the ease of having recreational ground near to them thus promoting healthy living and giving the existing houses a buffer from the new development.	
The growth across the district continues to represent the most appropriate strategy having regard to the sustainability appraisal	

and evidence of the nature of the urban areas and their capacity to accommodate and deliver the scale of housing growth required over the plan period in accordance with the definition of sustainable development.	
Bloor Homes is preparing a planning application for an area of land north of Common Lane in Kenilworth, known as the "Crackley Triangle". This site accords with the criteria set out in draft Policy RDS3 in that it is on the edge of an existing urban area, is not in the Green Belt and is thus an alternative which is suitable and available, and is in a location which will not lead to the coalescence of settlements.	
Support the inclusion of specific provision for a country park to the south of Leamington.	
Broad support for some principles in RDS3 and Section 4.3.	
Fully support the general desire for more development to take place on brownfield land expressed in 4.3.5.	
Welcomes the reduction in the number of settlements proposed for development along the A4177/B4439 corridor, which would have threatened the integrity of the Green Belt through peppet-potting.	
Pleased that Old Milverton has been omitted and therefore preserved and free from overbearing traffic.	
Support 4.3.14 and 4.3.15 and the conclusion drawn that allocations need to be made in the most sustainable villages.	
Support the provision of 7 affordable houses on land at Coventry Road.	
Support the exclusion of land at Stratford Road as it is a flood plain with drainage issues.	
<b>Wildlife</b>	
Pleased to see the RDS largely recognises that, for the majority of sites listed, wildlife sites are a constraint to development and that the green infrastructure proposals do outline mitigation measures where needed.	
Pleased to note the buffering and extension proposals around the Tach and Whitnash Brooks as well as the 50m buffer for the ancient woodland habitats at Thickthorn and Glasshouse Spinney.	
The above measures must be supported by a robust policy for the protection and enhancement of wildlife sites within the local plan.	
<b>Employment</b>	
Supports the RDS as it takes into account access to existing employers on the business parks and proximity to the M40.	
The plan will encourage new businesses to Leamington Spa.	
The plan will give local people more commutable employment opportunities.	
Glad to see some consolidation from employment areas and a large allowance for windfall sites.	
<b>Development</b>	
Proposes a more appropriate development approach, by predominantly allocating future housing development to non-Green Belt land.	

The Plan recognises any development should be close to existing employers on the business parks and easy access to the M40. This in turn has positive impacts on the environment and quality of life and lures more employers to the area.	
The RDS makes better use of brownfield sites.	
Focussing development in one broad area	
Continue to support the general distribution of growth across the district including within and/or on the edge of some villages.	
The proportion of the growth distributed to the villages will need to be reviewed by the Council following the proper assessment of the housing requirement for the District.	
Support criteria for broad location of development set out in RDS3	
Supports the intention to focus development on the edge of existing urban areas as to deliver a sustainable strategy.	
Support that the new RDS has moved development to an area which can better contain it.	
The RDS has a fair distribution of new housing across the district. 17% of the new houses will be in the Green Belt north of Leamington at Thickthorn and Lillington. 15% of the proposed development will be in Warwickshire Villages.	
Allocating development to larger villages is appropriate to concentrate on villages which can best sustain local schools, shops and other services should encourage a younger, more rural population to stay.	
All recently built supermarkets are to the south of town.	
Support the policy in terms of adopting a proportionate and distributive approach to accommodating the increased housing numbers and agree that higher growth is to be located in or attached to larger settlements where amenities are more readily available and smaller, less accessible settlements are allowed proportionately less growth.	

## **RDS4: Overall Distribution of Development is as follows:**

<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>General Comments</b>	
The broad location of housing does not accord with the objectively assessed housing need in the SHMA 2012. The spatial distribution needs to be amended to reflect the findings of the SHMA 2012.	The Local Plan Spatial Strategy (see Policy DS4) seeks provide for Objectively assessed Need in line with the Joint SHMA 2013. In doing so it aims to protect green belt land unless exceptional circumstances can be justified. This is consistent with the National Planning Policy Framework. This includes locations around Kenilworth, eastern Leamington and a number of villages.
If the Local Plan fails to identify sufficient land for development, the Plan is at risk of being found unsound.	
Relaxation of the Green Belt to the north of Leamington is well overdue and would have little impact on the gap with Coventry.	

<p>The Council has failed to understand the impact on both the services and infrastructure in the region. Warwick cannot support another 10,000 homes.</p>	<p>As there is insufficient brownfield land to provide for the required level of growth, this means that greenfield sites need to be used. The Strategy seeks to ensure these greenfield sites are in the most sustainable locations – e.g close to services and employment whilst limiting impact on the environment and existing communities.</p> <p>This means that many of the sites are on the urban fringe in areas outside the green belt.</p> <p>The Draft Local Plan includes a much greater emphasis on brownfield sites with brownfield allocations providing for 1330 dwellings.</p> <p>To support sustainable villages, 763 dwellings are also proposed on sites in or adjacent to the District’s main villages. The services, character and size of villages has been assessed to develop a village hierarchy. This in turn has shaped the level of housing that could be accommodated in each village. The final stage for village allocations has been to look at site capacity. This has meant the quantum for each village has been adjusted to take account of environmental constraints.</p>
<p>Residents of both north and south Leamington and Warwick have objected to the proposals which suggest the Council is pursuing a policy that is out of touch with those same residents.</p>	
<p>Residual housing numbers could be evenly distributed around the District in small development that could:</p> <ul style="list-style-type: none"> <li>-Benefit local builders</li> <li>-Require no vast changes to the road infrastructure</li> <li>-No significant burden on existing services</li> <li>-Have minimal effects on each local area</li> <li>-Ensure the character of the areas remains largely unchanged.</li> </ul>	
<p>Cannot believe the reasons for building on Green Belt land in the north given Warwick District Council has given permission for Green Belt land to be used in the Gateway project.</p>	
<p>There is no justification for placing the majority of housing south of Warwick. It is just the easier option for developments as the area will be very popular for incomers who work elsewhere and commute using the M40.</p>	
<p>It is unfair to put all of the housing in one area.</p>	
<p>Releasing sites to the north of the District would ease pressure on the south.</p>	
<p>The south of the district is already the more developed part. Avoiding development on Green Belt to the north will fail to balance the district in terms of housing, infrastructure and employment. A major employment site is being built in the north where development would be more appropriate.</p>	
<p>Deletion of sites north of Leamington creates unbalanced plan loading. An additional 3,000 houses on the south side creates imbalance and with Warwick Gates and the proposed additions, there would be approximately 4,400 houses using only 3 roads to access the town.</p>	
<p>The imbalance of development stems from the need to pass the ‘soundness test’.</p>	
<p>Planning Inspector has previously suggested that there should be no further building at Woodside Farm and Warwick District Council’s landscape consultant has suggested that the area south of Harbury Lane should not be developed.</p>	
<p>Need to reconsider Green Belt policy to counter apparent bias towards the north for the District at the cost to the south of the District.</p>	
<p>The concentration of development is being proposed to limit the number of objections and reduce the costs.</p>	

The level of growth proposed for south of the towns is unacceptable. Some development could be located in the Green Belt area without damaging the fundamental purpose of the Green Belt, which is to separate the Birmingham conurbation.	
The original proposal required relaxation of Green Belt to north of Leamington having little impact on the gap with Coventry and making a good contribution to housing need which have access to sub-regional employment unlike south Warwick which will require journeys across towns to access employment.	
The northern district Green Belt NIMBY has been taken too seriously and must be challenged.	
Between 2011 and 2013, the District delivered 447 new dwellings, leaving the District 919 short of their target for housing delivery in the early plan period.	This is accepted – see paper on 5 year housing land supply
The historic under provision of housing has been due to the lack of supply of deliverable housing sites.	There is no historic under provision before 2011. Since 2011 this is accounted for in 5 year land supply paper
The figures identified are premature as work is still continuing on the SHMA and the growth should be greater and at least by in line with the ONS 2008 Household Projections.	See Joint SHMA which provides the evidence base for Objectively Assessed Housing Need
The Council should plan for higher growth.	
The projected housing need for 12,300 new homes is too high.	
The Strategic Vision is not followed through RDS4 which proposed only 6,630 dwellings. The Council should be working towards a much higher figure of proposed allocations that includes greenfield and Green Belt sites as it is evident that there is limited land available within the urban area. Therefore additional sites need to be allocated to meet this principle in addition to unmet need arising from Coventry.	
<b>Village Development</b>	
Building in villages will ruin their heritage. The Green Belt is there to preserve this.	This is not the purpose of the green belt. Rural sites have been selected to minimise impact on the landscape and historic environment
The amount of development should be much lower as the infrastructure in most villages will be inadequate.	Village development has been focused on those villages with the best range of services
Allocating housing to villages is unsustainable as it will increase car dependency.	
It is not clear why the allocation of development to the villages has increased since the 2012 Plan.	The allocation of development to villages in the Draft Local Plan has reduced slightly
Expansion of villages does not necessarily lead to village survival. Since WWII most commercial services have been lost in villages but residential development has continued to increase.	This is accepted, but it is likely to assist
The proposals within RDS1, RDS2 and RDS3 will fail to be effective and sound unless the proposed housing allocated to the villages is delivered.	Noted

A large rural village may have a range of services and facilities, be accessible to the main towns and have ambitions to grow but if there are no suitable sites that are available and able to be delivered within the plan period, the village/site should not contribute towards delivering the strategy.	The site selection has explored site availability, suitability and delivery
When determining the choice of allocation of housing to the villages, significant weight must be attached to the availability of suitable land for development, particularly land that is being promoted by a developer/house builder who is able to demonstrate its ability to deliver the housing required in the plan period.	
The draft Settlement Hierarchy Report does not consider in detail land availability and suitability.	This is not its purpose. See Site Selection Matrix
The Council needs to review its proposals' present arbitrary groupings of settlements and apportion of growth as referred to in the Settlement Hierarchy Report.	See updated Settlement Hierarchy Report
The allocation of 1,000 dwellings to villages is an unreasonably low figure and a rounded number indicating it is arbitrary. Warwick has a significant number of villages and hamlets and these could support more housing (i.e. Burton Green, Hampton Magna, Baddesley Clinton)	This has been considered, but given the constraints of green belt and the need to provide sustainable patterns of development the level allocated to villages is below 1000
The land between Whitnash and Bishop's Tachbrook is Green Belt and acts as a boundary between the two villages. Village development would merge these two areas into a sprawling housing estate.	This area is not green belt and the proposals do not lead to coalescence of the settlements
Villages need mixed developments of 25 – 30 houses to allow local people to continue living locally.	Local housing needs have been considered in village allocations
1000 houses over 15 years in the villages is clearly inadequate to meet their housing needs or the lack of affordable housing.	
Development should be focussed on north of Leamington where there is a new local secondary school.	See IDP for how school capacity is being addressed
There has been a lack of consultation with rural communities, which are quite separate from the main urban areas. A three size rule was initially applied to outlying villages in the District such as at Barford, Sherbourne and Wasperton. The sweeping generalisation made for some villages categorised as having the same characteristics was based on a lack of resources and familiarity of the villages.	The Villages Sites and Settlement Boundaries consultation (2013/14) focused specifically on villages
There is the opportunity to build a business park in Lapworth to tap into the proximity to Solihull and a business park at Radford Semele to tap into the expertise and supply chain associated with Ricardos.	Lapworth does not offer a sustainable location for employment allocations
<b>Sites on the edge of Warwick, Leamington and Whitnash</b>	
Even with road improvements, the concentration of development south of the river will lead to congestion at the points where roads cross the river, canal and railway, especially given many residents will need to travel northward to access work and hospitals.	See Strategic Transport Assessment Phase 4

The allocation of development in the southern part of Leamington and Warwick will lead to the coalescence of existing settlements (Whitnash, Sydenham And Bishop's Tachbrook) and change the nature of the community.	The proposed allocations will not lead to the coalescence of these settlements
Reduced traffic flow through Warwick causes more accidents.	If designed correctly , this is unlikely to be the case
Local Councils need to work more closely to ensure your plans work in harmony to improve the larger Warwickshire area.	This is being done through Duty to Cooperate
Traffic through the town needs to be reduced by applying some type of charge to encourage drivers to taken circuitous route.	This is being considered though the Demand Management Study
Several developers have already placed opportunistically place planning applications for developing land south of the district taking advantage of the fact that the Warwick District Council Local Plan has not been approved.	Noted
Significant harm will be caused if the concentration of development is imposed on Whitnash. Smaller developments spread across several settlements would provide the necessary housing, infrastructure and employment without major disruption to Whitnash, South Warwick and Bishop's Tachbrook.	Whilst the plan proposes development across different parts of the District, the Council believes that further dispersal would provide for less sustainable patterns of development
Development at Warwick may destroy the place as a tourist attraction and could result in people not wishing to settle or remain in Warwick which defeats the need for expansion.	The Draft Plan seeks to ensure that Warwick remains a vibrant, prosperous and attractive place
If employment will be within towns then settlements should be developed along rail corridors rather than concentrated to the south of Warwick and Leamington. The 68 bus route is unreliable and this increases car dependency which in turn worsens traffic congestion.	The rail corridor to the west has been factored into the selection of growth villages. The new station at Kenilworth will support new development there. The 68 bus route will be improved (see IDP)
RDS should be requiring Gypsy and Traveller sites to be included within the major new housing developments in Warwick, Leamington and Kenilworth. This would enable sites to be properly integrated and have proper access to facilities.	This has been considered. However there are delivery concerns
Land south of Harbury Lane should be protected to act as a barrier to further development.	The site has been assessed as suitable, although the Country Park seeks to provide a way of limiting further expansion towards Bishops Tachbrook
Extent of recent development has already led to significant traffic problems on Myton Road.	Strategic Transport Assessment indicates that traffic growth can be accommodated on the network
Development at south Warwick would appeal to relatively finite number of prospective purchasers and this will impact on the rate of delivery that can be achieved. This will also limit the choice of housing and have detrimental cumulative impacts on infrastructure.	The Draft Plan will provide for a variety of housing in a variety of locations. The sites allocated are deliverable
Development needs to be planned in the context of Stratford District Council's proposals for development at Lighthorne Heath.	If SDC allocate development there, it will have an impact. This has been assessed through the "Cumulative Transport Assessment" and regular joint meetings

Levels of pollution in Warwick are breaching unacceptable levels and 4,500 houses would worsen it by creating additional traffic. The proposals are contrary to the Council's requirement to reduce traffic on certain streets.	The Air Quality Assessment shows air quality is likely to improve during the Plan Period due to cleaner engines.
There are five schools within Warwick which are impacted directly by pollution. This is irresponsible for the health of the future generation, although everyone in the town would suffer.	Open space will be provided as part of strategic developments
Warwick is a historic town with hostelrys and cages where people are encouraged to site outside and enjoy the atmosphere. The air quality is already poor and exceeds levels permitted by law and would be exacerbated by the proposed development.	
There are schools with playgrounds and playing fields, parks and sports facilities within the area which will be affected. The levels of pollution the development will create are counterproductive to health benefits gained from accessing such spaces.	
It is not sustainable to deliver 70% of the 12,000 homes over a 15 year period to south of Warwick and Leamington Spa because: -Development of this size is the equivalent of building a new Bishop's Tachbrook village every two years in the vicinity. -The local need for housing is half of this level. -Little consideration has been given for the difficulties in fostering community life at Warwick Gates.	The % to the south of Warwick is much lower than 70%. The evidence suggests it is sustainable and that these are the most suitable sites.  Community building is important – see Policy BE2
Within 5 – 10 years, Warwick town centre would be on its way to becoming a ghost town and within 10 – 25 years a 'problem' town.	There is no evidence to support this view. The Council's policies and proposals seek to maintain vibrant town centres.
The principle of development of the following sites is now established and should be recorded as commitments in the emerging Local Plan: -West Warwick Gates site (Planning Ref: W13/0607) -Care Retirement Community on land at Earls Rivers Avenue adjacent to Gallagher House.	These are commitments in the Draft Local Plan
Rather than provide all development south of Warwick, shops should be converted back into houses.	There may be some scope for this through permitted development, but it is expected to have a small impact in comparison with the District's housing needs
The Ford site in Leamington could have all been residential rather than a small part. The addition of another supermarket was unnecessary and will only detract from the viability of existing stores.	The remaining area of Ford Foundry is allocated for employment for which it is ideally suited
Warwick needs a pedestrian crossing on Jury Street.	Not an issue for the Local Plan
Too little attention has been paid to expanding the Green Belt to the south of the District.	The area to the south of the District does not meet green belt criteria
The Green Belt should be extended to include large areas in the south of the District and not zoned for residential development.	

Not convinced that the infrastructure proposals for the southern sites will work. Funding streams for new expensive infrastructure appear to be inadequate and the likely volume of road traffic due to the commuting necessitated by the density of housing and lack of local schools, shopping and employment will worsen traffic congestion in Warwick and Leamington Spa.	See IDP
The southern approach to Warwick will be damaged. The Avon Bridge with views of the castle will be a permanent traffic jam. Traffic already backs-up on the Banbury and Myton Roads and Castle Hill.	Gallows Hill and Asps sites not included to protect historic environment. Avon Bridge will not be change by the proposals and junction design to north and south of bridge will need to be carefully considered at the detailed stage
Increased security risk if Gypsy and Traveller sites are granted.	There is no evidence that G&T sites will lead to security issues
Warwick needs to be protected from further traffic congestion especially around the Morrisons roundabout.	The transport mitigation proposals seek to ensure the highway network functions effectively
As Stratford Upon Avon District Council is building a new town/village of up to 4,800 homes at Lighthorne Heath, there is no need for such a huge development south of Warwick.	If this development is proposed by SDC then there could be an impact. This has been the subject of regular liaison meetings between the two Councils and a cumulative transport assessment has been undertaken
<b>Urban Brownfield Sites</b>	
Section 4.3.5 states that there is a general desire for more development on brownfield land but the allocation of 380 houses does not reflect this.	The Draft Plan allocates 1330 to brownfield sites
The Plan fails to maximise the potential for brownfield sites to absorb much of the development requirement and too much has been allocated to villages which are actually less sustainable.	
Empty properties and brownfield sites should be priority for development.	
The Green Belt must not be eroded and should be protected in line with Government Policy to only use Green Belt in exceptional circumstances. No such circumstances have been demonstrated and rural communities should be protected.	Exceptional circumstances have been demonstrated for all green belt changes
Other brownfield sites such as those on the Queensway, Tachbrook Park, Chandos Street and land between the railway and canal in Leamington. Building on these sites would reduce the need to use cars.	These areas are all existing employment areas/commitments or are allocated for other uses.
WDC should create a local development agency (with small/medium sized building firms to come forward with proposals for brownfield site development).	Noted
Given shop vacancy rates and forecast trends, sufficient allowance should be made for conversions to residential in shopping areas, especially if major projects such as Chandos Street were now assumed to be available for high density accommodation.	Permitted development right changes allow for this, however it is expected to make only a very marginal impact on the District's housing requirement
Need to make use of empty properties such as those on Theatre Street and the site of a disused garage on West Street.	Empty properties have been factored in. The Theatre Street site has been allocated

Not all brownfield opportunities are being utilised (i.e. Coventry Airport and rail arches in Leamington).	Coventry Airport is not available for development. The Arches are being actively promoted (and many used) for employment
Need to consider the re-use of town centre buildings for older people.	Locations close to shops and other facilities are encouraged for older people where the impacts of other disturbance and noise make the sites appropriate (see policy H5)
<b>Sites on the edge of Kenilworth</b>	
The Council should consider alternative non-Green Belt sites, not only within their administrative boundary but also neighbouring authorities. Should consider less sensitive Green Belt land. This approach would avoid the need to release the tract of land on the edge of Kenilworth.	The Local housing needs of Kenilworth can only be met through green belt releases
Kenilworth is one of the most sustainable and desirable locations for housing and should accommodate a larger proportion given its proximity to Coventry and the role it plays in the cross-boundary Housing Market Area. There is no evidence to suggest that Kenilworth could not accommodate 10 – 12% growth.	The Draft Local Plan allocates 850 houses for Kenilworth, plus a further 380 on brownfield sites – a significant increase in comparison with the RDS to take advantage of the availability of the school sites.
The inexplicable lack of housing growth in and around Kenilworth is most odd given that the job growth is likely to be around the University and Coventry Airport.	
The Plan will impact the area around Kenilworth and Finham. Accepting 11,500 homes would leave the Green Belt development free.	Aside from Thickthorn, there are only very minor green belt releases in this area. 11500 houses would not meet the District's objectively assessed housing need.
<b>Impact</b>	
The welfare of animals and their habitats needs to be considered.	See site selection methodology
Agricultural land should never be compromised as it provides the population with food and security.	
Flooding is an issue and building on Greenfield land will worsen this.	
The proposals will create urban sprawl	The proposals will expand the built up area, but will not lead to coalescence
Proposals will add to traffic congestion but town centre roads cannot be widened.	See Strategic Transport Assessment phase 4
Town Centre parking will be put under further pressure.	There is sufficient capacity to accommodate the growth, though this is being considered further through the demand management transport study (e.g exploring the role of park and ride)
With the Gateway Scheme proposed as the major employer, the A46, Avon Bridge and Europa Way will be very congested.	The impact of the sub-regional employment site has been factored into Transport Assessments.
Spreading houses across the District would reduce the impact on infrastructure and would be in the interest of local residents.	This is not the case. The impact on infrastructure would be the same, but planning for its provision would be much harder.
The Council have made mistakes in the past such as Warwick Gates which was developed with poor supporting infrastructure.	see IDP

The infrastructure is more likely to be able to cope with 6 – 10 new houses per rural ward per annum than the huge estates proposed adjacent to Warwick.	
<b>Other</b>	
Sites on the edge of Coventry are suitable for development and have not been given sufficient consideration.	Options for development in this area have been considered (see both Sustainability Appraisal and Site selection methodology)
Need to consider building up rather than spreading out.	This is not consistent with the character of the towns
Kenilworth Golf Club is a non-Green Belt growth option which is suitable for development.	Kenilworth Golf Club is green belt and has been considered (see site selection methodology)
The exclusion of sites at Milverton has not been explained especially as this area has good access to Coventry.	This area is green belt and exceptional circumstances have not been justified
Have no faith that the new schools will be delivered.	See IDP
The areas which will be destroyed by HS2 should consider for industry and employment.	As HS2 would not stop in the District, this would not deliver a sustainable pattern of development
The five year supply has already been met balancing housing and employment.	The 5 year supply of housing land will be assessed in June 2014. We expect Local Plan allocations to enable the supply to be met
Local Authorities cannot resist national Government pressure regardless of what local people feel.	The Plan must be sound, including a requirement to be evidence based and consistent with national planning policy
It has been stated that land to the north cannot be built on unless there are no other places to build, yet the King Henry VIII land was protected from development, a condition of the building of the technology park.	This area is not green belt
A brand new settlement within the District (like Norton Lindsey) should be created below the A46/J15 interchange. It would have access to the major highways and new schools could be planned.	This has been considered and rejected. See Sustainability Appraisal
<b>Summary of Matters Raised in Support</b>	
<b>General Comments</b>	
There are no 'exceptional circumstances' for building on Green Belt land to the north of Leamington. Development of town centres and brownfield sites should be pursued to minimise development south of Leamington and Warwick.	
Green Belt land must be used as a last alternative. There is land to the south (near Whitnash) and to the east (near Radford Semele) that is non-Green Belt and should be used first.	
The RDS acknowledges that there are no exceptional circumstances to justify building in the Green Belt. Housing is proposed where the infrastructure of roads and existing employment already exists and development is more cost effective.	
The identification of 1,000 dwellings, 15.1% of the District's housing requirement is to be provided within Village Developments is supported. The level of development	

proposed will ensure the villages are not swamped but can meet future local needs.	
The strategy to limit new housing development in sustainable large villages is in accordance with the Government's key objectives to provide housing in the most sustainable locations.	
The Plan is the best option to protect the maximum amount of Green Belt land around Leamington and Warwick and brownfield sites and similar areas will be utilised.	
If the JSHMA identifies the need to increase the number of houses proposed there is sufficient non-Green Belt land to accommodate this.	
There is further space to develop south of Warwick and Leamington adjacent to existing services and employment opportunities. The transport infrastructure needed to accommodate development would be less in this area.	
There is clear justification for the new Green Belt boundaries around larger villages to allow for development. The Green Belt boundaries should be drawn to allow for the longer-term development needs of the Primary Service Villages.	
The draft policy is consistent with the advice given in the NPPF.	
The Plan correctly identifies that smaller less sustainable villages may also benefit from limited housing growth.	
The allocation of housing to the east of Kenilworth is appropriate and reflects the need/demand of the SHMA and accords with sustainable development as set out in the NPPF.	
If further sites are required, the housing should not be located on Green Belt sites but on brownfield sites within Coventry.	
The allocation of major sites to the south of Warwick and west of Whitnash provides both threats and opportunities to the residents of Leamington, Warwick and Whitnash [REP ID:59329, Royal Leamington Spa Town Council].	
The SHLAA Site at Baginton/Coventry Gateway is an appropriate site for a Sustainable Urban Extension.	
It is right to locate development close to employment and infrastructure and where there is adequate investment in new roads and other infrastructure to support development.	
Part of the former Honiley Airfield is suitable for residential development of a modest scale.	
Important that the Local Plan allocated land to all the most sustainable villages, irrespective of whether they are located within the Green Belt or not.	
It is important that the village sites are allocated through the Local Plan process as this provides the only opportunity to alter Green Belt boundaries.	
Radford Semele has the advantage of being close to the	

urban area for a full range of facilities but maintains its unique character within an attractive landscape.	
Support the allocation of approximately 17% of all housing over the Plan period will be delivered on land currently within the Green Belt.	
Recognise that under the current time constraints it has not been possible to identify which Green Belt parcels will be developed on the edges of the villages.	
The high grade arable farming land North of Leamington is protected and the possibility of Leamington merging with Kenilworth will also be prevented, protecting Leamington's identity and setting as a Spa town.	
The planned distribution of housing in the revised plan seems to be a fair distribution across the District within limited development on greenfield sites. It reflects a better use of brownfield sites and limits development in villages.	
The importance of existing infrastructure and scope for its improvement has been taken into account with the main development situated in the South of the town. This will provide closer links to rail and road networks.	
Traffic surveys show that road improvements to the south of Leamington can cope with the planned new development and that traffic movements will be reduced, also reducing pollution and congestion will be eased.	
South of Leamington has the infrastructure to cope with housing development. It has easy access to the M40 and Warwick Industrial Estate and huge supermarkets and retail parks already in place.	
In removing the proposal for 2,000 houses on the North Leamington Green Belt, and through the better use of brownfield sites has resulted in only a further 325 houses on greenfield land South of Leamington.	
The prospect of access to a good local workforce will help to encourage more businesses to relocate to the area, helping to generate more jobs and prosperity for the local community.	
There is unlimited land available to the south of Leamington where the nearest town is Banbury.	
It is vital that merging with the West Midlands conurbation is avoided, indeed prevented to retain the essential identify of Kenilworth, Leamington and Warwick.	

## RDS5: The following sites will be allocated for development...

### Part 1: General Comments

For comments relating to specific sites see pages xx to xxx

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
<b>Draft Settlement Hierarchy</b>	
The Settlement Hierarchy is not fit for purpose in its important role in group villages and providing subsequent targets.	<p>The Settlement Hierarchy has been developed and reviewed with reference to a number of factors including current facilities and services and the need to maintain and protect them or develop services where they do not exist, together with sustainable locations and those villages with housing need.</p> <p>The site selection methodology shows the work undertaken to assess sites.</p>
Apart from a checklist of facilities, there is no logic explaining the distinction between Primary Service Villages and Secondary Service Villages.	
Unsure as to why the further 14 Smaller Feeder Villages could not be included in the first two categories.	
It is not necessary to exclude Smaller and Very Small Villages from having the opportunity to grow organically. All villages might benefit from some new housing.	
The allocation of housing numbers to Primary and Secondary Service Villages is inappropriate until the general suitability of alternative sites has been considered. Only the total number of houses to be allocated to both Primary and Secondary Service Villages should be identified.	
There are inconsistencies in the scoring system and weighting of certain elements of the Draft Settlement Hierarchy.	
<p>The process set out in the Settlement Hierarchy Report 2013 is a mixture of objective statistical analysis overlain with subjective conclusions. The process has been adapted from the Preferred Options Report 2012 based on the Blaby Model and has altered the classification of certain villages (i.e. Barford and Cubbington). This is counter-intuitive to NPPF policy and is materially unsound for the following reasons:</p> <ul style="list-style-type: none"> <li>-It has mathematic discrepancies</li> <li>-Subjective views are introduced to a mathematic model</li> <li>-Process ignores Green Belt designation.</li> </ul>	
The threshold levels for Primary Service Villages and Secondary Service Villages have been applied arbitrarily across the board without any real consideration for the villages and their existing form and extent. Some villages may be able to accommodate more housing.	As above and regular meetings have been held with Parish Councils to identify the level of growth appropriate and that can be accommodated in the villages
The Settlement Hierarchy considers 'access to main towns by public transport' but does not include railway services. The assessment criteria does not give due weight to the provision of the rail service from Hatton Station and scores 0 points against the criteria when the village benefits from excellent public transport links to Warwick and further afield.	Agree

Warwick District Council admit the Draft Settlement Hierarchy is open to debate, does not assess Green Belt location, is arbitrary in scoring and prone to third party data influencing results and not subject to public consultation.	See above
The proposals to impose 100 – 150 houses on each of the five villages and 70 – 90 on five others would in most cases damage their rural character and unbalance their structure. Smaller numbers may be acceptable over a long period.	The term for the new housing developments is 15 years which will allow for small numbers to be developed over that period of time
RDS5 should refer to Hatton Green, not Hatton Park. Although Hatton Park is the larger area, there is possible merit in considering Hatton Park and Hatton Green as one settlement. Development at Hatton Green will help to support, expand and produce new services which will be to the benefit of the wider community both of Hatton Green and Hatton Park.	Noted
Over 50% of development allocated to villages is intended to take place in the Green Belt, even before further evaluation processes of the RDS has begun.	Land which is suitable, sustainable and available within the villages will be taken out of the green belt as most villages are currently 'washed over' by green belt making it difficult to provide even infill development
The village categorisation has been softened to allow some local influence over housing numbers but the numbers are still in excess of actual village needs or projections.	New development in the villages is not just to meet village needs but that of the whole district
<b>Housing Level</b>	
There is current housing which is not occupied and many developments are uncompleted.	Where developments have not yet been completed, these figures have been taken into account and have reduced the overall requirement. Warwick District has very little housing which is not occupied and officers are aware of the level of vacancy
Development should be within one of the following criteria: -On previously developed land -Community-led -For an identified local need -Demonstrate a business case that development will help a local service or amenity.	The Governments growth agenda goes beyond this however and there is also a need for more homes than just from current residents.
Additional housing requirements are needed to meet the strategic priorities which are likely to arise from the SHMA that is currently being undertaken.	The Joint SHMA shows that growth is needed and the new level for that growth has been included in the next stage of the Plan
Brownfield land should be used to increase the housing stock.	Agreed and wherever possible, the Council wishes to use brownfield land in preference to green field
To boost housing supply, the Plan should identify a broader range of housing sites which are free from technical and environmental constraints.	This has been done but has to be balanced with other factors
The RDS has made insufficient provision of land to meet the full objectively assessed requirements for housing.	This has been addressed

<p>The future population projections must be robust and take into account the types of individual/families that are predicted to move into the area. If it appears that a significant proportion of population growth will comprise single people, young professionals or smaller households', this would indicate that development is inappropriate and the priority should be brownfield/town centre development.</p>	<p>It is recognised that a mix of housing is required and this will be addressed at the time of a planning application</p>
<p>The RDS should recognise that there is a limited supply of sites within the current village envelopes and should identify the need to build on undeveloped land adjacent to the built up areas of villages.</p>	<p>This will depend upon the villages and their capacity to accommodate new development and where this is best delivered. If there is no land available within the village envelope, adjacent land could be considered, but the envelope may need to be redrawn to ensure that a defensible boundary is in place</p>
<p><b>Potential Impact</b></p>	
<p>Tourism and local businesses will be damaged and threatened.</p>	<p>Economic growth can only be beneficial to both tourism and businesses or the district will stagnate</p>
<p>There will be too much pressure on infrastructure, roads, water supply and services.</p>	<p>An Infrastructure Delivery Plan will accompany the Local Plan and this will indicate where infrastructure needs to be improved or provided. CIL money will contribute toward provision</p>
<p>High concentration of supermarkets in one area necessitating car use for majority of home-owners.</p>	<p>Policies will concentrate new retail provision into the town centres first and then a sequential test will be applied to identify the next best location if suitable sites are not available</p>
<p>The District cannot retain its character and quality of life unless the housing growth is kept at a much lower level and much of this by windfall development within urban areas.</p>	<p>This is an important issue, but there is a proven need for new development to ensure that the district also has a growing economy and the housing requirement is met</p>
<p>The Local Plan is over-implementation and the quantity of new housing needs to be reduced by 50% for the future sustainability of the town and its residents.</p>	<p>The Joint SHMA shows that growth is needed and the new level for that growth has been included in the next stage of the Plan</p>
<p>Pollution to the south of Leamington is poor and extra vehicles will make it worse and create safety hazards.</p>	<p>The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic</p>

<p>The concentration of development in the south of the District on the edge of Warwick and Whitnash will cause strain on the infrastructure. Traffic is already a problem and the mitigation proposals will not address the problems. The road through Barford is gridlocked at peak times and a large development will exacerbate this.</p>	<p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport</p>
<p>Samur Way and Myton Crescent are subject to flooding.</p>	<p>A Flood Risk Assessment (FRA) will need to be submitted in conjunction with a planning application and mitigation measures included</p>
<p>Building upwards would be in character with central Leamington and Warwick and take pressure off the need to build on agricultural land.</p>	<p>The District is not an area of 'high rise' buildings which are more in character with cityscapes than in towns. Development reflecting the existing building heights may be acceptable, but the demand is for more family housing rather than flats which lend themselves to this style of building</p>
<p>Wildlife habitat will be destroyed.</p>	<p>See landscape and ecology studies on the evidence base pages of the website.</p>
<p>Should the District Council wish to identify any sites then the full extent of sand and gravel resources at the sites needs to be considered. [REP ID:63326, Warwickshire Country Council]</p>	<p>This information is held on our GIS system and advice sought from WCC through consultation</p>
<p><b>Rural Housing</b></p>	
<p>Other villages should be expanded more than proposed given their size, land available, current lack of village services and proximity to the A46 corridor and Warwick/Warwick Parkway rail stations (i.e. Hatton and Leek Wootton).</p>	<p>This does not lead to sustainable patterns of development. Lack of services can be improved by providing new housing and therefore demand for facilities and services</p>
<p>Warwick District Council should encourage the Parish councils to identify plots within and adjacent to village envelopes.</p>	<p>This is how the sites identified for development within the villages has been achieved</p>
<p>Careful changes to the Limited Growth Villages policy could identify sympathetic housing developments in rural areas.</p>	<p>See policies H3, H10, H11 and H12 for approach to housing in rural areas</p>
<p>There are no detailed allocations for the rural settlements.</p>	<p>This is a piece of work that is being carried out separately and which will be incorporated into the Local Plan at a later date. Public consultation will take place for the village options soon</p>
<p>A critical mass of units is required to ensure villages can be regenerated and become economically and socially sustainable.</p>	<p>Agreed</p>

It is unlikely that affordable housing will be able to be satisfied in a small village development of 3 – 8 units in a village with no services. Additional residents might improve the social aspects of the community but the biggest gain would come from a community facility payment from a development directly to the Parish Council.	Policy H4 would apply to sites over 5 dwellings
Sustainability is a prerequisite not just for villages with shops and pubs but smaller settlements will have some sort of community facilities which ensure a thriving community. Planning policy should underpin this.	Agreed. The village hierarchy demonstrates that even villages with fewer facilities can still take some of the development required overall and others can meet their demonstrated need
<b>Alternative Sites</b>	
It is unclear as to how sites will be selected and evaluated to ensure there are economic, sustainable and desirable sites.	The site selection methodology shows how sites have been assessed. See also sustainability appraisal
Any application from Coventry City Council to build to the south of their area should also be firmly resisted; development south of Leamington would have less impact.	Under the Duty to Co-operate, Coventry City Council could ask us to assist with the provision to meet their needs if they are unable to do so, as could other local authorities in the area
No reference is made to the land on the edge of Coventry. A separate allowance should be made for sites on the edge of Coventry (including land off Howes Lane).	
There are sustainable sites on the periphery of Coventry which could provide some of the housing allocation.	
Future residential development at Hatton Station would accord with the provisions of the NPPF in terms of sustainable rural development. It is a sustainable location and development would support local services and facilities and therefore Hatton Station should be excluded from the Green Belt and inset.	There are other reasons to exclude this area from development based on landscape value and green belt quality together with highways objections to potential access
Land adjacent to Tournament Fields has not been given sufficient consideration despite previous representations on the Preferred Options. Based on the Council's decision to grant planning permission for a continuing care retirement community on allocated employment land at Gallagher Business Park, it is not logical for the Council to insist that land adjacent the Tournament Fields should be retained for office use.	This is currently allocated as employment land and as such is a high quality site which should be retained
<b>Other Comments</b>	
Further studies are required to identify what 'proportional' means in terms of scale of development and numbers and the definition of infill or 'small group of dwellings'.	This can be very much a site by site analysis and isn't a clear cut definition. Infill is filling in of a gap between other dwellings/buildings and this is often used for villages where the outer boundaries are clear cut and defensible
The tone of the suggested policy is contrary to the spirit of the Localism Act and seeks to impose from above rather than be formulated by the residents who live there.	There are certain policies that do come down from above as they conform to the NPPF
The RDS does not satisfy the test of soundness from the NPPF (Paragraph 12).	This will be an issue for the next stage of the Plan

<p>Planning officers have assumed that the general conclusion of the GL Hearn Employment Land Review (ELR) 2013 applies equally to every parcel of land within the overall development. This approach is too broad brush.</p>	<p>New employment allocations have been focused in two areas rather than applied equally to all parcels of land</p>
<p>The Draft RDS proposes a significant oversupply of employment land resulting from a combination of the following factors:</p> <ul style="list-style-type: none"> <li>-Average employment land completions since 2008 is only 0.5 ha per annum (Employment Land Review, 2013) but the RDS identifies a total supply of 71 ha, without consideration for the Coventry Gateway development.</li> <li>-The figure for forecast demand of employment land includes two separate 'flexibility allowances'; 16.5 ha flexibility margin (Table 4, RDS) and an additional 5 ha added to the balance figure of 17.5 ha totalling 22.5 ha.</li> </ul>	<p>The Draft Local Plan allows for some flexibility in the supply of employment land (in line with NPPF para 21. The supply reflects the requirements for potential future job growth in the District</p>
<p>'Garden Suburbs' would in fact increase sprawl around the towns and destroy the rural character of the District rather than preserve it. Low density suburbia, no matter how well designed can never be a good replacement for real countryside.</p>	<p>'Garden Suburbs' are often quite high density so do not necessarily take up more land than other types of development</p>
<p>The Garden Suburb principle is in contrast to the type of housing which is most likely to be in demand over the next few years.</p>	<p>The Government is strongly supportive of the Garden Suburb principle and this can include all types of housing</p>
<p>The Asps site has the capacity, in landscape and heritage terms to accommodate major built development.</p>	<p>A Historic Settings Report has been produced that shows that this site is not suitable for development because of its impact on the setting of the Grade 1 Castle Park and the approach to Warwick</p>
<p>Land at Lodge Farm, Westward Heath Road is suitable for delivering some of the additional housing needed in the District. It is available, achievable and suitable.</p>	<p>See SHLAA and site selection methodology</p>
<p>Land off Rouncil Lane is free of constraints that might preclude the delivery of new homes, other than the policy constrain imposed by the Green Belt but the release of the site would not harm any other purpose for the include of land within the Green Belt.</p>	<p>See SHLAA and site selection methodology</p>
<p>In Primary Service Villages, integration would be better managed by additions in smaller blocks (e.g. up to 33 dwellings and therefore 3 blocks to achieve the 100 houses total).</p>	<p>See Policy H10 with regard to phasing developments</p>
<p>Land known as 'Crackley Triangle' is appropriate for housing development.</p>	<p>This site is included with the Draft Local Plan</p>
<p>1000 dwellings can be delivered on the land south of Baginton (SHLAA Reference: C10).</p>	<p>Noted</p>
<p>The document gives support to the phasing of developments is crucial to enable small communities to absorb new housing and to grow community facilities.</p>	<p>See policy H10</p>
<p>Village envelopes should be altered to enable limited development providing developers do not see this as a 'green light'.</p>	<p>See policies H10 and H11</p>

Land to the west of Old Budbroke Road is suitable for housing. It is well matched to the established settlement pattern.	See SHLAA and site selection methodology
Longbridge Depot, South West Warwick is appropriate for housing development. It is available viable and should be included within the sites for release within Phase 1.	See SHLAA
<b>Summary of Matters Raised in Support (General Comments)</b>	
The most sustainable villages should make provision for new housing regardless of whether they lie within the Green Belt.	
Green Belt boundaries must be altered through the emerging Local Plan and not in a subsequent Development Plan Document. To do so would not be in compliance with the NPPF.	
The criteria used for the designation and development of village sites are sufficient.	
It would be inappropriate for new developments to meet any housing needs identified by the village/Parish in which it is to be located.	
The aspiration to create 'Garden Suburbs' is welcomed and the positive promotion of Green Infrastructure for each strategic development site is supported. Proposed buffering of wildlife sites and habitats is encouraged and consideration to connect sites and habitats should be made.	
Refusing to allow development on land to the north of Leamington was a sensible decision. Land designated Green Belt provides 'lungs' between towns. If the land was built on, Leamington and Kenilworth would eventually become one town.	
Land west of Home Farm is appropriate for village growth.	
Support the Former Ridgeway School being included as an allocation and a number of confidential sites are identified as Smaller Urban SHLAA sites in the plan.	
It is important to draft village envelopes for Primary and Secondary Service Villages as soon as possible without preconceived ideas as to where development will be located.	
In agreement that supporting only the larger rural settlements runs the risks of ignoring housing needs of the District's smaller rural settlements.	
The complexity of the District's rural areas and the assistance that future development can provide to supporting rural economies and the protection of local services and facilities is well acknowledged.	
The Strategic Highway Assessments carried out by Warwick County Council correctly demonstrate the ability of the highway network to accommodate likely levels of traffic generation providing mitigation is in place.	
Should the village of Hatton Station have a new envelope defined then land to the west of Station Road (SHLAA Reference: R71) is suitable for development.	See comment above

There is land available at Hatton Green which could be offered for the improvement of other facilities.	
With a suitable approach to design, land adjacent to Tournament Fields, Warwick is suitable for development and could meet relevant guidelines on noise.	See comment above
Where housing is added to existing communities, the green spaces envisaged in the 'garden principles' should be placed between new and existing dwellings to lessen the impact on existing home owners.	Noted

<b>RDS6: The Council is proposing to make provision for 22.5 hectares of new employment land</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>Numbers</b>	
Not enough employment land is being provided to provide jobs for the likely economically active. The balance is in favour of residential land.	The Employment Land Review update 2013 assessed the Districts employment land requirement over the plan period and the Local Plan allocates additional land on this basis. This takes account of land already committed for employment use.
Job creation figures are based on out of date forecasts (10,200 new jobs over the plan period equates to 700 per year)	The job creation figures are based on the Cambridge economic forecasts in the Employment Land Review Update 2013. It is accepted that projections can vary between years however comparison with other sources of economic data suggest these are in the right range.
There is little need to create employment land when the unemployment rate is only 1.7% so if this reason is being sought it is flawed.	The Local Plan must make sufficient provision for employment land and buildings to meet the needs of the District throughout the plan period.
RDS6, 7 and 8 should be removed There is no reference to how these figures have been derived, consists of arbitrary estimates for future employment land and non-scientific approach to amount of flexibility needed. Result is over provision	Policy DS8 outlines the employment land requirement and how this is made up. The evidence underpinning this is contained in the Employment Land Review Update 2013.
Amount of proposed employment land is excessive and inappropriate when there are vacant sites. It is not supported by fact and not wanted by local residents.	The Employment Land Review Update 2013 assessed the Districts existing and committed employment land. This has been taken into account in the identification of new allocations of employment land.
RDS is unsound due to the excessive allocation of employment land. The identified need is for 36 hectares compared with a supply of 48 hectares. A combination of land reallocation and 60% contingency turns an excess of employment land into a deficit resulting in 66 hectares of unsubstantiated need. This is used	The Employment Land Review Update 2013 sets out the justification for the amount allowed for flexibility and to take account of the redevelopment of underutilised employment sites. The Council considers this to be a reasonable approach.  The land allocated in the Local Plan takes account of

<p>to justify development in open countryside and the greenbelt. By protecting existing land and making more realistic assessments of buffers and flexibility there is ample employment without building in the greenbelt.</p>	<p>committed employment land.</p>
<p>There is no clear justification for the provision of 22.5 hectares when 17.5ha is needed. If this has been approached to provide a buffer and increase the flexibility of land then this should be approached on the basis of a sequential review of suitable sites. 16.5ha is already being allowed for flexibility therefore this is double counting. Land reserved for future employment requirements later in the Plan period should be located further away from the urban edge to avoid prejudicing or interrupting the early delivery of residential development on sites sequentially closer to the existing urban area.</p>	<p>The employment land review indicated that it would be appropriate to allocate between 15 and 25 hectares of additional employment land to meet the 17.5 hectare requirement.</p> <p>The amount proposed in the Revised Development Strategy was derived based on the minimum considered necessary to provide sites of sufficient size, in the case of the southern sites to expand the Technology Park and in Kenilworth to provide a meaningful contribution towards the provision of local employment needs. It also provides an allowance for the displacement effect of the proposed sub regional employment site. The figure allowed for displacement is based on the specific plans in the Coventry and Warwickshire Gateway Scheme. In the absence of certainty over the exact nature and scale of the sub regional site to be accommodated in this locality it was thought that this allowance should be made over and above employment put forward to meet the 17.5 hectare requirement</p>
<p>The misleading deficit of employment land is used to justify development of new employment land at Thickthorn, The Gateway and Southern Sites</p>	<p>Variation can occur in Cambridge Econometric projections year on year both in terms of individual sector change and overall GVA and employment numbers. It is reasonable to allow additional flexibility equating to a 5 year supply of employment land based on past trends.</p> <p>The rationale for the amount allowed for flexibility is set out in the employment land review update</p>
<p>Of the 17.5ha to be allocated 16.5 hectares is only needed to allow flexibility. This is a wasteful use of valuable land.</p>	
<p>Allowing 16.4ha margin of flexibility is already an enormous 46% over the requirement. A more reasonable margin would be 1.8 to 3.6 ha (5 to 10%)</p>	
<p>It is not acceptable to take land in urban areas out of employment use and replace it on greenfield sites. The strategy should be to improve the effective use of existing employment sites at increased density. By leaving these areas there is more than enough employment land</p>	<p>In line with the NPPF it is important to ensure the supply of employment land and buildings is capable of meeting current and future needs. The proposed policy approach to older industrial estates reflects an assessment of the projected requirements over the plan period and as a consequence the need to refresh the Districts stock. These industrial estates arose to accommodate small scale local manufacturing and are characterised by building stock which now does not necessarily reflect the requirements of many businesses. It is anticipated that due to increased virtual working, the further decline in manufacturing and the fact that modern manufacturing processes have resulted in the need for smaller footprint buildings levels of vacancy on these sites will increase over time. In addition these industrial estates do not have easy access to the strategic road network and being located within or adjacent to residential areas do not</p>

	offer the most suitable environment for certain employment uses. This has led to a range of environmental health odour and noise complaints. It is anticipated that redevelopment could occur as part of a wider canal side regeneration scheme running throughout Warwick and Leamington (except at Common Lane)
There has been industrial land empty for 15 years why is there a need to allocate more. Land next to Warwick Gates is standing empty.	The Employment Land Review Update 2013 assessed existing and committed employment land in the District, including suitability to meet current and future employment needs during the plan period. The land allocated in Policy DS9 reflects this assessment.
There is already an excessive amount of land available and within the logistics sector many warehouses are not being fully utilised.	The Employment Land Review Update 2013 assessed existing and committed employment land in the District, including suitability to meet current and future employment needs during the plan period. The land allocated in Policy DS9 reflects this assessment.
The RDS is contrary to NPPF policies on urban regeneration and focusing on brownfield land	The Council has sought to maximise the use of previously developed land when allocating land for employment and housing development. The Council has also reviewed existing underutilised employment areas to support future redevelopment
The use of land which could have been used for housing will only generate more need for housing.	It is important that the right type and amount of employment is provided in line with the proposed level of housing growth.
Removal of the Gallagher's business park from the supply is not justified as the site cannot be technically considered as a residential allocation until it has been considered at an independent examination by a local plan inspector. The current approach to the review and selection of sites is therefore flawed and unsound. It creates an artificial shortage of employment land. If WDC accept that there is no reasonable prospect of the Gallagher land coming forward for employment purposes based on the grounds that an employment use hasn't been forthcoming to date despite a period of prolonged marketing it must follow that other sites in the vicinity are likely to suffer the same problems.	Outline Planning permission was granted in August 2013 for the development of up to 220 dwellings on the land north of Harbury Lane known as the Warwick Gates employment land. In determining this application the Council considered the site in the context of identifying the best location for employment land across the southern sites. Whilst it was acknowledged that the site had the potential to provide good quality employment land the evidence at that time indicated that the need would primarily be for B1 land and in particular to provide for an extension of the Technology Park.
There are significant offices which are vacant and have been unoccupied for years in Leamington. Planning should bring these back into use, it's too easy to build outwards. The lack of interest for offices on the Morrison's site speaks volumes about the lack of demand. Suggests local plan aimed at attracting new homes owners to the Warwick area who will not work there thus increasing traffic and commuting.	The Employment Land Review Update 2013 assessed existing and committed employment land in the District, including suitability to meet current and future employment needs during the plan period. The land allocated in Policy DS9 reflects this assessment.
Objects to the employment land allocation on the grounds that it is based on a flawed and	The Employment Land Review Update 2013 assessed existing and committed employment land in the District,

excessive housing target, the case is not made in terms of evidence and policy, it doesn't properly take into account the future employment impact of the Coventry Gateway, it risks sterilising a large portion of land which could be used for other uses.	including suitability to meet current and future employment needs during the plan period. The land allocated in Policy DS9 reflects this assessment.  An assessment of sub regional employment land need was also undertaken
Take up of employment is beyond the Council's control.	The Local Plan must ensure sufficient land is provided to meet the projected needs of businesses over the plan period.
<b>Consolidation</b>	
Alternative uses at Common Lane Industrial Estate can only be considered if adequate financial support is available to facilitate the relocation of existing employers and ensure the workforce is kept in the town	In line with the NPPF it is important to ensure the supply of employment land and buildings is capable of meeting current and future needs. The proposed policy approach to older industrial estates reflects an assessment of the projected requirements over the plan period and as a consequence the need to refresh the Districts stock.
Employment land should be redeveloped as employment land. WDC is intending to remove a total of 19.5 ha to redevelop for housing and require a further 13.5ha elsewhere to accommodate this.	These industrial estates arose to accommodate small scale local manufacturing and are characterised by building stock which now does not reflect the requirements of many businesses. It is anticipated that due to increased virtual working, the further decline in manufacturing and the fact that modern manufacturing processes have resulted in the need for smaller footprint buildings levels of vacancy on these sites will increase over time. In addition these industrial estates do not have easy access to the strategic road network and being located within or adjacent to residential areas do not offer the most suitable environment for certain employment uses. This has led to a range of environmental health odour and noise complaints. It is anticipated that redevelopment could occur as part of a wider canal side regeneration scheme running throughout Warwick and Leamington (except at Common Lane)
<b>Distribution</b>	
Plan doesn't include any commercial development in any of the villages where residential development is planned, suggests a modest level would be beneficial.	Policy EC1 sets out the instances where new employment development will be permitted in rural areas
<b>Coventry and Warwickshire Gateway</b>	
The Gateway is inappropriate development on the green belt with no special circumstances to justify development. All references to the Gateway should be omitted. WDC should do nothing until the Secretary of State's deliberations are complete. Will ruin the openness and rural character of the area.	The exceptional circumstances for a sub regional site are based around the provision of a substantial number of jobs. The inclusion of the sub-regional employment site is not directly related to the Gateway Planning application, although it does rely on overlapping evidence.
Proposal will not support regeneration as it would directly compete with established underutilised sites such as Ansty. If the private sector thought it could develop business and create jobs in the area then Ansty and Ryton	The employment needs of the sub-region have been assessed and this has identified a shortfall and the that this area has the potential to address that shortfall.

would be full.	
Will adversely affect village life in terms of increased traffic and environmental damage	The impact of the site has been factored in to the transport assessments. Sustainable transport options would need to be explored as part of any planning application
Plenty of commercial land is available which wouldn't impact on a rural community	The employment needs of the sub-region have been assessed and this has identified a shortfall and the that this area has the potential to address that shortfall
The RSS which proposed a site for the Coventry and Nuneaton regeneration zone has been abolished. The long established partnership in the sub region is the CSW (Coventry, Solihull and Warwickshire) however the Council has chosen to align exclusively with the interests of the CWLEP and City Deal.	Agreed however the evidence underpinning the Coventry and Nuneaton regeneration corridor is still relevant. Significant pockets of unemployment exist in these areas.
The Gateway proposal is contrary to many of the criteria set out in the RDS relating to a sub-regional site, there are alternative sites, the job numbers are unsubstantiated and the environmental impact will be severe. The proposal will result in the coalescence of Coventry and Baginton.	The employment needs of the sub-region have been assessed and this has identified a shortfall and the that this area has the potential to address that shortfall
The largest areas of unemployment are in Coventry and Rugby to the north	It is considered that the sub regional site is well located to meet these needs.
Council should rethink its policy on employment land and redevelop and reinvigorate brownfield land and utilise existing employment sites such as Ansty and Birch Coppice.	The Council has sought to maximise the use of previously developed land when allocating land for employment and housing development.
A specific policy for Stoneleigh Park is needed in support of its development as a rural enterprise and innovation Park.	The unique role of Stoneleigh Park in the Districts economy is recognised in Policy MS2. The Council supports the delivery of the approved Master plan, and policy MS2 provides the framework for considering future proposals in the context of the Parks green belt location.
<b>General</b>	
Bridge in Mill Hill will not cope with the proposed buses	The County Council undertake regular safety checks on bridges to ensure they are structurally sound and capable of meeting current and future traffic.
Can the Council identify the type of employment to be provided	The Council has a portfolio of sites (outlined in policy EC3) which provide for the full range of B Class uses. The Council has also identified the type of employment it considers would be appropriate on the employment allocations.
Developing employment provision in connection with housing needs is unrealistic, has data been collected to establish the percentage of population who live and work in the same area	The provision of employment land is based on economic forecasting, projecting likely growth in different sectors during the plan period taking account of market signals and the existing provision of land.
Local Plan should provide greater flexibility to facilitate the release of employment sites over and above those areas currently identified which no longer meets current business needs. Recommends a policy listing criteria which must	Policy EC3 sets out the criteria via which existing and committed employment land may be changed to other uses. The Council considers there is sufficient flexibility through this policy to take account of circumstances during the plan period where employment land may not

be met to release land introducing the recommendations in the ELR 2013 would do this. Employment land allocations should be reviewed regularly and if necessary revised demand forecasts for employment produced.	serve the current or future requirements of the market. In accordance with the NPPF the Council will continue to monitor employment land allocations to ensure they are still capable of meeting needs.
The RDS does not take into account Stratford's consultation on proposed development at Gaydon / Lighthorne, this would be closer to the JLR plant.	The Council is aware of proposals being put forward by Stratford District Council and an officer group is in place. The employment needs of the sub-region have been assessed and this has identified a shortfall and that this area has the potential to address that shortfall.
The policy on employment land is in direct opposition to the stated local plan aims – to protect the green belt and avoid coalescence	Brownfield sites have been allocated and other areas protected for employment uses. The sub-regional employment sites requires exceptional circumstances to be justified to be consistent with the NPPF
Gallows Hill land is not suitable or needed for employment	The employment land allocations set out in DS9 reflect the assessment of existing and committed employment land and future requirements detailed in the Employment Land Review Update 2013.
Takes narrow view of employment uses, active economies need a range including those outside B Class uses	It is agreed that the Districts economy is supported by a range of uses including those outside B Class. The Prosperous Communities chapter of the Local Plan contains a wide range of policies to support these.
No allowance for the fact that B1 office buildings are typically two to three stories whereas B8 are single storey	When converting floor space requirements into land requirements typical plot ratios are used for each of the B Class uses to take account of this.
Concerned that the Local Plan does not explain how the LPA will use the development and planning strategy to help existing businesses, employers and service providers to expand and adapt	In protecting existing and committed employment land and allocating new employment land the Local Plan seeks to ensure that the needs of businesses are provided for throughout the plan period. It is anticipated that the Council will prepare a prosperity strategy which will sit alongside the Local Plan.

### Summary of Matter Raised in Support

Supports identification of the need for employment land over the plan period and the need to support and encourage sustainable economic growth in line with the objectives of the NPPF.	Noted
Supports the use of green belt land to expand employment opportunities at business parks at Stoneleigh and around the University. Must be good transport links to allow access from urban areas.	Noted

### RDS7 – Location of new employment land

Consultation Comment	Response
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<b>Summary of Matters Raised in Objection</b>	
Overestimated requirement	The Employment Land Review update 2013 assessed the Districts employment land requirement over the plan period and the Local Plan allocates additional land on this basis. This takes account of land already committed for employment use.
The rural economy needs greater support to remain viable, many village services are threatened with withdrawal.	The Local Plan recognises the need to support the rural economy. Policy EC1 sets out the framework for directing rural employment.
<b>Gateway</b>	
The Gateway is unsustainable and inappropriate development of the green belt with no very special circumstances Inappropriate development in the green belt	The exceptional circumstances are based around the provision of a substantial number of jobs and the investment in the sub regional economy.
References to the Gateway should be removed from the Local Plan	The inclusion of the sub-regional employment site is not directly related to the Gateway Planning application, although it does rely on overlapping evidence. It is appropriate to refer to the planning application.
Scheme does not enhance or improve the area and would have far reaching negative impacts on local communities and the environment	The delivery of a sub regional employment site would have significant benefits to the economy in terms of job creation and investment.
The benefits will be felt elsewhere	The development of a sub regional employment site at this location would have significant benefits in terms of job creation and investment.
Delivery of scheme not in Council's control	Together with neighbouring authorities the Council must ensure sufficient land is available to meet sub regional employment needs.
Scheme should not be given credence in the light of unfounded promises of boosting employment numbers / unlikely to generate jobs claimed	Evidence on the viability and potential job creation of the scheme was appraised as part of the Gateway planning application. The SEP and the emerging joint Employment Land Review 2014 also recognise the benefits of developing the site for the sub regional economy.
In light of many industrial units being empty in and around Coventry it is preposterous for green belt to be taken.	The emerging Joint Employment Land Review assesses the sub regional employment land need
It is important that the green belt is preserved around a village so close to Coventry	The proposals for part of the site to be retained as green belt but included in a comprehensive scheme will enable the identity of Baginton to be maintained.
Agrees with the need to provide employment but has serious reservations about the viability and robustness of the ability for the Gateway to produce the quantity and quality of employment.	Evidence on the viability of the scheme was appraised as part of the Gateway planning application. The SEP and the emerging joint Employment Land Review 2014 also support the development of the site.
A business park next to the airport suggests a giant logistics park however Ryton is already available for this purpose.	The emerging Joint Employment Land Review 2014 identifies the need for additional sub regional employment land in addition to committed sites

	such as Ryton.
The policy of supporting a sub-regional plan to create more employment is contrary to the NPPF; the Gateway will lead to displacement of jobs from Coventry - negative impact on regeneration zone. Very few of the jobs created will be new and many will be displaced from Warwick and Leamington.	The NPPF requires neighbouring local authorities to work together and with the Local Enterprise partnership to understand sub regional employment land needs.  Levels of displacement will be minimal and have been taken into account into account in calculating employment land needs in the Local Plan.
<b>Expansion of Warwick Technology Park</b>	
Land to the east of the Technology Park is designated as an area of restraint therefore should not be proposed.	The Council reassessed all land designations in preparing the new Local Plan and the area of restraint has been superseded by the new Local Plan. It is considered that in comparison with many other options this is a suitable sustainable site to meet the Districts development needs.
There is no need for employment land south of Warwick as the district has low unemployment at 1.7%	The Local Plan must make sufficient provision for employment land and buildings to meet the needs of the District throughout the plan period.
Objects to the Councils strategy of selecting sites which does not take into account: <ul style="list-style-type: none"> <li>- market signals – that employment take up across the district has been slow and the apparently decreasing rate of completions should be considered in determining the location of future employment land. In addition there is increasing demand for residential land, to ensure that the residential development is phased appropriately the most sequentially preferable sites should be given priority.</li> <li>- employment land phasing - The allocation of additional employment land in the early phases of the Plan may prejudice the completion of other existing sites (Tournament Fields) and the delivery of proposed strategic employment sites (Coventry Gateway)</li> <li>- sequential approach – the proposed employment land north of Gallows Hill represents the most sequentially preferable site for residential development. Based on the difficulties of Gallagher’s in marketing their site it is likely this would be left undeveloped leaving a significant gap in the urban extension for some time.</li> </ul>	The Employment Land Review Update 2013 assessed the Districts existing and committed employment land. This has been taken into account in the identification of new allocations of employment land.  See also comments in relation to RDS6
Does not see how the expansion of the Technology Park will help low skilled workers find jobs.	The employment land allocation adjacent to the Technology Park is part of a larger portfolio of sites which will cater for a range of different types of employment during the plan period.
Warwick Gates was earmarked for employment for a number of years but remains empty	Outline Planning permission was granted in August 2013 for the development of up to 220 dwellings on the land north of Harbury Lane known as the Warwick Gates employment land. In determining this application the Council considered the site in the

	context of identifying the best location for employment land across the southern sites. Whilst it was acknowledged that the site had the potential to provide good quality employment land the evidence at that time indicated that the need would primarily be for B1 land and in particular to provide for an extension of the Technology Park.
Employment site will be visible from Warwick Castle	A heritage settings assessment was undertaken to understand the impact of development on Warwick Castle.
Do not support this option south of Gallows Hill, which will be much harder to integrate as part of a comprehensive sustainable travel and bus priority package, including "virtual Park and Ride".	Noted. The Local Plan allocates land north of Gallows Hill for development.
<b>Thickthorn</b>	
Objects to green belt land at Thickthorn being designated as employment land. It has been demonstrated that there is over 20 years supply already designated. Permission has been granted at Abbey Park and Stoneleigh Park yet both sites are struggling to find occupants.	The Employment Land Review Update 2013 identified that the supply of employment land in Kenilworth is limited. The site at Thickthorn has good access to the strategic highway via the A46 and is considered suitable to provide employment as part of a wider residential led development.
Unacceptable to use unsubstantiated need for employment to justify development	
Doesn't understand why Thickthorn would be designated for employment use, when there is no history of employment use in that part of Kenilworth, and there would not appear to be a demand for employment land in Kenilworth	
<b>Former Honiley Airfield</b>	
Welcomes recognition that the sub region has a particular strength in the automotive / vehicle manufacturing sectors, the Former Honiley Airfield plays a key role in delivering this.	The unique role of the Former Honiley Airfield in the district and sub regional economy is recognised in Policy MS2. Policy MS2 provides the framework for considering future proposals in the context of the sites green belt location.
Important that a site specific policy framework is developed to support appropriate development	
Aside from the economic benefits future development at the site could bring a number of on-site environmental improvements, including re-laying the test track with a noise reducing surface and providing noise-attenuating bunds The major developed site boundary should be extended so that it is consistent with the Fulcrum planning permission which approves the principle of development in an area of woodland currently excluded from the MDS. It would be appropriate to extend the MDS boundary to cover the test track.	
Provides a superior site to the Gateway	
<b>Consolidation of employment land</b>	
A reduction of employment land on the identified industrial estates would be to the detriment of low skilled workers across the area. Currently people are able to walk or cycle to work	It is important to ensure that any existing businesses are supported in relocating close to their existing workforce and market. There are a wide range of other sites which would be suitable for these types of uses

<b>Summary of Matters Raise in Support</b>	
Supports both strategic allocations. The provision of employment land at the western end of Thickthorn could be served by existing bus provision.	Noted
The augmentation of employment land at WTP could create a greater mass of demand as well as reducing the average distances people in the area will need to travel to work increasing opportunities for more sustainable modes of transport such as the use of bus services. It should be possible to address current unsatisfactory bus circulation and stopping arrangements within the Tech park and problems associated with current on street parking on the carriageway.	Noted
Rigorous travel plans should be required to reduce car dependency.	Noted
<b>North of Gallows Hill Employment Site</b>	
Would prefer the extension of Warwick Technology Park to take place north of Gallows Hill where the opportunity to address the challenges and opportunities created by current car dependency can be better realised	Noted
Would be more acceptable site if it can be linked to the existing Technology Park	Noted
Supports aspiration for a Stadium but it will require significant supporting infrastructure.	Noted
Site will have direct access to the main highway network and have a visible presence on the Europa Way corridor	Noted

<b>RDS 8 Sub-regional employment site</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
There are no special circumstances to justify release of greenbelt land. It is unsustainable and will ruin the rural character of the area	The exceptional circumstances are based around the provision of a substantial number of jobs
Approach to RDS8 is inconsistent with the NPPF in terms of the need to ensure the long term permanence of the green belt. If the land is being reallocated for employment it should be logically removed from the green belt in the same way as	The Draft Plan proposes that the site is removed from the green belt

other strategic sites in the Plan.	
Plenty of brownfield sites are available in Coventry as well as Ryton and Peugeot	These sites are either being developed or have been assessed as less suitable for meeting the employment needs of the sub-region
No mention is made of current employment at Stratford and the houses that are planned nearby. WDC should site another large development near there.	The employment needs of the sub-region have been assessed and this has identified a shortfall and the that this area has the potential to address that shortfall
Strategy is illogical in terms of the amount of land allocated for sub regional needs. Within this area an excessive amount of land is already available and within the logistics sector this is far from being fully utilised. The employment claims within G L Hearn's report are spurious at best.	The Employment Land Review 2013 sets out local employment land needs. The sub-regional employment site is aimed at a different market
Contrary to NPPF policies on urban regeneration and making the focus on brownfield land.	Brownfield sites have been allocated and other areas protected for employment uses. The sub-regional employment sites requires exceptional circs to be justified to be consistent with the NPPF
The RSS has been abolished but the justification for the site still relies on policies such as the Coventry and Nuneaton regeneration zone. This is in conflict with government policy. There is no definition of what a sub regional site is but the justification seems to rely on the RIS in the RSS.	The policy is not reliant on the RSS, but it does to draw (to a small extent) on the studies and evidence that underpinned the RSS. The emerging Joint Employment Land Report seeks to update this.
The long established economic partnership in the area is the Coventry, Solihull and Warwickshire Partnership (CSW) but the RDS focuses on the CWLEP, the sub region is therefore an artificial construct with no proven need.	Cooperation with the LEP is required in the legislation (Localism Act)
Will have a detrimental impact on existing employment sites in the district which remain undeveloped. These include unused sites such as Ansty and Daw Mill Colliery	The potential for other major employment sites to meet the sub-regional need has been assessed as part of considering the Gateway planning application and in the emerging Joint ELR (2014).
Warwick has low levels of unemployment. The Gateway site is remote from the main areas of unemployment in the north of the sub region. The proposal will take jobs away from these areas of greatest need and increase the excess of employment land in WDC area.	There is no excess of employment land in Warwick District. Employment land is required to support the potential for the District's economy to grow. This will be further supported by a thriving sub-regional economy
It will increase travel by car from towns to the rural area scuppering chances of urban regeneration. It is contrary to the transport strategy	The impact of the site has been factored into the transport assessments. Sustainable transport options would need to be explored as part of any planning application.
Would result in the coalescence of Baginton and Coventry	The proposals for part of the site to be retained as green belt but included in a comprehensive scheme will enable the identity of Baginton to be maintained
Unhappy with the process, scale of proposal is out of character	The scale is large, but is necessary to support large scale investment
Evidence of employment land requirement is flawed, no justification for need for site or demand for uses. Even if site is needed no justification for siting in Warwick District. There	The 2013 ELR justifies local employment land requirements. Evidence for sub regional employment land is based on

has been no consideration of alternative sites.	studies to help with assessing the Gateway planning application, the SEP and the emerging joint Employment Land Review 2014.
It is not for the local plan to anticipate or favour planning applications particularly commercial developments in the green belt.	The inclusion of the sub-regional employment site is not directly related to the Gateway Planning application, although it does rely on overlapping evidence
While the policy describes a generic employment site for B1, B2 and B8 uses it depends on the justification from the planning application. This is pre determination of the planning application.	
Developer contributions and mitigation needs to be viewed and assessed in the context of financial viability	Noted
It is unclear the level of employment which will be displaced from existing employment areas in the District and the impact of this on housing need. Economic projections point to a need between 13,300 and 13,900 dwellings - It is anticipated that the impact will be at the top of this range.	The 2012 Economic and Housing Market Impacts study made some assumptions the level of displacement from Warwick District employment areas and assessed the housing impacts of the Gateway, which was at the margins for Warwick District.
As this will be a significant creator of employment a substantial number of dwellings should be built close by within each authority area.	
<b>Summary of Matters Raised in Support</b>	
Scheme seems logical however if this is the main development housing south of Warwick is illogical	Noted
The site being promoted at Baginton would provide an ideal location for a sustainable urban extension to Coventry, in close proximity to this major new employment site	Noted

## **RDS Strategic Development Sites: Sites south of Warwick and Whitnash – Whole Area**

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
<b>TRAFFIC AND AIR QUALITY - Castle Bridge, Saumur Way, Myton Crescent, Barford High St, Gallows Hill, Banbury Road, Bridge End roundabout, The Butts, St Nicholas Church</b>	
There will be too much traffic congestion and therefore exhaust fumes and air pollution causing greater health risks.	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.
Travelling to Warwick and Leamington is currently terrible and the roads in town will always be inadequate despite improvements to surroundings roads such as Europa Way.	
The extra traffic will cause a massive increase in noise pollution.	
Cars are currently parked all the way up Gallows Hill during the working week and are now starting to park in Bridge End and Archery Fields. This will only worsen with development.	
Only 10% of people use busses to get to work and bus service	However the Council, in conjunction with

providers are reluctant to provide frequent services to developments without subsidies.	<p>WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport</p> <p>The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic</p>
River crossings will create a bottleneck for traffic.	
Congestion is already unacceptable and will worsen.	
We should be encouraging visitors to town, not providing a rat run for commuters to Birmingham, London and Coventry.	
Over 69% of housing is planned in the south of the region which will place a huge burden of river crossings and roads and access to motorways, which are already congested.	
Barford High Street is already used by commuter traffic to bypass Warwick and the plan to build alongside the Banbury Road would worsen this.	
Concentrating development south of the river, canal and railway will exacerbate traffic congestion as there are so few crossing points.	
Adding thousands of extra vehicles will make the air quality poor and roads will become dangers.	
There has been flooding on The Malins, Saumur Way and Myton Crescent and the whole area will be at risk of flooding if the top soil is removed from the fields.	
Ref: Para 5.1.29- The studies show no such thing (that a mitigated transport network can accommodate development). They show that the measures may reduce traffic but will still result in a deterioration of air quality. The mitigating measures may worsen matters at off peak periods.	
New roads and larger junctions will just feed more vehicles into the existing bottlenecks.	
The number of dwellings is disproportionate to the local road infrastructure.	
Warwick prep school playground next to Banbury Road, St Nick's Park, Avon Bridge and Myton Road with 3 schools are not areas to increase the volume or speed of traffic.	
There is inadequate public transport.	
The amount of vehicle movements associated with the recent developments in and around Whitnash are seriously underestimated.	
There is no capacity to widen, extend or improve Myton Road which is already overloaded with traffic.	
The proposed access to the garden suburb is via Saumur Way which is a tiny residential road.	
The changes proposed to roads seem to encourage cars to drive through the town centre of Warwick rather than use the bypass.	
Warwick town centre is already extremely congested with traffic often queuing back from the Eastgate traffic lights to the Castle roundabout and from there to the bridge over the River Avon, this will worsen matters.	
Nobody wants to see Kings High School demolished to make space for a roundabout.	
The traffic modification scheme for Castle Hill will be detrimental to local traffic. The scheme will damage tourism and the scheme assumes significant growth in traffic over the Avon Bridge, but no study has been commissioned to determine the Bridge's	

capability.	
Saumur Way will become a through road.	
The cycle path that is well used by school children will become a danger spot	
There are currently dangerous queues on the hard shoulder of the M40 during the morning rush hour and queues from Leamington to the M40 at 5pm. Current plans will worsen these.	
Town centre car parks will be put under increasing pressure.	
NPPF Policy DC7 states that development will not be permitted where it generates significant traffic. The developments proposed will generate significant traffic and mitigation measures will not alleviate them.	
Warwick's streets are too narrow for more expansion are will not be able to cope- especially Avon Bridge, The High Street, The Butts and Priory Road.	
There should not be dual carriageways and traffic lights all in a Conservation area along Banbury Road.	
Appendix E of the Warwick Strategic Transport Phase 3 Assessment shows that there will be large areas of 0-5mph average speed at rush hours and this is unacceptable.	
The area is already a heavily congested area with school and technology park traffic.	
The proposals to create a 2 lane approach to the bridge is pointless as the bridge will remain one lane and will therefore be a bottleneck.	
There are limited number of crossing points over the railway and river leading to pinch points.	
The Warwick strategic transport phase 3 assessment show traffic speeds on only 0-10mph at large parts of Warwick.	
Object to the proposed provision of a Park and Ride facility to address the parking problems in Warwick Technology Park as this problem should be addressed on site at the Technology Park through improved transport provision and better utilisation of existing land at the park. There is no evidence related to the need, size or location of such a park and ride facility.	
Air pollution will worsen.	
The plan will mean there are thousands of commuters going through, but not stopping and using Warwick Town centre meaning no benefit will be seen by shops and businesses.	
The health of Warwick residents is at risk due to the poor air quality and pollution.	
Air quality in Warwick in 2007 was above the recommended level, with levels at Pageant House 41% above the minimum level deemed acceptable.	
Why concentrate most of the new building in an area where air quality is already bad?	
Little consideration has been given to providing a sustainable high quality bus service within walking distance of homes.	
Any bus services will not be self-funding and will rely on subsidies to run.	
Parking on Tachbrook Park Drive is blocked by HGV traffic even at nonpeak times- loading bays are needed.	

Residents in Bishop's Tachbrook have poor bus services.	
There will be severe disruption to roads and sewage systems whilst constructions of these sites take place.	
The X18 bus service along Myton Road should be made more frequent.	
Banbury Road must keep its pedestrian crossings, as they are well used.	
Town centre needs better parking plan. Nothing to encourage traffic directed through town to stop and enjoy what Warwick offers.	
The recent development of Morrisons indicated that traffic will not be able to circulate properly and that residents do not have confidence in the mitigation package proposed.	
The mitigation measures will turn St Nicholas Church Street into a 2 lane carriageway making it difficult to cross and impossible to park.	
<b>General</b>	
How will local schools cope with new housing?	WDC is continuing to work with WCC education and the education providers to ensure school capacity is expanded and improved where it is needed
Brownfield sites have been used for super markets; more should have been used for housing.	Available and suitable brownfield sites are included within the Local Plan
More brownfield sites and empty properties should be brought back into use.	
Areas of town that have become untidy and desolate should be revived first.	
The amount of housing proposed for the south is disproportionate compared with that of the north.	The area to the south of the towns lies outside the green belt
Development has not been fairly distributed over the whole district.	
Whereas the proposal is improved, it is still too crammed into the southern area.	
The area around Whitnash has had to deal with a substantial amount of development over the past decade.	
The proposals seem to go against the advice on WDC's landscape consultant and the 2006 planning inspector.	Updated landscape work suggests these sites are suitable with the right mitigation
Harbury Lane should remain the southern boundary of the built up area of Warwick and Leamington.	
The development will be an eyesore on a beautiful skyline.	
The visual impact on so many houses will be significant.	
Rural views from Bishop's Tachbook, Harbury Lane, Tachbrook Valley and Gallows Hill will be ruined.	
This is one step away from the coalescence of settlements leading to absorption of Bishop's Tachbrook into the Warwick/Leamington/Whitnash conurbation.	The proposed country park seeks to prevent coalescence with Bishops Tachbrook
The building will eventually lead to urban sprawl and uncontrolled development	
The towns of Warwick and Leamington are small and urban sprawl is already large in comparison.	The Joint SHMA shows that growth is needed. Edge of urban locations are the most sustainable after brownfield sites
Warwick's Castle deserves more green space	The Gallows Hill sites has been removed

	from the proposals
Development will lead to areas being more prone to flooding.	The strategic assessment suggests development here is suitable. Flooding will need to be addressed in detail as part of applications
The proposals make no provision for the allocation of Gypsy and Traveller Sites. New housing areas should include all Gypsy and Traveller Sites into those new developments so they offer better quality of environment, local services and better integration.	Alternative proposals are being explored for G&T sites
It will cause harm to the existing communities of Whitnash and Bishop's Tachbrook especially since Whitnash is now more like a town than a village.	These concerns are noted and have been weighed in the proposals
There is no demand for such development between Bishop's Tachbrook and Warwick Gates.	Evidence and development interest suggests otherwise
Further work needs to be done on the impact of development on listed buildings.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report
The development of the eastern side of Banbury Road as a "garden suburb" would be extremely detrimental to the historic landscape of the Grade I registered park.	
The historic buildings in Warwick are being eroded.	
The biggest area of expansion is around Warwick Castle which is one of our biggest assets, this is wilfully irresponsible.	
There will not be a sense of community on the new estates	This will require work. Policy BE2 seeks to address this
The quantity of building is too much.	The evidence suggests this quantity is needed and that it can reasonably be accommodated
Warwick Gates does not have its own school, so school children have to travel further and further to get to school.	Noted. New schools will be provided
The RDS does not provide any evidence that the infrastructure requirements will be adequately addressed by CIL/Section 106 obligations.	See draft IDP
Where will parking be for Smith Street Shops?	The existing on street parking will be retained
Where will all the jobs be for the new residents?	See policies DS8 and DS9
More brownfield sites should be used.	See policy DS10 and DS11
There is an inadequate access to services such as Police, Fire Services, Hospitals, main shopping areas, banks, train stations, bus stations etc. All of these are north of the Grand Union Canal / River Avon.	See IDP and traffic comments above
Warwick Gates has caused traffic congestion; flooding and local children are unable to get into their local catchment schools.	All these aspects have been considered – see comments above and below
It's better to grow more communities across the region organically, based on their individual needs rather than use a sledge hammer approach.	This is very difficult to do in terms of identifying enough sites and does not necessarily lead to sustainable patterns of development
Developers and land owners are only interested in money.	Noted
The number of houses will lead to a lower quality of life for residents.	If carefully planned, this need not be the case (see range of comments above and below)
Houses should be located nearer employment opportunities.	These sites are close to significant areas of employment

The Local Plan does not contain evidence to show proposed infrastructure can be delivered from developer contributions through S106 and CIL.	See IDP
Bishops' Tachbrook had water pressure problems when Warwick Gates was built.	Severn Trent Water have been consulted and do not have concerns about the proposals
Sewage disposal in Warwick is at capacity.	
Local doctors surgeries, hospitals and schools are already at capacity.	See IDP
Employment should be provided first followed by a gradual increase in housing numbers.	This will be determined by market demand. The sites will be available concurrently
The concentration of building to south of Warwick and Whitnash has not been justified.	See comments above and below
Development at Whitnash will create further congestion and put pressure on the infrastructure and community facilities.	See transport comments above and IDP
The proposals contradict the vision for the district to 2026 which sought to protect settlements and characteristics and identities.	They are certainly different from previous proposals as current development needs are significantly different
The development should be scaled down as a local survey found need for only small number of houses.	The Joint SHMA suggests the proposed level of development is appropriate
Whatever numbers and areas are finally agreed on, they should be "enclosed" as a final limit by extending the proposed Country Park across to the West to meet the Warwick Castle Park and stopping the inexorable creep southwards into the Green Belt areas.	The Gallows Hill area is not included in the proposals making it difficult to extend the Country Park in that direction
It is not fair to dump a huge amount of housing on a small area around Myton, which will significantly impact on the quality of life of Myton residents.	There may be an impact for some communities and this has been weighed against the benefits of development. Mitigation has been considered.
The people who live in Warwick have not been considered	
Myton residents will have to put up with 15 years of construction, on the back of the recent construction of Lidl, Brittain Lane Site and Morrison's.	
The strategy would not benefit existing residents.	
It would appear that Warwick and Stratford have not liaised regarding the development at Lighthorne Heath.	There have been regular coordination meetings
We do not want to bring our children up in a huge town out of control.	Noted
Why can't the Leper Hospital, Gas Works, Empty Fire Station offices be redeveloped into housing before large development on our green fields.	These are all proposed for development as small urban sites
Additional housing will require investment in a major infrastructure which in turn will lead to more traffic.	See IDP
Developments should benefit the main school entrances on Myton Road, a park and ride south of the schools.	Noted
There is a preponderance of social housing that will be predominately built.	We aim for 40% of new development to be affordable housing see policy H2
With changing high street requirements (more sales done online etc) there is a case for more empty shops and public houses to be utilised for housing.	We are seeking to support vibrant town centres – see Retail and Town Centre section of Local Plan
Further work needs to be done regarding impact on listed buildings and health.	Air Quality and impact of heritage have both been explored further
The proposals will have a significant negative impact on the	We are seeking to minimise these

historic environment in Warwick including the traffic management scheme that will damage the environment around Banbury Road and Castle Hill and damage to the Stone Bridge on Banbury Road.	impacts through careful junction design
New housing at the Pottertons site took a long time to sell and employment land at Warwick was sold for housing.	Noted
Warwick Town needs as much if not more protection than the Green Belt.	The proposals seek to protect the green belt, mitigate the worst impacts on Warwick and bring some benefits to the Town
The development size will lead to a large urban identity with no identity or natural connections with existing towns.	See policy BE2
Delays in finalising the plan will result in a developer's charter, with the Planning Department unable to prevent developers building unwelcome areas with no planning, design or size of dwellings.	It is important to progress the Plan as quickly as possible
The designated housing areas are far from the employment areas.	This is not the case – see employment allocation and existing employment areas
There is a potential threat that many properties could be bought to let, which tends to destroy communities.	Noted
There appears to be no pro-active planning layout.	See policy BE2
Coten End School is oversubscribed and will be expanded this year from 60 to 90 children each year resulting in a very crowded school.	See IDP
Cape Road GP has closed its books and Warwick hospital cannot cope with a population increase.	See IDP
There are plenty of industrial estates which would be better built upon than green field sites.	Use of some traditional employment for housing is included within the Plan –see policy DS17
Richard Morrish said that Gallows Hill should not be considered for urban extension in 2009.	Site now not included
Policy on Housing Mix should be advised by the awaited SHMA.	See policy H4
Flexibility is required on the affordable housing target of 40% which is not in the conformity with the NPPF. The affordable housing provision should remain to be agreed with the Council on a site by site basis.	See Policy H2
£106 million generated from the sites would be inadequate to fund the necessary infrastructure.	See IDP
The supply of water and electricity and hospital services are at capacity and new sewage treatment works would be required.	See IDP
Concerned that the strategic development proposals set out in the Strategy are coming forward through the development control system in an uncoordinated manner and these now account for the majority of the strategic quantum.	The Council has no control over when planning applications are submitted
Developing Zone 6 is not sustainable development according to the original concept (United Nations Brundtland Commission in the 1980s) which says we should not destroy something that future generations will find valuable.	Housing is also needed for future generations
Although information is set out at a sub district level, there may be justification for a specific type and mix of housing in a particular locality and therefore the Council should ensure the policy is sufficiently flexible to deal with such circumstances.	See policy H4

Affordable housing will have problems with it.	See policy H2
Warwick is a historic county and should remain as such.	Agreed
Stratford should take more housing than they currently are as should Coventry.	See policy DS20
Housing mix and densities set out in paragraph 5.1.3 and 5.1.4 of the RDS can be achieved on the proposed development sites.	See Policy H4
The 'at least 25% of homes' figure given as Lifetime Homes standards set out in paragraph 5.1.4 is discretionary and should not be compulsory through planning policy.	The Local Plan does not require this
Paragraph 5.1.4 refers to the provision of homes for the elderly. The Council is aware that there is planning permission for elderly accommodation on land adjacent to the West Warwick Gates site, so it is unlikely there will be demand for further facilities for the elderly.	Noted. See policy H5
Bridge End is in a conservation area.	Noted
The potential for an expansion to the south of the Tach Brook will be dependent on the availability of land. A C Lloyd Ltd controls additional land north of Tach Brook and south of Harbury Lane as shown on the attached plan. This extended area should be included within the area shown on Map 3, provide open areas for amenity and recreation; habitats to support a diverse ecology and to integrate development in the landscape and surrounding settlements. The disposition of these uses should be determined through an analytical assessment of the opportunities and constraints with the benefit of stakeholder and public consultation. For the purposes of this stage in the Local Plan process it is considered sufficient to identify the extent of the allocation as portrayed on Map3, subject to revision of extent of the area as noted above.	See policies DSDS11, DS12, DS13, DS14, DS15
There is no evidence provided to justify a phasing limitation set out in paragraph 5.1.2. A phasing limitation is likely to constrain strategic sites from being brought forward.	There is no general phasing policy
<b>Flood Risk</b>	
There will need to be a buffer zone between the old and new developments in the Myton area to allow for some natural drainage.	The strategic assessment suggests development here is suitable. Flooding will need to be addressed in detail as part of applications
Development will lead to areas being more prone to flooding.	
<b>Employment Land</b>	
New employment land requirements are far too great.	See policies DS8 and DS9. These policies have been evidenced by the Employment Land Review 2013.  There is also employment to the south. The sub-regional employment site will service a different market
It took years to fill Warwick Technology Park	
Land for industry by Warwick Gates has been reassigned to residential due to lack of interest.	
No companies have expressed an interest in the Ford Foundry site other than shops.	
Even if jobs at Coventry Gateway were factored in, residents of south Warwick would have to drive approx. 10 miles to get there.	
3165 houses south of Warwick is nearly half of the total of around 6000 identified in section 4.3 and yet the major employment site is proposed north east of Warwick in the area of Coventry airport. It would seem more sensible to have a more balanced approach and include sites north of Leamington	
Proposal for a 'major sub-regional employment site' at Gateway	

appears odd as there are 3,195 houses south of Warwick which will create huge volumes of traffic that will pass along Banbury Road over Avon Bridge along Coventry Road.	
On the basis of the evidence WDC has in respect of the direction of the urban expansion of Warwick / Leamington and the employment land supply and demand, WCC Property considers that its land should be promoted for residential development only and that alternative sites should be identified for employment later in the plan period. The employment site allocation should be made from the list of alternatives considered by the Employment Land Review Study and only the least sequentially preferable site for housing should be considered for employment development in the early part of the Plan Period.	
Land south of Gallows Hill could not provide a suitable expansion of WTP with a direct link from a new junction close to or opposite one of both of the existing access points to WTP.	
<b>Green Belt/Rural issues</b>	
The land south of Warwick is very good farmland and should not be development on when land in the green belt has been given an unjustifiable premium	The NPPF requires that Green Belt can only be released for development if there are exceptional circumstances and where there are no alternative sites outside the green belt that could meet the need.  The evidence suggests that the sites to the south of Warwick and Whitnash that have been identified can meet a significant part of the District's development need outside the Green Belt  See also comments on Landscape assessment above
Deletion of sites north of Leamington denies the area to make a contribution to housing need in the area and would have little impact on the gap between Leamington and Coventry.	
Present policies indicate that land between Warwick and Bishop's Tachbrook is an area of environmental sensitivity which gives Warwick Town and Castle some of its finest views.	
The scale of development on a rural landscape- not urban fringe is unacceptable.	
There is no consistency with the Council fighting HS2 from intruding on the landscape but building houses on the same open space.	
The Local Plan 1996-2011 endorsed the desirability of protecting areas of restraint such as the wedge west of Europa Way which has historically separated the two towns.	
The precise dimension of Country Park should be determined by detailed environmental analysis.	Noted
<b>Specific sites</b>	
Concerns over the impact of 3,000+ houses on the green field land between Myton Road and Europa Way, which is currently an Area of Restraint.	See site selection methodology
Land south of Harbury Lane is high grade agricultural land.	
The proposals will result in the loss of high quality agricultural land and will destroy the green corridor between Bishop's Tachbrook and Whitnash.	
The Country Park that is proposed on the edge of the new Gallows Hill development is a poor substitute for open fields and becomes a semi urban "park".	
Woodside Farm area should not be built on.	
The farmland that is now being earmarked for development is medium to high grade and should be retained for its ability to produce multiple crops.	
The Landscape Study recommends land south of Gallows Hill	

should not be developed.	
Experience with Chase Meadows and Warwick Gates shows that infrastructure often does not get built.	
The development of 4500/6000 homes along the side of Europa Way is too large and the numbers encourage net migration rather than meeting the needs of local people.	
<b>Tourism</b>	
Concerned about Warwick being spoilt for tourists and residents	These are reasonable concerns. However, the demand management traffic study seeks to help this. The removal of Gallows Hill helps reduce impact of development on historic assets
It is already unsafe for tourist to walk around Warwick.	
Objects to the reference at paragraph 5.1.6 relating to potential detrimental impact of views from Warwick Castle	
The reputation of Warwick will be tainted which will have a negative effect on tourism.	
<b>Specific sites/paragraphs etc</b>	
The Planning Inspector considering current Local Plan rejected proposal at Woodside Farm.	The context at that time was different
WDC's landscape consultant has suggested the area to the south of Harbury Lane should not be developed.	This is not the case. See RMA landscape study
<b>Suggestions</b>	
It would be more appropriate to spread development around edges of Warwick, Leamington and Kenilworth.	This has been done subject to green belt restrictions
More sites north of Leamington should be looked at.	This is green belt
The old Peugeot Factory is underdeveloped and can be compulsory purchased.	This is outside Warwick District
It would be better to spread development throughout the district.	This does not lead to sustainable patterns of development and does not accord with green belt policy
There needs to be a neighbourhoods policing base within the housing developments proposed for South Warwickshire and Whitnash.	See IDP
Large areas of green area need to be included in any development plans.	The policy DS13 and IDP
A new village should be developed by the Coventry Gateway area rather than Warwick and Leamington.	The area is green belt and would not meet the needs of the towns as well as the proposed sites
No direct access onto Myton Road should be allowed.	Noted
The overhead cables from Emscote Road need to be put underground.	Noted
Surface water drains and pathways on Leam Road need updating.	Noted
CIL should be applied to any affordable housing proposed.	CIL cannot be used for affordable housing
High speed broadband should be installed along Myton Road.	There is a separate project looking at this
More effort should be made to create a new area in which homes are not seen as isolated units of investment, but as parts of the greater social whole.	See policy BE2
We need higher density housing which would allow for a proper public transport system, rather than less dense Garden Suburbs.	There is a balance to be struck between densities and the quality of the built environment.
Developers must be required to demonstrate affordability, sustainability and diversity	See policies H2, H4, H5
WDC must create neighbourhoods that are distinctive, have individual identities and contain elements needed for family living.	See policy BE2

The increasing importance of allotments for people's leisure should be recognised.	See policy HS4 and HS5
Locations 2 and 3 along the Banbury Road will blight the setting to the immediate east of Warwick Castle Park.	No longer included in proposals
A significant green strip all along the north-eastern side of the proposed south Warwick development area should be created which could form the basis for an alternative transport infrastructure linking the north-eastern corner with the town centre.	This will be a matter for planning applications to consider
Compensate for the loss of building land by moving the proposed Country Park to the area of 'possible expansion' south of Tach Brook.	This area is not included within the development sites and is therefore more difficult to deliver
Implement a park and bike scheme to work.	Could be part of green travel plans required in policy TR2
There is still space on the western edge of Warwick where development would not link up with any other historic entity.	This area has been discounted on landscape grounds
Sites along the west side of Olympus Way might accommodate government requirements.	Further information required
The majority of older people do not need care provision, just sheltered apartments, The most successful retirement schemes are those closest to town centre.	See policy H5
<b>Ecology/Wildlife/Rural</b>	
Development around Whitnash will impact on ecology such as skylarks etc.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factor which mean these sites cannot be developed
The high number of housing to the south is in contravention to WDC's own guidelines and a number of environmental indicators.	
Productive agricultural land will be lost forever.	
There will be the removal of a lot of hedgerows and mature trees as well as natural habitats.	
Development will result in the loss of beautiful countryside and wildlife.	
The area to the West of Europa Way is an area of rich agricultural land with wide hedges providing habitats for many species. The area should be protected for recreation and education and health food. Development here would be unsustainable.	
<b>Gypsy and traveller sites</b>	
WDC should consider allocating an area of land to the south of Warwick and Leamington and G&T sites GT5, GT6, GT9, GT10 as Green Belt to provide a buffer to the proposed developments to the south of Warwick and Leamington or extend the proposed Bishop's Tachbrook Country Park.	Exceptional circumstances are required to change green belt boundaries
<b>Summary of Matters Raised in Support</b>	
The Canal and River Trust support the plan so long as any development does not adversely affect the integrity of the waterway structure, quality of water, result in unauthorised discharges and run off or encroachment, detrimentally affect the landscape, heritage, ecological character of the waterways, prevent the waterways potential for being fully unlocked or discourage the use of the network.	
The waterways can be used as tools for place making and	

contribute to the creation of sustainable communities.	
Canal and River Trust would seek for any development to optimise the benefits of such a location can generate for all parts of the community.	
Good to see that this recognises there are no exceptional circumstances that warrant major development in the north of the district and it is necessary to preserve the greenbelt between Leamington and Kenilworth.	
Whilst keeping the housing requirement WDC has managed to satisfy this through better use of brownfield sites and limited number of houses on green belt land south of Leamington.	
The RDS is more equitable in that new houses allocated include 17% in green belt north of Leamington and 15% in villages.	
Development south of Leamington is closer to employment opportunities and should reduce journey time/mileage for commuting.	
The RDS provides for improvements to the road network to the south of Leamington and provision of necessary schools and infrastructure to support development.	
Support the inclusion of WCC land on Map 2.	
The Country Park will see a permanent and picturesque barrier between the 2 communities helping each retain their own nature. Further consultation as to what form the country park will take is desirable.	
We are encouraged that the Preferred Option for the Built Environment (Policy PO10) calls on the principles of sustainable garden towns. This policy should be adopted for the Banbury Road, and specifically include a 30m wide shelter belt of trees along the road.	
The Revised Development Strategy provides for improvement to the road network South of Leamington to relieve the existing congestion and to cater for the new development.	
The RDS proposes a substantial proportion of new development is located close to employment opportunities, thus reducing travel and exhaust pollution whilst offering the benefits from greenfield space before the nearest town of Banbury.	
Sport England supports the aspiration for a stadium, but it should be noted that it will require significant infrastructure to support the sustainability of the stadium; i.e additional training pitches some of which will have the requirement for floodlighting..	noted

## **RDS : Infrastructure Requirements for Sites South of Warwick and Whitnash (Whole Area)**

<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>General</b>	
The expansion of existing secondary school will put additional	The IDP proposals will accommodate

pressure on existing schools and infrastructure.	additional pupils at all ages
Education provision needs to be planned up to 6 <sup>th</sup> form.	
There is no mention of the capacity of Warwick Hospital to cope with the planned increase in population.	See IDP, proposal H1
The County Park idea to buffer Bishop's Tachbrook from urban sprawl is inadequate.	It will provide a valuable open space as well as providing the limit to the southern expansion of the towns
Growth on this scale requires inevitably huge infrastructure improvements which will destroy our town.	The evidence suggests otherwise. See IDP
Local people neither want nor need an additional 12,300 homes.	Noted, but the plan must be evidenced based.
The current improvements included in the plan are needed now, so with extra houses the improvements will be inadequate.	The evidence suggests otherwise – see evidence base pages on WDC website
It is doubtful that it will possible to provide the necessary schools and local facilities from the Developer contributions through S106 and the CIL.	See IDP
Infrastructure such as schools and community centres	See IDP
Warwick Gates have failed to provide adequate educational provision.	Lessons need to be learnt from previous development in the District. See IDP
This plan still fails to address the shortfalls of current infrastructure let alone look at the long term needs of Warwick and Leamington.	Shortfalls in existing infrastructure cannot be addressed through new development
Considerations need to be given to linking Whitnash and Cubbington/Lillington and also Warwick and Leamington as the current situation forces all current traffic to the M40 or A46.	This is not proposed. See STA Phase 4
<b>Traffic/Transport</b>	
The transport infrastructure required to support this development cannot be provided.	The STA phase 4 and IDP suggest otherwise
The transport assessment needs to take better account of reality of travelling along Myton Road and to/through Warwick town centre.	The STA phase 4 is based on reasonable assumptions and sound methodology
There will be too much traffic for any mitigation to make a difference.	The STA phase 4 is based on reasonable assumptions and sound methodology
Road junction improvements will not ease the points where roads cross the river, canal and railway.	The STA phase 4 is based on reasonable assumptions and sound methodology
There is little provision made to rebalance transport availability in favour of more sustainable modes, especially the bus.	There are proposals for sustainable transport in the IDP. The demand management transport study will explore the potential to increase this further.
There are unmitigated impacts that will further disadvantage bus services.	See IDP T9, T7, T10
There are significant inconsistencies between the evidence base studies (WSTA), and the draft Development Strategy, most notably the service specification of the virtual Park and Ride.	This has been addressed – see IDP T14 and T15
The proposals for Priory Road/Smith Street and Castle Hill are unacceptable.	This point needs greater clarity to be able to respond
The Infrastructure Strategy makes little or no explicit provision to rebalance modal dependence in favour of public transport There is little provided in the way of bus priority and there is a risk that the impact of the Strategy may undermine current bus operations.	See IDP T1, T2, T3, T4, T5, T6, T7, T8, T9, T10, T 12-17
Concerned, that no mention is made of comprehensive measures to assist public transport and redress the current conditions in the	See IDP T T9-17

area today that all favour personal car use over more sustainable modes.	
A disproportionate level of bus operating mileage within the area earmarked for strategic growth needs to be financially supported, compared with the rest of Leamington and Warwick, where services are generally fully commercial. The Strategy needs not only to deliver augmented service that can credibly be sustained through revenue alone at the full build out period, but to recover a modest deficit situation.	Noted. This will be important to address as scheme are implemented
There is virtually no provision of high-quality roadside infrastructure in the wider area. Any perpetuation of this approach would be inconsistent with the NPPF.	See IDP
<b>Suggestions</b>	
There should be a purpose built modern school to serve the needs of Warwick Gates and the south Sites and this would reduce traffic issues and build more of a community feel to the area.	See proposals to redevelop Myton School
Development here will require a new hospital, two new secondary schools and employment.	See IDP Proposals H1, H2, and H3
There needs to be a strategic landscape corridor along the route of Europa Way and other main distributor roads and a wildlife corridor linking the Tach Brook with the River Leam and Grand Union Canal to mitigate for loss of green fields.	The proposals in the Local Plan do not accord entirely with this suggestion. But see policies DS13, NE2 and NE3
Any planning consent should ensure the provision for infrastructure requirements.	This will be negotiated for all major planning approvals
Notes that the Tach Brook corridor forms part of the River Avon Local Wildlife site. A key objective in planning this area should be to create and enhance its water-based biodiversity and potential for biodiversity in line with the local objectives included within the Severn RBMP. Rivers and brooks in the area and their associated riparian habitat should be integral in any green infrastructure planning.	But see policies DS13, NE2 and NE3 and also IDP (Green Infrastructure)
Recommend that in order to provide maximum environmental benefits for the Tach Brook, the park should be extended to cover the whole southern perimeter of the development so that the full length of the Tach Brook is afforded the best possible protection from pollution and potential for improvement. As a minimum, the EA would require an undeveloped buffer zone along the river bank which should be informed by site-specific modelling	It has not been possible to to extend the park west of Europa Way as no development is proposed in that area.
<b>Summary of Matters Raised in Support</b>	
The transport mitigations are feasible and the country park proposals are a huge improvement as there are large areas in this region with no public footpath at all at present.	
The Green Infrastructure proposals are good and should be increased to take the Country Park across to meet with Warwick Castle Park.	
Sport England has been supporting WDC in the preparation of the playing pitch strategy and sports strategy.	
Welcome the proposals for Green Infrastructure in all new development and in particular a country park along the Tach Broo and nature reserve.	

There is no difficulty in principle subject to any request made of the developer being commensurate with the CIL regulations, to the infrastructure topics covered by the RDS.	
It is agreed that infrastructure requirements are likely to cover road, public transport, cycling and walking, green infrastructure, local centres, utilities and education. In relation to the latter it is unclear, within the RDS, whether secondary provision will or will not need to be provided and clarification is required on this point as the Local Plan moves forward.	
Supports the identification of a possible site for a secondary school south of Harbury Lane.	
Dualling Europa Way is vital.	
The Country Park is welcomed and should provide a area for rainwater infiltration and a buffer to surface water run off.	
Welcomes that the Plan Strategy makes explicit reference to high-quality bus stop infrastructure, at least incorporating high profile flags and timetable displays, a suitable boarding area to offer level access to the disabled and infirm, and additionally, high quality shelters where appropriate. This should take a more prominent place within the final Plan.	

## **RDS Strategic Site: LOWER HEATHCOTE FARM**

<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>General</b>	
There is no guarantee that the infrastructure improvements needed for such a large development can be provided by the Developer contributions through S106 and the CIL.	See IDP
Housing requirements are overestimated.	The Joint SHMA shows that growth is needed.
The local schools, doctors and dentists are oversubscribed.	See IDP
There will be a greater risk of flooding. Farmland off Europa Way allows rainfall to soak away. The amount of water that runs off into the culvert is significant and building on the land will dramatically reduce the amount of soak-away.	The strategic assessment suggests development here is suitable. Flooding will need to be addressed in detail as part of applications
Local residents do not want building on this scale.	The Joint SHMA shows that growth is needed.
The sites selected for development to the south of Warwick and Leamington do not appear to meet the requirements of the NPPF paras 54, 55, 109 and 125.	
Proposed housing will come down from the hedgerow on the horizon along the Harbury Lane covering the top half of the field between that hedgerow and the trees along the brook, the tops of which can just be seen.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factor which mean these sites cannot be developed

Planned housing on this site before has been cancelled.	The context at that time was different
It will devalue property values as people have paid for a countryside view.	This is not a planning matter
Warwick Hospital is already at capacity.	See IDP
<b>Specific Paragraphs</b>	
Paragraph 5.1 describes the site as high value with a large variety of views, long vistas, wide panoramas and framed focal points which shows an interesting shape and scale of topography.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factor which mean these sites cannot be developed
The proposals would be contrary to paragraphs 109 to 125 of the NPPF relating to conserving and enhancing the natural environment.	Planning decisions require a range of factors to be balanced. The area is not of the highest landscape or ecological value and has been allocated for support the District's housing needs
<b>Green Belt/Field/Environment</b>	
The Land south of Harbury Lane should not be developed as it is high grade agricultural land.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factor which mean these sites cannot be developed
This application will destroy the protecting green area that protects Whitnash.	
There is considerable wildlife in the neighbouring woodland and the farmland that will be gone forever.	
The large number of houses will destroy views of the countryside from the village.	
It is an area of natural beauty with historic interest, before any building can take place an archaeological survey would need to be carried out.	
Lower Heathcote Farm should remain in the current rural area as it is an expansive piece of grade 2 agricultural land	
In the 2012 consultation, this site was described as a green wedge, protected by rural area policies to be considered as part of a possible urban park. Keeping it as a green wedge presents recreational potential for the village and urban walkers.	
The undulating form is a 'trademark' of the rolling Warwickshire countryside that is part of the tourist attraction experience on the approach to Warwick Castle from the south and is seen as a backdrop along the Banbury Road and is highlighted in the Morrish Landscape consultant's report of 2009 as of very high landscape value.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factor which mean these sites cannot be developed
The existing landscape is an asset that everyone in Warwick District can enjoy and is part of the package that makes Warwick District a Great Place to Live, Work and Visit.	
The Inspector considered this open land well protected by the Rural Area Policies of the Plan, without the need for the additional protection of an Area of Restraint. This set of policies should be included in the new local plan to meet the	

requirements of NPPF.	
<b>Traffic/Transport</b>	
Road capacity is insufficient.	<p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport</p> <p>The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic</p>
Parking and road access into Leamington Spa can get terrible, particularly when small events such as the recent Peace Festival takes place.	
Traffic around Shires Retail Park/Morrisons would not cope with additional traffic.	
This will force a horrific amount of traffic through the Sydenham area, which is already struggling to cope.	
Should the development extend more than 400m south of Harbury Lane, the area would not be accessible to high quality bus services.	
Traffic on the Harbury Lane is terrible during peak times. Further overload would make this completely unacceptable, especially as the plan shows 2 primary schools and 1 secondary school in the area between Tachbrook Road traffic lights and Earl Rivers Avenue roundabout.	
The current speed limit on Harbury Lane is often ignored.	
Recent studies that were conducted noted that nearly 75% of all traffic was pass through traffic that did not reside in Warwick.	
At peak times the traffic along Europa Way (As far as J14 and the M40), Gallows Hill, Tachbrook Road and Tachbrook Park Drive are gridlocked.	
During recent heavy rain, cycle paths have flooded.	
The roads are potholed and cannot cope.	
<b>Suggestions</b>	
Smaller developments spread over several areas in the District. That way, no harm will be done to existing communities, traffic will not be overbearing, schools will not be oversubscribed and expensive road networks will not be necessary.	This is very difficult to do in terms of identifying enough sites and does not necessarily lead to sustainable patterns of development
Smaller development evenly spread around the district with no development for Leamington, Warwick or Whitnash as they have received the bulk of development over many years.	
Two or three medium isolated sites to the North, East or West of the district.	
A new town in the Green Belt that is completely independent of neighbouring towns and villages which would give established towns and villages a chance to stabilise.	This is very difficult to do in terms of identifying enough sites and does not necessarily lead to sustainable patterns of development
Higher-density development along the existing bus route on Harbury Lane would be justified and would tend to reduce the need to extend the footprint to the south.	See IDP
Any future proposals for this land should assume the retention and enhancement of the existing	See IDP

service along the existing routes, with attractive pedestrian links to quality bus stops on Harbury Lane. This approach justifies higher densities on the northern edge of future proposals. It may be appropriate to reduce densities at the southern edge especially if these plots end up being outside a reasonable 400m walking distance of stops on Harbury Lane.	
Spread development across the district and locate houses next to employment and locate houses next to employment.	This does not lead to sustainable patterns of development and does not accord with green belt policy
The Green Belt should be reviewed to allow for houses to be built by the employment site at Coventry Airport.	

<b>RDS Strategic Site: Former Severn Trent Sewage Works</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>Traffic</b>	
The extra cars will increase air pollution to an intolerable level.	<p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport</p> <p>The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic</p>
Roads will become gridlocked on a daily basis.	
A viable bus service could not be provided as this area could foreseeably be within 400m of public transport corridor.	
Plans for Grove Farm and Lower Heathcote Farm make no provision for an efficient bus route.	
Even if a comprehensive approach is taken to deliver a bus corridor south of Harbury Lane, this would draw any service away from existing development north of Harbury Lane or lead to the splitting of the provision such that the frequency of service offered would not be sufficiently high to be attractive.	
Parking and road access into Leamington Spa can get extremely congested, particularly when a relatively small event such as Peace Festival takes place.	
Traffic around the Shires Retail Park/Morrisons would not cope with addition increase in traffic.	
At peak times the traffic along Europa Way (As far as J14 and the M40), Gallows Hill, Tachbrook Road and Tachbrook Park Drive are gridlocked.	
Recent studies that were conducted noted that nearly 75% of all traffic was pass through traffic that did not reside in Warwick.	
<b>Green Belt/Rural/heritage issues</b>	
The beauty of green field sites will be permanently eliminated.	<p>There is an opportunity to improve the ecology and biodiversity of sites by utilising additional funding gained from developers.</p> <p>The setting of Warwick will not be affected</p>
The beauty of historic Warwick and the heritage of the surrounding area will be permanently damaged.	
The land between Whitnash and Bishop's Tachbrook is Green	

Belt and acts as a boundary between the two villages. This would disappear and we would merge into a sprawling housing estate.	detrimentally if developments are carefully and sympathetically designed to take into account views into and out of the town and landscaping, both formal and informal is carried out to best advantage. Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report. The Council wishes to avoid coalescence and has therefore chosen sites which can bring forward sites which will provide positive and defensible edges to the urban area. Wildlife habitat will be preserved wherever possible and new habitats formed as part of the wider Master Plan for the area south of the towns. In addition the proposed country parks seeks to prevent coalescence with Bishops Tachbrook
There is an area of mature trees which provides wildlife to a number of animals including deer, birds and insects.	
<b>General</b>	
There will be over 7,500 homes built within 10 miles of each other.	The Joint SHMA shows that growth is needed. Edge of urban locations are the most sustainable after brownfield sites
The tank depths and ground contamination is likely to make this a difficult site to develop for housing and there is a steep fall as the ground slopes down towards the brook.	This is an issue that will be addressed through the planning management process when a planning application is received
NPPF paragraph 109 requires development to conserve and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land where appropriate.	This is what the allocation of this land will achieve
The site selected for development south of Warwick and Leamington do not meet the requirements on paragraphs 54, 55, 109 to 125 of the NPPF.	
Although development of brownfield sites is preferable to greenfield sites access to this particular site seems problematic and could have an adverse effect on the residents of the static caravan homes.	This is an issue that will be addressed through the planning management process when a planning application is received
Development will destroy the separate character and identity of Bishop's Tachbrook	The proposed country parks seeks to prevent coalescence with Bishops Tachbrook and will retain the separate identity and more rural character
The steep fall as the ground slopes down towards the brook is poor land to build housing on.	NPPF paragraph 109 requires development to remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land
There can be exceptionally high costs of contamination remediation of sewage works which can run to and exceed £200,000 per acre. If adopted methodology involves the removal of contaminated material and/or the building of bunds etc. the landscape issues will be problematic.	Developers will be expected to contribute a large percentage of the cost of such remediation works
<b>Infrastructure</b>	
The infrastructure will not cope with the number of houses proposed.	Additional infrastructure is proposed as part of the Master Plan for the whole of the southern sites area which will provide for
Schools and other amenities will not be able to cope.	

	the needs of the incoming population and support existing infrastructure serving existing residents/businesses
<b>Suggestions</b>	
The site would be an ideal site to develop as woodland as part of the low carbon environmental sustainability objective of the Council's Corporate Development Strategy. Carbon dioxide sequestration of woodland is calculated on the basis of 25m2 absorbs 1 tonne of CO2 per annum. This provides sequestration for approximately 1000 new homes.	As part of the southern sites Master Plan, there will be a new country park which will assist in offsetting the developments in this location
<b>Employment</b>	
There will not be enough jobs for all the new residents resulting in unemployment.	An appropriate amount of employment land and therefore jobs for the number of proposed houses, has been allocated in the Plan to enable those living in the area an opportunity to work nearby
<b>Summary of Matters Raised in Support</b>	
Open Space is always preferable to sprawling housing developments	

## RDS Strategic Site: Myton Garden Suburb

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
<b>Traffic/transport</b>	
Increased level of traffic on roads which are already very busy.	<p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport</p> <p>The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic</p>
If the Technology Park, its extension, the Park and Ride and the residential area using a dedicated bus-only link through or alongside the development to create a bus priority route to Europa Way; the opportunity will have been taken to protect and exploit sustainable transport modes in line with the NPPF paragraph 35.	
It will lead to an increase in accidents.	
Increase levels of pollution.	
It will increase the pressure on town centre parking.	
The length of car journeys will be increased.	
The traffic mitigation proposals are inadequate; particularly given the Avon Bridge will be a bottleneck.	
The proposals fail to consider the needs of pedestrians and cyclists.	
Traffic will have an impact on noise and pollution and therefore the historic environment.	
Additional traffic on Europa Way is a concern.	

Myton Road is already congested with no extra capacity.	
The historic nature of Warwick means we should not change the road system.	
Congestion will impede and delay emergency vehicles.	
More roads would need to be built meaning an additional cost for tax payers	
Roundabouts at the retail park and Europa Way are already congested.	
Since the opening of Morrisons supermarket the volume of traffic on Princes Drive has already increased and floods during heavy rainfall.	
There is no capacity to widen, extend or improve the over used Myton Road	
Access to part of the 'garden suburb' is proposed via Saumur Way which is only a tiny residential road.	
Those commuting into Warwick for work will worsen traffic in Warwick particularly along the High Street.	
Neither Myton Road nor Saumur Way can accommodate construction traffic.	
<b>General</b>	
Unnecessary building of new homes that will lead to overinflated property prices resulting in a further economic crash.	The Joint SHMA shows that growth is needed
It is an area of restraint to prevent urban sprawl.	The context at that time was different
It is mostly productive, agricultural land. To build on it will undermine the potential for the country to feed its growing population.	See site selection methodology
Flooding is an issue along Myton Crescent and The Malins. Development here would lead to faster run off and would threaten the houses on Myton Road, Saumur Way, The Malins and Myton Crescent.	This is detail which will be considered during a planning application
Henry 8 <sup>th</sup> Trust has sold land for profit and not for the benefit of the people of Warwick.	This is not a planning issue
Object to the development south of Gallows Hill and west of Europa Way as it will ruin the historic landscape of Warwick Castle Park.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report
The sequence of views on the approach to Warwick will be irreversibly changed and will have a very detrimental effect on the setting of the Castle and Castle Park.	
There is a serious risk of flooding in the Aragan Drive/ Saumur Way area.	This is detail which will be considered during a planning application
Allowing access behind Saumur Way will increase the risk to school children who use the cycle path that runs past the proposed development.	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.  However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for

	road space in the towns. This will focus on the role of sustainable forms of transport
The development includes too many houses and doesn't take into account the impact on the quality of life and whether development of this size can be sustained.	The Joint SHMA shows that growth is needed.
6,000 rather than 12,300 homes would be more appropriate. Building 12,300 on greenfield sites is a direct contradiction to the Council's vision.	
The scale of development means that the proposed social, environmental and economic benefits cannot all be delivered at the same time.	
If SUDS are proposed then it is probable that building should not be carried out on the land.	This is detail which will be considered during a planning application
The notion that Myton will be a garden suburb seems exaggerated when you look at the number of houses proposed.	There is a balance to be struck between densities and the quality of the built environment
The proposed development will result in the coalescence of Warwick, Whitnash and Leamington.	
Air quality in Warwick is already bad, this will worsen it and be hazardous for residents and school children.	The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic
Development should be concentrated elsewhere to allow the town time to assimilate new houses.	There is no general phasing policy
3,000 homes in an estate is not a garden suburb and will destroy the character of Myton and Warwick.	There is a balance to be struck between densities and the quality of the built environment
The owners of much of the Myton land earmarked for development (King Henry VIII / Oken Trust) have clear conflict of interest given the position that WDC Councillors hold on the Trustee board. Prior to any formal engagement of land sale, The King Henry VIII/Oken trust must be independently audited to ensure covenants of sale are not compromised.	This is not a planning issue
It is unfair to allocate a huge amount of housing on our small area as an 'easy' option.	The Joint SHMA shows that growth is needed.
There have been months of development with construction of Lidl, the Brittain Lane site, Morrisons and Aldi.	There may be an impact for some communities and this has been weighed against the benefits of development. Mitigation has been considered.
The quality of life for residents will be greatly reduced.	
The council have ignored RDS Strategic Vision (3.5 Environment) as this area was designated an area of restraint.	The context at that time was different
Drainage issues have not been addressed.	This is detail which will be considered during a planning application
<b>Green Belt/Rural</b>	
It is valuable green field site that should be preserved	See site selection methodology
There is sufficient value to justify "exceptional circumstances to allocate a relatively small amount of green belt instead.	
The New Local Plan threatens to overdevelop green space	

with too little mitigation for traffic and school places.	
The New Local Plan threatens to create a conurbation out of communities that currently enjoy rural lifestyle with natural breaks to separate communities.	
The proposal will get rid of a working, productive farm.	
<b>Suggestions</b>	
Creative and imaginative urban design and master planning could deliver bus priority through or alongside the development, thus unlocking the viability of the proposed virtual Park and Ride, the new bus route and by extension to the other public transport initiatives supporting the strategy.	Noted
A number of alternative approaches can secure the opportunity to protect and exploit the NPPF paragraph 35 including peak bus priority along the duelled Europa Way, with the nearside carriageway being bus lane at peak times, an additional bus land or dedicated bus road provided over and above the duelling of Europa Way for general traffic and a purpose designed bus corridor within the Garden Suburb, which may be used by vehicular traffic but with a bus gate to prevent rat running. Without such measures the Strategy will only perpetuate and exacerbate the existing car-dependence in this area, in direct contravention of the NPPF.	Noted
<b>Infrastructure</b>	
Increased pressure on already oversubscribed GP/ health centre services and Warwick hospital.	See IDP
The proposals represent too many houses in the wrong location without adequate infrastructure.	See IDP
<b>Employment</b>	
Paragraph 5.1.7 includes the sentence '...If this area was accessed separately from Gallows Hill, the ability to market the area as part of the Technology Park would be diminished...'. Object to this proposal. Marketing of any site should not be allowed to influence strategic planning policy.	Noted, see DS9.

<b>RDS Strategic Site: South of Gallows Hill</b>	
<b>Consultation Comments</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>Traffic</b>	
Air pollution is already illegal due to the very bad traffic and this development will worsen this..	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the
More houses means more cars, and this area already has major traffic problems and bottlenecks.	
More traffic will be forced down Banbury Road, Europa Way, Myton Road and into Warwick.	

Even with improvements, south Leamington will be bad to drive through.	proposals to locate development in this area are soundly based.
The traffic mitigation proposals are inadequate; particularly given the Avon Bridge will be a bottleneck. The proposals fail to consider the needs of pedestrians and cyclists.	However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport
The road layout would involve excessive circuit and only allow buses to serve the far edge of the development, which would mitigate strongly against effective and attractive bus service provision.	The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic
<b>Infrastructure</b>	
The infrastructure requirements are not being adequately addressed.	See IDP
<b>Suggestions</b>	
I Suggest smaller developments spread over several areas so no harm is done to existing communities	This does not lead to sustainable patterns of development and does not accord with green belt policy
<b>Employment</b>	
The Site is not considered to be appropriate for employment as the demand for employment is characterised by use classes B1c, B2 and B8 rather than offices.	See site selection methodology
The success of Jaguar Land Rover has increased the demand for industrial / warehouse buildings particularly where there is good access to the road network. This demand could be better accommodated by Option 2 employment site north of Gallows Hill and would better satisfy the wider market rather than a site promoted as an extension by the employment uses to the west and east.	Noted
The allocation of employment land on land South of Gallows Hill would have a detrimental visual impact on the setting of Warwick Castle Park.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report
Well documented parking issues at the Technology Park would be exacerbated as users will have to continue to use the car. Option 2 has better access to the road network.	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.  However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport

	The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic
Larger scale units on land South of Gallows Hill could not be disseminated into the landscape as easily as they could on Option 2.	Noted
<b>GENERAL</b>	
The historic environment of Warwick Castle Park will be ruined and landscape lost.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report
This is a view that has been available to Kings, Earls and visitors since 1395 when the Tower was constructed, so is significant for Tourism and should not be lost to development. No amount of landscape 'mitigation' will compensate.	
The Banbury Road approach design was for a series of views on the approach to Warwick, commencing with the spire of St Nicholas Church and concluding with the panorama of the castle and town, this sequence of views will be lost. The landscape study shows that the area known as the Asps provides the historical context to the park; it in fact only provides part of the context and the first of a sequence of views up the Banbury road.	
The planning Inquiry in 2006/7 looked particularly at sites both in Areas of Restraint and subject to rural area policies. The decision made then needs to be seen in the context of the NPPF paras 54, 55, 109 to 125. The sites selected for development to the south of Warwick & Leamington do not appear to meet these requirements.	
The access along Castle Park will downgrade the character of this historic approach if one side is lined with development.	
The 2009 Landscape area statement concluded that the area is principally well preserved farmland that creates an attractive rural setting and should be considered an important part of the setting for Castle Park.	
Potential complete coalescence between Warwick and Leamington Spa.	
The Inspector at the 2006/7 Public Inquiry considered this site for employment purposes but concluded land at Gallows Hill should not be allocated under Policy SSP1 for employment (Class B1) purposes.	
Local residents do not want building on this scale.	
The local schools are at capacity and are already oversubscribed as are doctors and dental surgeries.	
The pressure on Warwick Hospital will be increased, which is already struggling.	See IDP
Local need is for affordable housing for first time buyers and the elderly, this site is not offering these in any meaningful number.	We aim for 40% of new development to be affordable housing see policy H2
The land will be at greater risk of flooding.	This is detail which will be considered at the planning application stage

Before any building can take place an archaeological survey would need to be carried out.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report
A lot of offices on the business park are empty, and even with these empty offices, there are parking difficulties for National Grid employees.	See traffic above
There will be a loss of farmland.	See site selection methodology
Development here would have a direct impact on views to visitors to the castle.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report
Far too high concentration of new housing being put in South Warwick.	See site selection methodology
This is further overdevelopment of land south of Warwick and takes development closer to the M40.	
No more countryside should be concreted over. Only brownfield sites should be considered.	
The numbers proposed are not needed.	The Joint SHMA shows that growth is needed
There are too few jobs as it is- more people will mean even fewer.	see employment allocation and existing employment areas
The rural character of the area will be destroyed.	The evidence suggests that the sites to the south of Warwick and Whitnash that have been identified can meet a significant part of the District's development need outside the Green Belt. See also Landscape assessment
The proposal is an unacceptable encroachment onto Bishop's Tachbrook Village.	The proposed country parks seeks to prevent coalescence with Bishops Tachbrook
There would be a impairment of the visual approach to Warwick.	Impact on the setting of Warwick and other heritage assets has been assessed – see heritage settings assessment report
In 2009 WDC's landscape consultant Richard Morrish recommended this land wasn't developed on.	See updated landscape report
DC report states that land south of Gallows Hill and The Asps is prominent in approaches to Warwick, valuable in the setting of the town and provides historic context for Castle Park.	Impact on the setting of Warwick Castle and other heritage assets has been assessed – see heritage settings assessment report

## RDS Strategic Site: West Warwick Gates

Consultation Comments	Response
<b>Summary of Matters Raised in Objection</b>	
<b>Traffic</b>	

Extra house means extra cars and this area already has major traffic problems especially at rush hour.	<p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport</p> <p>The air quality assessment showed that with cleaner engines, air quality is likely to improve during the Plan Period, even with additional traffic</p>
<b>General</b>	
More houses being built in this area will result in more countryside being concreted over.	See landscape and ecology studies on the evidence base pages of the website.
Where would the children go to school as there is no primary school in Warwick Gates and surrounding primary schools are already full.	See IDP
House numbers are not needed.	The Joint SHMA shows that growth is needed
Development will be unacceptable encroachment onto Bishop's Tachbrook village.	The proposed country parks seeks to prevent coalescence with Bishops Tachbrook
Development would be the degradation of the countryside and loss of farm land.	See landscape and ecology studies on the evidence base pages of the website.
<b>Infrastructure</b>	
There is no evidence or guarantee that infrastructure improvements can be provided from the developer contributions through S106 and the CIL.	See IDP
<b>Employment</b>	
There are numerous people living in this area without jobs, so even with the possibility of a few more companies moving into the area, I do not think that there will be sufficient jobs available.	See policies DS8 and DS9
There is no need for more industrial units in the area as there are already many vacant units. There is not the demand for them, open space should be kept instead.	See policies DS8 and DS9

## Strategic Development Sites: Woodside Farm

Consultation Comments	Response
<b>Summary of Matters Raised in Objection</b>	
<b>General</b>	
The proposal to build 3 storey houses at the	This is a detailed matter for the planning application

highest point is ill planned	
There are not enough jobs in the area for new residents.	The evidence base provides a figure for the amount of new jobs required to be associated with this level of housing growth. The employment land requirement is thus evidenced and the appropriate level of provision is proposed through the Local Plan
The 2006 Public Inquiry concludes this land should remain open as part of a more extensive Area of Restraint. The Council's landscape consultant agreed.	The Local Plan which was then current provided for sufficient land for all requirements up until 2011. Since the Local Plan is now out of time, we are looking for new provision and a new target for growth. With this change of circumstances, land which was not suitable whilst there was other land available, is now being considered as part of the process for a new plan where a new target has to be satisfied. This puts pressure on all land previously considered, especially where it is not in the Green Belt. Thus land that was not previously needed is now being considered for development
Local amenities would not cope with the increased housing proposed.	As part of the new developments, new amenities will accompany sites where increased demand cannot be met currently. This can be achieved particularly where a substantial number of new houses are concentrated in a relatively small area
The infrastructure will not cope with the population increase.	As above
Stratford have proposals at Lighthorne Heath for 4,000 homes meaning there will be more than 7,500 homes built within 10 miles of each other.	Under the duty to co-operate, this Council is working with its neighbours and particularly where there will be a significant impact on this District
The planning Inquiry in 2006/7 looked particularly at sites both in Areas of Restraint and subject to rural area policies. The decision made then needs to be seen in the context of the NPPF paras 54, 55, 109 to 125. The sites selected for development to the south of Warwick & Leamington do not appear to meet these requirements.	The Local Plan which was then current provided for sufficient land for all requirements up until 2011. Since the Local Plan is now out of time, we are looking for new provision and a new target for growth. With this change of circumstances, land which was not suitable whilst there was other land available, is now having to be considered as part of the process for a new plan where a new target has to be satisfied. This puts pressure on all land previously considered, especially where it is not in the Green Belt. Thus land that was not previously needed is now being considered for development
The area is an essential part of the distance between Whitnash and Bishop's Tachbrook and an important part of the valued change from town to country along the Tachbrook and Oakley Wood Roads, in particular their junction with Harbury Lane going east.	The Council has looked at potential sites very much with the potential for coalescence in mind. There is however, a finite amount of land available that is not in the Green Belt and therefore some sites on the edge of the current urban area are needed to meet the housing requirement. This site fulfils this requirement
<b>Green Belt/Field/Environment/Historic</b>	
No more development should take place on green field sites	There is insufficient land available that is not in the Green Belt and is previously developed land. Much of the previously developed land that was available in the past has now been developed and few new sites are now likely to come forward. The Council's policy however is that previously developed land is preferred for development before green field sites

The beauty of the greenfield sites will be permanently eliminated.	See above
Warwick's historic and heritage attraction will be permanently damaged.	The Council has very strong policies in place to protect the historic environment. Every care will be taken to ensure the protection of the historic assets whilst ensuring that the required development and growth in the District can be accommodated
The site is on grade 2 agricultural land which is very productive.	According to records the land is Agricultural Grade 3b. A small area around the farm buildings is Grade 3. Provisionally this land is to be graded as 'urban'
It is in the vicinity of Mallory Court historic park and Garden (Grade II Listed).	The Council has very strong policies in place to protect the historic environment. Every care will be taken to ensure the protection of the historic assets whilst ensuring that the required development and growth in the District can be accommodated
This is an environmentally bad option based on an over estimation of local demand.	The demand has been assessed using the methodology recommended by the Government
<b>Traffic/Transport</b>	
There are serious access flaws without proper pedestrian crossings and future traffic flows in this area.	This is an issue which has been considered and modelled by the highways department at Warwickshire County Council. This Council will be advised about any course of action required as part of a planning application
There are major traffic and parking problems in the area.	See above
The amount of cars will increase pollution to an intolerable level.	See above
All of our roads will become gridlocked on a daily basis as road capacity is insufficient to meet the traffic requirements.	See above
The roundabout near the Shires Retail Park/Morrisons would not cope with additional traffic, neither would access roads into Leamington.	See above
At peak times the traffic along Europa Way (As far as J14 and the M40), Gallows Hill, Tachbrook Road and Tachbrook Park Drive are gridlocked.	See above
Recent studies that were conducted noted that nearly 75% of all traffic was pass through traffic that did not reside in Warwick.	See above
<b>Suggestions</b>	
I suggest smaller developments spread over several areas in the district so no harm is done to existing communities, traffic will not be overbearing, schools will not be oversubscribed and expansive road networks will not be necessary.	It is only possible to provide the infrastructure and services needed for the new developments and to improve facilities for existing residents if larger sites are delivered. The Council would be unable to require developer contributions on small developments spread over a wide area

## Strategic Development Sites: Whitnash East (South of Sydenham)

Consultation Comments	Response
<b>Summary of Matters Raised in Objection</b>	
<b>General</b>	
Already there is approval for 209 houses; an extra 300 will place extra burdens on the facilities in the area.	The quantum of development will allow the Council to require developers to provide infrastructure and services for the new developments as well as improving facilities for existing residents
It will join the 2 individual communities of Whitnash and Sydenham by removing the green barrier between the two.	The two communities will remain separated by the brook and a wide area of associated local nature reserve together with the railway line
The proposals are excessive.	The demand has been assessed using the methodology recommended by the Government
Schools capacity, medical facilities and transport infrastructure is already stretched.	The quantum of development will allow the Council to require developers to provide infrastructure and services for the new developments as well as improving facilities for existing residents
Flooding has been a significant problem in the proposed area and this will worsen it.	Any flooding issues can be mitigated against as part of a planning application and if there have been problems in the past this will be highlighted by a Flood Risk Assessment submitted by the applicants as part of the application documentation
Such a large scale development located on such a small area is unsustainable.	The quantum of development will allow the Council to require developers to provide infrastructure and services for the new developments as well as improving facilities for existing residents
The Bridge into the new estate at the end of Church Lane will need to be redesigned.	This will be considered as part of a planning application
It will see the devaluation of what was once an attractive village and conservation area.	The Council has a policy with regard to the built environment in which the design of new development is carefully considered. The Council has published a design document 'Garden Towns, Villages and Suburbs; A prospectus for Warwick District Council', which outlines its ambitions for future developments which will enhance the District
The cost of relocating Campion School is too much.	The cost would have to be borne largely by the developer(s) in consultation with the local education authority (Warwickshire County Council)
The northern edge will complete the join of Whitnash and Sydenham and in the middle is the Whitnash Brook Valley Nature Reserve.	The majority of the site will be separated from adjoining communities by the brook, local nature reserve and railway line
<b>Green Belt/Field/Environment/Historic</b>	
This area is traditionally agricultural land with historic interest.	The importance of agricultural land is not to be underestimated; however, some agricultural land is needed to provide sufficient non green belt sites to meet housing demand. Historic assets will be protected through the relevant policies in the plan
There needs to be greater protection for the Local	There is an opportunity to strengthen the protection of

Nature Reserve and the up-stream length of Whitnash Brook.	these assets as part of the new development by requiring developer contributions to help enhance and maintain these important environmental assets
In the immediate vicinity of this site there are areas of historical and conservation interest which must be preserved.	This will be taken into account as part of a planning application
There is wildlife around this site and also important farmland and habitat/ wildlife that includes otters.	See above
<b>Traffic/Transport</b>	
Access to this development will increase traffic at the entrance to Champion School and may endanger children's lives.	This is an issue which has been considered and modelled by the highways department at Warwickshire County Council. This Council will be advised about any course of action required as part of a planning application
The site is physically divorced from the existing built up area and distant from existing bus services.	The quantum of development will allow the Council to require developers to provide infrastructure and services for the new developments as well as improving facilities for existing residents
This will create too much traffic for South of the river.	This is an issue which has been considered and modelled by the highways department at Warwickshire County Council. This Council will be advised about any course of action required as part of a planning application
Whitnash will be used as a rat run for commuters.	As above
The southern boundary of site appears to have no exit route unless it breaks through onto Fieldgate Lane.	It has been demonstrated through the Local Plan process that access can be achieved: the detail will be dealt with at the time of a planning application
Particularly objection to the smaller scale releases of land south of Sydenham/east of Whitnash. These areas are well beyond 400m of existing bus services. Extending services into this area are not sustainable even at reduced frequency.	The quantum of development will allow the Council to require developers to provide infrastructure and services for the new developments as well as improving facilities for existing residents
The potential patronage that would be generated by the proposals will not sustain a credible commercial service in the long term. The need to split access to land south of Sydenham with a second access across the current Champion School site, makes viability much worse.	As above
<b>Suggestions</b>	
It needs to be increased to 50% affordable housing and 40% lifetime homes.	The Preferred Options included a requirement for 40% affordable housing. This figure was assessed in the Affordable Housing Viability Assessment which supported this figure on most types of sites. The Council is of the opinion that 50% would be difficult to justify in terms of its effect on the viability of sites. The Preferred Options suggested that 25% of homes should be built to Lifetime Homes standards. Emerging Government Policy is that a set of national housing standards will be included in the Building Regulations and any standards over and above this will need to be justified by a local authority. The number of older and disabled people in Warwick District is no higher than the national average and the Council considers that it

	would not be possible to justify higher standards than the nationally adopted standards. However the Council will consider a policy which seeks to ensure that a proportion of dwellings are built to meet the needs of older people, such as “age friendly dwellings”. This could include bungalows or homes which are easily adapted to meet the needs of those with mobility problems.
There needs to be homes built with solar panels, ground source heat pumps, insulated walls, roof spaces and double glazed throughout.	This will be required under new climate change policies in the Local Plan and through the Building Regulations

<b>RDS Strategic development Site: Fieldgate Lane/Golf Lane</b>	
<b>Consultation Comments</b>	<b>Response</b>
<b>Summary of Matters Raised in Objection</b>	
<b>General</b>	
Development will spoil a sensitive area.	This will be taken into account when a final decision is made on sites, but it is a balance of all factors and this may still prove to be one of the best sites on which to develop when all of these factors are taken into account
There aren't the amenities to cope with this development.	As part of the overall plan, many new amenities are proposed as part of the new developments to the south of the towns of Warwick, Leamington and Whitnash. The new developments will improve the offer in the local area for new and existing residents
I suggest smaller developments spread over several areas in the District. That way, no harm will be done to existing communities, traffic will not be overbearing, schools will not be oversubscribed and expensive road networks will not be necessary	'Pepper potting' new development will not result in the new facilities being offered as part of the current plan. A quantum of development is necessary to allow the Council to ask developers to provide vital infrastructure and services or pay towards these services by way of legal agreements and CIL
This site is an Area of Restraint and should be protected from development.	Areas of restraint are being examined as part of the work on the Plan. They are not likely to remain in their current form if they survive at all. The new Plan is a time when all previous constraints are re-visited as these may no longer serve their purpose or may unduly hinder government policy to develop to improve the economy
Stray Golf balls from the Golf Club would be an annoyance to new residents and could potentially cause damage.	This will be a matter for a detailed planning application
This development may impact on the commercial operation of the golf course.	This is not something that we can take into account when allocating new housing land
The steep incline of Location 11 could mean flooding of the area.	Advice is being sought of the Environment Agency and our own drainage engineers on all flooding issues
Medical facilities, transport infrastructure and	As part of the overall plan, many new amenities are

schools are already stretched.	proposed as part of the new developments to the south of the towns of Warwick, Leamington and Whitnash. The new developments will improve the offer in the local area for new and existing residents
<b>Green Belt/Field/Environment/Historic</b>	
Development will spoil natural habitats.	Advice is being taken on all such aspects. There may be a way to mitigate any such impacts
There is potential impact on the open countryside.	Advice is being taken on all such aspects. There may be a way to mitigate any such impacts
There are virtually no green spaces left around Whitnash, brownfield sites should be used first.	This is the policy of the Council, however there are insufficient brownfield sites left to meet the district's housing requirement
At the highest point of the development there will be a blot on the landscape visible to all entering Whitnash.	This is an issue for a planning application
Great Crested Newts have habitants in the vicinity.	Advice will be taken on this
This site is described as having some historic value in the sustainability assessment and potential for a long term negative effect on heritage after identification of its ridge and furrow field markings.	Advice will be taken on this
The area has traditionally been agricultural land, with historic interests and should remain as such.	Advice will be taken on this, but there will have to be some loss of agricultural land to meet the district's housing requirement
<b>Traffic/Transport</b>	
Development will cause traffic problems	WCC will advise on this and are modelling the potential situation if development takes place
Construction vehicles will bring with them congestion and hazards.	This is an inevitable part of developing sites, but is short term and cannot be taken into account as a valid planning reason for removing a potential site
All major services for the Whitnash area appear to be north of the river making access difficult for fire, police and hospital vehicles.	New facilities will be attached to the new developments and any shortfall can be considered during this process.
Access via the M40 is already an issue at peak times.	WCC will advise on this and are modelling the potential situation if development takes place
The junctions at Coppice Road/Morris Drive and Whitnash Road/Golf Lane do not have the capacity to cope with additional traffic, especially during peak hours.	WCC will advise on this and are modelling the potential situation if development takes place
<b>Suggestions</b>	
Can this be increased to 50% affordable housing?	There is a question over viability of sites at this level. Although the district requires affordable homes, it is believed that this can be met at a slightly lower %
Can this be increased to 40% lifetime homes?	Advice is being taken over the level appropriate for lifetime homes
There needs to be homes built with solar panels, ground source heat pumps, insulated walls, roof spaces and double glazed throughout.	Developers will have to address energy efficiency in the new houses. The climate change chapter of the plan will deal with this requirement and there are regulations in place through building control

## RDS: Infrastructure Requirements for Whitnash and South of Sydenham

Consultation Comment	Response
<h3>Summary of Matters Raised in Objection</h3>	
The access road to the site east of the railway will cause congestion on the already busy roundabout outside Campion School.	The Strategic Transport assessment indicates that the roundabout will have the capacity to accommodate the additional traffic
Any infrastructure such as schools, shops and community centres need to be in place before houses are built.	It is unlikely that infrastructure will be in place before the houses are built. However the Council is considering how forward funding of infrastructure could be achieved. In any event, development will be restricted by condition until sufficient infrastructure is in place.
There is no mention of houses of worship or youth provision.	Existing community facilities have capacity to provide for meeting rooms and youth facilities
The proposed infrastructure requirements will be insufficient to facilitate the provision for sustainable bus service.	The proposals will be required to fund improvements to existing bus services
Without a bus link across the railway offering scope to tie this area into a wider network to the west this proposal is not sustainable.	
Merely extending bus services into this area at existing limited frequencies will require substantial additional resources which would not meet CIL Tests of reasonableness nor would they be commercially sustainable.	
<h3>Summary of Matters Raised in Support</h3>	
Sport England supports WDC in preparation of the playing pitch strategy and sport strategy.	
Would like Severn Trent Water Ltd to comment on the council's comments in the Water Cycle Study, 2010 which state that downstream of Land at South Sydenham and East of Whitnash have significant capacity constraints. Capacity improvements to alleviate this problem are currently being appraised and further analysis will be required.	
Eastern boundary of the site is within Flood Zone 2 and Flood Zone 3 of the Whitnash Brook. The Sequential Approach to flood risk management outlined within the NPPF and Tables 1, 2 and 3 of the supporting Technical Guide should be applied. Providing the Local Plan confirms the extent of development will not encroach into Whitnash Brook Floodplain, then this should not pose a problem but further modelling may be required.	
Support the Local Wildlife Site Buffer shown on Map 4.	

## RDS Strategic Development Site: Red House Farm

Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
Should be increased to 50% affordability and 40% lifetime homes	The percentage of affordable housing set in Policy H2 reflects the assessment of viability on different types of sites in Warwick District to ensure that sites can deliver this amount of affordable housing without impacting on the viability of developments. The assessments of viability are set out in the Affordable Housing Viability Assessment (2011) and the follow up addendum (2012).
Further work indicates that a greater area of the site is available for development with the capacity being nearer to 300 excluding the area in the ownership of Glebe Farm.	Further landscape work indicates that the boundary of the site should not be extended south. It would introduce development onto the more prominently visible south facing slopes located south and south west of the riding school. It is considered that development of this area would result in significant landscape and visual impact.
Additional land should be allocated at Red House Farm which could accommodate a further 150 dwellings. There are no significant landscape constraints which would prevent this being released	
There would be no difficulty in accommodating the additional area in terms of infrastructure	
<b>Summary of Matters Raised in Support</b>	
Takes good advantage of a nearby high quality bus service, and is one of the most sustainable development options	Noted, site is included as a housing allocation in the Local Plan.
The Council is supportive of the release of green belt balanced against the benefits the site can bring in assisting in the urban regeneration of the Lillington area	
Supports limited development up to 250 homes	
Supports provision of open space as part of the development of the site.	
There are no fluvial flood risk concerns for the site. Welcome proposals to create improved access to the associated wetland habitat creation project	

## Strategic Development Site: Thickthorn

Consultation Comment	Response
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## Summary of Matters Raised in Objection

The proposal has not been supported in previous consultations.	See site selection methodology
This area of Green Belt has no special circumstances to justify development	There are special circumstances in providing much needed employment to a town which has little and is tightly constrained by green belt
The NHS will not cope and the fire and police will also be inadequate and services for older people will deteriorate.	See IDP
There will be large traffic increase.	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.  However the Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport
There will be a lot of noise, traffic and pollution during construction.	
There is an oversupply of employment land within the area and Abbey Park and Stoneleigh Park are struggling to find tenants.	see employment allocation and existing employment areas
There is inadequate provision for the disposal of surface water.	This is a detailed consideration in a planning application
Kenilworth Allotments should be expanded as they are a vital part of society contributing to major events and is also an educational site. There are 150 on our waiting list.	See policy HS4 and HS5
Paper copy of the local plan to be sent to planning expectorate	Noted
Where is the 770 predicted numbers for new homes in Kenilworth coming from?	The Joint SHMA shows that growth is needed. Edge of urban locations are the most sustainable after brownfield sites
The density of housing in Kenilworth is far too high.	There is a balance to be struck between densities and the quality of the built environment
Object to a portion being commercial use as there is an abundance of factory units and offices lying empty.	see employment allocation and existing employment areas
The site is too large.	The Joint SHMA shows that growth is needed. Edge of urban locations are the most sustainable after brownfield sites
Protection of Thickthorn Close and the Orchards is required.	Noted
The Thickthorn development will seriously degrade the visual character of the entrance to the town.	Updated landscape work suggests the site is suitable with the right mitigation
Thickthorn is already too big for its infrastructure and facilities.	The site demonstrates the very special circumstances to remove it from the green belt
Deplores the loss of significant areas of green belt	

at Gateway and Thickthorn when alternative options are available elsewhere.	
No development should be allowed on the Green Belt. With the West Midlands conurbation nearby Warwick should be kept as rural as possible.	
There should be no exit onto the Leamington Road.	The Council, in conjunction with WCC are exploring whether there are better traffic solutions based around managing demand for road space in the towns. WDC is continuing to work with WCC education and the education providers to ensure school capacity is expanded and improved where it is needed
The huge expansion of sporting activity at Kenilworth Wardens has put pressure on the facilities as the club has outgrown its existing site. The proposal to site a school on the edge is far from sensible as it will create major traffic problems.	
The site for 700 houses at Thickthorn represents a large tract of significant land given it performs all of the Green Belt functions set out in the NPPF. It also services as a Green Wedge that avoids the coalescence with Leamington and is highly visible and sensitive landscape.	Updated landscape work suggests the site is suitable with the right mitigation The site demonstrates the very special circumstances to remove it from the green belt
The deliverability of the allocation and the ability to deliver 700 new dwellings in a single location, is questioned on account that sites in multiple ownership require effective collaboration which is in not in place.	See IDP and site selection policy
Any shortfall in delivery will need to be made up on sites at Kenilworth, not elsewhere in the district.	Noted
One of the current Thickthorn sites is Green Belt/ Greenfield and is concentrated on one side of Kenilworth potentially unbalancing the infrastructure and amenities within the town.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed. See also IDP
Yet to see the pupil projections that support the secondary education requirements.	See IDP
The site of 700 houses at Thickthorn will have significant deliverability issues.	Evidence and development interest suggests otherwise
The emerging allocation cannot be regarded as sound as there are alternative options available such as land at Kenilworth Golf Club	See site selection methodology
No hectares are given to the commitment to the provision of open space in Thickthorn. This should not only meet the needs of the new development but also address the shortfall of public open space to the south of the town.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed
Kenilworth is already threatened by HS2, this will result in a further loss of greenbelt.	The strategic assessment suggests development here is suitable
The number of houses should be reduced and spread around smaller sites around Kenilworth.	The Joint SHMA suggests the proposed level of development is appropriate and see policy H1
Roads around Thickthorn are already congested at peak times.	The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.  However the Council, in conjunction with WCC are exploring whether there are better traffic solutions

	based around managing demand for road space in the towns. This will focus on the role of sustainable forms of transport
Development in Kenilworth is out of scale and character with existing properties in Birches and Glasshouse Lane.	The Joint SHMA suggests the proposed level of development is appropriate
The development will impair existing views and worsen noise and pollution.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed
Loss of the local sports clubs will be devastating.	See policy HS2
The loss of such a large area of green belt is out of proportion.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed
A more balanced policy would allow for better integration with the town.	See policy BE2
There is a lot of empty commercial property already within the town- these should be refurbished.	We are seeking to support vibrant town centres – see Retail and TC section of Local Plan
When Ford at Castle End of town was flooded Kenilworth was at a standstill.	Flooding will need to be addressed in detail as part of applications Agreed
This development must complement and preserve what exists.	
This development will require infrastructure that will connect those developments to the town.	See IDP See IDP and CIL policy
Funding for many of the projects should be financed by money generated by the developments. This funding should be used to improve the town and its services.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed
The proposed Thickthorn and Old Milverton Sites are adjacent to one another on either side of the A46 and provide essential greenbelt separation between Leamington and Kenilworth. Development here would create urban sprawl and the towns identities would be lost.	
WDC has lost sight of both the purpose of greenbelt legislation and its own requirement to serve its electorate.	There are exceptional circumstances that justify the release of this land from the Green Belt to accommodate new development in a sustainable location
The County's housing needs are best served by using brownfield sites in existing towns and creating a new town to the north-west of Warwick.	See policy H1
No mention is made of the financial arrangements for these developments	See IDP
The final distribution of housing numbers should await the publication of the NPPF compliant update to the SHMA and joint working with neighbouring authorities. For this reason alone the site should be increased to include K17 and K19.	The Joint SHMA shows that growth is needed
The 46.5ha land at Thickthorn is constrained by ancient woodland, heritage assets, proximity to the A46, the need to replace two large areas of playing	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed

fields/sports grounds, the need for areas of water attenuation, proximity to existing housing and the presence of two local wildlife sites.	
The land at Thickthorn is not capable of accommodating 700 homes.	There is a balance to be struck between densities and the quality of the built environment.
Density figures are more likely to be around 25-30 dph.	There is a balance to be struck between densities and the quality of the built environment.
The clear view at the Consultation was that development should stop at Rocky Lane and the current playing fields should remain.	See site selection methodology
The RDS acknowledges that the three playing fields are a potential constraint.	See policy HS2
Advice from Sports England is to object to the loss of sports facilities unless replacements are provided.	
It seems illogical to remove sports fields as The Garden Suburbs prospectus encourage sports pitches as part of a well-planned, integrated, mixed use urban extension	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed
There is no certainty that the land at Thickthorn will become available from the land owners.	Evidence and development interest suggests otherwise See IDP
No assessment of the viability of the scheme has been made.	See site selection methodology There is a balance to be struck between densities and the quality of the built environment.
The allocation of a single site in Kenilworth is insufficient to provide the flexibility required in the Local Plan to adapt to rapid change throughout its lifetime.	
SHMA (2012) identified 2070 dwellings in Kenilworth. 700 dwellings is significantly short and should be increased.	
The proposed focus of new housing allocations at land south of Warwick and Leamington will not adequately meet the identified need for future housing growth in Kenilworth and is not considered to be sustainable distribution of development.	See site selection methodology
Concerned with the deliverability, sustainability and achievability of the Thickthorn site.	Evidence and development interest suggests that this site can be delivered
The Kenilworth Golf Club site has been identified by the council as a potentially suitable site to accommodate housing growth in the 2012 SHLAA.	See site selection methodology
To address the shortfall in housing provision in Kenilworth, the golf club should be allocated for housing.	
Kenilworth Golf Club should be released from the Green Belt and safeguarded for future development.	
The area outlined for development is green belt and a haven for wildlife	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed

Those on the south side of Jordan Close enjoy the amenity of a spinney which runs along the backs of the 11 gardens. This spinney has an abundance of wild life and ancient Oak Trees.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed
The area marked as employment land seems excessively large and looks as though it will abut the gardens of properties in Thickthorn Close. There must be an effective natural barrier for these properties.	This will be determined by market demand.
The majority of Kenilworth residents would prefer the lowest option of growth.	The Joint SHMA shows that growth is needed
There can be no more than 100 houses built without the need for more facilities and without changing the character of the village.	There may be an impact for some communities and this has been weighed against the benefits of development
Green field land is important between Kenilworth and Coventry and is used regularly by cyclists and walkers.	See landscape and ecology studies on the evidence base pages of the website. There are no fundamental factors which mean this site cannot be developed

## Infrastructure Requirements for Thickthorn

Consultation Comments	Response
<b>Summary of Matters Raised in Objection</b>	
Racetrack use along "the straight" of Glasshouse Lane (30mph limit, 50± not uncommon) will inevitably be the cause of further accidents, as it is used as a "rat run" to avoid the choked Warwick Road.	The development at Thickthorn will offer an alternative route to the A46.
There are concerns about how road infrastructure will support the new location for Rugby and Cricket Clubs.	This is being considered in assessing appropriate sites for the relocation of the clubs
The new road junction and road from Castle Park for the rugby club will have a severe impact on the existing quality of life for the residents on Castle Road as there is an additional risk of serious accidents.	The design of junctions and roads will need to take safety concerns into account. This should be considered at the detailed design stage
Kenilworth Runners request the inclusion of an athletics track in Kenilworth.	It unlikely that this could be justified in relation to new developments
The provision of facilities to Kenilworth should be improved commensurately should the housing stock grow.	The Infrastructure Delivery Plan includes proposals for schools, roads, health centres, sports facilities and open space
Kenilworth needs adequate infrastructure of eco houses.	Policy CC3 in the draft Local Plan seeks to set appropriate and achievable sustainable building standards
Kenilworth needs an integrated transport system with a new station.	See policy TR5 in the Draft Local Plan
To support the level of growth at Thickthorn and Kenilworth, Warwick hospital will need further development.	The IDP includes provision for significant capacity increases for Warwick Hospital
The mitigations proposed will not enable the roads to cope.	The Strategic Transport Assessments indicates otherwise
The bus services will need to be enhanced a lot	See T7, T8, T9, T16 in the IDP

including further links to town centre, supermarkets and the new railway station.	
The provision of better cycling and walking links across town will be necessary.	See T1, T3, T5, T6 in the IDP
<b>Summary of Matters Raised in Support</b>	
Sport England support WDC in preparation of the playing pitch strategy.	
There are no fluvial flood risk concerns for this site.	
The site will make the most of existing green infrastructure assets on the site including Thickthorn Ancient Woodland, Glasshouse Wood and Glasshouse Spinney.	
The relocation of sports clubs could provide schools and community groups with excellent facilities to support health and leisure of local residents.	

## RDS District Wide Transport Mitigation Proposals

Consultation Comments	Response
<b>Summary of Matters Raised in Objection</b>	
<b>General comments relating to Traffic flows, congestion and air quality</b>	
Widening Banbury Rd will increase the problems of a bottleneck at the Bridge and will increase pollution.	The traffic proposals for the junction of Myton Rd and Banbury Rd will be reviewed. However, the Bridge itself is not a significant constraint on capacity. The real issue lies with junctions either side of the Bridge.
Transport mitigation proposals for Kenilworth will not be able to accommodate traffic arising from Thickthorn	The traffic modelling suggests that the with improvement to the Thickthorn Roundabout and St Johns Gyatory, the traffic arising from the Thickthorn could be accommodated
Proposed transport mitigation will be intrusive and urbanising and would not be needed if the level of growth was lower	The NPPF requires us to provide for Objectively Assessed Housing Need. The detail of the traffic mitigation to support new housing needs to be reviewed to minimise its impact. An alternative transport strategy which seeks to restrict traffic growth in the towns will also be explored.
The proposals do not do enough to increase capacity of north south crossings of the Avon	There are no cost effective options for achieving this and the Strategic Transport Assessment suggests that the traffic growth can be accommodated anyway
The proposals do not do enough to increase capacity of crossings of the West Coast Main line	Strategic Transport Assessment suggests that the traffic growth can be accommodated without further crossings
Too many sites are located to the south of the towns and will cause problems as a result of restricted rivers crossings and narrow streets (Warwick Bridge, the Butts, Princes Drive, Lower Ave, Friar Street, St Nicholas Church St, Theatre St etc). Dual carriageways leading to	This is an issue; however the Strategic Transport Assessment suggests that the traffic growth can be accommodated. Work is being done on an alternative transport strategy which seeks to restrict traffic growth in the towns. Once this study is complete the optimum traffic solution can be applied.

the town centres will merely increase pinch points across the river and in town centres.	
SDC's proposals for Gaydon/Lighthorne Heath will make this even worse	A transport study looking at the cumulative impact of SDC's proposals alongside WDC's Local Plan proposals has been undertaken and appropriate mitigation measures applied within the Infrastructure Delivery Plan
In general, the proposals will result in more congestion and more pollution. They are ill-thought through and will spoil quality of life for those living in the towns. They are not compliant with Para 109 of the NPPF	The STA suggests that queuing times may increase as a result of the proposals, however the impacts are considered to be within reasonable bounds. The air quality study suggests that air quality will improve over the Plan period due to cleaner vehicles.
Air quality issues will impact on health. Inconsistent with other policies in the Plan	The air quality study suggests that air quality will improve over the Plan period due to cleaner vehicles.
The proposals are inappropriate in a conservation area and will have a negative impact on the historic environment	It is accepted that the proposals are likely to have a negative impact on the conservation areas, although they are likely to be "less than substantial" in terms of the harm. WCC are exploring how to minimise the impact of junction improvements (eg signalisation) in the moist sensitive locations
By locating employment at Gaydon, south of Warwick and south of Coventry, the proposals will lead to much more north-south traffic through the towns	It is an aim of the plan to locate homes close to employment areas. However it is not possible to ensure people live close to work. The modelling has taken in to account the impact of the all these employment areas and builds on existing commuting patterns to ensure traffic in commuting peaks still work effectively
The traffic proposals will damage Warwick as a destination for tourism, shopping and dining, damaging the economy of the town	Congestion and impact on the historic environment are issues that need to be taken seriously. See above comments in relation to both.
The additional houses will exacerbate existing parking problems in the towns	This depends on how parking capacity for town centres is addressed. This will be subject to review following the "alternative transport" study referred to above
Smaller, more dispersed development would distribute the traffic better	Dispersed development can increase the overall quantity of traffic as it is more difficult to locate schools, facilities and services in convenient locations and close proximity to new development, thereby increasing the need to travel. Transport mitigation is easier to design for concentrated areas of development rather than dispersed.
Many of the schemes are for signalisation. This is unlikely to work in the long term and more radical solution needs to be looked at.	The Alternative Transport study referred to above will explore alternative to signalisation. However the signalisation proposals have the potential to ensure that traffic growth resulting from this Local Plan can be accommodated
Traffic should be directed out to Warwick Town Centre, not through it.	It is accepted that this would be the ideal, however work needs to be done on the Alternative Approach to demonstrate whether (and how) this could work
Proposals are not consistent with the objectives of the Plan or with the LTP as they will increase pollution, noise and congestion and they focus too much on motor vehicles	See comments above relating to pollution and the Alternative Transport study
Major amenities (town centres, hospital etc.) are north of the river, yet the bulk of the new housing is to be located south of the river	There are significant range of destinations south of the river too – notably food retail and employment.
Access for emergency services needs to be maintained. The proposals could lead to	The evidence suggests that the proposals will not lead to gridlock

gridlock putting lives at risk	
The proposals include provision for Travel Plan to support major new developments. Yet these are never provided	They have provided for a number of major development proposals. This will be a policy within the Local Plan which developers will be expected to comply with
The present Plan does not address these traffic problems sufficiently and should be “refused on transport grounds where the residual cumulative impacts of development are severe” (NPPF 32).	The Strategic Transport Assessment (STA) addresses traffic issues and shows that traffic can be reasonably accommodated without severe impacts
Roads linking to the M40 will not be able to cope with the volume of new traffic	The proposals include significant improvements to the Europa Way corridor to address this issue
No concrete proposals for new roads, only ideas. A North Leamington relief road suggestion could cost £50million+ and the idea that the A452 could be routed to the Fosse – one of the most dangerous roads in the County is preposterous	The North Leamington Relief is not proposed and the STA suggests it is not required. There are no proposals in the RDS for routing the A452 on to the Fosse. Such a proposal may have benefits for the traffic in the towns, but should only be considered if the safety aspects have been fully addressed.
Tariffs and tolls should be introduced for the town centres along with a southern ring road. The funds could be used to tackle air pollution	Proposals along these lines are being explored as part of the Alternative Transport Study referred to above
People are unlikely to work close to where they live, so providing employment close to new residential areas will make no difference	This may be partially true, but the evidence suggests it will make some difference
The Gateway will encourage journeys through the towns to link to Europa Way	The demand management transport study will look to route these journeys round the towns. The evidence shows the number of movements is limited.
It is not inevitable that people will use cars if good alternative are offered.	The demand management study seeks to address this
Lower densities proposed in the RDS mean that there is bias towards the car – in conflict with the aims of the plan and the NPPF. Higher densities would help public transport and reduce walk times	This is partly accepted, but with good layout and design the densities proposed in the local plan can support public transport
Parking should be used as part of strategy to get people in to towns and to support town centres, instead of being used as a “cash cow”	There is a tension between town centre parking and encouraging sustainable transport. The Local Plan does not seek to determine this issue.
Noise and vibration would increase damaging businesses and tourism and long term health of residents	HGV journeys are a small percentage within Warwick, Leamington and Kenilworth
There should be wider pavements to prioritise pedestrians and to slow down traffic	The demand management study seeks to address this
There should be free extra parking on the edge of the towns with frequent mini buses	The Local Plan make provision for park and ride
All traffic should be directed out of centre of Warwick - not through middle. Imperative that new houses based south of Warwick should have major road access to by-pass/motorway or other links to major employment areas.	The demand management study seeks to address this
Town centre needs better parking plan. Nothing to encourage traffic to stop and enjoy Warwick	The demand management study seeks to address this

How can the Plan reassure EH that these highway schemes will protect, and where appropriate, enhance the historic environment including the setting of individual heritage assets?	The junctions at Castle Hill and Banbury have been redesigned to reduce signalisation and the highway footprint
Whilst congestion may not be significantly worse the “shoulder” peaks will experience heavier traffic	Noted
<b>Comments on specific traffic proposals</b>	
The proposals will result in additional traffic on Tachbrook Road. There therefore need to be improvements at the junction with the A425	Improvement in the area of Bath Street, Spencer Street, Lower Ave and High Street are included in the mitigation proposals
Concern about the proposals to eliminate right hand turn at the bottom of Smith St. The proposed alternative is unlikely to work. This will damage trading on Smith St and will lead to longer journey times as alternative routes are found	The revised traffic proposals will retain the right hand turn at the bottom of Smith St.
The Shires roundabout needs to be improved beyond what is proposed. This could be done by linking Tachbrook Park Road to Queensway via junctions	Improvements are proposed for the Shires Roundabout which will bring opportunities for this junction to work more effectively. There are no proposals to link Tachbrook Park Rd and Queensway. Whilst this might help relieve traffic on the Shires, the modelling suggests it is not a requirements and it would be a costly option, involving 3 <sup>rd</sup> party land.
Banbury and Myton Road should be made 20mph as they are used by children attending schools.	Comments will be passed to WCC. Not an issue to be considered within the Local Plan
Housing linking directly to the A46 should not go ahead. Stanks Island is already at capacity and the scheme for this area is insufficient.	There are proposals for improvements to Stanks Island which suggest the junction could accommodate the proposed developments
As a bottleneck, traffic needs to be diverted away from the Avon Bridge. It is hard to see how this could be done with so many houses located in the south of the towns.	The Bridge itself is not a significant constraint on capacity. The real issue lies with junctions either side of the Bridge. The STA proposes improvements to these junctions to increase capacity
We need a super-highway bypass to enable traffic to go round Warwick rather than through it	The principal of reducing through traffic is being explored as part of the Alternative Transport Approach.
Proposals for the M40 are not workable. There needs to be a non-motorway solution by building a new stretch of road from Longbridge to Grey Mallory.	There is little scope for building a non-motorway solution and the STA suggests this is not necessary
The proposals will threaten the structure of the Avon Bridge in Warwick. Is its structured checked to take account of the additional traffic flows?	There is no evidence to suggest the structure of the Bridge is threatened. WCC engineers undertake assessments of all bridges.
Proposals at Bericote and Blackdown are unnecessary. Improvements to the roundabouts with additional feeder lanes and cycle/pedestrian crossings should be considered.	The proposals for Blackdown are considered to be essential to enable the traffic mitigation to work. The proposals for Bericote are high desirable
Major development to the south of Warwick	This concern is noted and the alternative along Europa Way

will lead to increased traffic on the A429 through Barford. Extra traffic should be directed to use the corridor between M40 J14 and Europa way	and M40 should be encouraged.
Access to Stoneleigh Park should be changed to the north	This forms part of Stoneleigh Park's most recent planning approval
Improvements to Blackdown Roundabout are a waste of money. It would be much more effective to improve the Bericote roundabout to aid flow out of Leamington in the evening.	The proposals for Blackdown are considered to be essential to enable the traffic mitigation to work. The proposals for Bericote are high desirable
Additional traffic from Hampton Magna will not be accommodated by the proposals for Stank's Island and will lead to more rat-running. Development at Hampton Magna should not proceed.	Proposals for improvements to Stanks Island suggest the junction could accommodate the proposed developments
Pedestrianisation of Smith St would damage businesses and should not be pursued.	This is not being proposed
The left hand filter lane at the end of Myton Road is a bad idea threatening road safety close to schools.	The junction design at Myton Rd/Banbury Rd is being reviewed.
The idea to block on entrance to Bridge End is not workable	This is not being proposed
The case for widening the approaches to Spinney Hill Roundabout is not clear. It is likely to have an impact for cyclists	Spinney Hill roundabout is an important junction and will need to accommodate extra traffic. The impact on cyclists is important and all junctions need to be designed with cyclists in mind
If Warwick Fire Station is relocated at Queensway, Fire vehicles would experience increased delays	The site for the relocation of the fire station has not be finalised, but it is unlikely to be on Queensway
Mitigation proposals that have already be agreed through S106 (e.g. A46 to Stoneleigh Park, B4113) are not taken in to account in the proposals	These are accounted for in the modelling but do not form part of the Local Plan proposals as they are already committed
Congestion charging would help in Warwick	Schemes of this nature will be considered as part of the Alternative Transport Approach
The junction of Coventry Rd and Coten End is a particular concern but is not addressed	Assessments show the issues will be resolved by addressing traffic flow along St Nicholas Church St
Introduction of two lanes at St Nicholas Church St and reduced parking is detrimental to residents and will impact on air quality	This issue is noted, but air quality is likely to improve during the Plan Period
Harbury Lane will be a busy road and could become a major barrier dividing housing on either side and threatening safety	This issue will need to be addressed in development briefs/master planning of southern sites (see policy DS15)
Roundabout at Earl Rivers Ave needs to be improved by "smoothing it out" to cope with extra traffic	
The shared space of Jury St/ High St should be a blueprint for the future of Warwick rather than junction improvements and increased traffic	To be considered as part of Demand Management Transport study
The proposals for Thickthorn need more consideration to ensure Warwick Rd through	This point is understood. The traffic modelling has included an assessment of this and improvements to Thickthorn island

Leek Wootton is not used as a “back way” to Kenilworth	should help. However, the detailed work will accompany a future planning application and these will explore detailed modelling and the need for specific schemes to address this
The HA wish to record that that there is no committed scheme for the proposal for a managed motorway scheme between M40 junctions 15 and 14	Noted, but there is evidence of need and the HA have been involved in discussions which accept the long term benefits of such a scheme
Traffic will be increased significantly along a widened Banbury Road outside Warwick School at a point where there is no pedestrian crossing and where residents have already been informed that the road is too dangerous for a crossing patrol to operate.	By not allocating the site at Gallows Hill this issue is likely to be addressed
Parking at the Technology Park is already inadequate, spilling out onto the road and nearby residential areas.	The park and ride proposals seek to address this
Concerned that planned changes to the motorway (a running hard shoulder between junctions 12 to 15) will not be sufficient for the increased volumes of traffic and may well contribute to severe congestion and increased pollution in the area	The evidence suggests it will be sufficient
EH is particularly concerned regarding proposals 11, 12, 13 and 24 and the subsequent substantial harm to a number of nationally significant heritage assets. There is no reference to the townscape/landscape implications of these proposals in either the RDS or SA - a serious omission.	Junctions along this corridor have been redesigned to address some of the heritage concerns, reducing signalisation and highway footprint. Further work may be possible depending on the outcome of the demand management transport study
The consequence of further increased use of the road in terms of noise, light pollution and visual intrusions from highway paraphernalia such as signage does not appear to have been considered	This is a matter for detailed design of schemes
Castle Bridge: 'highway works' in the vicinity will affect its setting which needs to be considered and resolved at an early stage.	Junctions along this corridor have been redesigned to address some of the heritage concerns, reducing signalisation and highway footprint. Further work may be possible depending on the outcome of the demand management transport study
A pedestrian phase needs to be included in the signals for the junctions at Myton Rd/Banbury Rd, Castle Hill, and Priory Rd/Smith St – but this will increase congestion	This has been taken in to account to the signal optimisation for this junction
The report over estimates traffic flows at St Nicholas Church St	The findings of the report are based on reasonable assumptions and a sound methodology
<b>Pedestrian and cyclists</b>	
Cycle routes in the District are poor and need to be improved.	Improvements to cycle routes will be incorporated in to the Infrastructure Delivery Plan
The bridge over the railway at the end of Church Lane, Whitnash should be cycle/pedestrian only.	There will be no vehicular access over this bridge except for emergency vehicles.
Should consider a park and walk scheme for visitors	Noted, though unlikely to be a scheme promoted through the Local Plan

The proposals do not do enough to consider the needs of pedestrians	The needs of pedestrians should be incorporated in to the design of new developments (this will be part of the Local Plan policies) and should be a priority in designing new road layouts in line with the Local Transport Plan
More routes for cycling and walking between the new development and town centres, hospital and college.	Noted. This will form part of the Infrastructure Delivery Plan
Proposals to remove pedestrian crossings on Myton and Banbury Roads are flawed, especially with schools in the area.	Details regarding the most appropriate locations for crossing will be developed as schemes are planned and implemented
Cycleways have prepared a draft cycling plan for Warwick District. The Local Plan should embrace this	The cycle plan has been received and has been given consideration. There are several elements that can be encompassed on the transport proposals. A separate detailed response has been prepared.
The plan needs to do much more for cyclists – for instance along Myton Road, linking to Banbury Rd	Improvements to cycle routes will be incorporated in to the Infrastructure Delivery Plan. This will include linking the Myton Rd cycle track through the Banbury Rd.
There is a lack of integration of cycle route (eg Emscote Rd to Adelaide Rd). There should be more traffic light phasing for pedestrian and cyclists.	To be addressed as specific schemes to deliver transport improvements are drawn up
Cycleways should not end abruptly in inappropriate locations and should not be obstructed by parked cars	See proposals T6 in the IDP
The additional traffic will make the roads more hazardous for cyclists	Junction design and cycle route design will be important
Every community should be served by a cycleway	See proposals T3 and T4 in the IDP
The proposals make no provision for improvement to national route 41	Noted. To be considered in conjunction with WCC cycling officer
Kenilworth Gyrotory currently shows no provisions for cyclists. Roundabouts are dangerous for cyclists so this should be taken into consideration.	To be considered as part of K2L cycle route and in conjunction with WCC cycling officer
Bericote roundabout currently shows no provisions for cyclists. Roundabouts are dangerous for cyclists so this should be taken into consideration.	To be considered as part of K2L cycle route and in conjunction with WCC cycling officer
A452 Spinney Hill Roundabout should be made more safe for cyclists	Noted. To be considered in conjunction with WCC cycling officer
Cycleways has prepared a draft cycle plan for the Warwick District embracing all three towns to show how the objectives set out in 5.6.3 of the Local Plan could be delivered	This has been discussed with WCC transport and reviewed by WCC cycling officer. The proposals will inform further detailed work on cycle routes
Plan for free flowing left hand turn out of St Nicholas Church Street into Banbury Road would be detrimental. Disabled persons unable to walk on sloping surfaces hindering mobility. Respondent has particular needs associated with accessing the car which would involve her husband having to cross the road through a stream of fast flowing traffic	Noted. This junction is to be redesigned.
Not enough detail regarding cycling provision	Further detail will be worked up as schemes are planned and

	implemented
<b>Public Transport</b>	
The park and ride proposals would tend to increase traffic rather than reduce as they are wrongly located	The traffic modelling suggests park and ride could play a part in reducing congestion if supported by other measures.
The absence of bus priority measures will undermine the ability bus operators to provide an attractive service and to deliver a significant modal shift	Bus priority measures are being considered as part of the Alternative Transport Approach and in conjunction with the park and ride
Public transport plans are sketchy and unambitious. We need frequent services and improvements to services at weekends and evening. Better bus connections to railway stations are needed	Noted. Steps will be taken to explore how more detail can be provided in the Infrastructure Delivery Plan
STA suggests deterioration in traffic conditions which will impact on bus services – more resources to maintain current frequency, increased costs and longer journey times. This can only be addressed by rebalancing the highway network in favour of buses. In this respect the current proposals are far too limited	The Alternative Transport Approach will explore the potential to place more priority on buses and to deliver an effective park and ride with a significant modal shift. Until the study is complete, it is not known whether such an approach is workable.
The assumptions underpinning the assessment of the park and ride are flawed and cannot be relied upon. The P&R will only deliver significant modal shift if parking at the destination is heavily constrained	See comments above
Densities are too low making it harder to serve by public transport and making distances longer for walking and cycling	There is a balance to be struck, however it is also important that the housing provided meets people's needs and that a high quality environment is brought forward. It should be possible to do this at the same time as providing for alternatives to the car, particularly if sensible street patterns are used to make bus travel quicker and easier to understand
Need better inter-town express services funded by CIL	Noted.
The park and ride proposals are unclear and are unlikely to make a difference in the form proposed	Further work is being undertaken to establish the viability and feasibility of park and rides
Will lead to longer journey times and less reliability for public transport due to congestion	If mitigation works, congestion should not be significantly worse. If P&R introduced, bus priority measures can help speed and reliability
Distance between jobs and new housing means there is a need to subsidise long distance bus routes to	Data shows many people live fairly close to work (Census). However there are some significant patterns relating to longer distances and public transport can certainly play a part in this (see IDP T12, T13, T14, T16).
<b>The STA methodology, presentation of proposals and delivery of infrastructure</b>	
There should be no further housing before the traffic problems of Warwick Town Centre are resolved	The traffic problems in Warwick Town Centre are very complex and cannot be wholly attributed to new development. It will not be possible to delay development until they are resolved as the NPPF requires development to be brought forward promptly. However, the proposals for forward funding aim to help some of the most important improvements to be implemented ahead of development

The proposals for traffic mitigation are too vague	Whilst the proposals are not fully designed up schemes, they show sufficient detail to illustrate that they would work effectively and that the proposed costs are reasonable
The planned growth should not take place until the infrastructure improvements have been carried out	The Council is putting a forward funding approach in place to ensure essential infrastructure is, as far as possible, provided ahead of development. Where this is not possible the Infrastructure Delivery Plan will set out how and when infrastructure will be provided.
Key elements have been missed from the traffic assessment : Lower Ave and Railway Bridge, Myton Rd roundabout	These areas are all included in the mitigation proposals
The modelling is not credible and under-estimates the impact of transport (for example along Banbury Road)	The traffic modelling is based on studies of actual traffic flows at a number of key locations in and around the towns. It is up to date and accurately recorded
There appears to be a funding gap which will inhibit the delivery of the transport infrastructure	The Infrastructure Delivery Plan shows how the transport mitigation proposals can be funded and delivered.
There is a need to look at a sustainable transport solution – rebalancing the road network away from the car and focusing on cycling and bus priority and a strategic network of routes, combined with better cycle parking	This suggestions will be considered as part of the Alternative Transport approach
The STA is hard to understand and obscurely written. It should not be offered for public consultation	It is accepted that it is a technical document and that in places it is hard to understand for a layman. The key points have however been summarised in the Revised development Strategy publication
The mitigation measures will cause disruption whilst being implemented	This is true, but is an inevitable consequence of transport improvements
The traffic mitigation is likely to require more than the proposals once all the problems are known	The Traffic Modelling specialist consider that the modelling represents a worst case scenario (for a variety of reasons) .
Model is based on assumptions of less than one car per household – not realistic	The model is based on likely car usage as predicted in national models adapted to local circumstances
The mitigation measures proposed which will be in operation 24/7 are based entirely on data relating to just 300 hours per year. The 12 mitigation measures are entirely counterproductive at off-peak times.	There is an assumption that if the network can cope with peak hours it will also cope when there are lower traffic volumes
No evidence that mitigation can be delivered	This is set out in the IDP and will be developed further as the IDP evolves
STA has fundamental mistakes: <ul style="list-style-type: none"> <li>• Based on unique data;</li> <li>• Only make 2% difference to flows – which is insignificant</li> <li>• Incorrect assumptions about traffic growth</li> <li>• Morning peaks restricted to before 9am, but this may not be the case</li> <li>• Proposed mitigation unnecessary during pm peak because school traffic will be unchanged.</li> </ul>	Noted

## Summary of Matters Raised in Support

The proposals for improved footpaths and a cycleway between Leek Wootton and Kenilworth are supported	Noted
Dualling of Europa Way vital to the success of the plan. Encourages the council to ensure that this is actioned at the beginning of developments in order to minimise the potential for long term disruption. Will assist commuting. Council should consider improvements to the already congested roundabout at the end of Europa way leading to the access road for the M40	Noted
Important that the road improvements are carried out as part of a coordinated plan that will reduce traffic movements, ease congestion and reduce pollution.	Noted
Support the policies regarding the Kenilworth to Leamington Spa (K2L) cycleway and the provision of a shared foot/cycleway alongside the Warwick Road between Leek Wootton and Kenilworth St Johns Gyratory	Noted
Pleased to note the general principles for the development of sustainable transport in the District	Noted
supports the proposal for a dedicated off road cycle path between Leamington and Kenilworth	Noted
Thickthorn roundabout will benefit from signalised crossings for pedestrians and cyclists	Noted
Without the improvements in Warwick Town Centre outlined within the STA, the impacts on delay are significantly worse, as such the air pollution will be considerably more	Noted
As cars improve and become more environmentally friendly it could be argued that the quality of the environment within the AQMA is likely to be as much a function of the vehicle fleet therein as it is the levels of growth.	Noted
Proposals will help reduce congestion	Noted
Public transport and cycling proposals are supported	Noted
Support removal of Northern Relief Road	Noted

## 6. Summary of representations made: Village sites and settlement boundaries

- 6.1. Consultation on **Village sites and settlement boundaries was undertaken during November, December and January 2013/14.** This built on the consultation on the village hierarchy undertaken as part of the Revised Development Strategy. This consultation took the proposals to a more detailed level identifying preferred options for specific development sites in rural areas and proposing amendments to rural settlement boundaries, including proposing areas to be removed from the green belt.

<b>Village Sites and Settlement Boundaries</b>	
<b>Consultation Comments</b>	<b>Response</b>
<b>General - Technical and Background</b>	
<p><b><u>Type of Document and Information</u></b></p> <p>The document may be difficult to understand without an overall background to the topic. It could have been improved by a glossary defining terms.</p> <p>Information on proposals outside the immediate area of the plan would have been beneficial to villages on the fringes of the district.</p> <p>The basics of the plan appear to be well researched and well argued.</p>	<p>It is acknowledged that the consultation document contains a lot of material and is supported by a number of technical appendices. The plan and proposals however, have been discussed extensively with parish councils and was subject to an 8 week consultation road show.</p> <p>The final site allocations feed in to the Draft Local Plan, which contains information about the context to the plan and relationships with other authorities.</p>
<p><b><u>Changing Nature of Rural Areas</u></b></p> <p>The data illustrates that the demographics of rural communities are different to urban communities; this has been the case since the mid-18<sup>th</sup> Century in England and is not a logical and rationale basis for basing housing proposals.</p> <p>The council has identified the key housing villages housing issues, which are the shortage of housing for older people – with older people unable to downsize and remain living locally and a shortage of smaller homes for local families. Support the proposal that the mix of houses should include sufficient affordable housing.</p> <p>Support the recognition that there is a need for growth not just within or on the edge of the main urban areas but also in sustainable rural areas, to support local services / facilities. As part of a balanced and sustainable spatial growth strategy for the District, the Trust also considers it is appropriate for some of the larger villages to accommodate new development and that, where necessary, Green Belt boundaries should be altered</p>	<p>The basis for policy is both rational and logical based upon recent research which identifies the changing nature of rural economies and societies and the increasing urban characteristics of rural areas. Census statistics is used to underpin the research at a local level.</p>

<p>to facilitate this.</p> <p><b>Growth in Rural Areas</b></p> <p>Support for the expansion of rural settlements to accommodate new housing, also support for the Revised development Strategy requirement that for development to be supported in the smaller settlements that there must be Parish Council / Neighbourhood Plan support.</p> <p>Need to ensure that development consider the needs of small businesses to ensure that transport needs are strategically planned and managed to allow ease of movement for residents and employees; broadband needs are met; small businesses can secure utilities at reasonable prices; a planning system which is clear and simple and one which avoids imposing CIL requirements that would make small developments unviable.</p> <p>The number of new homes in rural settlements could be greater than the number proposed.</p> <p>The burden of extra houses should be fairly shared out It is biased and unfair that villages are having houses.</p> <p>Built on Green Belt land when potential development areas such as Milverton are being removed due to Green Belt issues.</p> <p>RDS3 of the RDS states that growth should be concentrated on the edge of existing urban areas. Whilst we support growth within the rural settlements to maintain and bolster economic development we object to the level of growth proposed in the VHO. The current strategy is considered to be unsound in that it is not positively prepared, justified, effective or consistent with national policy.</p> <p>Policies for allocated sites need to make reference to important historic environment considerations in order to guide how development should be delivered.</p> <p>-The NPPF requires Local Plans, to set out a positive strategy for the conservation and enjoyment of the historic environment. This means ensuring that the proposed sites put forward for development, will assist in delivering such a strategy and not contradict it.</p> <p>-The selection of sites for development needs to be informed by the evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage asset.</p> <p>The latest version of the Local Plan seems to be much the same as the previous one, with an attempt to distribute dwellings to the south of Leamington / Warwick and little attention paid to strategic traffic and public transport issues.</p>	<p>The new Local Plan recognises that the majority of development is best located in the most sustainable village locations. It also recognises that limited infill development may occur in other settlements during the lifetime of the plan and an appropriate policy has been developed to help guide development in this regard.</p> <p>The plan includes new policies on directing new employment opportunities in rural areas and farm diversification.</p> <p>The numbers proposed are based upon an initial proportional growth strategy, which has been modified by landscape assessment and site appraisals.</p> <p>The sites allocated in the villages have been subject to a detailed review of landscape quality and Green Belt function. The area north of Leamington is recognised of high Green Belt value helping prevent the coalescence of Kenilworth and Leamington Spa.</p> <p>The site allocations for the villages have been prepared positively under the NPPF, which recognises the importance of helping sustain village settlements and services / facilities.</p> <p>The County's Historic Landscape Characterisation data was used to help shape the Land Cover parcels and to inform their inherent cultural sensitivity. A separate historic environment assessment, in line with English Heritage guidance, has not been undertaken as this is deemed to have been covered by the Warwickshire Historic Landscape Characterisation project.</p> <p>The new Local Plan aims to strike a balance of positively promoting housing growth which is reflective of objectively assessed district needs and providing a comprehensive approach to mitigating the impact of such growth together with establishing a comprehensive approach to infrastructure planning, including highways</p>
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	works and public transport investment.
<p><b>Revised Development Strategy</b></p> <p>The overall level of new homes forecast for the District is far too much. The local infrastructure will not be able to accommodate such a large increase in population.</p> <p>Why does Radford Semele need extra houses? None of the families in the area require housing. This is the result of the increase in the UK population brought about by uncontrolled immigration.</p> <p>The scale of the proposed growth at Hampton Magna is disproportionate to the ability of the settlement to absorb this increase and will negatively impact on the semi-rural character of the neighbourhood.</p>	<p>Following the consultation on village housing options and further evidence gathering on sites has further reduced the capacity of villages to accommodate housing growth. However, the Local Plan identifies a range of sites across the district which will assist in meeting objectively assessed housing need.</p> <p>The overall number of new homes in the Local Plan is based upon sound information and approaches to forecasting housing need.</p> <p>Radford Semele has been identified as one of the most sustainable village locations to accommodate housing growth. New housing will address both parish housing need and district housing need, as identified in the Joint Strategic Housing Market Assessment.</p> <p>The scale of housing proposed for Hampton Magna is equivalent to a 16.61% increase in the number of dwellings. The level of housing growth for the district as a whole is approximately 20%.</p>
<p><b>Strategic Growth Levels</b></p> <p>The interim level of growth of 12,300 between 2011 and 2029 is not accepted as an appropriate housing requirement for WDC. Coventry and Warwickshire Joint SHMA identifies 720 dwellings per annum equivalent to 12,960 dwellings over the Local Plan period. It is likely to increase pressure on the District to accommodate new development and it is essential that all of the opportunities for the larger villages to accommodate sustainable development are fully and thoroughly explored. It might be prudent to delay further work on defining the settlement boundaries until the true scale of the housing need has been objectively assessed on the basis that additional rural capacity might need to be found to ensure the needs are met.</p> <p>There is a danger of being drawn into a numbers game in which an expert will argue for an even higher housing figure, with the scales being tipped too far in favour of development. Many residents wonder whatever happened to localism and the idea that local people should have a say in what happens in their area. The council have not yet concluded their searches to identify more brownfield sites for development. Neither have they convinced anyone in Warwickshire that we have a compelling need for 12300 new homes or that this number</p>	<p>The consultation document was based upon the most up to date publically available information on housing requirements at the time of publication. It is recognised that the Joint SHMA slightly increases the housing requirements within Warwick District. The new Local Plan sets out the sites to meet this objectively assessed housing need across the district including village locations.</p> <p>The housing needs for the district have been researched thoroughly and have been finalised at 12,860. The Joint Strategic Housing Market Assessment (SHMA) provides the context to the housing need. The new Local Plan provides a wide range of housing sites in various sustainable locations and importantly also sets out a 40% affordable housing policy on new sites, which will assist local residents obtain more affordable homes within the district.</p>

<p>could be sustained in the longer terms. WDC through its meeting, reports and events have not convinced me that they have accurately predicted the need for 12300 new houses nor demonstrated how this might benefit local people at all.</p> <p>It is clear to see that an increase in housing numbers is required throughout the district and the opportunity for villages to allow a sensible and proportionate increase in their housing numbers within the village envelope will obviously help provide some of the increases required when looked at on a district wide basis.</p> <p><b><u>Policy Gaps</u></b></p> <p>'Health' does not feature in the current VHO and Settlement Boundaries Consultation. Public Health Warwickshire recommend that Warwick District planning policy systematically considers health and wellbeing. In any new development, addressing inequalities and accessibility should be essential planning considerations</p>	<p>The evidence base to support the identification of the village housing sites includes a review of environmental health issues. The new Local Plan includes a focus upon developing sustainable communities, which access to cycle and walking corridors. The plan also recognises the need to support new communities with sufficient health facilities, as part of its infrastructure requirements.</p>
<p><b><u>Green Belt, Permanence and Principle</u></b></p> <p>There must be 'exceptional circumstances' before building on Green Belt land is allowed. There are no exceptions circumstances for the release of this Green Belt land beyond political imperatives to build 12,300 houses. Boundaries should not need to be altered at the end of the development plan period.</p> <p>WCC proposal to remove some villages from the green belt to accommodate limited development suggest that all villages/hamlets should be excluded. When grouped they form part of the large parish and are at risk of becoming even more isolated without allowing for modest growth. Villages did not spring up overnight. They have all developed and decreased/increased in size over a long time.</p> <p>The reassessment of sites against the purposes of the Green Belt is entirely the wrong starting point. All of the decisions relating to these purposes were taken when the Green Belt was adopted and the permanence of the Green Belt boundaries must continue to be taken as the starting point, irrespective of the local planning authority's current views.</p> <p>Concerned that more houses are proposed on Green Belt compared to non-Green Belt villages.</p> <p>Paragraph 3.8 of the Options Paper, the local planning authority seems to openly accept that the District has sufficient capacity outside the Green Belt to accommodate its needs for new housing.</p>	<p>The growth strategy for the district is focused upon channelling objectively assessed housing need into the District's most sustainable locations, with a significant level of growth identified in urban fringe and non-Green belt village locations. However, it is also recognised that there are environmental and landscape constraints to the level of growth which can be accommodate in non-Green belt areas. To help meet the district's housing need there is also a requirement to consider other sustainable locations for growth, some of which are located in Green Belt locations. This approach will also assists villages tackle local housing issues, including providing more affordable housing and a greater mix of housing in villages with often ageing populations and a declining younger population, putting at risk local services and facilities.</p> <p>The council's housing strategy for the villages includes both new sites for housing in often larger more sustainable village settlements and a new policy direction on limited infill housing options in a range of the district's smaller settlements.</p> <p>The NPPF recognises that a Green Belt</p>

Much is made of the needs of Green Belt villages to grow and be sustainable. Green Belt policy has always been intended to be permanently restrictive. A simple change of mind by WDC does not meet 'Exceptional' or 'Very Special' circumstances to override this permanence.

Green Belt land should only be altered in exceptional circumstances and the change must be sustainable. The proposed scale of development for Hampton Magna fails to adequately take account of this.

Recognition that a significant number of developments proposed have been included with the co-operation of the appropriate parish councils

Support the recognition that the development strategy should direct new housing not only to urban sites but also to the more sustainable villages, whether these lie within the Green Belt or beyond it.

It is noted that many of the settlements are in the green belt and there is reluctance to breach the green belt policies. Forty years ago, when the greenbelt was created its intention was to avoid urban coalescence. It has been successful in doing that but at the same time it has also contributed to the arrested development of villages and other settlements to their detriment. May also lead to over-development in village locations.

To boost significantly the supply of housing, the NPPF (Paragraph 47) requires local authorities, in preparing their local plans, to ensure that the full objectively assessed needs for housing are met as far is consistent with policies set out in the Framework. Seeking to meet such needs is part of the soundness test of development plans being positively prepared (Para. 182). According to the Warwick District Council, the full objectively assessed housing needs for the District is 12,300 dwellings a scale of development for which WDC considers there are insufficient suitable and available sites outside of the Green Belt to meet. Then lack of suitable and available sites to meet objectively assessed housing needs provides the exceptional circumstances for a review of Green Belt boundaries. Supportive of a Green Belt review.

### **Village Boundaries**

The insetting of villages into the Green Belt is a policy direction we fully support as it will generate opportunities to construct much needed affordable housing.

It is not necessary to remove Green Belt status from a village in order to permit some new development within existing villages

review can be undertaken as part of a new Local Plan. A partial review of the function and purpose of various Green belt parcels around the villages has been undertaken, which indicates that a number of sites could be removed from the Green Belt without significantly impacting upon the purpose of the Green Belt.

The District has a large number of villages in the Green Belt. Of the 10 growth villages, 7 of these are in the Green Belt, averaging a growth level of 66 dwellings per village, compared to 3 non-Green Belt villages averaging a growth level of 110 dwellings.

Paragraph 3.8 accepts that there is a limit to growth in non-Green belt locations, beyond which sustainable development would be best served through identifying supporting growth options in other locations.

It is recognised that Hampton Magna has a very restricted built form, with very little opportunities to accommodate housing need through infilling alone.

The Local Plan only proposes insetting a Green Belt located village, where the built form and character is supportive of this approach. By not insetting a Green belt village, this would only allow very small levels of infill housing to come forward through across the plan period, which would not help address local housing needs.

<p>or in some cases on their edge. The Green Belt has played a large role in conserving the character and attractiveness of the district, it has more likely to have assisted the District's economic performance than harmed it.</p>	
<p><b><u>Consultation Impact and Changes</u></b></p> <p>WDC will need to show clear examples of changes which have been made to the plan as a result of the views expressed by residents.</p> <p><b><u>Scale of Proposals</u></b></p> <p>Agree with the principles set out in 4.3 regarding the strategy for sensitively managed growth areas for a considerable number of villages. Infrastructure requirements, including new roads, schools and other amenities should be prioritized rather than 'carefully' considered. Whilst it is important that additional housing is directed towards the villages it is also important that this does not cause unacceptable harm to the environment.</p> <p>Concern that the plan assumes that this growth across several villages will sustain marginal businesses and services.</p> <p><b><u>Burton Green and Consultation</u></b></p> <p>Regrettable that Cala Homes were allowed to make a presentation supporting their proposed Red Lane development at the same Parish Council Meeting where WDC VHOSBC was presented to the village for the first time. Whether by accident or design, this gave the impression that the village was being presented with a fait accompli with the Calla Homes site having already been chosen.</p> <p>Disappointed that the village consultation for Burton Green was not more widely publicised and that the tone of the documentation is very much that the decision has already been made.</p> <p><b><u>Cubbington and Consultation</u></b></p> <p>There has been a lack of communication in Cubbington about the site proposals, which has not involved local residents.</p> <p><b><u>Hatton Station and Consultation</u></b></p> <p>At Hatton Station, we were not aware that the boundary was proposed to change and only found out about this change at the public consultation stage.</p> <p><b><u>Hatton Park and Consultation</u></b></p> <p>Hatton Park - The consultation arranged at the village hall was insufficient and I was unable to have my questions answered, with over one hundred residents waiting to speak to WDC representative.</p>	<p>Several sites in several villages have changed or been modified as a result of the consultation. For example, Radford Semele, Lapworth, Leek Wootton and Hatton Park.</p> <p>The scale of housing proposals has sought to balance impact on local communities with the need to sustain marginal businesses and services. The Local Plan policies for rural areas seek to do likewise</p> <p>The consultation process sought to provide opportunities for people to be well informed about the proposals and how to make representations. At a local level Parish Councils have varied significantly in their approach to engaging local residents in debates about housing growth and the most appropriate sites. The District Council has not proposed a particular approach to Parish Councils for consultation, but ensured that every location impacted by development has been subject to a comprehensive public consultation programme. As with every consultation programme there are areas for improvement, and comments are noted regarding specific issues.</p> <p>The village options consultation was an opportunity for local residents to feedback on the preferred housing option for the</p>

<p><b><u>Radford Semele and Consultation</u></b> Local people in Radford Semele have not been given the opportunity of consultation or any involvement in the decision-making for the preferred options, which is undemocratic and unacceptable. The preferred option site at Radford Semele has been brought in at a very late stage. The 'preferred' site in Radford Semele which was not the Parish Council's choice seems to have appeared in the local plan without consultation. Why and how did it become the 'preferred' site?</p> <p><b><u>Rowington Parish and Consultation</u></b> Concerns that the consultation was not well run within Rowington Parish, with limited information available.</p> <p><b><u>Consultation and Prematurity</u></b> The consultation is premature in advance of the conclusions of both the SHMA being established and tested through examination and housing need being defined. This prematurity includes the discounting of villages not included in the consultation document, such as Norton Lindsey.</p> <p><b><u>Other Consultation</u></b> The NLPC has not received information on proposals covered by the Stratford District Council Local Plan which is of concern. A lack of local plan in other areas has meant local communities have no say in developments and developers are causing severe concerns.</p>	<p>village and this has partly informed a change of direction on site selection. It is acknowledged that the working relationship with the parish council has not been as strong as with some other parish councils, although all local residents have had the same opportunity (and done so) to formally comment on various stages of the new Local Plan development.</p> <p>The new Local Plan sets out a range of housing which is based upon objectively assessed housing need. The village sites contribute towards meeting this housing need. Norton Lindsey has not been identified as a growth village in the plan as there are more sustainable locations with better services and facilities. This policy position was established through the work on developing a settlement hierarchy for the villages, and is quite distinct from the work on the SHMA and housing numbers.</p> <p>Comments noted with regard to cross border working, which will be picked-up through the duty to co-operate programme of activity.</p>
<p><b><u>Site Selection Process and Methodology</u></b> The site selection process should have included a scoring system. The site appraisal matrix includes a number of errors and incorrect judgements. The reduction in the site selection process from 190 to 77 sites prior to field survey is not considered sound methodology.</p> <p>Landscape sensitivity assessment fails to provide an appropriate historic environment assessment. It fails to assess whether, how and to what degree the settings of affected heritage assets make a contribution to their significance and set about how the proposed development would affect that significance.</p> <p>Based on AMEC's experience of undertaking similar work on behalf of landowners and local authorities, we consider that the site selection process and methodology, which has been developed by WDC for appraising village site options, is appropriate, suitably thorough and robust.</p> <p>The approach to the identification of villages for rural growth is not robust and is premature ahead of a clear identification of an objectively assessed housing need.</p> <p><b><u>Housing Estimates (Overall)</u></b></p>	<p>The site selection methodology summarises a wide range of work that was undertaken to select the most appropriate sites within villages.</p> <p>Where potential errors have been raised through the consultation, these issues have been revisited. Examples include site access, landscape and hydrology.</p> <p>The Joint SHMA provides a robust methodology for assess the District's housing requirement. This has formed the basis for the local plan proposals.</p> <p>The approach to identifying the most appropriate villages for growth in based upon an assessed range of sustainable indicators. This approach is robust and has been used in the development of other local plans.</p> <p>The Joint Coventry and Warwickshire</p>

<p>Comments made in July 2013 concerning the housing estimate of 12,300 have been ignored. An independent assessment, supported by our local MP, of 5,400 obviates the need to find room in the nominated villages. The 'housing estimate' needs re-assessment.</p> <p>The preferred option will deliver the minimum dwellings required as identified in the RDS and will not allow for any additional housing WDC must deliver under the SHMA.</p> <p>Burton Green housing stock increase and loss of housing issues – clarity required on gross / net issues.</p> <p><b><u>Landscape Assessment</u></b></p> <p>The Landscape Sensitivity Assessment fails to provide an appropriate historic environment assessment. It fails to assess whether, how and to what degree the settings of affected heritage assets make a contribution to their significance, and set out how the proposed development would affect that significance. The Landscape Sensitivity and Ecological and Geological Study follows considered methodology in respect of identification of the Landscape Character Parcels, not specific sites and there sensitivity to certain types of development. It therefore does not focus on each individual site but the wider area. Just because a site lies within a 'high sensitivity' land parcel, it does not follow that it cannot and should not be developed.</p>	<p>Strategic Housing Market Assessment (2013) objectively assessed the future housing needs of the Housing Market Area and the six local authority areas within it. Warwick District aims to meet its Objectively Assessed Need for housing by providing 12,860 new homes between 2011 and 2029. A number of the District's more sustainable village locations have been identified to assist in helping meet this objectively assessed housing need.</p> <p>Burton Green may witness a loss of 6 dwellings as part of the HS2 project. The housing number forecast for Burton Green is a total gross number.</p> <p>The methodology and approach to assessing landscape sensitivity is set out in the Landscape Sensitivity and Ecology and Geology Study 2013/14 and is based upon a rigorous approach to defining Landscape Description Units (LDUs) and lower level Land Cover Parcels (LCPs). The methodology builds upon national best practice in assessing landscape character and quality. In addition to assessing LCPs, the work also focused upon reviewing the sensitivity to change of housing and non-housing uses on smaller areas within LCP's if this was appropriate and linked to a potential development site. This helped fine-tune the assessment methodology to take into consideration smaller potential development sites. Specific historic environmental issues where considered as part of the overall landscape sensitivity methodology and revisited as part of an update to the main report and in light of consultation comments. This has resulted in changes to some site selections and landscape assessment scoring.</p>
<p><b><u>Site Selection Process – Various Locations</u></b></p> <p>Disappointed that Norton Lindsey has not been selected as a village to take modest growth. Object to the selection process for failing to consider providing housing on the Cedar Farm site at Radford Semele.</p> <p>Lyons Farm in Rowington Green - a limited amount of residential development here would both offer housing for</p>	<p>Norton Lindsey is not classified as one of the District's most sustainable growth villages and has particularly poor public transport connections and a very sensitive historic environment. Over the course of the plan period there may be some options for limited infill as indicated under Policy H1</p>

<p>young families, single people and the elderly and encourage retention of services.</p> <p>Various sites in Burton Green require further consideration as viable development options, including discounted sites 2, 5, 6 and 7.</p> <p>Hatton Green village is not considered for assessment or promotion of development despite infill opportunities existing.</p> <p>Strongly support the recognition that there are parcels of land on the edge of settlements which lie beyond the Warwick District boundary yet are themselves within Warwick District which are appropriate for development to help meet District housing needs in a sustainable manner.</p> <p>Respondent is promoting their plot of land between the School House and the Stag Public House, Offchurch for development.</p> <p>Pinley Green and Shrewley Common Road – There are opportunities for housing sites at Shrewley Common Road and Pinley Green which are near to local services.</p>	<p>Directing New Housing.</p> <p>The Cedar Farm site is remote from the village and services and was therefore not considered for development.</p> <p>Rowington Green, Pinley Green, Shrewley Common, Hatton Green and Offchurch are all very small settlements in the Green Belt with limited facilities and low sustainability scorings but may have some potential for limited infill housing as indicated under Policy H1 Directing New Housing. Rural affordable housing exception sites, could also come forward during the plan period will be treated according to their merits and in line with policy H3 Affordable Housing on Rural Exception Sites.</p> <p>In Burton Green, the majority of the discounted sites were reassessed for landscape impact and layout / configuration connected to the existing village built form. Site 1 was still considered the best option for accommodating housing growth due to its ability to better connect the built form of the village and provide a range of integrated community benefits (additional car parking, space for the relocated village hall and a new village green).</p>
<p><b><u>Technical Studies and Research – Radford Semele</u></b></p> <p>Radford Semele - No Flood Risk assessment plan from the current site promoter Gladman for Site 1</p> <p>Radford Semele has been submitted to Warwickshire County Council, and has no proper Habitat Assessment. The environmental report carried out for Sites 2, 3 do not represent the areas of land under consideration and should not be used as evidence. Sites 2, 3 and 4 are far better sites from an environmental viewpoint to accommodate housing.</p> <p>Radford Semele - A highways report was not provided as evidence in this consultation. It would look like WDC and highways have carried their Access assessment based on the existing 50MPH speed limit alongside Sites 2 &amp; 3. According to DOT advice on speed limits for villages, a speed limit of 30mph should apply.</p> <p>Radford Semele - The assessment reaches a spurious conclusion regarding discounted Site 2 at Radford Semele because the assessment was made regarding land from the village edge all the way down to the Fosse Way. In reality, the area needed at</p>	<p>In originally allocating Site 1 as a Preferred Option, detailed discussions were undertaken regarding hydrology issues connected to the site. The site was not considered at risk of flooding. Any planning application for this site, will also need to review this issue in detail.</p> <p>As part of the Landscape Sensitivity and Ecology and Geology Study 2013/14, which was part of the evidence base for the village housing consultation work, a thorough review of habitat / ecology value was undertaken for all the sites in Radford Semele. This did not identify any major habitat / ecology issues on any of the sites.</p> <p>The feedback from County Highways at the time of consulting on village housing options, indicated that adequate access and associated visibility splays could not be</p>

<p>Site 2 for 100+ houses is only a tiny fraction of that area. Access to Site 2 in Radford Semele has been said by WDC to be unachievable. A traffic study/report has been prepared by a specialist traffic consultant who has concluded that safe access can be achieved for Site 2.</p> <p>Radford Semele - Sites 3 and 4 at Radford Semele have been rejected by WDC and the reasons put forward are not convincing. Access/visual impact issues are the same for Site 2 as Site 3 and WDC reasons for rejection are not valid. A traffic report shows that access can be achieved at Site 3. As for visual impact, the WDC assessment is invalid because it relates to a huge area of land and not this site specifically. Site 4 has been said to cause the merging of Radford Semele and Leamington. The site merely 'rounds off' the village boundary.</p> <p>Radford Semele - traffic surveys were not carried out at a sufficient time. The landscape impact and traffic congestion in the village centre impact would be less at the discounted sites than the preferred option.</p>	<p>obtained to sites 2 and 3, particularly considering the national speed limit in this area. Further traffic assessment work and technical analysis on visibility splays as indicated that an appropriate visibility splay could be obtained to Site 3. It may be the case that an appropriate site access could also be obtained to Site 2, but this will need to be discussed in detail with the County Highways team.</p> <p>The landscape assessment work is not invalid and includes a rigorous approach to assessing Landscape Cover Parcels (LCPs) and also the sensitivity to development of sites within these parcels. In light of consultation feedback and a further review / update to the landscape evidence, this has resulted in a change to the site allocation for Radford Semele, to include Site 3 only, as suitable for housing.</p>
<p><b><u>Technical Studies and Research – Hatton Park</u></b></p> <p>The WDC Local Plan Inquiry Inspectors Report identified the risk of harming the special character of the area [Hatton Park] and community setting, thus ruling out any further development or removal of Green Belt land. There is no evidence to support expansion and 'no exceptional circumstances' are linked with the site to convince or justify removing the land from the Green Belt designation.</p>	<p>A Partial Green Belt Review was undertaken to identify the role and function of Green Belt land around various villages. This report was also independently reviewed which indicated that the Site 1 Sub-parcel is largely contained within the Birmingham Road (A4177) and Ugly Bridge Road and could accommodate a sensitively designed village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.</p> <p>Hatton Park has been identified as a Growth Village and one of the more sustainable locations to support housing growth. This site will help support the delivery of district wide housing requirements and address parish housing needs. Hatton Park is located near a major railway station and development will also help sustain village services / facilities, including the bus connections and village hall. It may also encourage further investment in local retail and community facilities.</p>
<p><b><u>Technical Studies and Research - Cubbington</u></b></p> <p>In Cubbington, WDC have failed to assess one parcel of land which was promoted for development. That land being adjacent to Site 5 and does not have the constraints mentioned in paragraph 5.7.</p>	<p>The wider area around Site 5 was assessed as part of the Landscape Sensitivity and Ecology and Geology Study 2013/14, which indicated that it was a visible location with a high landscape value.</p>

<p>A previous WDC survey concluded that the allotments were not suitable for development due to the impact on the landscape/greenbelt/recreational aspects. Nothing has change on the allotments, what makes it suitable for development now?</p> <p>Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Inconsistency in the assessments of land at Cubbington.</p>	<p>The Landscape Sensitivity and Ecology and Geology Study 2013/14 reviewed in detail the sensitivity of all sites around Cubbington for development including Site 1 (allotment land). Site 1 was evaluated as slightly less sensitive to change, which is partially informed by its current use and ability to screen the area as part of the new built form. The landscape study has been used to update the SHLAA report, which may be the previous survey referred to in the representation. Site visits and field surveys were undertaken as part of the Landscape Sensitivity and Ecology and Geology Study 2013/14.</p>
<p><b><u>Technical Studies and Research – Hampton Magna</u></b></p> <p>Traffic impacts for Hampton Magna need a proper independent assessment, which has hitherto not been carried out. Such assessment is likely to reach a conclusion which is very different from the current one.</p>	<p>On several occasions WDC has sought professional opinion from the County Council Highways Department about the potential impact of traffic at Hampton Magna, due to the proposed new development. The conclusion was that development of the scale proposed would not have a major impact on traffic circulation and flow in the area, but did recognise that some minor work may be required on signalisation and the better syncing of traffic flows at peak periods between the Old Budbrooke Road bridge traffic lights and the A4177 junction. The IDP also indicates investment is required at the Stanks Roundabout over the plan period. As this is also a larger housing site at Hampton Magna, a policy has also been put in place to phase development across the plan period to help deliver an appropriate balance in housing delivery and also assists in integrating development at a village level.</p>
<p><b><u>Technical Studies and Research - Bishop's Tachbrook</u></b></p> <p>Traffic on Oakley Wood Road is already a concern during peak times and according to the Transport Assessment (Phase 3) with the developments set out in the Local Plan per para 2.7 these figures are predicted to rise by 45% and 46% respectively. A similar study should be carried out for Mallory Road which is already heavily used by commuters to reach the M40 from Leamington, passing through the centre of the village. The junction of Mallory Road and Banbury Road (B4100) has a bad accident record.</p> <p>In agreement with the Overview of Findings relating to Bishop's Tachbrook on Table 3 on pages 27 of the village housing options</p>	<p>The site allocated for housing growth is located towards the south of the village, with a new access road proposed off the Oakley Wood Road. This proposal would ease some of the traffic congestion in the main village area (particularly around Kingsley Road) associated with the primary school. The County Council Highways Team has not raised any major objections to the area identified for housing growth on the basis of traffic impact. In the wider area, the IDP focuses investment in Highways around</p>

<p>paper.</p>	<p>key corridors and junctions and this may help minimise traffic flows through village locations. The emerging Neighbourhood Plan for the area could also focus upon proposals to minimise village through traffic as part of its spatial strategy.</p>
<p><b><u>Preferred Options and Village Boundaries - General</u></b></p> <p>Top down imposition of sites and boundaries is not acceptable, but help from officers to identify and evaluate possible sites for development is very welcome.</p> <p>There is an increasing body of appeal casework that concludes that settlement boundaries - the purpose which is partly to define where development is to be promoted and where it is to be resisted are policies for the supply of housing for the purpose of Par 49 of the Framework. In the absence of a 5 year supply of deliverable housing land, such policies are to be considered out of date.</p> <p>Some support for the removal of villages from the Green Belt and both the rationale and logic presented in the report for identifying indicative village boundaries for non-Green Belt villages.</p> <p><b><u>Rowington Parish</u></b></p> <p>Rowington Parish Council would be prepared to consider, in principle, other small scale developments where appropriate, subject to normal planning rules and including sight of development and traffic management proposals where applicable. Opportunities for limited development may be available at Rowington Green.</p>	<p>Where possible WDC has worked collectively with Parish Councils to define housing site options. At a strategic level it is important that the new Local Plan sets the key policy directions and major housing sites. This will allow neighbourhood plans to focus upon the policies and proposals that are important locally within the designated Neighbourhood Plan area.</p> <p>Many of the villages are surrounded by areas of high landscape value. Defining clear village boundaries, which takes into consideration landscape constraints and also opportunities to develop in areas of lower landscape value helps support a sustainable approach to development. The Local Plan proposes sufficient housing land to meet its objectively assessed housing need and deliver a portfolio of suitable housing sites, without impacting on areas of high landscape value.</p> <p>Many of the settlements in Rowington Parish are small in nature and have limited services / facilities. The new Local Plan indicates that limited infill development may be an option in some of these smaller villages / hamlets. There are also options for rural affordable housing, subject to policy constraints.</p>
<p><b>Baginton</b></p>	
<p><b><u>Village Character and Green Belt</u></b></p> <p>Baginton is an elongated village close to Coventry. It makes a contribution to openness as it is. Its closeness to Coventry makes Baginton very sensitive to new development. It should be retained as it is now with washed-over status.</p> <p><b><u>Built Heritage</u></b></p> <p>Fails to establish site 1 contributes to the character, appearance and significance of the Conservation Area, and the effect of the proposed development on those attributes. It appears neither the Baginton Conservation Area Appraisal nor the industry</p>	<p>It is acknowledged that Baginton is located close to Coventry and that Green Belt land north of the settlement plays a particularly strong role in maintaining the separation of this small village from a large urban area. However, the village also has a clearly defined built-up area, focused around Mill Hill and the Coventry Road, which is quite separate in character (and quite suburban in parts) in contrast to the surrounding</p>

<p>standard guidance on assessing the impact of development on the setting if heritage assets have been applied.</p> <p><b><u>Sites Review</u></b></p> <p>The consultation document sets out those 8 sites that were initially considered leading to the discounting of some and then onto a preferred option and 3 further discounted options. It is not clear, however, how this relates to the SA/SEA process and an explanation of the full range of options that were considered and discounted, or the reasons for discounting.</p> <p>Site 5 may be suitable for a single school building.</p> <p><b><u>Preferred Option</u></b></p> <p>Potential interest in sand and mineral issues associated with the site.</p> <p>Baginton Village provides sufficient land to deliver at least 90 dwellings to meet the needs of the emerging development strategy for Baginton. This site could be extended to better fit into the landscape and connect with the village.</p> <p>Some mixed response from local residents in favour and again the site as preferred option.</p> <p>We support the preferred option for the development of 35 dwellings subject to correction to "Land north of Roswood Farm", Of all of the potential development sites in Baginton, this site has been identified to have the least negative impact with good connectivity with the settlement with suitable access and provides opportunities to enhance the visual appearance of this part of the village, clearly defining an entrance to the village from the south. The site would form a logical boundary to this end of the village with development extending no further south than the pub and fronting the highway.</p>	<p>agrarian landscape.</p> <p>The character, appearance and significance of the conservation area have been fully considered as part of the Landscape Sensitivity and Ecology and Geology Study 2013/14. Due to comments received during the consultation period, the allocated housing site in Baginton was reassessed and the original assessment comments still hold for this site. The site requires substantial screening along its edges and the scale (up to 35 dwellings) and depth of the site is limited due to wider landscape considerations and proximity to the Conservation Area.</p> <p>The site selection process is highlighted in Figure 2 of the villages consultation document, which indicates that the 'long list' of sites was sieved for sites of excessive size with marginal connection to village settlements; negative SHLAA commentary and obvious impact / site restrictions, and isolated development options with limited connectivity to village settlements. All the sites considered for Baginton are listed in the detailed villages' site appraisal matrix. The consultation document on village housing options was subject to a detailed SA appraisal which supported the main consultation document.</p>
<p><b>Barford</b></p>	
<p><b><u>General and Multiple-Sites</u></b></p> <p>Concern about the scale of housing in Barford.</p> <p>Barford village is a more sustainable location than its secondary service village classification would suggest.</p> <p>Bearing in mind that the village may have to absorb up to 70 units of housing in the Plan Period, smaller parcels of land within the village should be identified.</p> <p>Acceptance that the WDC Local Plan must accept a share of the district-wide growth even though it is in excess of the village's identified and measured immediate local needs.</p> <p><b><u>Sites Review</u></b></p>	<p>It is essential that villages with facilities take a proportion of the need for the whole District. Villages will be made more sustainable by increasing the number of people living there and using the facilities. There is no GP surgery, but other essential services are present which makes this a key 'Growth Village'. The sites selected for housing minimise landscape impact.</p>

Site 6 - It is not a Registered Park or Garden and at the recent appeal, the local planning authority and Inspector referred to the site only as part of the setting of Barford House and the Conservation Area... not an 'important landscape'. This point has been reinforced by English Heritage. As a visually enclosed site, we submit that the authority's starting point for the analysis of Site 6 is flawed and unsound. Development would not harm protected hedgerows or trees of significance on Site 6. The Landscape study's identification of this LCP as high sensitivity is not justification for a landscape refusal in this instance.

Site 7 - The owner of the land, the Trustees of Warwick United Charities object to the proposals set out for Barford. They are aware that planning consent has recently been issued for other development on Westham Lane and wish to promote the entire area north and south of Westham Lane between the existing development and the bypass for future development.

If Barford has to take the additional homes currently proposed by the District Council, the Neighbourhood Development Plan Group supports the three preferred sites named in the consultation documents provided that:(i) The mix of types of housing meets the needs identified in the Housing Needs Survey  
(ii) The building is phased over the Local Plan period

**Site 1**

Site 1 is more acceptable than the discounted options for the reasons given in the consultation document.

**Site 2**

Too much development on the former nursery site. There is also concern about the access to this site, mix of housing and impact on the conservation area. The plan to build so many news homes in this area will only exacerbate the existing traffic congestion issues and the suggestion that current traffic connections are reliable is inaccurate. The evidence base, fails to establish how Site 2 at Barford contributes to the character, appearance and significance of the Conservation Area; and the effect of the proposed development on those attributes.

The site provides an appropriate and sustainable location for growth. The location of the site within the existing built form/bypass means any development would have a minimal impact on the landscape setting of Barford. It would deliver benefits to the village creating housing opportunities for both new and existing residents.

**Site 3**

Too many houses already. Roads are busy and parking is poor. People currently park cars on grass verges destroying grassed areas. Too many parked cars are causing safety issues in the

Following a review of the Landscape Report, a small area of land has been re-assessed as suitable for limited development.

An update to the Landscape Report indicates that land south of Westham Lane is generally more sensitive to development and has a higher landscape value than land to the north of the lane. The land south of the lane is more agrarian or rural in character, including discounted site 7.

Site 1 does not currently have a development sponsor and may have capacity for less than 5 dwellings. Due to these considerations the site has not been included as a housing allocation, but could come through the plan period as a windfall site, if circumstances change.

Site 2 - Impact can be reduced by careful design and layout of development. This would therefore be an issue for a detailed planning application. Large sites of over 50 dwellings will be brought forward in phases (see Policy H10 of the new Local Plan) so that the growth of the village can take place more slowly and in proportion to the size of the settlement.

It is recognised that Site 3 has a close relationship to the current Bremridge Close housing estate and the development capacity of this site has been reduced slightly to take into consideration local problems with overflow car parking and the single

<p>current close. A good/nice standard of property would enhance the area and maintain current residential walks. It's too close to the bypass and why should the families that move in be forced to breathe all those car fumes when they live in a rural village. This is not healthy.</p> <p>The site is of a relatively small-scale and can be developed without any significant adverse impacts.</p> <p>Access can be gained through the existing residential road layout and the development design could accord with the adjacent development thus providing consistency in the built form.</p> <p><b><u>Village Boundary</u></b></p> <p>The settlement boundary makes no practical sense. Indeed, it seems to have been designed specifically to exclude Barford House and our clients' land.</p> <p>The bulge in the boundary to the east of Dugard Place in order to accommodate the extended garden of one house is anomalous. It might also create an undesirable precedent for back land development and encroachment on the open rural area. The boundary should be set nearer the houses and on the same line as all of the other back gardens.</p>	<p>vehicular point of access to this site.</p> <p>This will be an issue for a detailed planning application with regard to design in particular.</p> <p>The Council has received very little comment on the village boundary for Barford, which reflects the built up area of the villages and associated newly allocated housing sites.</p> <p>Some minor changes have been made to the boundary in this area, in light of comments received.</p>
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**Bishops Tachbrook**

<p><b><u>General / Multiple Sites</u></b></p> <p>Local survey says we need 20 not 120 houses. The preferred option may be the best option, but the scale of development is excessive.</p> <p>Support the discounting of Site 2 and 3 for development as: They are the most elevated and open space area. The village's visual appearance and gateway would be impacted on the western side.</p> <p>Other small sites around the parish could accommodate small numbers of housing and these are being considered in our Neighbourhood Plan. The scale of development is not required when 4500 new houses are being proposed on sites within 2 miles of the village.</p> <p><b><u>Site 1</u></b></p> <p>Site access - There is accessibility questions around the preferred option as the Oakley Wood and Mallory Road are both 30mph but many vehicles exceed this. Combine this with more traffic and there will be more accidents and more difficulties entering and leaving Oakley Wood. Will lead to more congested local roads.</p> <p>The site is near the M40 and may be impacted by substantial noise pollution. There is also some evidence of surface water</p>	<p>The scale of development proposed for Bishop's Tachbrook takes into consideration very local parish housing need (as evidenced through housing needs surveys) and district housing needs.</p> <p>It is noted that the work on the neighbourhood plan may identify small housing sites around the parish. These may come forward during the plan period, if they are compliant the policies set out in the new Local Plan.</p> <p>The level of housing proposed for Bishop's Tachbrook village, will have a regenerative impact on the village and may play an important role in sustaining the future of local services / facilities. This is a separate issue to growth associated with the southern development sites. The new Local Plan sets out a policy to assist in phasing the delivery of larger village housing sites across the plan period, which should help integrate development within the wider village.</p>
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flooding on the site. Development may result in the loss of a playing field. Also concerns about capacity at the primary school and extra impact on stretched services. Will fundamentally involve the loss of agricultural land.

The site is too big and it cannot therefore be regarded as sustainable in regard to the present character of the village, its facilities and infrastructure, which is only that expected of a small village.

From a community consultation on 18/01/14 as part of its Neighbourhood Plan process, the unanimous opinion of residents was that if additional housing is required in the village then Site 1 is the best location and it should be phased and limited in total to 70 homes or thereabouts.

**Discounted Option - Site 2**

Land west of Bishop's Tachbrook is in a sustainable location, adjacent to the built up area of the village of Bishop's Tachbrook. Access to the site is deliverable within either the existing highway or land controlled by A.C.Lloyd. Future residents of the site would have the opportunity to access every day facilities and key destinations by a choice of transport modes. The site is available and achievable and offers a sustainable solution to assist in meeting the housing requirement for Bishop's Tachbrook.

**Discounted Option - Site 3**

Site 3 (SHLAA Reference R31), controlled by Barwood is suitable for development as – available, deliverable, sustainable location, can provide a mix and range of housing types to meet the needs of the village's existing population, potential for landscape enhancement, opportunity to provide a sizeable area of open space, no major constraints

-Both Sites 1 and 3 are sustainably located within convenient walking distance of the village centre. Site 3 is only 300m from an existing bus stop. Discounting Site 3 on the lesser potential regenerative benefits it will bring is not justified.

The detailed evidence demonstrates that the site is deliverable and represents an excellent opportunity for a high quality and sustainable housing scheme which would make a positive contribution towards Warwick District Council's housing supply and will deliver a number of benefits for the village.

Support the discounting of Site 2 and 3 for development as:

- They are the most elevated and open space area.
- The village's visual appearance and gateway would be impacted on the western side.
- Many properties in Holt Avenue and Kingsley Road suffer flooding. An increase in surface run off would impact existing properties.

Site 1 – WCC Highways has raised no major concerns about access issues from Oakley Wood Road to the new housing site. Detailed access design issues, will need to be addressed during the detailed planning application stage.

Site 1 – the site may suffer from limited noise pollution issues and this will need to be carefully considered in the design and layout of the development and houses. However, there is no evidence that the site suffers from flooding issues. It will not result in a loss of a playing field.

Site 2 – landscape evidence suggests that this area is of high landscape value and more sensitive to change. The site is also located at the settlement edge away from local services / facilities and would have little regenerative impact on the village.

Site 3 does not integrate with the village as well as site 1 and access to the school is less good. There is more local support for site 1 as it has the potential to provide an alternative access to the school thereby addressing congestion issues on Kingsley Road. The provision of 150 dwellings in the village (as justified in the village hierarchy) requires that one or other of sites 1 or 3 should be allocated, but not both (this would represent unsustainable development in a relatively small community). For the reasons explained, site 1 is preferred and there are issues of scale, integration and impact with site 3

There is a strong possibility of integrating the

<p>-Homes within the village found that taps, showers and cisterns ran dry during the construction of Warwick Gates. Further pressure loss would be caused.</p> <p>-Mallory Road/A452 junction is already congested and dangerous.</p> <p>The positioning of all new development at one end of the main approach road to the settlement is unbalanced and creates an impression of a new-old divide.</p> <p>If we are forced to have housing developments in the village, I would support the alteration of the boundary to the South of the village (preferred option 1) as the only viable extension. However, the new boundary shown on Page 39, in my opinion extends too far west.</p> <p>Village boundary would be best set by the parish / neighbourhood plan.</p>	<p>development to the existing built form through walkways and travel corridors to the main village centre. It is also adjacent to the village allotments, playing fields, sports and social club and to the south of the village primary school.</p> <p>The village boundary includes the main built up area of the village and the identified housing site and is fairly logical. Any changes to the village boundary could come through the local plan review process, led by the neighbourhood planning process.</p>
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<b>Burton Green</b>	
<p><b><u>General / Multiple Sites</u></b></p> <p>The requirement for Burton Green to accommodate further 70 - 90 homes is excessive and would create a large change in the population. Some support for the PO site but the development level is too high. Do not think 1 site should be the preferred option. Additionally 75 houses is a large number which increases housing stock in BG by 28% which is more than the other village increases.</p> <p>The proposed numbers were to take into account properties destroyed by HS2. The number of properties impacted by HS2 has decreased. The village is under threat from HS2 and already in turmoil.</p> <p>-Construction phase will cause significant disruption to the village and its residents</p> <p>Site 2 and 7 cannot create a village centre with facilities, parking and housing at the same time.</p> <p>The intake of the local school is 15 pupils per year. The new development is directly next the school and since numbers 75 houses. With an average of 1.7 dependent children each, if only a third of these are primary school age at any time, it still represents almost half the intake for the school. This will leave undoubtedly lead to many people who have lived in the village all their lives being unable to send their children to the village school.</p> <p>Linear built form character of the area – uncertainty over whether this should be re-enforced or bulked out at certain locations in the village. All of the housing development should not be placed on Site 1. Some should be located on one of the</p>	<p>The level of housing set out for Burton Green is now 60 units on the Burrow Hill Nursery Site. The level of housing has been reduced to fully take into consideration the additional requirements in this area to provide space for a new village hall, car parking and a potential new village green.</p> <p>The site allocated for housing can move forward with or without HS2. There is strong commercial interest in the site which would tend to suggest confidence in selling houses in this location, even considering uncertainty over the delivery of HS2.</p> <p>This is a low intake primary school which attracts pupils from a fairly wide catchment. WCC Education has indicated that the school could benefit from new housing growth, which would mean more new local children going to the primary school instead of pupils travelling into the area to attend from outside the village. A change in the catchment area and associated policy would be required to support this approach.</p>

discounted sites. Some support the discounted options 2,5,6 and 7 as they are 'back garden developments'

All sites should be considered to spread the increased number of houses throughout the village.

**Site 1 – Preferred Option**

A relatively large single development on the edge of the village would be isolated and bring little benefit to the existing community. The location should be noted is one of the highest points in Burton Green and therefore any development would have the highest visual impact on the landscape. Potentially impacted by HS2.

Development of the site would create a new heart for the village by bring the local facilities together whilst avoiding urbanisation with Coventry and would alleviate some parking problems associated with the school and greenway. Provide a much needed focus for the village. New housing stock for young families. Will create more of a village community feel by creating a cluster of homes and a local store. Many young families feel their needs and views are under-represented and would be in favour of new development. The Burton Green 'Blogspot' shows that 84% of residents are in favour of the preferred site.

**Discounted Site – Site 2**

There is poor access and it would be very out of character with the surrounding area. It is also at the very edge of Burton Green meaning it would be poorly connected with the village. This Site also suffers from flooding and the pond regularly over flows. The pond and land around the point is home to a plethora of wildlife.

Views of nearby residents relatively unaffected, probable that the Peeping tom pub could be enhanced and the site is near bus routes and the railway station. Relatively low landscape impact with development being containable. Access arrangements are in place for the site.

**Discounted Site – Sites 5/6**

Some support for discounting as indicated in the consultation document.

Landscape review indicates that there is no danger that development on sites 5/6 will result in unrestricted sprawl or encroachment into the countryside. The sites are located near public transport and within easy reach of services and facilities.

**Discounted Site – Site 7**

In the site review for the discounted option number 7 which constitutes two separate sites, which have not been separated, it states that there is an issue of accessibility. This is not the

Site1 - The development of Site 1 will require a certain amount of housing to subsidise non housing uses. No other site in Burton Green offers the opportunities to deliver housing of a reasonable scale and create a new community hub, with a very minimal impact on existing residents and the surrounding landscape. Most of the alternative sites are located within areas of higher landscape value.

Site 2 – The site forms part of an area of higher landscape value and indeed is characteristic of exactly the type of landscape features, which have eroded over the years in this area and need protection and enhancement, not development.

Sites 5/6 – WDC maintains the position that development in this area will erode a parcel of high landscape value and that access to the sites is reasonably poor and development may lead to the usual adverse impacts of backland development.

Site 7 - Although technically deliverable, in a central location, and in a pocket of lower landscape value, it is nevertheless a classic backland development with no street frontage. It also does not have the capacity

case. There is a slip way at the side of 36 Hodgetts lane. No arrangements in regards to this have been undertaken.

The following objections to site 7: The construction phases of both HS2 and a housing development would cause an upheaval for many years. Both proposals would financially impact our property. The community would not benefit from the site with regard to the relocation of the village hall as envisaged on Site 1. The rear gardens of the adjacent houses would be overlooked by the new properties. Additional access onto Cromwell Lane would make accessing our property more dangerous. Construction of HS2 will make Cromwell Lane busier, thus exacerbating the danger

Fundamentally, this site creates no new outgrowth of the village as it lies enclosed by boundaries of the existing residential area. It will accommodate new development without changing the character and the qualities of the village. It does not contribute to further ribbon development. It is in the core of the village community within easy walking distance of the existing village hall, the school, the public house, the Tile Hill railway station, and the established nearest Tile Hill shops. It is within 200m of *all* the bus services that pass through the village, particularly the only service with multiple journeys through the day between Coventry and Balsall Common/Berkswell Rail Station. This site is in close proximity to the National Cycling Network Route to Balsall Common and to Kenilworth and Warwick University that will persist post HS2 Construction. The site is deliverable.

**Village Envelope**

The green belt should extend to cover gardens associated with dwelling houses to deter a development of those gardens on a piecemeal basis. Village boundary should be kept as tight as possible.

The settlement boundary on the plan does not include the whole of the village in Red Lane.

In agreement that the boundary should not extend into Hob or Red Lane as to preserve the area as green belt and avoid ribbon development.

-In being against development at Site 1, it should not be included in the village boundary. Boundaries should encompass the gardens.

Green Belt boundary should be amended to reflect various discounted housing options.

Should the green belt be amended it will cause a great deal of anguish, intrusion and the devaluation of property. Keep the Green Belt as now, no back land infilling.

to deliver the type of community hub facilities envisaged on site 1. Adverse impacts of backland developments can include: a loss of amenity, overshadowing, overlooking, loss of sunlight / daylight, noise, loss of green links / vegetation, visual intrusion, loss of space between buildings, long driveways and difficulties servicing housing (recycling / waste collection etc). It is recognised that site 7 includes multiple land ownerships.

Minor changes have been made to the village envelope to take into consideration the village school and a nearby small cluster of houses. The overall village boundary remains fairly tight but encompasses, in the majority of cases, the long gardens which are typically associated with housing in this area. This strikes the right balance between facilitating some limited housing growth through inseting and protecting the wider Green Belt and landscape.

<p>The proposed Settlement Boundary on the Burton Green Village Plan is considered to be positively prepared with the incorporation of the most appropriate development site (Site 1) incorporated within land to be inset from the Green Belt such that it will enable to delivery of sustainable development.</p>	
<p><b>Cubbington</b></p>	
<p><b><u>General and Multiple Sites</u></b>  New houses will create problems for the local school and will generate high levels of new traffic.</p> <p>Parish Council raise no objections to the preferred options sites. Understand that a number of affordable houses will be included. Want assurances that new allotments will be provided to replace those that will be lost. Wish to be included in discussions re any CIL which becomes available</p> <p><b><u>Preferred Option – Site 1</u></b>  Strong opposition to developing on the current allotment site. Would lose an important and unique facility for horticultural and leisure users in our village and the allotments are an innovative approach to community engagement that brings community (i.e. neighbourhood attachment), health and environmental benefits. There would be extra burden on the local infrastructure and area's character would be changed. Detrimental impact on wildlife. Gardeners invest labour and time to establish such productive land. An established allotment is manageable and rewarding, but starting again is soul-destroying. Allotment users and holders are being picked on as an 'easy target'. In 2009 the allotments were not suitable for housing, what has changed?</p> <p>Entrance from rugby road will be opposite Broadway and bus stop making a busy junction. Rugby road residents at present have difficulty exiting drives due to volume of traffic. Willow Sheet Meadow - It is not a road that can take even more traffic with no white lines or pavements. I notice several other sites were discounted because of lack of vehicular access and landscape impact which i believe also affects this site.</p> <p>Inaccurate highways site assessment in terms of speed limit issues with competing site.</p> <p>Nearby properties impacted by flooding and sewage discharge. Sewers serving rugby road often block at the culvert located in the allotments</p> <p><b><u>Preferred Option – Site 2</u></b>  Some limited support as a [planning application has already been approved for residential development in the area.</p> <p>Object to the plan for 40 houses on the site opposite Willow Sheets Meadow. The Coventry Road has a history of accidents at both end crossroads. Destroy landscape views.</p>	<p>WCC Education team strongly support additional housing growth at Cubbington to facilitate more local children attending the primary schools. The CE Primary School currently has a significant catchment intake of pupils from the rural hinterland and this would be modified to support more local children attending the CE Primary School.WCC Highways have raised no major issues about traffic problems generating by additional new homes in Cubbington.</p> <p>Site 1 – WDC strongly supports the continued provision of allotment facilities in Cubbington and there is a clear commitment from the landowner for a generous relocation and compensation package for the current allotment holders. A new allotment site, with enhanced features is proposed within close proximity to the current site and with good accessibility for users.</p> <p>WCC Highways have raised no major issues about the access, traffic impact and parking difficulties associated with the proposed housing sites in Cubbington. Similarly no major issues have been raised by Environmental Health and District engineers with regard to flooding and sewage issues in this area, which could not be overcome by sensitive design.</p> <p>The consultation included part of the field (site 2), with a focus upon environmental screening in the left over parts of the field.</p> <p>We looked at taking the full field into the housing option. The updated feedback from</p> <p>Site 2 – This site has been subject to a further review by the landscape consultants which has indicated that by redefining the development parcel to include the whole field, this would not impact significantly on the landscape. It would also make a more</p>

<p><b><u>Discounted Sites –3 and 4</u></b>  Sites 3 and 4: Are mostly previously developed land; Are well screened; Would be a natural continuation of adjacent development; Will have little impact on residential amenity through loss of privacy. If too low a number is proposed then their long-term viability could be compromised. Good access- no accidents in the local vicinity in the latest five year period; the existing private driveway could be utilised; access to the south is good- it is unlikely cars will be exceeding 30mph; Although there are trees in the visibility splay at the northern end, they do not obstruct the required visibility splays.</p> <p><b><u>Discounted Site – Site 5</u></b>  Site 5 has been discounted for development due to its alleged poor access and elevation. Land around Site 5 does not appear to have been considered either in the Village Housing Options report or properly in the SHLAA. Object to these exclusions and request that land around Bungalow Farm be allocated for development in the Village Housing Options paper.</p> <p><b><u>Village Envelope</u></b></p> <p>Object to the exclusion of land around Bungalows Farm which his considered elsewhere to be appropriate for development to meet the needs of Cubbington during the plan period. Other discounted sites will require alterations to Breen belt to accommodate development.</p> <p>The Settlement boundary around Site 1 and 2 is incorrect as the boundary should encompass the whole of the village. This should be corrected as the Parish Council do not want residents to be confused.</p>	<p>efficient use of the left over aspects of the field which would not be commercially viable for agriculture. There is an increase in housing numbers (from 40 to 65) suggested for this site, which now includes the full field area. At the new numbers suggested, this would still result in a low density development, with substantial environmental screening.</p> <p>Sites 3, 4 and 5 were all discounted due to poor site access and high landscape value. The allocation of village housing sites has aimed to avoid any land assessed as of high value. Sites 3 and 4 would also significantly extend the village envelope along the Coventry Road, whereas Sites 1 and 2 would complement the adjacent Cotton Mill Spinney housing estate.</p> <p>The built up area of Cubbington already lies outside the green belt. It was therefore decided to only change the green belt boundary to include the proposed site allocations.</p>
<b>Hampton Magna</b>	
<p><b><u>Overall and Multi-sites</u></b>  Impact of discounted sites has not been considered equally. No account has been taken on the adequacy or expandability of existing services despite being allocated a 'growth village'. Hampton Magna has been expanded a lot already and any further development would be unsustainable in terms of infrastructure as well as transport</p> <p>It is inappropriate development in the Green Belt, causing the loss of high grade agricultural land. No significant local demand for development has been identified. Air, light &amp; noise pollution will increase, especially in the construction phase. It will cause significant traffic and transport problems both within the village and on surrounding roads. The capacity of the infrastructure: roads, sewers and electricity supply, are insufficient.</p>	<p>All the sites have gone through the same site appraisal process and this has helped inform the selection of the preferred housing option. Hampton Magna has a fairly good range of services and facilities as indicated through the work on the settlement hierarchy for the villages. It has been classified as a 'growth village', which benefits from generally good public transport connections.</p> <p>Exceptional circumstances have been justified – see para 3.1 to 3.10 of the village housing options report. This makes reference to NPPF para 84 which sets out the NPPF policy for promoting sustainable patterns of development and the idea of 'villages inset' within the green belt.</p>

**General and Preferred Option**

Covenants are in place restricting use of the land.

A fully independent review of the decision to prefer Site 1 in Hampton Magna should be undertaken to ensure there has been nothing prejudicial to the process from such potential conflicts of interest.

Before any new dwellings are considered, the amenities (including sewage/drainage and electricity supply) must be adequately reinforced. Sewage and drainage facilities at capacity. The sewage system is outdated and currently insufficient for the village.

Local school is at capacity with expansions already underway. School run parking already leads to serious traffic congestion and safety problems.

The single road through the two villages is used as a 'rat run' to/from Warwick Parkway railway station and the M40. If 100-150 dwellings are to be constructed in Hampton Magna, the heavy construction traffic will have to come through Hampton-on-the-Hill since the only other two means of access are unsuitable; Ugly Bridge cannot take heavy vehicles and the railway bridge over Old Budbrooke Road at Warwick Parkway has only 12ft.6in headroom. The only route for all the heavy construction vehicles is through Hampton on the Hill. A new access road is needed to deal with this issue.

Consideration must be made for the increase in traffic through the village estate as it would be dangerous.

If the currently identified sites are included in future versions of the plan, much greater detail must be provided as to how the infrastructure issues will be addressed. Access to the village is restricted by a single lane low railway bridge or through Hampton on the Hill. Transport- Access is dangerous; Many blind corners around the site; Increase in traffic will be dangerous for children. The access point would be very dangerous. Traffic passing through the village would increase and increase road safety issues for children. Warwick Parkway and the school Expansion have forced wildlife onto the site and have caused a huge parking and road safety problem in the village. 1. We need accurate information rather than carte blanche 'our experts believe traffic problems can be overcome'. How exactly? 2. Traffic is already a problem for commuters and

Traffic and transport has been considered in selecting the sites (see village sites matrix) and air quality, light pollution and noise pollution are all considered to be within acceptable limits

The preferred housing option at Hampton Magna has been supported by an active landowner and their planning consultant. No major issues have been raised with regard to covenants restricting the development of the site for housing.

It is acknowledged that the village sewage system dates back to the late 1960s / early 1970's when the village estate was originally built. Specialist drainage / sewage engineers have reviewed the development proposal and have indicated that any new development will need its own sewage / drainage infrastructure to avoid impacting on the current village network. This issue will need to be addressed at the detailed planning application stage. No major issues have been identified with regard to flood risk, with hydrology engineers suggesting that there is a requirement for a comprehensive approach to managing surface water run-off. Similarly Environmental Health has made no major objections to the site selection on the basis of noise pollution, which could be addressed through the detailed application stage.

WCC Education has raised no major issues over the capacity of the primary school to accept new local pupils from the village, but that the current school catchment may need to be re-defined. As with many schools there are congestion issues with car parking and movement at peak times and the site housing proposal may help alleviate this issue by allowing another point of access to the school from the south.

WCC Highways has raised no major issues regarding construction traffic accessing the site, but as with many schemes the limitations to site access will need to be noted by any development party and a 'considerate construction' clause / condition

school parents. Access is dangerous due to several blind bends. The bus service is limited.

The historic village (Hampton-on-the-Hill) is within the Green Belt. The new (1960s/70s) settlement was tightly drawn to the area of the former barracks. The site is prominent on the hill west of the A46. Retaining Green Belt status is justified. If this were to be lost, there could be intensification of development at Hampton Magna resulting in more intrusion and a loss of openness. No development should be allowed on green belt land, especially to the east and south of Hampton Magna as it would erode the limited countryside between the village and Warwick. The green belt is specifically designed to protect the green space between villages and towns. No exceptional circumstances to changes to the Green Belt.

Additional 100-150 dwellings would have an adverse effect on existing amenities. The increase of some 300 residents (greater than the population of Hampton-on-the-Hill) would adversely affect the quality of life in the village. Residential Impact- 60 houses will be impacted. Most residents do not want housing to change the character of the village. This lack of consideration of the residents' concerns. Plan for adding homes is too large.

The PO field regularly floods and more houses could increase the risk of flooding. An investigation is required to ensure flooding on the site is not increased by the development. Increased numbers of houses on the scale proposed could increase this risk and so a full study of flood risk should be undertaken so that residents are not subjected to greater risk of flooding from large amounts of the area being concreted over.

Ecology/Site of Historical Interest- Hedgerows and Gog Brook ponds on the site should be protected as well as a number of protected species that shouldn't be disturbed. Area has ecological value (i.e. protected bats/newts). Archaeological interest (Old Barracks/First World War Hospital armaments). The Copse on the preferred site should have entry forbidden since it is believed that armaments are buried there. A First World War hospital was situated on the proposed site and as a result there may be buried bodies in the surrounding area. These factors are not recognised in the Consultation, and their impact must be assessed. The Gog Brook ponds and ancient hedgerows should be preserved and protected. They are one of the few remaining links with the past and belonged to the old monastery which used to stand there. A thorough ecological study should be undertaken and the rules which are applied to individual householders should be applied equally stringently to developers. It should be ensured that bats in the village boundary are preserved and protected. There is no evidence in the consultation that this has been looked into.

Buried Armaments- Could be buried bodies and armaments in the area. The Old Barrack Site needs to be assessed for

may need to be discussed as part of the detailed planning application.

As with many village locations, it suffers from rat-running and congestion on access / exit roads at peak times. The issue has been discussed in detail with WCC Highways, who have indicated that some minor traffic light syncing improvements may be required at the Old Budbrooke Road bridge junction and A4177 junction. Improvements are also scheduled in the IDP for the nearby Stanks Island roundabout to help minimise stack-back along the A4177. The Parish Council and local residents also understand in detail the specific details and difficulties of drivers using roads near and within the village and could provide possible solutions to improve the situation - including possibly recommending parking restrictions, tackling localised speeding, traffic calming and so on. These sorts of issues could be looked at in detail through the new Neighbourhood Plan for the area.

Site 1 scores slightly lower than much of the surrounding area for landscape sensitivity to housing. The full landscape assessment analysis for Hampton Magna is available as part of the evidence to the new Local Plan. This has partially informed the site selection process. Two reviews of the Green Belt parcels have been undertaken with regard to land around Hampton Magna. The review of the Green Belt sub-parcel for Site 1 indicates that it could accommodate a sensitively designed village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration will need to be given to ensuring that the boundary fronting the open countryside is consistent with the proposed village inset boundary, and is clearly defined using permanent physical features that are readily recognisable.

As the majority of the site area is currently commercial farmland, it does not score highly for ecological value. The majority of habitat importance in this area is associated with hedgerows and a small Local Wildlife Site to the south, which will be required to be protected and strengthened as part of

undiscovered armaments.

The Councils guidelines around maintaining seem to have been ignored, especially around maintaining and improving the landscape. The potential landscape impacts and sensitive location remain a weakness. Significant impact on the landscape and destruction of open views towards Warwick. The open character should be protected in line with the NPPF paragraph 86. Other sites should be considered.

There is no reference to the existing noise nuisance from the A46 and M40 in relation to the preferred option.

Overall, from our preliminary assessment of Preferred Option site and of potentially competing sites, we consider that our client's site is not only a logical location for new development at Hampton Magna but the best site based on the following factors: Least impact on the Green Belt; Least landscape and visual impact; Physically well connected to the village, with good vehicular access; Physically well located to the primary school and existing local facilities; Physically set back from the A46 and the railway line – sources of visual and noise impact; No known physical or environmental constraints to development. Finally, we can confirm that our client's site is available now, offers a suitable location for development now, and is viable and achievable, with a realistic prospect that housing will be delivered on site within five years.

#### **Discounted Sites – Site 4**

Is close to the main settlement and would have low landscape impact with appropriate screening. Would have low ecological impact due to previous disturbances. A natural permanent boundary exists. Close to railway. Traffic would not pass through the village. Residential impact would be low.

#### **Discounted Sites – Site 5**

Support from site promoter for site which has good access and would round of the settlement.

#### **Discounted Sites – Site 6**

It comprises of land which is partially developed. The land could be removed without impacting the fundamental aim of Green Belt policy. It would protect agricultural land elsewhere and remove the highway depot which has a negative visual impact and creates numerous lorry movements. It has clear defined boundaries. Traffic movements would not be concentrated in one area. Hampton-on-the-Hill could potentially be connected with the village of Hampton Magna. Would have minimal residential impact. Natural screening is present. Good and safe

any development in this area.

Site 1 is a relatively large village housing site and a policy has been put in place on sites allocated for 50 or more dwellings to allow homes to be delivered across the plan period in phases of no more than 50 dwellings at a time over a period of 5 years, starting from the date the development commences on site. This will allow development to come forward throughout the plan period in a balanced manner to meet often changing local housing needs. It will also help focus development attention on the regeneration of brownfield sites and the strategic growth allocations in the Local Plan.

Site 1 is located near the primary school, playing pitches, recreation ground and main village services / facilities. Development may stimulate regeneration and investment in existing community facilities and help address traffic congestion around the school by providing additional walkways / points of the access to the school. Any detailed regeneration programme could come through the new neighbourhood plan for the area.

Site 4 - This site has some advantages, but is quite separate from the main village, would lead to an urbanisation of the northern gateway to the village and provides little regenerative benefits to the centre of the village.

Site 5 – This site does have a number of potential access points but does not provide any physical regenerative impact, being quite separate from the main village services and facilities.

Site 6 – This site falls within an area of high landscape value and is quite separate from the main village centre. The area is generally very open in character and scores high for Green Belt function.

<p>access can be achieved. The site conforms to existing policies (LDF/LP, Rural Area policies) Low landscape impact despite WDC primarily discounting the option for its location within a sensitive landscape.</p> <p><b><u>Village Envelope</u></b></p> <p>Residents support to maintain as current with site promoters wishing to amend according to site being promoted.</p>	<p>The village boundary is tightly drawn which reflects its historic built character and the accommodation of a new housing site towards the south of Arras Boulevard.</p>
<p><b>Hatton Park</b></p>	
<p><b><u>General Comments</u></b></p> <p><u>Lack of services and facilities</u>  Hatton Park does not have the facilities or infrastructure to support 90 more dwellings. Village needs an upgraded shop, new doctors and probably a school. Public transport and recreation facilities are limited. Available capacity in neighbouring facilities is also oversubscribed or minimal. Focussing development at Hatton Park is contrary to the need to provide affordable and market homes in rural locations with good community facilities. Development would attract those with minimal established connections with the current communities with potential disruption caused by anti-social behaviour, no school capacity, medical facilities or shopping provision. Facilities and services would need to be upgraded to accommodate these deficiencies.</p> <p>Focusing development at Hatton Park will not help to address all of the identified housing needs. There is no identified local housing need in Hatton Park at present. 90 homes would increase the population by 10%+.</p> <p><b><u>Preferred Option</u></b></p> <p><u>Scale of Development</u>  Capacity of site is estimated as 156 dwellings at at density of 30 dwellings per hectare - the maximum allowed. Ultimately the development will realise more houses than required. First submission from Taylor Wimpey clearly indicates their intention to build to the maximum capacity of the site.</p> <p><u>Ribbon Development</u>  Light pollution on the eastern boundary of Hatton Park will increase as a result of the development leading to coalescence with that from Warwick and Hampton Magna. It will also become a precedent for further development along the A4177 towards Warwick. The quality of the rural environment between the settlements will be severely diminished.</p> <p><u>Site Access and Birmingham Road</u></p>	<p>Hatton Park has been identified as one of the more of the more sustainable village locations for housing growth. It has good public transport connections, a village hall and some limited retail facilities. It could benefit from an enhanced retail offer. Residents of Hatton Park are within close proximity of Hampton Magna which has a doctor’s surgery and various education facilities, including a primary school and nursery. WCC Education has indicated that the level of new primary school pupils generated from the development at the east of Hatton Park could be accommodated at Hampton Magna Primary School. There may be a change required in pupil catchment areas.</p> <p>The level of housing proposed in the new Local Plan for the preferred option site is 80 dwellings (down from 90 dwellings) on a smaller site. This level of growth could be accommodated on the first field fronting the A4177 and leave a strong environmental buffer to the east and north of the site. There is no intention to support a level of growth beyond 80 dwellings on this site.</p> <p>Development on the preferred option site essentially ‘rounds off’ the built form of the village and is in line with the small cluster of dwellings on the opposite side of the A4177 at Hatton Locks. An enhanced eastern boundary to the site is proposed along the existing access track to maintain a strong edge to the expanded settlement. The inset village only will be removed from the Green Belt, therefore preventing further</p>

Hatton Park has significant development concerns in relation to achieving safe vehicular access. The purposed site is totally unsuitable the current infrastructure i.e. roads cannot cope with current traffic levels using the Birmingham Road. Significant traffic congestion, particularly during rush hours, on A4177 through village will be exacerbated by this development. Proposed exit onto A4177 is already an accident blackspot and will encourage use of Shell garage as a local shop increasing the accident risk. A4177 is main diversionary route for M42/M40 already resulting in gridlock

#### Site Flooding

The site is subject to flooding concerns. Water run-off from the site and the former hospital entrance is already an issue on the A4177. Development of the site will exacerbate this and will potentially affect existing properties.

#### Ecology and Landscape Impacts

Ecological impacts at Smith's Covert. Further encroachment of development into the landscape. There will be disruption and a threat to wildlife in Smiths Covert if this plan is carried through, as well as bats that are protected and inhabit this area. Impact on resident views from Hatton Park. The site forms the ecological access to Smith's Covert which will be destroyed by development. The ecological diversity of Smith's Covert will thus be irreversibly diminished. Currently supports amongst others bats, rooks, deer and birds of prey.

#### Discounted Sites – Site 2

Support the discounting of Site 2 as it would create a separate community divide by Hatton Park and its facilities by the A4177. Children would need to cross the road to access the school buses. It has higher landscape sensitivity and ecological value than Site 1 and would impinge on the highly-rated canal environment.

Option 2 has more advantages than the preferred choice. Site 2 is naturally shield by the existing tree line. The site is big enough to house the 90 homes needed. It will give support to the canal and locks providing safer access and additional parking. The new road layout (new island by Brownley Green Road) will ease traffic and reduce the speed of the traffic on Birmingham Road. Bloor Homes do not consider the Preferred Option represents the most appropriate when considered against the alternative, Option 2. Furthermore, Bloor Homes do not consider that there are any adverse impacts of the development of Option 2 which would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole. Bloor Homes respectfully request the Council identify

development along the A4177 towards Warwick.

WCC Highways was consulted on all the village housing sites and no major issues have been raised with regards to access from and onto the A4177. The IDP highlights a range of highways improvements, including works on the Stanks Island roundabout. This will assist in reducing stack-back along the A4177.

It is acknowledged that there have been issues historically with regard to flooding on and near the A4177. Feedback from our hydrology engineers suggests that this may be due to insufficient drainage infrastructure being in place to service parts of the existing Hatton Park development. Any planning proposal for this site would be expected to look at these issues in detail and agree a forward strategy with the district's engineers.

The revised proposal for Hatton Park fully takes into account the ecology value of Smith's Covert. Indeed the reduced scale of the proposal provides an opportunity to provide further screening or enhancement to this area of woodland.

Site 2 – This site is located on the opposite side of the road to the main village settlement, with little or no scope to integrate with the existing built form. The area rises from east to west and has been assessed of high landscape value and would essentially give the impression of large infill development in the Green Belt along the A4177. There are also concerns about the proximity of any development to the canal corridor which has high environmental, heritage and recreational value.

<p>Option 2 as an allocation within their Draft Local Plan recognising that the site is of lesser environmental value, and that its development would meet a number of objectives of the Framework.</p> <p><u>Settlement Boundaries</u> NHS Property Services support the inclusion of its land at the junction of Beausale Lane and Birmingham Road being within the proposed settlement boundary for Hatton Park. The land is bounded on three sides by development and falls between two existing properties fronting onto Beausale Lane. The site visually and physically forms part of the built settlement and as such is relevant for inclusion.</p> <p>The identification of smaller sites to the north of Hatton Park would better represent the level of facilities it offers, would have less infringement into the landscape as sprawl, whilst also allowing for some housing to be delivered within the nearby village of Hatton Green.</p> <p>The new boundary extends current housing eastwards towards Warwick, substantially beyond the present Green Belt. The permanence of the Green Belt would be violated beyond the period of the plan. There are no exceptions circumstances for the release of this Green Belt land beyond political imperatives to build 12,300 houses. If development takes place, there will be a future risk of coalescence with communities on the outskirts of Warwick. It would extend a ¼ of the way towards Stanks; it will be a first step towards infilling the rest of the land towards it with housing.</p>	<p>The village boundary has been drawn tightly around the current village and also includes the new development site. The Green Belt Sub-parcel is largely contained within the Birmingham Road (A4177) and Ugly Bridge Road and could accommodate a sensitively designed village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. The revised proposals for Site 1 include strong environmental screening along the east and north of the site to maintain a strong village / Green Belt boundary.</p>
<p><b>Hatton Station</b></p>	
<p><u>General Comments and Multi-Sites</u> This is a set of houses built south of the station in around 1970 on former railway land. This is not a village as Hatton Village (church, school) is some way to the east. There is no justification for removing this loose grouping of houses from the Green Belt. The present level of development does retain openness, but intensification would harm openness.</p> <p>We welcome the strategy adopted of allowing development within the villages and welcome the inclusion of site 1 in the plan.</p> <p>We consider that site 1 has many positives. The site is previously developed land with an existing access, which is suitable for new development. The site is located close to the train station, providing a choice of transport for any new residents. Indeed new development would help keep the station viable.</p> <p>The site allows for a greater mix of housing as opposed to site 2 and would appear as an extension to the existing cul-de-sac.</p>	<p>Hatton Station is a small village / hamlet with very limited facilities and limited access to services in the wider parish. There is also very little Parish Council support or confidence that building housing at Hatton Station will enhance the viability of local services / facilities across the parish. Although it is possible to define a built-up area to the settlement it is very open in parts and is fairly well integrated into the wider Green Belt landscape. In consideration of these matters, it has now been withdrawn as an appropriate location for a housing allocation and will remain washed over by Green Belt. It may be the case that limited infill housing may be an option in this Green Belt village location under the appropriate new policy area.</p>

The site would not involve the development of a Greenfield site unlike the other two sites at Hatton Station.

Allowing the development of either of the other sites would result in non-defensible green belt boundaries being created especially at the Old Station Road site (site 2). The Del Site (site 3) would in fact break the defensible boundary, which is Old Station Road and would represent development encroaching into the open countryside. Site 2 falls into category 3 for noise assessment - NEC C states that 'Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.

### **Site 1 – Storage Depot**

#### General

The proposed development encroaches on the Green Belt and on areas that contain wildlife and recreational land. The land is of high environmental value and residents are concerned about what is considered protected space. Sewage and drainage systems are currently at capacity and there are concerns about the level of provision for other utilities such as electricity and broadband. Community facilities and services such as schools, shops, roads and transport may not be able to safely absorb additional residents. The circumstances that have given rise to the development of the Green Belt need to be made clear.

The PC disagrees with WDCs recommendation that this is a preferred site, unless an up to date housing needs survey clearly shows there is a need for new housing in Shrewley Parish, (in contradiction to the recent Parish Plan survey) which cannot be satisfied by developing the two preferred sites in Shrewley Common. -The proposed number of new dwellings on this site is disproportionate to the overall size of the adjoining estate. 20 houses added to the existing 35 represents a 57% increase. The impact of such an increase on existing housing is NOT acceptable.

Some support for development of a brownfield site first.

#### Railway Station

Proposed development at Hatton station would increase footfall at the station so an S106/CIL contribution should be made to improve station access and passenger facilities.

#### Waterway Structures and Drainage

Canal & River Trust would require any development at Hatton Station to; not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect

It is noted that there may be substantial noise issues associated with site 2 due to its proximity to the M40 corridor.

Site 1 – there is a debate over the ecological value of the site and potential impact of any development on the existing sewage / drainage infrastructure, which would need to be subject to more detailed discussions if the site became available as an affordable housing rural exception site under the new Local Plan.

the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities.

Do have concerns about the existing drainage system which has given problems on several occasions and the loss of ground which I have always understood as being part of the Hatton Country World walks.

An assessment of foul drainage has been done to ensure a suitable solution can be found without increasing the pressure on existing systems. This report has already been submitted and concludes there is a workable drainage solution. This site affords the Local Authority the opportunity to have defensible boundaries around the site with the railway line on one side and the brook at the rear.

#### Ecology

In terms of ecology, we are satisfied there would be no ecological issues in developing the site. Some residents have raised the issue of slow worms being present on the site however the ecology report states there is unlikely to be slow worms on site with more attractive habitats being available nearby along the railway embankment. Grass snakes and the common lizard are also protected species but were found to be absent from the site.

The site is of high ecological value and should not be developed.

#### **Preferred Option - Site 2**

Site 2 should be kept as a pleasant and valuable part of the Green Belt. Properties built at his option would suffer badly from the Motorway noise. Mention is made of alleviating motorway noise but if that is possible why hasn't it already been done to benefit the existing households? Site suffers from very high levels of traffic noise.

#### **Other Sites – Site 3**

Support the discounting of Site 3 as it lies out of the village boundary and any development would radically alter the current village, quite apart from the already noted access concerns. The PC agrees with WDCs recommendation that this site should not be considered for development for both reasons given in WDCs site appraisal, on access and the impact on existing housing amenity. This is also a GREENFIELD site

Development on this site can be obtained by overcoming site access and landscape impact concerns.

Agree that Site 2 may suffer from excessive levels of motorway traffic noise, which could impact on the viability of developing the site.

Agree that Site 3 lies outside the village envelope.

<p><b><u>Village Envelope</u></b></p> <p>The settlement boundary should NOT include the dwellings to the North of the canal, i.e. maintaining the status quo, with the whole area to the North being washed over by the Green Belt as there are no suitable sites for development. To the south of the canal, the boundary should be drawn at the bottom of existing gardens, as indicated on the map.</p> <p>Need to amend boundaries to avoid dissecting gardens. Also various detailed scenarios for amending the village envelope.</p>	<p>The settlement boundary has been amended around the Oakside Farm area, but the village envelope is only being applied to manage limited infill development. There is no proposal to remove the settlement from the Green Belt.</p>
<p><b>Hill Wootton</b></p>	
<p><b><u>Green Belt and Character of the Village</u></b></p> <p>This is an attractive small village, which helps create openness of the Green Belt. The proposal for up to 5 dwellings in the village (if achievable) does not justify the removal of the village from the Green Belt. This is a small rural hamlet of just over 20 properties and the proposal is a significant increase to the hamlet. It would erode the Green Belt concept further. Modern houses overlooking Stud Farm and Rose Cottage are not in keeping with the rural setting. The proposed allocation at Hill Wootton is directly opposite a Grade II listed building. How does the setting contribute to the listed significance and what is the implication of the development on that significance.</p> <p><b><u>Pressure of Services / Facilities</u></b></p> <p>The notion that up to 10 houses could be built in this field as used for sheep grazing and pasture is utterly absurd, putting excessive pressure on local facilities (water drainage and sewage disposal). Infrastructure to support a development of this nature does not exist. Consideration has not been made for existing difficulties (i.e. drainage issues).</p> <p><b><u>Traffic Impact and Roads</u></b></p> <p>-The road through the village has been a significant concern as it is used as a 'rat run' from the main Kenilworth/Leamington Road to Warwick.-The speed of the traffic has been dangerous. We know the speed limit will be reduced to 30mph but this will not stop many going too fast and it will end up being a short cut-Additional housing will add to this problem. The road next to the plot is dangerous with a blind bend and narrow lanes put pedestrian safety at risk.</p> <p><b><u>Flooding</u></b></p> <p>Extensive flooding has occurred on the road/pavements approaching the farms and drastic problems would occur regarding access and traffic increase.</p> <p><b><u>Loss of Agricultural land</u></b></p> <p>Agrarian land must not be destroyed since this country has</p>	<p>Hill Wootton is a very small village / hamlet with no major facilities / services, although it is located near Leek Wootton. Although it is possible to define a built-up area to the settlement it has a strong relationship with the wider farming landscape and forms part of open Green Belt. In consideration of these matters, it has now been withdrawn as an appropriate location for a housing allocation and will remain washed over by Green Belt. It may be the case that limited infill housing may be an option in this Green Belt village location under the appropriate new policy area. Site 1 has been withdrawn as a housing allocation.</p>

<p>become entirely dependent on food imports for at least 14 weeks of the year.</p> <p><u>Support</u> Support development subject to design, location and provision of local amenities.</p> <ul style="list-style-type: none"> <li>-It is necessary to build additional residential units to house the increasing number of inhabitants within this area.</li> <li>-There are several locations within Hill Wootton which could offer suitable development opportunities.</li> </ul> <p><u>Village Boundary</u> Concerned about the redrawing of our boundary.</p> <ul style="list-style-type: none"> <li>-It appears illogical that 'Tower House', Hill Wootton is excluded although Hilary Farm directly opposite is included. On what grounds would Tower House be excluded when it is clearly part of Hill Wootton? Requests that the Indicative Settlement Boundary be amended to include Tower House, gardens and adjoining paddock.</li> <li>-Hill Wootton is essentially rural farmland/Green Belt and it is inappropriate that it should be removed from the protection of the Green Belt by inseting.</li> </ul>	
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**Kingswood**

<p><u>Settlement Identity</u></p> <p>Kingswood Village does not exist. Over 50% of the proposed developments for Lapworth are now in nearby Rowington. If these numbers of houses are built, it will not be complimentary to the Rowington area especially with listed buildings nearby. Believes the document is misleading as Rowington residents have not been consulted. Site 2 described as being Kingswood is in fact in Rowington. Local people live in the villages of Lapworth or Rowington which are completely separate villages. Have Rowington residents been consulted on the proposed developments in their village?</p> <p><u>Overall Approach and Level of Growth</u></p> <p>Pleased by the sensible and balanced proposals for housing development in Lapworth and Rowington which protects Green Belt. Lapworth Parish Council is pleased to see that several of its representations have been accepted as reasonable and incorporated into the latest version of the Local Plan.</p> <p>Many of the new dwellings are set to be within the Rowington Parish Council's part of Kingswood, and Lapworth PC cannot comment on how they might view the Local Plan. Both Parishes are affected by the decisions however. Welcome the new version of the Local Plan as being a much improved reflection of the overwhelming view of parishioners about development. Lapworth is blessed with good community facilities. To continue more housing must be available to young people in particular to reduce the average age of the</p>	<p>There has been a debate over the name / identity of the settlement for a number of years. There are a number of streets / key feature references to Kingswood (Kingswood Close, Kingswood Bridge, Kingswood Farm, Kingswood Junction and so on). The name Kingswood has therefore been used to differentiate the settlement from Lapworth Village which is located nearby but is a separate distinct area. Lapworth and Rowington Parish Councils and their local residents have been fully consulted on the proposals for Kingswood.</p> <p>Following a comprehensive review of housing site options, landscape impact and hydrology issues this has reduced the housing numbers for Kingswood in the new Local Plan to 43 dwellings. This</p>
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<p>population which is high.</p> <p>The village could accommodate growth at the upper end of the housing range set out in the Revised Development Strategy.</p> <p>-There are important environmental considerations that need to be considered but these do not justify any reduction in housing provision for Kingswood.</p> <p>-Kingswood is a sustainable location and has a range of facilities and railway links to London and Birmingham</p> <p>- Development at sites 1, 2 and 6 is too intensive in such a small settlement.</p> <p><u>Flooding Issues</u></p> <p>Objects to sites 1, 2 and 6 (Meadow House, Kingswood Farm, and rear of Kingswood Cottages).</p> <p>Considers the sites to be at risk of flooding and believes the Environment Agency have not been consulted. All flooding concerns must be tackled fully starting with understanding and resolving the existing causes of flooding in the Lapworth/Rowington boundary areas where existing properties/businesses are already flooded in severe storms. Further work on hydrology modelling required. Application of criteria based on recent actual occurrence of flooding to ensure that flood mitigation and prevention are provided, particularly land to the rear of Kingswood Cottages. Requires more information about housing numbers, design, types/sizes, landscape including site screening. There is great risk of flooding.</p> <p>-A gabion wall (if erected) would displace water and reduce existing flood water storage and potentially increase existing property flooding.</p> <p>-The culvert which passes under Old Warwick Road already means houses, gardens, shops and garages flooded during heavy rain. A restricted water culvert under the feeder canal will worsen this.</p> <p>-Old Warwick Road already becomes impassable during flooding incidents.</p> <p>-I am concerned that my property, which has not been flooded, will flood because of the displacement of water away from proposed developments. All flooding concerns must be tackled fully starting with understanding and resolving the existing causes of flooding in the Lapworth/Rowington boundary areas where existing properties/businesses are already flooded in severe storms. Site 1 is</p>	<p>is considerably less than the upper end of the RDS housing range, but is a defensible position based upon the updated evidence base.</p> <p>The housing density levels for sites 1 and 2 are very low and take into consideration, potential flooding issues as well as the proximity of the sites to the canal corridors and a nearby listed building. Site 6 has not been included in the plan as a housing option, due to substantial concerns over flooding on site and possible knock-on flooding effects post-development elsewhere.</p> <p>Further detailed hydrology modelling has indicated that there is a possibility of a flood risk to sites 1 and 6. The housing capacity of site 1 has been reduced to enable onsite flood alleviation works to be included in any scheme design. There are more substantial concerns over the ability of site 6 to accommodate flood alleviation works and still deliver a minimum of 5 dwellings as required for a site allocation in the new Local Plan. On site 6 there are also concerns about the impact of development including surface water run-off on nearby properties. Site 6 has therefore not been included as an allocated housing site. The Environment Agency is a statutory consultee and as such is consulted on every stage of the Plan.</p>
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<p>50% within the high risk flooding zone. The whole area requires serious hydrology mapping before any further development is permitted.</p> <p>-Attention is given to protecting the view from the canal if Site 1 is developed.</p> <p>-Assurance is needed that all highway safety aspects have been considered carefully.</p> <p><u>Village Boundary, Green Belt and Character</u></p> <p>Strongly object to the change in status from washed over by greenbelt to inset in greenbelt. It seems to be a thinly veiled attempt to undermine the rural nature of the village and facilitate future developments. This is another long (1 mile) strip of single-house frontage development. To remove the Kingswood part of Lapworth from the Green Belt would risk intensification of development in a long linear corridor. It is essential to avoid larger or bulkier houses along the single road. To avoid harm to openness Kingswood should retain 'washed-over; status. (It is this area which was 'white land' within the Green Belt until a Local Plan Inquiry in the late 1970s.) -In agreement that Green Belts need to be altered to meet long-term needs of the villages.</p> <p>Green Belt boundaries should be amended now to allow for the future needs of villages.</p> <p>The land east of Station Lane should be safeguarded for future development needs to be met without having to review the Green Belt again.</p> <p><u>Sites 1,2 and 6</u></p> <p>Support the current housing density proposal.</p> <p>Should the housing density become higher because of financial viability to developers, the Parish Council may withdraw their support.</p> <p><u>Site 1 – in detail</u></p> <p><u>Support</u></p> <p>Supportive of development on the Meadow House site in Kingswood.</p> <p>Small area, close to transport and local services. Previously developed land. Does not flood. Urgent need for smaller housing, not only for young people but also to allow older people to remain</p>	<p>This will be taken into account at the detailed planning application stage.</p> <p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>The Green Belt boundary has been drawn to exclude site 6 which is no longer under consideration. The village boundary should however, restrict the further spread of development into the green belt therefore giving a defensible boundary and offering green belt protection.</p> <p>The village boundary encompasses the land at site 3 only, as the remaining open landscape to the east of Station Lane to the canal has been evaluated of high landscape value. It also features areas of ecological interest.</p> <p>The development capacity of site 1 has been reduced to take into consideration the implications of recent flood risk forecasting. It still remains a site with a</p>
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<p>within their communities. This would have the advantage that, in addition to remaining with friends and neighbours, they could be cared for within the community, and not become a burden on the state! This appears to be an ideal plot - good local facilities and not in anyone's sight lines so would not cause offence to neighbours; additionally it has been previously developed as a site, and is known not to have a flooding problem. There is a need for bungalows/houses in the area so people can downsize. I have had friends who have had to move away because of the lack of suitable housing and the problem is worsening with an ageing population. Site is near a doctor's, post office, shops and a railway station. It is also well screen. Rowington Almshouse Charity supports the Meadow House site for development of affordable housing. The Charity has been in discussions with the landowner as a potential Provider of 1-2 bedroom affordable housing under a Section 106 agreement.</p> <p>As a provider of social housing for &gt;100 years we believe that the development of affordable housing on this site would support the policy context outlined in section 2.2 to 2.10 by providing housing suitable for younger people and families. This would support sustainability of local schools, shops and transport infrastructure to the benefit of the local area as a whole. Have witnessed a gradual decline in village life due to a number of factors such as the closure of the village school, the local pub etc.</p> <p>Lapworth is blessed with good community facilities. To continue more housing must be available to young people in particular to reduce the average age of the population which is high.</p> <p>The site is well screened, has defensible boundaries, does not flood and would have little/no impact on the landscape of the area.</p> <p>Development would be beneficial to the community subject to being affordable for young people and of a suitable style for the area.</p> <p><u>Object</u></p> <p>Potential flood risk areas registered with the Environment Agency.</p> <ul style="list-style-type: none"> <li>-Many local properties are flooded on a regular basis.</li> <li>-The 30mph limit on the Old Warwick Road is regularly exceeded. Even if the visibility site lines could be achieved in order to meet current Highway Specifications the proposed access points to each site would put motorists and pedestrians at risk.</li> <li>-The existing boundary constraints would not allow a new section of footway to be accommodated for without extensive highway works being needed, which would significantly change the historic character of the area. -Site 1 becomes waterlogged with potential of flooding, influencing water levels and flooding of nearby properties</li> </ul>	<p>reasonably strong level of local support for a sensitively designed housing scheme. This site could contribute towards addressing local housing needs including smaller more affordable housing for young people and older residents looking to downsize.</p> <p>Further detailed hydrology modelling has indicated that there is a possibility of a flood risk to site 1. The housing capacity of site 1 has been reduced to enable onsite flood alleviation works to be included in any scheme design. Furthermore, for new development planning applications would need to be accompanied by a Flood Risk Assessment to show how potential flooding will be dealt with. New developments will have to mitigate against flooding so that the situation is at least no worse and possibly, improved.</p> <p>There is a need to effectively enforce speed limits through this village and the</p>
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<p>especially with the ever increasing rainfall each year.</p> <p>-Traffic congestion would be caused by the accesses to Site 1 and 6 being opposite each other on one of the busiest and most dangerous sections of the Old Warwick Road.</p> <p>-Hydrology mapping cannot predict 100% what the water may do. New house insurance would be difficult to obtain if at all within 100 - 120 yard of the stream.</p> <p><u>Site 2</u></p> <p>The 30mph limit on the Old Warwick Road is regularly exceeded.</p> <p>-Even if the visibility site lines could be achieved in order to meet current Highway Specifications the proposed access points to each site would put motorist and pedestrians at risk.</p> <p>-The existing boundary constraints would not allow a new section of footway to be accommodated for without extensive highway works being needed, which would significantly change the historic character of the area. Should development take place on Site 2 there is great risk of flooding.</p> <p>Kingswood Farm and listed status – how does the setting contribute to the listed buildings significance and what is the implication of the development on that significance.</p> <p><u>Site 3</u></p> <p>Insufficient highways access and it looks from the map as if the primary site access point will be directly opposite the station, creating congestion at peak times. Suggest primary access point be moved south, opposite 79 and 81 Station Lane. Not building new property directly in front of my home as this will directly impact my views of green belt land and treeline. There will also be increased noise levels due to cars pulling out of this new development, again opposite my home. This development will also reduce the value of my property.</p> <p><u>Site 6</u></p> <p>Flooding concerns about this part of Kingswood. It is difficult to see how development here is not going to make flooding worse in Sites 1 &amp; 2.</p> <p>Traffic concerns about the vehicles emerging onto the Old Warwick Road opposite Sites 1 &amp; 2 just after the canal bridge.</p> <p>Concerns about parking in an already overcrowded area for cars. I object to the development of this this land due to being too close to</p>	<p>issue needs to be addressed with the police. County Highways has raised no major concerns about motorist and pedestrian safety in this area as part of a detailed sites review.</p> <p>There is a need to effectively enforce speed limits through this village and the issue needs to be addressed with the police. County Highways has raised no major concerns about motorist and pedestrian safety in this area as part of a detailed sites review. The main access point to site 2 is through site 1.</p> <p>The development proposals have been reassessed for this site in light of comments about the listed building and its historic setting. This has resulted in a slightly higher landscape value scoring for the parcel of land but the low density housing proposals continue to be supported and reflect the importance of the nearby listed building.</p> <p>It is recognised that site 3 does not have visibility splays of a sufficient standard to support development beyond 6 dwellings. The site allocation is located within an area of land with slightly lower landscape value scorings, and is a fairly well screened site. House values are not a planning issue.</p> <p>Further detailed hydrology modelling has indicated that there is a possibility of a flood risk to site 6. There are substantial concerns over the ability of</p>
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<p>defensible physical boundary. The site is in an extremely sustainable location being approximately 2 minutes walk to Lapworth railway station and bus stops, 6 minutes walk to the local primary school, less than 10 minutes walk to the shops in Lapworth and just over ten minutes walk to Lapworth surgery. The assessment of their site was distorted by the Council’s decision, in the evidence, to ignore the existing access opposite number 145, Station Lane and assume that access would be provided towards the northern end of the road boundary, opposite 155 Station Lane. In order to secure visibility sight lines, this would necessitate the removal of exiting Tree Preservation Order (TPO) oak trees and an extensive length of road frontage hedging, one of the primary reasons for discounting the site. Landscape assessment has been insufficient.</p> <p><u>Site 13</u></p> <p>Objecting to the exclusion of site 13 (Land of Brome Hall Lane) as a preferred option site. Believes the reasons for exclusion are not justified as is as close to the settlement as other preferred options, has no higher landscape value than other sites, and will have no greater impact on wildlife. In ownership of discounted option (Site 13), which they wish to promote for development as:</p> <ul style="list-style-type: none"> <li>-The landscape value is the same as the other preferred options.</li> <li>-The land is well screened on all sides with mature trees and high hedges. Therefore it would not impact on the surrounding landscape.</li> <li>-Seek to provide a low density, very high quality housing scheme which would have limited impact on the surrounding landscape.</li> <li>-There is already housing either side of the field lending to a natural extension to the village.</li> <li>-There is no wildlife present over and above that expected on the preferred options.</li> </ul> <p><u>Other Locations</u></p> <p>Consideration to possible small scale development at Rowington and Lowsonford, namely Areas R132, R133 and R152 in the Location Plan of Rowington.</p> <p>Area R133, adjacent to land owned by Almshouse Charity should be looked upon favourably by parishioners and the Parish Council.</p> <p>Prepared to consider other small scale developments where appropriate, subject to normal planning rules and including sight of development and traffic management proposals where applicable. Would like confirmation of site suitability and sustainability, including confirmation that the existing drainage system has adequate capacity to facilitate the developments given the limited infrastructure available in the Parish.</p>	<p>This site is located in a corridor of high landscape value and with features of ecological importance. Development in this location would significantly change the character of this very visible and open Green Belt area. The site is not considered suitable for housing. The landscape assessment work has been re-assessed for this area of Kingswood and the original comments hold.</p> <p>Concerns about access have been raised, and whilst it may be possible to achieve access opposite 145 Station Lane, this has not been explored in detail and the landscape assessment suggests the site is not suitable.</p> <p>Flooding concerns have also been raised on part of the site</p> <p>Site 13 is located outside the main village envelope and in an area which is more rural in character than many of the allocated housing sites. The area is particularly sensitive to development given its proximity to the canal corridor and is considered of high landscape value. Site 13 is therefore not considered suitable for housing.</p> <p>Site assessment work has proven that there are more appropriate and sustainable locations for allocated housing sites. However there may be the opportunities for small infill sites and affordable housing rural exceptions sites to come forward over the plan period in various settlements.</p>
<p><b>Leek Wootton</b></p>	
<p><u>Focus for Growth</u></p>	

<p>We were informed at the Parish Council meeting that the Local Plan Booklet may already be out of date with a prospect of 90 houses now being proposed, all in the Police Headquarters and NONE at the Manor House site within Police Grounds by the way. Concern that Warwick District Council and Warwickshire Police have conflicting ideas. Reduce development in sites 1-4 to maximum 10% increase. If Warwickshire Police go ahead with their plans, ban development of all sites completely and cap Warwickshire Police to maximum 10% increase. Concerns over density of housing in proportion to site size (Site 1: 35 dwellings on 1.51 ha and Site 4: 20 dwellings on 1.76 ha) - Why is there no commercial interest in the original Retirement Village option, with a rapidly ageing population? Reduce the identified sites so that the number of dwellings is increased by 10% max, with building phased in across the 15 years of the plan. The character and ethos of the village would be put at risk as there is no mention of 'phasing in' the new development. -The density of dwellings is optimistic. In-depth survey of environmental and wildlife implications and definitive information on the police intentions for their site.</p> <p>The proposal put forward for the village of Leek Wootton and its adjoining hamlet of Hill Wootton are not unreasonable and therefore, no objections thereto subject to whatever development takes place is in keeping with the surrounding area. Leek Wootton has a high population of retired people living in substantial family houses who would like to down size within the village, but there are no suitable houses available. The village is crying out for a development of 2 bedroom houses which are spacious and of a high quality with garages. This downsizing would release larger houses for families within the existing village boundaries.</p> <p>Concerns about capacity of infrastructure (school, sewage system, sports facilities) and about the ability of the infrastructure development to take place</p> <p>The Parish Council opposes a single large development, preferring a number of smaller sites.</p> <p>There are uncertainties for site 4 and these need to be resolved before view can be taken on sites 1,2 and 3.</p> <p>There are concerns about traffic and access to sites 1,2,3 and 4 particularly the Anchor Junction.</p> <p>Maintaining the character of the village is important including its separation from the built up areas.</p> <p>Phasing of development is important so that infrastructure can keep pace and the village can adapt to the new housing</p> <p><u>Heritage Concerns</u></p> <p>A sizeable development is proposed within the setting of Woodcote House.</p> <p><u>Level of Growth</u></p>	<p>There has been a reduction in the number of houses for Leek Wootton taken forward into the Local Plan (down from 80 to 45). The Police Headquarters has been omitted from the development sites and from the proposed village boundary. The density and house types are a matter for the Neighbourhood Plan for the area and any detailed planning application.</p> <p>Information on the infrastructure (eg from WCC education and Severn Trent Water) suggests that the proposed development can be accommodated. However CIL provides opportunities for local infrastructure to be improved, including sports facilities etc).</p> <p>The development is spread over four sites and although three of these are close together, there is no single large site being proposed.</p> <p>The character of the village has been an important factor in selecting sites, as has been the issue of coalescence of settlements (including the identity of Leek Wootton)</p> <p>The scale of development proposed for sites within the Woodcote House estate have been reduced significantly. This will help minimise the impact on the listed building and its landscape setting.</p>
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<p>Leek Wootton is being asked to increase its size by almost 25% which will change the village completely, and the percentage is greater than any of the other settlements under review, with the exception of Burton Green which exceeds only because it is accommodating replacement housing due to the construction of HS2. This is totally disproportionate and grossly unfair to the current homeowners in Leek Wootton. Object on excessive size of proposed development and impact on facilities. The increase of dwellings by 22% appears too high compared with other villages. Support some degree of growth, but number excessive. The number of dwellings proposed is disproportionate to the size of the village, giving an increase of over 20%, up to 40% if windfall developments are allowed. Such development would put an unsustainable burden on the current infrastructure.</p> <p><u>Pressure on Services / Facilities</u></p> <p>The high proportion of affordable housing in the proposal (40%?) would suggest an additional number of primary school children. The school is full. The village does not have a good range of services and facilities. The hourly bus service can hardly be described as good accessibility to public transport. Possible reliance on this service by new residents would cause problems. We know that additional housing should be provided in the village but we feel that the proposed scale is far too large for the village to sustain.</p> <p><u>Anchor Pub Junction and Highways Issues</u></p> <p>Wherever the new housing is built, access onto any existing roads in the village would need to be considered carefully. Access onto Warwick Road by the Anchor Inn would require traffic lights or some other form of control. Anchor 'T' junction present safety hazards and could not cope with an increase in traffic. Absence of pavement and increase in traffic risks pedestrian safety.</p> <p>Concerns over the proposed one way system at Woodcote Lane. Will increase the traffic flow at Woodcote Land and Warwick Road, which is already a difficult junction. Traffic flow at this junction has been a significant issue to prior plans to develop on LW1 to LW4. I would question what has substantially changed in the pattern of traffic flow in the village to have removed this prior consideration. A new road would need to be constructed to safely give access to the Police HQ site and a shop incorporated into the development. Woodcote Drive would not be able to take the volume of traffic from the extra proposed housing. Pedestrian safety on narrow footpath, children going to school will have to negotiate an increase in traffic, deliveries to residents and offloading to the Anchor Inn. - Gates at Headquarters are very narrow. Traffic lights or roundabout at anchor pub junction.</p> <p><u>Landscape and Green Belt studies</u></p>	<p>There has been a reduction in the total number of houses proposed for Leek Wootton.</p> <p>The number of affordable homes as a % is the overall figure within the Plan and the policy is applied to each new development.</p> <p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based. The WCC Highways team has been consulted on development options in Leek Wootton several times and it is acknowledged that the traffic activity levels associated with the Police HQ operation are potentially significantly higher than the number of movements forecast with new housing. However, it is possibly the case that further attention needs to be paid to the Anchor Pub junction if this continues to remain a concern of local residents as a potential accident hot spot. Looking in detail at this junction and reducing traffic speed through the village could be a theme for the emerging Neighbourhood Plan for the area.</p>
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<p>Undertake a revised assessment of the proposed areas LW1 to LW4 taking into account the existing planning granted to the Police Authority or modifications thereto, the retention of activity by the Police at Woodcote House for the foreseeable future as a result of delays in the integration of the Warwickshire and West Mercia forces and the with due consideration given to the presence of Muntjac Deer and Bat populations adjacent to Woodcote Lane.</p> <p>Extend the scope of the Peer Review process to include previously dismissed site in order that a full equal assessment of all potential sites can be seen to have been undertaken.</p> <p>If the above result in some of LW1 to LW4 being retained as preferred options then limit the development size and density to be commensurate with the size increases proposed for other villages within the study area namely circa 16%. This to be done to accordance with recommendations relating to the retention of hedgerows and trees adjacent to Woodcote Lane.</p> <p>Retain the Village within the Green Belt. This village is attractive and makes a contribution to the Green Belt by its openness. It should remain 'washed over'. We oppose the suggested new housing sites 1-3. The conversion to residential units of Woodcote House (on departure of Warwickshire  Police) is reasonable. But this does not justify removing the whole of Leek Wootton from the Green Belt, and as a conversion can be undertaken while the site remains Green Belt. Any changes to the green belt boundary will have a detrimental effect on the character of the village. There is a real concern that the village will become part of the growing homogenous sprawl between Kenilworth and Warwick. The inseting of the village settlement boundary is not appropriate as it could encourage over-development or excessive 'infilling' in the future. The village should not lose its Green Belt status as surely this gives some control of future development and growth options.</p> <p>I support the indicative settlement boundary which identifies the position of the village within the Green Belt and any proposed development should be within this boundary.</p> <p><u>Site 5</u></p> <p>Car parking is a big problem especially if proposed site 5 is developed. (There is an unofficial arrangement for the parents to use this car park to transport children 'safely' to and from school). The extra vehicles coming from the construction site would have a big impact on the junction with Warwick Road.</p> <p><u>Site 7</u></p> <p>Area 7 - land abutting Warwick Road and Hays Drive could accommodate approximately 12 houses and is on a lower plain than the main hill. Site 7 - discounted options on the Local Plan would be</p>	<p>This work has been undertaken. Woodcote House is excluded from the development proposals for Leek Wootton.</p> <p>For development to take place, the new areas will need to be excluded from the Green Belt and the Local Plan process is the way in which to achieve this as there are no other opportunities to do so. This will also strengthen the defensible boundary around the village.</p> <p>The Strategic Transport Assessment stage 4 indicates that the additional traffic can be accommodated within the road network subject to implementing identified mitigation measures. In this respect the proposals to locate development in this area are soundly based.</p> <p>This site is no longer under consideration. A further review of</p>
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more accessible and less controversial and met with little objection.

Site 8

Noise off A46 and dangerous access. Bloor Homes respectfully request the Council identify land north of Hill Wootton Road as an allocation within their Draft Local Plan recognising that the land is of lesser environmental value, and is consistent with the policies of the Framework.

Site 9

Area 9 - access available either through the field adjacent to the school, or from Hill Wootton Road which would allow building of a considerable number of houses.. Object to 9 because of noise from A46 and dangerous access. Bloor Homes respectfully request the Council identify land south of Hill Wootton Road as an allocation within their Draft Local Plan recognising that the land is of lesser environmental value, and is consistent with the policies of the Framework.

Site 10

If Site 10 has to be built on, access through the small padlock onto Home Farm (part of which I own) would be undesirable and possibly dangerous.

It is considered that Leek Wootton settlement boundary should inset the village within the Green Belt. Objection is raised however to the extent of the indicative new settlement boundary for Leek Wootton village. It is considered that the settlement boundary should be amended to include Site 10 land off Home Farm, Leek Wootton.

Site 11

Noise off A46 and dangerous access.

Site 12

Site 12 - discounted options on the Local Plan would be more accessible and less controversial and met with little objection.

landscape evidence for this area has indicated that the whole of site 7 is of high landscape value.

Site 8 acts as an environmental buffer to the village from the A46 transport corridor. It is part of an attractive landscape break before entering the built up area of the village. Development in this location is likely to suffer from substantial noise pollution and will have a significant impact on the amenity of residential properties backing onto this site. The site is also fairly narrow and it is difficult to envisage how a quality scheme could be built in this area. The site is not considered suitable for development.

Site 9 acts as an environmental buffer to the village from the A46 transport corridor. It is part of an attractive landscape break before entering the built up area of the village. Some parts of the site have long-range views and aspects of the land have reasonably high landscape scoring. This site is therefore not considered suitable for development.

This site is situated in an area of high landscape value and has poor access. It is therefore not considered suitable for development.

This site is no longer under consideration and has similar constraints to Site 8. Unless access was obtained through The Hamlett or Site 8, it is difficult to see how the site could be delivered. There are also concerns about the proximity of the site to an area of habitat / wildlife importance.

There are concerns about the impact of developing this site on areas of high habitat / wildlife importance. It is also in an area of high landscape value and situated towards the north of the village

which is particularly sensitive to concerns about coalescence with Kenilworth. This site is not under consideration as a suitable housing site.

## Radford Semele

### PO Support

Support for site 1. This will need careful consideration to vehicle access. Proposed additional access adjacent Church End will not be accepted.

Access should be via Church End, the junction at School Lane, Church End. Radford Road should be made traffic lights or road island. The respondent controls the land and supports the allocation of the site and can confirm the suitability, achievability and availability of the site.

The land to the west of Church Lane and immediately east of Church Lane is included as integral part of their proposals as public open space.

Detailed assessment has been undertaken and demonstrates a developable area of 5.4 hectares can be achieved with a site capacity of more than 100 houses.

The respondent has carried out additional assessments on the preferred option site regarding; agricultural, archaeology, ecology, flood risk, heritage, transport and landscape and visual impact.

Balances village out.

- Using space already inside the village.
- Puts the church in a residential setting.
- Has access to the main road.
- Has easy access to bus stops and shops.
- Has facilities for crossing main road.
- Is set back from main road so safer for pedestrians.
- Area does not flood.
- Can be easily made accessible.
- It is in an area of controlled traffic flow.
- Will have a pleasant outlook onto fields and the church.

The site has safe access onto the Radford Road from Church Lane.

Will cause the least long term disruption to the village.

- Majority of functional, rather than aesthetic, objections will apply to the other potential sites and particularly surface water drainage which is already grossly inadequate for sites 2, 3 and 4.
- The new residents will have considerably safer vehicular and pedestrian access from Site 1.
- The aesthetic objections will apply to all sites for different reasons but will apply to fewer dwellings in site 1, than to other sites.

-The scenic views enjoyed at the moment will be enjoyed by a great

During the course of the consultation on village housing options there was some support put also considerable opposition to the preferred option. This included a number of comments about the relationship of the site to the nearby listed church and the landscape setting overall to the northern edge of the village. Further detailed work was undertaken on reviewing the landscape quality and sensitivity of the area to accommodate housing and this has resulted in a re-appraised parcel of land. The area has now been re-classified as high landscape value and Site 1 has been withdrawn as a preferred option for housing in the new Local Plan.

<p>number of new villagers, which ever site is chosen. Would have the least visual and traffic effect on the village.</p> <p>-It affects the least number of people in the village. The village is in need of additional housing as, if left, it will be full of elderly residents. This development would give an opportunity for younger people to stay in the village; therefore priority should be given to younger people in the village.</p> <p><u>Village Boundary</u></p> <p>Site 1 should be omitted and the boundary should stop adjacent to the houses on Offchurch Lane.</p> <p>-The village should be changed to include the area shown as Site 2.</p> <p>The proposed boundary excludes an area between existing housing and the church and the preferred option site. In other parts of the settlement such open space is included within the settlement boundary and to be consistent it should be included. Gladman Developments control the land and have prepared a Development Framework Plan that identifies this land as open space and indicates the area that should be included in the settlement boundary.</p> <p><u>Development Generally and Village Hierarchy</u></p> <p>Object to development anywhere in Radford Semele. The last major build in the village was in School Lane on the site of the old school, these properties were out priced and took ages to sell if at all, some are still being rented out.</p> <p>Support the identification of Radford Semele as a Primary Service Village.</p> <p><u>School Related</u></p> <p>The effect on the traffic in the village at school start and finish times is horrendous with many cars parking where they should not. The school is at maximum capacity already</p> <p><u>PO site access, safety and congestion</u></p> <p>Site could not be accessed safely even after road alterations. Dangerous to pedestrians accessing the school. Increased</p>	<p>The village boundary has been amended to exclude site 1 and include a slightly extended site 3.</p> <p>Radford Semele has a generally good range of services and facilities and is within close proximity to Leamington Spa. There is strong market interest in developing sites within and near the village and this would tend to suggest market confidence in being able to sell houses.</p> <p>WCC Education team has been consulted several times on housing growth options for Radford Semele. They have suggested that the school could manage a growth in new pupils of up to 100 dwellings, during the course of the plan period. The village is also located near Leamington Spa with access to a number of other primary schools. As with many schools there is a need to better manage parking at peak times and this issue will need to be addressed with the primary concerned and the parents / careers dropping off and collecting children.</p> <p>In relation to Site 1, WCC Highways have been consulted in detail on site</p>
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congestion. The extra traffic that would use Southam Road would be dangerous on what is already an exceptionally busy road. The proposed development requires traffic access on a congested and busy road area. Current new site access assumes modifications to Church Lane, a dog leg left turn driving west on Southam Road and opposed with School lane.

This junction is already severely affected at peak times by traffic numbers to and from School, nursery, dwellings and traffic coming on stream from Offchurch Lane. If the development is to go ahead part of the land parcel at the junction with Offchurch Lane must be allocated to a traffic island with access to the new site, possibly with peak time signals. This will better control flow of Offchurch lane peak traffic, manage traffic speed at the foot of the hill, manage traffic flow in and out of the White Lion, and address site access without affecting School Lane/Church Lane crossroad, or a need to cross designated open land with new site access road. Traffic congestion between Lewis Road and School Lane is already high at peak times and accidents will increase with further development. The only access would have to be more or less opposite the bottom end of School Lane on the Southam Road which is between the 'blind bend' and junction with Offchurch Lane and the brow of the hill in Southam Road and the junction with Kingshurst. This is a busy and potentially dangerous piece of road often with children having to cross Southam Road at this point. An additional junction with additional traffic would only make this main road through the village more hazardous. The junction of Offchurch Lane and Southam Road is already a bottleneck and dangerous, there was an accident on Monday 6th January which resulted in severe injury to a motorcyclist.

Traffic passing through Radford Semele on the A425 towards Leamington is usually above the speed limit of 30mph. The proposed entrance as indicated on a leaflet sent to residents by Gladman is obscured by the bend in the road. I believe this has the potential for more accidents in the future. Crossing the A425 presents safety hazards, particularly for children. All services are located to the south of the A425 and high density housing would increase the number of children crossing the road. No agreement with the Highways department regarding access to the site. This cannot be considered the preferred site without access having been considered.

#### Consultation Process

WDC should have engaged with the Parish Council's to obtain its view before proposing any new option. The respondent objects to the process that WDC has gone through to reach their decision and to commence their consultation. Believes the site is unsuitable and was not included in Local Plan consultation; therefore questions how it can now be the preferred location.

access and they have confirmed that a safe access can be achieved to and from the site, but this would require improvements to visibility splays on the Southam Road and the possible introduction of new traffic lights, depending upon finalised housing numbers and further technical assessment on traffic flow and volume.

It is acknowledged that the working relationship with the Parish Council has not been as strong as with other Councils, but that WDC has listened to all views expressed during the extensive consultation process (run over 8 weeks) and this has resulted in changes to the preferred housing option for Radford

<p>1- Little or no evidence to substantiate WDC's decision making in determining their preferred site</p> <p>2- There has been inadequate notice served on local residents to allow time for full assessment and discussion.</p> <p><u>Affordable Housing and Housing Types</u></p> <p>Radford Semele does not require affordable housing. There are no particular types of houses that Radford Semele is currently lacking and it is a well-balanced facility. RS already has its quota of affordable houses.</p> <p><u>Landscape, Ecology and Heritage Impact</u></p> <p>The WDC Environmental Report is not representative of the parcels of land known as Sites 2, 3 and 4 thus provides insufficient evidence for selecting Site 1 as the preferred option. The proposals would undermine the rural character of the village and specifically the area around the church. It will spoil the village views of countryside and Grade 2 Listed Church. Will spoil the view of Radford Semele from South Leamington Spa. Negative effect on character of area, and the rural landscape. Archaeological value. The Church Fields are fundamental to the identity of the village.</p> <p><u>Flooding</u></p> <p>Increased risk of flooding</p> <p>Proposed development in this location should not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. There are canal structures, weirs, culverts, sluices, in proximity to the development site used in the operation of the canal and the presence of a cutting and embankment. Development should not affect these structures.</p> <p><u>Community Facilities and Village Life</u></p> <p>Community facilities are more than perfectly adequate for the present population. The developer has no interest of the impact on the village or wider effects the proposals will have on the village and surrounding environment and is only interested in maximising profit.</p>	<p>Semele.</p> <p>There is extensive evidence through the Joint SHMA that the district overall has a requirement for a high level of affordable housing. Current policy is set at 40%. There is probably a requirement for a local housing needs survey to be undertaken for Radford Semele Parish, which will provide up to date information about very local housing needs requirements.</p> <p>Further landscape assessment work has been undertaken on the land parcels around Radford Semele. This has partially resulted in a change to the preferred village housing option.</p> <p>There is no evidence that there are major flooding issues associated with this site.</p> <p>An increased population will potentially mean more people using the local community hall and the village shop. This must surely be beneficial in sustaining village facilities, which in many locations have historically closed due to a lack of patronage. It would be interesting to gather the view of people running facilities and businesses over whether new customers are a good or bad thing.</p> <p>Site 2 has remained a discounted option</p>
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Site 2

Support the discounting of Options 2 from the Village Housing Options as I believe this would enlarge the village envelope.

Object to Options 2 being discounted from the Village Housing Options. The existing 30mph speed limit zone should be extended further along Radford Road. The reduced speed limit would allow the construction of a safe road junction for these sites. Two independent access assessments have shown vehicle access to sites 2 and 3 onto the A425 is possible at the 50mph speed limit. Traffic surveys were not carried out at a sufficient time. The landscape impact and traffic congestion in the village centre impact would be less at the discounted sites (2 and 3) than the preferred option.

Site 2 or 3 should be the preferred options for development because:

- Future development is possible.
- Development would not impact on the view from the Fosse.
- Safe vehicle and pedestrian access can be provided from Site 2 and 3 via a reduction to 30mph which would be expected as the new site becomes part of the village envelope.
- They are an attractive location as it has close access to the Fosse and M40 and would minimise the risk of new commuters through the village, where traffic congestion is already a problem.
- Site 1 would be preserved. Both the Parish Council and developers have identified Site 2 as feasible and acceptable. WDC should not have discounted Site 2 and should not ignore the Parish Council's local knowledge and expertise. Site 2 should be the preferred option because:
  - Future development is possible.
  - Development would not impact on the view from the Fosse.
  - Safe vehicle and pedestrian access can be provided.
  - It is an attractive location as it has close access to the Fosse and M40 and would minimise the risk of new commuters through the village, where traffic congestion is already a problem.
  - Site 1 would be preserved. Site 2 should be the preferred option because:
    - It would retain the character of the village.
    - It has good pedestrian access to the village, the church is accessible via existing crossing and it promotes walking via right of way.
    - All housing would be on one site minimising the disruption for building.
    - Most efficient in terms of infrastructure.
    - Minimise traffic. Access by Southam Road can be made safe and could have two entry points. There would be no need for traffic lights or roundabout.
    - Have minimal impact on existing residents as few houses are adjacent. Site 2 and 3 should be the preferred options as the increased traffic would sort itself out before entering the village. The distance from the village centre would not obstruct the current

and an updated assessment of landscape quality and value has continued to support a high landscape value scoring for this area. The views from Site 2 are wide ranging and the site forms part of a very open commercial agrarian landscape. It may be difficult to provide a natural edge to any development in this area. Development in this location may also lead to further water run-off to the valley watercourse area, but this could possibly be accommodated through a sensitive approach to hydrology engineering. A suitable vehicle access with appropriate visibility splays will also need to be demonstrated for this site.

views of the church and any introduction of a roundabout or traffic lights would not be needed. Sites 2 and 3 are better options providing the numbers of house are kept at 60 - 80.

-They provide more room to put in new access roads without disturbing what is already there.

There would need to be:

- 1) New footpaths to the village
- 2) An extension of 30mph limit
- 3) Road modifications to provide exists.

Not against village development but would prefer it to east of village and at site on Fosse Way. The additional traffic would then turn away from the village

### Site 3

Support the discounting of Options 3 from the Village Housing Options as I believe this would enlarge the village envelope.

Object to Options 3 being discounted from the Village Housing Options. The existing 30mph speed limit zone should be extended further along Radford Road. The reduced speed limit would allow the construction of a safe road junction for these sites. Two independent access assessment have shown vehicle access to sites 2 and 3 onto the A425 is possible at the 50mph speed limit. Traffic surveys were not carried out at a sufficient time. The landscape impact and traffic congestion in the village centre impact would be less at the discounted sites (2 and 3) than the preferred option.

Site 2 or 3 should be the preferred options for development because:

- Future development is possible.
- Development would not impact on the view from the Fosse.
- Safe vehicle and pedestrian access can be provided from Site 2 and 3 via a reduction to 30mph which would be expected as the new site becomes part of the village envelope.
- They are an attractive location as it has close access to the Fosse and M40 and would minimise the risk of new commuters through the village, where traffic congestion is already a problem.
- Site 1 would be preserved. Site 2 and 3 should be the preferred options as the increased traffic would sort itself out before entering the village. The distance from the village centre would not obstruct the current views of the church and any introduction of a roundabout or traffic lights would not be needed. Sites 2 and 3 are better options providing the numbers of house are kept at 60 - 80.
- They provide more room to put in new access roads without disturbing what is already there.

There would need to be:

- 1) New footpaths to the village
- 2) An extension of 30mph limit
- 3) Road modifications to provide exists.

Not against village development but would prefer it to east of village and at site on Fosse Way. The additional traffic would then turn

The revised landscape assessment for Radford Semele has indicated that Site 3 is slightly less sensitive to housing development than some other areas. This is mainly due to the smaller and more screened field patterns in this location compared to the more open landscape on the south of Southam Road. Further research and feedback from WCC Highways has indicated that a suitable vehicular access could be obtained to the site - this is a significant change in the evidence base. This site has now been included as the preferred housing option (for up to 50 dwellings) for the village, with a slightly extended development envelope. The envelope is constrained to the east to enable a high level of environmental screening and minimise the impression of ribbon development along the Southam Road. There is also a gas pipeline which constrains the ability to develop further east in this location.

<p>away from the village</p> <p><u>Site 4</u></p> <p>I support the discounting of Option 4 due to increased traffic and risk of flooding. I support the discounting of Option 4 from the Village Housing Options. It would have led to increased traffic flow along narrow congested roads (School Lane and Lewis Road) and would have resulted in more accidents along these roads (especially with the congestion outside the school at drop-off pick up times), more accidents at the junction to Radford Road and emergency vehicles would have been unable to access the site. Building on Option 4 would have also led to an increased risk of flooding along roads to the South of Option 4 which have been flooded in recent history.</p> <p>Site 4 is unacceptable because of dangerous access, increased flooding and coalescence with Leamington. Site 4 should not be developed on due to the entry of increased traffic onto the main A425 Southam Road at the junction of School Lane/Church Lane, which would need roundabout/traffic lights, something which would destroy the village ambience.</p> <p>Prefer site 4. Site 4 should be the preferred option for the following reasons:</p> <ul style="list-style-type: none"> <li>-It provides good and safe foot access to the main village and its facilities.</li> <li>-There have been no highway objections to development on the site and multiple points of potential access exist.</li> <li>-Should Site 4 be developed, the landowner also owns 27 hectares adjacent to the site which they propose would be made available as open space that would be permanently managed and maintained.</li> <li>-Development to the southeast of Radford Semele would not reduce the gap with Sydenham.</li> </ul> <p><u>Other Sites</u></p> <p>There are other more appropriate locations in and around Radford Semele many of which have not even been considered. It is important that all these sites are re-assessed properly and professionally.</p>	<p>Site 4 has remained a discounted option and there continues to be substantial local concerns that any development of this site will cause considerable traffic congestion problems in this part of Radford Semele and will lead to the impression of coalescence between the village and Sydenham.</p> <p>Historically a range of SHLAA sites have been discounted as suitable options due to such problems as flooding and insufficient access. No new sites have come through the village consultation process.</p>
<b>Shrewley Common</b>	
<p><u>Proximity to Railway Cutting</u></p> <p>Identified sites in Shrewley are located by railway cutting. Developers should seek Network Rail advice to avoid any negative impact on railway.</p> <p><u>Green Belt and Openness</u></p> <p>The two small housing sites at the south end of the village against the railway cutting are capable of being fitted in to the village with the right design. The scale of this development is small and does not justify taking the whole village out of the Green Belt. The village</p>	<p>Shrewley Common is a small village with a limited range of services / facilities. There is also very little Parish Council support or confidence that building housing at Shrewley Common at the scale originally proposed will enhance the viability of local services / facilities across the parish. In consideration of these matters, it has now been withdrawn as an appropriate location for a housing allocation and will remain</p>

<p>should stay 'washed-over'.</p> <p><u>Scale of Development and Site Specifics</u></p> <p>The proposals are over-crowded. This would also break the linear character of the village to accommodate the new housing numbers.</p> <p>There are sewerage problems and the drainage system will not cope with more houses and a whole new system is needed. Local residents do not support the village and the majority of trade in the village pub and village shop is from passers-by. The small committee and council only has one Shrewley Resident. With no school, GP or community services Shrewley is a drive through village, there are no communal areas and further housing will only add to further congestion and traffic.</p> <p>Site access is not sufficient to the sites.</p> <p>The sites are small and do not justify removing the village from the Green Belt. Little discussion about the settlement boundary overall.</p> <p>Site promoter supports the inclusion of the two sites as preferred options.</p>	<p>washed over by Green Belt. It may be the case that limited infill housing may be an option in this Green Belt village location under the appropriate new policy area.</p> <p>The sites would have been consistent with the linear character of the village, though they do represent an extension.</p> <p>Foul water drainage would require further analysis, though it is not expected that this would give rise to insurmountable problems.</p> <p>Issues regarding access to facilities are key as to why development is no longer being proposed here.</p> <p>Highways have not raised concerns about access</p>
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**Former Aylesbury House Site**

<p>Support for sensitive restoration of Aylesbury House Hotel and addition of further sympathetic buildings on the site. Further works required on heritage protection and associated issues.</p> <p>Access / egress restrictions from the site.</p> <p>There is no justification for permitting new housing in the Green Belt around the existing building. Conversion to residential (flats) of the old building (the Hotel) can be undertaken without changing the Green Belt status.</p> <p>Do not disagree with the principle of allocating 20 new dwellings at the former Aylesbury House Hotel. Hockley Heath has very poor infrastructure.</p>	<p>The visibility splay from the site is less than Highways Standards, but it is also recognised that the site functioned historically as a hotel with potentially significantly more vehicle movements than those on a small housing development. Within this context, WCC Highways has not raised any objections to development of this site.</p> <p>An initial survey of the building and surrounds has indicated that the main house may be suitable for sub-division into residential units and that further housing could be accommodated on the current brownfield areas of the site, including the newer auxiliary hotel buildings and various parts of hard standing. Development of the brownfield aspects of the site would contribute significantly to achieving the housing numbers. WDC recognise that a detailed master plan will be required for the development of this site, which will need considerable input from the council's conservation architects.</p> <p>Hockley Heath has sufficient</p>
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	infrastructure to support this development
<b>Oak Lea</b>	
This is a location which could be developed - it is trapped land between Warwick Lane and the A46 Kenilworth Bypass. Have no objections in principle to these houses being built on the Green Belt. May be suitable for retirement living as it is located near the A46 for easy access and has the associated services and facilities as it forms part of the Finham suburb of Coventry.	Agree that this is a suitable site for small scale housing subject to its removal from the Green Belt and the development of a high quality scheme, which takes into consideration the proximity of the site to the A46.
<b>District wide site and boundary proposals</b>	
<p><u>Burton Green</u></p> <p>The green belt should extend to cover gardens associated with dwelling houses to deter a development of those gardens on a piecemeal basis. The village boundary should be kept as tight as possible to the maximum concentration of houses, discouraging ribbon developments to minimise impact on natural habitats and landscapes and allow villagers to walk to the edge of the village.</p> <p><u>Non-Green Belt Villages</u></p> <p>Leave decisions on village envelopes to Parish Councils / NP work.</p> <p><u>Further Dispersal / Growth</u></p> <p>Opportunities for further development in non-Green belt villages, prior to developing on Green Belt locations. Also opportunities for each village settlement to take a proportion of growth rather than selected villages.</p>	<p>The village envelope has been drawn pretty tightly around Burton Green but does include the majority of residential gardens. Due to the linear form of the village, there are very limited opportunities for significant garden development and the usual range of planning policies would apply to maintain a focus upon quality development.</p> <p>There has not been a high level of representations about non-Green Belt village envelopes and many of the envelopes are fairly logical in structure. However, there may be the opportunity to modify boundaries through the neighbourhood plan processes and the review programme for the new Local Plan.</p> <p>The new Local Plan includes a focus upon the most sustainable growth villages for allocated housing sites, but also includes a significant quantity of smaller settlements, which could accommodate limited infill development across the plan period. These Limited Infill Villages are spread across the district and detailed under Policy H1 – Directing New Housing.</p>
<b>Others</b>	
<p>Need for clarification over WDC position in the release of Green Belt for development.</p> <p>Lack of cross-border communication with Stratford Upon Avon DC (SUA) about planning matters.</p> <p>Number of sites within SUA in very rural locations are causing</p>	The new Local Plan clearly sets out the Councils position with regard to the release of Green Belt land for development on the basis of exceptional circumstances.

concerns.	Comments noted about development in Stratford Upon Avon, which will be picked-up through the Duty to Co-operate programme.
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## Appendix 1 – Preferred Options Distribution List

Adam James	Adjoining Council	Warwickshire County Council
Lesley Dury	Adjoining Parish	Balsall Parish Council
Mrs Jenny Walsh	Adjoining Parish	Beaudesert Parish Council
Mrs S Wyldbore-Smith	Adjoining Parish	Berkswell Parish Council
Jenny Casey	Adjoining Parish	Brandon & Bretford Parish Council
Mr P Creek	Adjoining Parish	Brinklow Parish Council
Mrs S Fennell	Adjoining Parish	Frankton Parish Council
Mr J A Clay	Adjoining Parish	Fulbrook Parish Council
Mrs S Jack	Adjoining Parish	Long Itchington Parish Council
Miss Selina Cullit	Adjoining Parish	Marton Parish Council
Mrs Elizabeth Spencer	Adjoining Parish	Newbold Pacey & Ashorne Parish Council
Mr A Clark	Adjoining Parish	Preston Bagot Parish Council
Mr B Yeates	Adjoining Parish	Princethorpe Parish Council
Mr Geoffrey Tooke	Adjoining Parish	Ryton on Dunsmore Parish Council
Mr I A Wilkins	Adjoining Parish	Snitterfield Parish Council
Mrs Lara Simmonds	Adjoining Parish	Stretton on Dunsmore Parish Council
Ms Diane Malley	Adjoining Parish	Tamworth in Arden Parish Council
Mrs Gillian Ingham	Adjoining Parish	Ufton Parish Council
Mrs Lynda Scriven	Adjoining Parish	Wellesbourne Parish Council
Mrs June Read	Adjoining Parish	Wolverton Parish Council
Dennis Bradley	Organisation	Binswood Allotment Society
David R Hucker	Organisation	Campaign Against Expansion of Coventry Airport
Mr Craig Callingham	Organisation	Coventry & Warwickshire Society of Chartered Architects
Pauline Smart	Organisation	Crackley Residents' Association
Pauline Smart	Organisation	Crackley Residents' Association
Denny Reader	Organisation	Friends of the Earth
Graham Harrison	Organisation	Hatton Parish Plan Steering Group
Mrs S Powell	Organisation	Kenilworth Chamber of Trade
Mr Tom Clark	Organisation	Kenilworth Disability Action Group
Mrs Joanna Illingworth	Organisation	Kenilworth Society
Mr M Hoggins	Organisation	Leamington Gospel Hall Trust
Carolyn Wilson	Organisation	Mono Consultants Ltd
MR R C Smith-Ryland	Organisation	Sherbourne Estate
Robin Richmond	Organisation	The Leamington Society
Alan Watson	Organisation	The National Trust

Trevor Seeley	Organisation	University of Warwick
Janet Alty	Organisation	Warwick and Leamington Green Party
A J Bligh	Organisation	Warwick Independent Schools Foundation
Ms A Barwinskyj	Residents' Association	Barford Residents Association
Chris Langton	Residents' Association	Burton Green Residents' Association
Robert Fryer	Residents' Association	Finham Residents Association
Business Planning Manager	Statutory Consultee	British Gas Trading
To Whom it May Concern	Statutory Consultee	British Telecommunications plc
To Whom it May Concern	Statutory Consultee	Central Networks
Mr Mr Limbrick	Statutory Consultee	Defence Estates
To Whom it May Concern	Statutory Consultee	DEFRA
To Whom it May Concern	Statutory Consultee	Department for Business, Enterprise & Regulatory Reform
To Whom it May Concern	Statutory Consultee	Department for Children, Schools and Families
To Whom it May Concern	Statutory Consultee	Department for Culture, Media & Sport
To Whom it May Concern	Statutory Consultee	Department for Transport
To Whom it May Concern	Statutory Consultee	Department for Works & Pensions
To Whom it May Concern	Statutory Consultee	Department of Health
To Whom It May Concern	Statutory Consultee	E.ON UK plc
Mr Robert Field	Statutory Consultee	E-on
To Whom it May Concern	Statutory Consultee	Home Office
To whom it may concern	Statutory Consultee	HSE Chemical & Hazardous Installations Division
Charles Orr-Ewing	Statutory Consultee	Ministry of Defence
To Whom it May Concern	Statutory Consultee	NHS West Midlands Division
To Whom it May Concern	Statutory Consultee	nPower
To Whom it May Concern	Statutory Consultee	Oil & Pipelines Agency
Michael Maguire	Statutory Consultee	Positive about Young People
To Whom it May Concern	Statutory Consultee	Powergen UK plc
To Whom it May Concern	Statutory Consultee	Scottish Power
Gareth Smith	Statutory Consultee	Severn Trent Water
Ms J Burton	Statutory Consultee	Severn Trent Water
Paul Hodgson	Statutory Consultee	Severn Trent Water (Disposal)
Pat Spain	Statutory Consultee	Severn Trent Water (Supply Team)
To Whom it May Concern	Statutory Consultee	Society for the Protection of Ancient Buildings
Sarah Phipps	Statutory Consultee	South Warwickshire PCT
To Whom it May Concern	Statutory Consultee	Warwickshire & Northamptonshire Air Ambulance
Mrs Rachel Baconnet	Statutory Consultee	Warwickshire County Council
Ruth Bradford	Statutory Consultee	Warwickshire County Council
To Whom it May Concern	Statutory Consultee	Warwickshire County Council
Helen Maclagan	Statutory Consultee	Warwickshire County Council - Heritage & Culture (Museums)
Eva Neale	Statutory Consultee	Warwickshire County Council - Landscape Architect Team
Nigel Grant	Statutory Consultee	Warwickshire Fire & Rescue Service
Head of Property Services	Statutory Consultee	Warwickshire Police
Lindsey Shaw	Statutory Consultee	Warwickshire Police
Mr Gary Knight, (PC 209)	Statutory Consultee	Warwickshire Police
Peter Davies	Statutory Consultee	Warwickshire Police
To Whom it May Concern	Statutory Consultee	West Midlands Fire Service

David Carter	Adjoining Council	Birmingham City Council
Mr Azim Walimia	Adjoining Council	Coventry City Council
Tracy Darke	Adjoining Council	Coventry City Council
Dorothy Barratt	Adjoining Council	North Warwickshire Borough Council
Kelly Ford	Adjoining Council	Nuneaton & Bedworth Borough Council
Mr Robert Back	Adjoining Council	Rugby Borough Council
Dave Simpson	Adjoining Council	Solihull Metropolitan Borough Council
Paul Harris	Adjoining Council	Stratford upon Avon District Council
Stephanie Chettle	Adjoining Council	Stratford upon Avon District Council
Mrs Deborah Wellings	Adjoining Parish	Charlecote Parish Council
Paul Manley	Adjoining Parish	Chesterton & Kingston Parish Council
Michael Woodman	Adjoining Parish	Hampton Lucy Parish Council
Mrs J M Patrick	Adjoining Parish	Harbury Parish Council
Linda Davis	Organisation	Alvis Sports Club
Mr Geoff Southgate	Organisation	B.L.A.S.T.
Mr Clayton Denwood	Organisation	Bath Place Community Venture
Stephen Hill	Organisation	Birmingham International Airport Ltd
Geoff Southgate	Organisation	BLAST (Bringing Leamington Allotment Societies Together)
Mr John Ruddick	Organisation	Brindley Twist Tafft & James
Mr Dave Squires	Organisation	British Transport Police
Mr Craig Callingham	Organisation	Callingham Associates
Sharon Newport	Organisation	Coventry & Warwickshire Local Enterprise Partnership
Anne Smith	Organisation	Coventry Golf Club Limited
Mr Michael Jeffs	Organisation	CPRE Warwickshire
Mark Sullivan	Organisation	CPRE Warwickshire
Mrs Alice de la Rue	Organisation	Derbyshire Gypsy Liaison Group
Ewan Calcott	Organisation	Forestry Commission
John Brightley	Organisation	Friends of the Earth
S J Staines	Organisation	Friends, Families & Travellers and Traveller Law Reform Project
Joel Hancock	Organisation	Hancock Town Planning
Mr A Hodkinson	Organisation	Health and Safety Executive
Mrs Margaret Begg	Organisation	Hill Close Gardens
John Holmes	Organisation	Holmes Antill
Scott Carpenter	Organisation	Jehovah's Witnesses
Mr Mike Hitchins	Organisation	Kenilworth Allotment Tenants Association
Charles Smith	Organisation	Kenilworth Chamber of Trade
Mr Jim McCarthy	Organisation	Kenilworth Golf Club
Mr Michael Wellock	Organisation	Kirkwells
David Malcolm Beck	Organisation	Leamington and County Golf Club
Harry Wilson	Organisation	Metropolitan and Scott Ltd
Miss Helen Cork	Organisation	National Farmers' Union
Sarah Faulkner	Organisation	NFU
M Wahlberg	Organisation	Offchurch Plan Implementation Group

Ms Ruth Beer	Organisation	RNID
Mr Michael Hobday	Organisation	SPAce
Bob Sharples	Organisation	Sport England
Peter Findley	Organisation	St Johns Westwood
Andrew Spencer	Organisation	St. John's Church
Roger Clay	Organisation	Stratford and Warwick Waterways Trust
Tim Chudley	Organisation	Sundial Group
Mr Archie Pitts	Organisation	The Leamington Society
Richard Ashworth	Organisation	The Leamington Society
Mr Chris Lambart	Organisation	The National Trust
S.G. Wallsgrove	Organisation	The Ramblers' Association
James Mackay	Organisation	The Warwick Society
Ian Davison	Organisation	Warwick and Leamington Green Party
mr keith smith	Organisation	warwick books ltd
Sue Butcher	Organisation	Warwick Chamber of Trade and Commerce
Steve Scaysbrook	Organisation	Warwickshire Association for the Blind
Linda Ridgley	Organisation	Warwickshire Rural Community Council
Gina Rowe	Organisation	Warwickshire Wildlife Trust
Richard Wheat	Organisation	Warwickshire Wildlife Trust
Mr Justin Milward	Organisation	Woodland Trust
Mr Neil Denison	Organisation	WYG Planning & Design
Mr P Hunt	Organisation	
Bob Crowther	Organisation, School	Governors of Champion School
Mrs P.A. Maddison	Parish Council	Ashow & Stoneleigh Parish Council
Mr Steve Williams	Parish Council	Baginton Parish Council
Mr J F Johnson	Parish Council	Barford, Sherbourne and Wasperton Joint Parish Council
Mrs Sylvia Green	Parish Council	Beausale, Hasely, Honiley & Wroxall Parish Council
Ms Corrine Hill	Parish Council	Bishop's Tachbrook Parish Council
Mrs Simone Bush	Parish Council	Budbrooke Parish Council
Mr Graham Leach	Parish Council	Burton Green Parish Council
Mrs Eileen Clayton	Parish Council	Leek Wootton & Guy's Cliffe Parish Council
Mrs J Bendall	Parish Council	Norton Lindsey Parish Council
Mr Graham Cooper	Parish Council	Old Milverton & Blackdown JPC
Mr David Leigh-Hunt	Parish Council	Radford Semele Parish Council
Mrs Elaine Priestly	Parish Council	Shrewley Parish Council
Rosemary Woodforth	Parish Council	Weston-Under-Wetherley Parish Council
Mr Graham Harrison	Parish Councillor	Hatton Parish Council
Mr John Holland	Parish Councillor	
Mr Philip Morris	Residents' Association	Barford Residents Association
Cllr Arthur Taylor	Residents' Association	Burton Green Residents' Association
Rena Taylor	Residents' Association	Burton Green Residents' Association
Robin Brabban	Residents' Association	CLARA
Mr Nick Hillard	Residents' Association	Crackley Residents Association
Mr Adrian Pauling	Residents' Association	Southern Windy Arbour Area Residents' Association
Mr John Myers	Residents' Association	St Mary's Residents Association
Mr Mark Feldman	School	Champion School
Ms Ann Lawson	School	Myton School
Chris Paget	School	

Mr Damien Holdstock	Statutory Consultee	AMEC
Chrisine Hemming	Statutory Consultee	British Waterways
Katherine Burnett	Statutory Consultee	British Waterways
Mr Adam Harrison	Statutory Consultee	Centro
Rachel Bell	Statutory Consultee	Centro
Kim Auston	Statutory Consultee	English Heritage
Jim Kitchen	Statutory Consultee	Environment Agency
Laura Perry	Statutory Consultee	Environment Agency
Paul Gethins	Statutory Consultee	Environment Agency
Giles Matthews	Statutory Consultee	Environment Agency (Biodiversity)
Mr Paul Webster	Statutory Consultee	Forestry Commission
Dr Will Pascoe	Statutory Consultee	Health and Safety Executive
Kathryn Burgess	Statutory Consultee	Highways Agency
To Whom It May Concern	Statutory Consultee	Mobile Operators Association
Dr Stefan Preuss	Statutory Consultee	National Grid
Allison Crofts	Statutory Consultee	Natural England
Anton Irving	Statutory Consultee	Natural England
Mr Steve Austin	Statutory Consultee	Network Rail
Dr Michael Caley	Statutory Consultee	NHS Warwickshire
Mrs Jayne Blacklay	Statutory Consultee	South Warwickshire Foundation trust
Miss Rachael A. Bust	Statutory Consultee	The Coal Authority
Ms Rose Freeman	Statutory Consultee	The Theatres Trust
Rose Freeman	Statutory Consultee	The Theatres Trust
Mr David Lowe	Statutory Consultee	Warwickshire County Council
Janet Neale	Statutory Consultee	Warwickshire County Council
Ms P Neal	Statutory Consultee	Warwickshire County Council
Sarah Wells	Statutory Consultee	Warwickshire County Council
Tony Lyons	Statutory Consultee	Warwickshire County Council
Ciaran Power	Statutory Consultee	Warwickshire County Council - Environment & Economy Directorate
Eva Neale	Statutory Consultee	Warwickshire County Council - Environment & Economy Directorate
Adam James	Statutory Consultee	Warwickshire County Council (Minerals Policy Team)
Rob Leahy	Statutory Consultee	Warwickshire County Council [Gypsy and Traveller Team]
Mr Mark English	Statutory Consultee	Warwickshire Police
C I Tim Bailey	Statutory Consultee	Warwickshire Police
Tim Sanders	Statutory Consultee	Warwickshire Police
Mr Andy Donnelly	Statutory Consultee	West Midlands Chief engineers and Planning Officers Group
	Statutory Consultee, Statutory Consultee - SA	
Rohan Torkildsen	Only Statutory Consultee, Statutory Consultee - SA	English Heritage
Consultation Hub	Only	Natural England
Mr G D Symes	Town Council	Kenilworth Town Council
Mr Robert Nash	Town Council	Royal Leamington Spa Town Council
Mr Derek Maudlin	Town Council	Warwick Town Council
Mrs Jenny Mason	Town Council	Whitnash Town Council

## Appendix 2 – Revised Development Strategy Distribution List

Ashley Baldwin	Adjoining Council	Nuneaton & Bedworth Borough Council
Mr Azim Walimia	Adjoining Council	Coventry City Council
Dave Nash	Adjoining Council	Stratford upon Avon District Council
David Carter	Adjoining Council	Birmingham City Council
Dorothy Barratt	Adjoining Council	North Warwickshire Borough Council
Dave Simpson	Adjoining Council	Solihull Metropolitan Borough Council
Mr Jim Newton	Adjoining Council	Coventry City Council
Kelly Ford	Adjoining Council	Nuneaton & Bedworth Borough Council
Paul Harris	Adjoining Council	Stratford upon Avon District Council
Sarah Fisher	Adjoining Council	Rugby Borough Council
Tim Willis	Adjoining Council	Warwickshire County Council
Tracy Darke	Adjoining Council	Coventry City Council
Mrs S Wyldbore-Smith	Adjoining Parish	Berkswell Parish Council
Mrs J M Patrick	Adjoining Parish	Harbury Parish Council
Mrs Deborah Wellings	Adjoining Parish	Charlecote Parish Council
Paul Manley	Adjoining Parish	Chesterton & Kingston Parish Council
Michael Woodman	Adjoining Parish	Hampton Lucy Parish Council
Ms Shafim Kauser	Adjoining Parish	Balsall Parish Council
Chris White MP	MP	
Mr J Wright MP	MP	
Mr A Hodgkinson	Organisation	Health and Safety Executive
Andrew Spencer	Organisation	St. John's Church
Mr Archie Pitts	Organisation	The Leamington Society
Richard Ashworth	Organisation	The Leamington Society
Mr Brian Melling	Organisation	Leek Wootton Parish Plan Working Group
Mr Bob Sharples	Organisation	Sport England
John Brightley	Organisation	Friends of the Earth
Charles Smith	Organisation	Kenilworth Chamber of Trade
Mr Jonathan Chilvers	Organisation	Green Party
Mr Chris Lambart	Organisation	The National Trust
Mr Neil Denison	Organisation	WYG Planning & Design
Christine Hodgetts	Organisation	Warwickshire Gardens Trust
Clare Skeels	Organisation	
Mr Clayton Denwood	Organisation	Bath Place Community Venture
Mr Craig Callingham	Organisation	Callingham Associates
Mr Dave Squires	Organisation	British Transport Police
David Cox	Organisation	National Landlords Association
Dr Katharina Dehnen-Schmutz	Organisation	Cycleways
Mr Denis Secher	Organisation	SPAce

Mrs Alice de la Rue	Organisation	Derbyshire Gypsy Liaison Group
Mr Roger Yarwood	Organisation	National Federation of Gypsy Liaison Groups
Sir John Egan	Organisation	Warwick Castle Park Trust Ltd.
Ginny Hall	Organisation	Mono Consultants Ltd
Emily Smith	Organisation	Warwickshire Public Health and South
Ewan Calcott	Organisation	Warwickshire Clinical Commissioning Group
Geoff Southgate	Organisation	Forestry Commission
Geoff Wiggin	Organisation	BLAST (Bringing Leamington Allotment Societies Together)
Mr Gerry Adderley	Organisation	Parichial Church Council Of St James Church
Gina Rowe	Organisation	Health and Safety Executive
Tessa Mckenzie	Organisation	Warwickshire Wildlife Trust
Helen Winkler	Organisation	Goldstraws
Harry Wilson	Organisation	Tyler-Parkes Partnership
Miss Helen Cork	Organisation	Metropolitan and Scott Ltd
Mr Mike Hitchins	Organisation	National Farmers' Union
Mr Michael		Kenilworth Allotment Tenants Association
Hobday	Organisation	SPAce
Mr David Joseph	Organisation	Bloor Homes
Ian Davison	Organisation	Warwick and Leamington Green Party
Mr Geoff		
Southgate	Organisation	B.L.A.S.T.
Mr David		
Morphew	Organisation	Photography by David Morphew
Joel Hancock	Organisation	Hancock Town Planning
mr keith smith	Organisation	warwick books ltd
Ms Ruth Beer	Organisation	RNID
Jane Coates	Organisation	Kenilworth Community Forum
Jane Coates	Organisation	Whitnash Community Forum
Mr Jim McCarthy	Organisation	Kenilworth Golf Club
Mr P Hunt	Organisation	
Mr John Ruddick	Organisation	Brindley Twist Tafft & James
Mr Jonathan		
Hockley	Organisation	Birmingham International Airport Ltd
Junaid Hussain	Organisation	Warwickshire Race Equality Partnership (WREP)
Mr Justin Milward	Organisation	Woodland Trust
Mr Kevin Porter	Organisation	Leamington Gospel Hall Trust
Linda Davis	Organisation	Alvis Sports Club
Mrs Linsey Luke	Organisation	Federation of Small Businesses
M Wahlberg	Organisation	Offchurch Plan Implementation Group
Mrs Marianne Pitts	Organisation	Leamington Society
Mr Mark Sullivan	Organisation	CPRE WARWICKSHIRE
Mrs Margaret Begg	Organisation	Hill Close Gardens
Mr Malcolm		
Hoggins	Organisation	Leamington Gospel Hall Trust
Mr Michael		
Wellock	Organisation	Kirkwells

Mr Michael Jeffs	Organisation	CPRE Warwickshire
Mark Sullivan	Organisation	CPRE Warwickshire
Mrs Patricia Cain	Organisation	Kenilworth Society
Peter Findley	Organisation	St Johns Westwood
John Holmes	Organisation	Holmes Antill
Richard Wheat	Organisation	Warwickshire Wildlife Trust
		Binswood Ex Servicemen Allotments
Mr Robin Cathcart	Organisation	Association
Mr Roger Dowthwaite	Organisation	Coventry & Warwickshire Local Enterprise Partnership
Roger Clay	Organisation	Stratford and Warwick Waterways Trust
Mr Roy Mowbray	Organisation	Waterloo Housing Group
Sarah Faulkner	Organisation	NFU
mrs sarah brooke-taylor	Organisation	WRCC
Scott Carpenter	Organisation	Jehovah's Witnesses
James Mackay	Organisation	The Warwick Society
David Malcolm Beck	Organisation	Leamington and County Golf Club
MS S MARTIN	Organisation	LIBRARY SUPPLY INT LTD
Mr Stephen Wheatcroft	Organisation	Coventry Gospel halls Trust
Mr Stephen Stacey	Organisation	Baginton Green Ltd (Focus School)
Steve Scaysbrook	Organisation	Warwickshire Association for the Blind
		Friends, Families & Travellers and Traveller
S J Staines	Organisation	Law Reform Project
S.G. Wallsgrove	Organisation	The Ramblers' Association
Sue Butcher	Organisation	Warwick Chamber of Trade and Commerce
Tim Chudley	Organisation	Sundial Group
Trevor Seeley	Organisation	University of Warwick
Linda Ridgley	Organisation	Warwickshire Rural Community Council
Welfare Officer	Organisation	Warwick SU
	Organisation, Residents'	BLAST (Bringing Leamington Allotment
Ms Juliet Carter	Association	Societies Together)
Bob Crowther	Organisation, School	Governors of Champion School
		Kenilworth Children's Centre & Nursery
Julie Joannides	Organisation, School	School
Mr Andr�� Davis	Parish / Town Councillor	Whitnash Town Council
Antoinette Gordon	Parish / Town Councillor	
Mr Graham Harrison	Parish / Town Councillor	
Mr John Holland	Parish / Town Councillor	
Mrs A Coleman	Parish Council	Rowington Parish Council
Mrs Katherine Skudra	Parish Council	Hatton Parish Council
Mr A W Winterburn	Parish Council	Eathorpe, Hunningham, Offchurch, Wappenbury JPC
Rosemary Woodforth	Parish Council	Bubbenhall Parish Council
Mrs Simone Bush	Parish Council	Budbrooke Parish Council

Mrs Louise Baudet	Parish Council	Burton Green Parish Council
Mr Robert Inman	Parish Council	Cubbington Parish Council
Mrs Eileen Clayton	Parish Council	Leek Wootton & Guy's Cliffe Parish Council
Mr Graham Cooper	Parish Council	Old Milverton & Blackdown JPC
Mr David Leigh-Hunt	Parish Council	Radford Semele Parish Council
Mrs J Bendall	Parish Council	Norton Lindsey Parish Council
Mr J F Johnson	Parish Council	Barford, Sherbourne and Wasperton Joint Parish Council
Mrs Elaine Priestly	Parish Council	Lapworth Parish Council
Laurence Mathers	Parish Council	Baddesley Clinton Parish Council
Mrs P.A. Maddison	Parish Council	Ashow & Stoneleigh Parish Council
Mrs L Mathers	Parish Council	Baddesley Clinton Parish Council
Lesley Coles	Parish Council	Weston Under Wetherley Parish Council
Ms Corrine Hill	Parish Council	Bishop's Tachbrook Parish Council
Mrs Sylvia Green	Parish Council	Beausale, Hasely, Honiley & Wroxall Parish Council
Eleanor Choudry	Parish Council	Shrewley Parish Council
Mr Steve Williams	Parish Council	Baginton Parish Council
Maria Norman	Parish Council	Weston-Under-Wetherley Parish Council
Mr Adrian Pauling	Residents' Association	Southern Windy Arbour Area Residents' Association
Professor Leslie Clark	Residents' Association	Kingswood Residents Group
Mr Nick Hillard	Residents' Association	Crackley Residents Association
David Hull	Residents' Association	Cannon Park Community Association
Mr Philip Morris	Residents' Association	Barford Residents Association
Bryan Houston	Residents' Association	Chase Meadow Residents Association
Jan Gillett	Residents' Association	Central Leamington Area Residents Association
Mr John Myers	Residents' Association	St Mary's Residents Association
Cllr Arthur Taylor	Residents' Association	Burton Green Residents' Association
Mr Peter Gogerly	Residents' Association	Hampton-on-the-Hill Residents Association
Mr Rod Scott	Residents' Association	Barford Residents Association
Rona Taylor	Residents' Association	Burton Green Residents' Association
G Swards	Residents' Association	Finham Residents Association
Mr Adam Harrison	Statutory Consultee	Centro
Adam James	Statutory Consultee	Warwickshire County Council (Minerals Policy Team)
Mr Andy Donnelly	Statutory Consultee	West Midlands Chief engineers and Planning Officers Group
Becky Clarke	Statutory Consultee	Environment Agency
Chrisine Hemming	Statutory Consultee	British Waterways
Ciaran Power	Statutory Consultee	Warwickshire County Council - Environment & Economy Directorate
Mr Damien Holdstock	Statutory Consultee	AMEC
David Westbrook	Statutory Consultee	Natural England
Mr David Lowe	Statutory Consultee	Warwickshire County Council

MS Elaine Bettger	Statutory Consultee	Warwickshire County Council Warwickshire County Council - Environment & Economy Directorate
Eva Neale	Statutory Consultee	Warwickshire County Council
Garry Palmer	Statutory Consultee	Environment Agency (Biodiversity)
Giles Matthews	Statutory Consultee	Mobile Operators Association
To Whom It May Concern	Statutory Consultee	Environment Agency
Jim Kitchen	Statutory Consultee	Natural England
Jamie Melvin	Statutory Consultee	Warwickshire County Council
Janet Neale	Statutory Consultee	South Warwickshire Foundation trust
Mrs Jayne Blacklay	Statutory Consultee	Centro
Jonathan Haywood	Statutory Consultee	British Waterways
Katherine Burnett	Statutory Consultee	Highways Agency
Kathryn Burgess	Statutory Consultee	English Heritage
Kim Auston	Statutory Consultee	Environment Agency
Laura Perry	Statutory Consultee	Warwickshire County Council - Environment & Economy Directorate
Louise Wall	Statutory Consultee	Warwickshire Police
Mr Mark English	Statutory Consultee	NHS Warwickshire
Mel Duffy	Statutory Consultee	Highways Agency
Neil Hansen	Statutory Consultee	Ancient Monuments Society
Dr Richard K Morris	Statutory Consultee	Warwickshire County Council
Ms P Neal	Statutory Consultee	Environment Agency
Paul Gethins	Statutory Consultee	Forestry Commission
Mr Paul Webster	Statutory Consultee	The Theatres Trust
Ms Rose Freeman	Statutory Consultee	The Coal Authority
Miss Rachael A. Bust	Statutory Consultee	Centro
Rachel Bell	Statutory Consultee	Warwickshire County Council [Gypsy and Traveller Team]
Rob Leahy	Statutory Consultee	The Theatres Trust
Rose Freeman	Statutory Consultee	Natural England
Roslyn Deeming	Statutory Consultee	Warwickshire County Council
Sarah Wells	Statutory Consultee	Warwickshire County Council
Mr Steve Smith	Statutory Consultee	Warwickshire Police
Tim Sanders	Statutory Consultee	Warwickshire County Council
Tony Lyons	Statutory Consultee	Centro
helen davies	Statutory Consultee	Network Rail
Town Planning Team LNW	Statutory Consultee	Health and Safety Executive
Dr Will Pascoe	Statutory Consultee	Natural England
Consultation Hub	Statutory Consultee,	English Heritage
Rohan Torkildsen	Statutory Consultee - SA Only	Royal Leamington Spa Town Council
Nina Hamlett	Town Council	Warwick Town Council
Mr Derek Maudlin	Town Council	Royal Leamington Spa Town Council
Mr Robert Nash	Town Council	Whitnash Town Council
Mrs Jenny Mason	Town Council	Kenilworth Town Council
Mr G D Symes	Town Council	

Ms Diane Malley	Adjoining Parish	Tamworth in Arden Parish Council
Mrs Jenny Walsh	Adjoining Parish	Beaudesert Parish Council
Mr A Clark	Adjoining Parish	Preston Bagot Parish Council
Mr P Creek	Adjoining Parish	Brinklow Parish Council
Miss Selina Cullit	Adjoining Parish	Marton Parish Council
Mrs S Fennell	Adjoining Parish	Frankton Parish Council
Jenny Casey	Adjoining Parish	Brandon & Bretford Parish Council
Mrs Lara Simmonds	Adjoining Parish	Stretton on Dunsmore Parish Council
Mr B Yeates	Adjoining Parish	Princethorpe Parish Council
Mrs Gillian Ingham	Adjoining Parish	Ufton Parish Council
Mr J A Clay	Adjoining Parish	Fulbrook Parish Council
Mrs Elizabeth Spencer	Adjoining Parish	Newbold Pacey & Ashorne Parish Council
Mrs Lynda Scriven	Adjoining Parish	Wellesbourne Parish Council
Mr I A Wilkins	Adjoining Parish	Snitterfield Parish Council
Mrs June Read	Adjoining Parish	Wolverton Parish Council
Mrs S Jack	Adjoining Parish	Long Itchington Parish Council
Lesley Dury	Adjoining Parish	Balsall Parish Council
Mr Geoffrey Tooke	Adjoining Parish	Ryton on Dunsmore Parish Council
Mike Natrass MEP	MEP, Statutory Consultee	
Chris White MP	MP	
Robin Richmond	Organisation	The Leamington Society
MR R C Smith-Ryland	Organisation	Sherbourne Estate
Denny Reader	Organisation	Friends of the Earth
Juliet Carter	Organisation	Transition Towns
Joan White	Organisation	The Kingsley School Playing Field Trust
Janet Alty	Organisation	Warwick and Leamington Green Party
Dennis Bradley	Organisation	Binswood Allotment Society
Mr M Hoggins	Organisation	Leamington Gospel Hall Trust
Mr Craig Callingham	Organisation	Coventry & Warwickshire Society of Chartered Architects
Graham Harrison	Organisation	Hatton Parish Plan Steering Group
Mr Tom Clark	Organisation	Kenilworth Disability Action Group
Pauline Smart	Organisation	Crackley Residents' Association
Mrs Joanna Illingworth	Organisation	Kenilworth Society
Mrs S Powell	Organisation	Kenilworth Chamber of Trade
David R Hucker	Organisation	Campaign Against Expansion of Coventry Airport
John Mumby	Organisation	Tesco Stores Ltd
Mrs P.A. Maddison	Parish Council	Ashow & Stoneleigh Parish Council
Mrs L Mathers	Parish Council	Baddesley Clinton Parish Council
Mr Steve Williams	Parish Council	Baginton Parish Council

Mr J F Johnson	Parish Council	Barford, Sherbourne and Wasperton Joint Parish Council
Mrs Sylvia Green	Parish Council	Beausale, Hasely, Honiley & Wroxall Parish Council
Ms Corrine Hill	Parish Council	Bishop's Tachbrook Parish Council
Rosemary Woodforth	Parish Council	Bubbenhall Parish Council
Mrs Simone Bush	Parish Council	Budbrooke Parish Council
Mrs Louise Baudet	Parish Council	Burton Green Parish Council
Mr Robert Inman	Parish Council	Cubbington Parish Council
Mr A W Winterburn	Parish Council	Eathorpe, Hunningham, Offchurch, Wappenbury JPC
Mrs Katherine Skudra	Parish Council	Hatton Parish Council
Mrs Elaine Priestly	Parish Council	Lapworth Parish Council
Mrs Eileen Clayton	Parish Council	Leek Wootton & Guy's Cliffe Parish Council
Mrs J Bendall	Parish Council	Norton Lindsey Parish Council
Mr Graham Cooper	Parish Council	Old Milverton & Blackdown JPC
Mr David Leigh-Hunt	Parish Council	Radford Semele Parish Council
Mrs A Coleman	Parish Council	Rowington Parish Council
Eleanor Choudry	Parish Council	Shrewley Parish Council
Maria Norman	Parish Council	Weston-Under-Wetherley Parish Council
Robert Fryer	Residents' Association	Finham Residents Association
Ms A Barwinskyj	Residents' Association	Barford Residents Association
Steve Dolphin	Residents' Association	Cannon Park Community Association
Pat Spain	Statutory Consultee	Severn Trent Water (Supply Team)
To Whom it May Concern	Statutory Consultee	NHS West Midlands Division
Ms J Burton	Statutory Consultee	Severn Trent Water
Gareth Smith	Statutory Consultee	Severn Trent Water
To Whom it May Concern	Statutory Consultee	West Midlands Fire Service
Mr Mr Limbrick	Statutory Consultee	Defence Estates
Business Planning Manager	Statutory Consultee	British Gas Trading
To Whom it May Concern	Statutory Consultee	British Telecommunications plc
Michael Maguire	Statutory Consultee	Positive about Young People
Nigel Grant	Statutory Consultee	Warwickshire Fire & Rescue Service
Mr Gary Knight, (PC 209)	Statutory Consultee	Warwickshire Police
Lindsey Shaw	Statutory Consultee	Warwickshire Police
To Whom it May Concern	Statutory Consultee	Warwickshire County Council
Helen Maclagan	Statutory Consultee	Warwickshire County Council - Heritage & Culture (Museums)
Eva Neale	Statutory Consultee	Warwickshire County Council - Landscape Architect Team
Ruth Bradford	Statutory Consultee	Warwickshire County Council

Mrs Rachel Baconnet	Statutory Consultee	Warwickshire County Council
Sarah Phipps Head of Property Services	Statutory Consultee	South Warwickshire PCT
Peter Davies To Whom it May Concern	Statutory Consultee	Warwickshire Police
To Whom It May Concern	Statutory Consultee	Warwickshire Police
Mr Robert Field To Whom it May Concern	Statutory Consultee	Powergen UK plc
Paul Hodgson To Whom it May Concern	Statutory Consultee	E.ON UK plc
To Whom it May Concern	Statutory Consultee	E-on
To whom it may concern	Statutory Consultee	Warwickshire & Northamptonshire Air Ambulance
Charles Orr-Ewing To Whom it May Concern	Statutory Consultee	Severn Trent Water (Disposal)
To Whom it May Concern	Statutory Consultee	Society for the Protection of Ancient Buildings
To Whom it May Concern	Statutory Consultee	Scottish Power
To whom it may concern	Statutory Consultee	HSE Chemical & Hazardous Installations Division
Charles Orr-Ewing To Whom it May Concern	Statutory Consultee	Ministry of Defence
To Whom it May Concern	Statutory Consultee	Central Networks
To Whom it May Concern	Statutory Consultee	nPower
To Whom it May Concern	Statutory Consultee	Department of Health
To Whom it May Concern	Statutory Consultee	Department for Business, Enterprise & Regulatory Reform
To Whom it May Concern	Statutory Consultee	Department for Children, Schools and Families
To Whom it May Concern	Statutory Consultee	DEFRA
To Whom it May Concern	Statutory Consultee	Home Office
To Whom it May Concern	Statutory Consultee	Department for Transport
To Whom it May Concern	Statutory Consultee	Department for Culture, Media & Sport
To Whom it May Concern	Statutory Consultee	Oil & Pipelines Agency
To Whom it May Concern	Statutory Consultee	Department for Works & Pensions
Jane Field	Statutory Consultee	Environment Agency
Mr G D Symes	Town Council	Kenilworth Town Council
Mr Robert Nash	Town Council	Royal Leamington Spa Town Council
Mr Derek Maudlin	Town Council	Warwick Town Council
Mrs Jenny Mason	Town Council	Whitnash Town Council

## Appendix 3 – Villages Consultation Distribution list

Jenny Casey	Adjoining Parish	Brandon & Bretford Parish Council
Lesley Dury	Adjoining Parish	Balsall Parish Council
Miss Selina Cullit	Adjoining Parish	Marton Parish Council
Mr A Clark	Adjoining Parish	Preston Bagot Parish Council
Mr Geoffrey Tooke	Adjoining Parish	Ryton on Dunsmore Parish Council
Mr J A Clay	Adjoining Parish	Fulbrook Parish Council
Mr B Yeates	Adjoining Parish	Princethorpe Parish Council
Mr I A Wilkins	Adjoining Parish	Snitterfield Parish Council
Mr P Creek	Adjoining Parish	Brinklow Parish Council
Mrs June Read	Adjoining Parish	Wolverton Parish Council
Mrs Gillian Ingham	Adjoining Parish	Ufton Parish Council
Mrs Lara Simmonds	Adjoining Parish	Stretton on Dunsmore Parish Council
Mrs S Fennell	Adjoining Parish	Frankton Parish Council
Mrs S Jack	Adjoining Parish	Long Itchington Parish Council
Ms Theresa Saul		Cubbington Parish Council
MEP	MEP, Statutory Consultee	
Chris White MP	MP	
David Beck	Organisation	Leamington and County Golf Club
David M Beck	Organisation	Leamington and County Golf Club
David R Hucker	Organisation	Campaign Against Expansion of Coventry Airport
Dennis Bradley	Organisation	Binswood Allotment Society
Denny Reader	Organisation	Friends of the Earth
Gordon Green	Organisation	
Graham Harrison	Organisation	Hatton Parish Plan Steering Group
Janet Alty	Organisation	Warwick & Leamington Green Party
Janet Alty	Organisation	Warwick and Leamington Green Party
Joan White	Organisation	The Kingsley School Playing Field Trust
John Mumby	Organisation	Tesco Stores Ltd
Juliet Carter	Organisation	Transition Towns
Laura Gayden	Organisation	Sheldon Bosley
M J M Welsh	Organisation	Mid-Warwickshire Mind
Mr A Carver	Organisation	Lapworth Charities
Mr Alan Charlish	Organisation	The Coventry Heritage Detector Society
Mr John Miller	Organisation	Stratford Town Management Partnership
Mr M B Rickett	Organisation	Plato Trust
Mr M Hoggins	Organisation	Leamington Gospel Hall Trust
Mr Martin Gordon	Organisation	Formation Media Ltd

Mr P Bailey	Organisation	Mid-Warwickshire Neighbourhood Watch
MR R C Smith- Ryland	Organisation	Sherbourne Estate
Mr Robert Inman	Organisation	Cubbington Freeholders
Mr Tom Clark	Organisation	Kenilworth Disability Action Group
Mr William Clemmey	Organisation	Warwickshire Association of Youth Clubs
Mrs Joanna Illingworth	Organisation	Kenilworth Society
Mrs S Powell	Organisation	Kenilworth Chamber of Trade
Ms E Phillips	Organisation	Age Concern
Nick Small	Organisation	Stagecoach
Paul Eccleshare	Organisation	Warwickshire Rural Housing Association
Paul Mullins	Organisation	West Midlands Ambulance Service
Pauline Smart	Organisation	Crackley Residents' Association
Phil Ward	Organisation	Warwickshire Rural Community Council
Philip Harris	Organisation	Warwick Castle Park Trust Ltd.
R Bassil	Organisation	DCA Design
Rodney King	Organisation	Cycleways
Rohan Torkildsen	Organisation	English Heritage
Sarah Taylor	Organisation	Picturesque
Susan Green	Organisation	
Mr Anthony Rollins	Parish Council	Leek Wootton & Guy's Cliffe Parish Council
Ms A Barwinskyj	Residents' Association	Barford Residents Association
Robert Fryer	Residents' Association	Finham Residents Association
Steve Dolphin	Residents' Association	Cannon Park Community Association
Business Planning Manager	Statutory Consultee	British Gas Trading
Charles Orr- Ewing	Statutory Consultee	Ministry of Defence
Eva Neale	Statutory Consultee	Warwickshire County Council - Landscape Architect Team
Head of Property Services	Statutory Consultee	Warwickshire Police
Helen Maclagan	Statutory Consultee	Warwickshire County Council - Heritage & Culture (Museums)
Lindsey Shaw	Statutory Consultee	Warwickshire Police
Michael Maguire	Statutory Consultee	Positive about Young People
Michael Taylor	Statutory Consultee	English Heritage
Mr Gary Knight, (PC 209)	Statutory Consultee	Warwickshire Police
Mr Mr Limbrick	Statutory Consultee	Defence Estates
Mr Robert Field	Statutory Consultee	E-on
Mrs Rachel Baconnet	Statutory Consultee	Warwickshire County Council
Nigel Grant	Statutory Consultee	Warwickshire Fire & Rescue Service
Pat Spain	Statutory Consultee	Severn Trent Water (Supply Team)
Paul Hodgson	Statutory Consultee	Severn Trent Water (Disposal)
Peter Davies	Statutory Consultee	Warwickshire Police

Ruth Bradford	Statutory Consultee	Warwickshire County Council
Sarah Phipps	Statutory Consultee	South Warwickshire PCT
To whom it may concern	Statutory Consultee	HSE Chemical & Hazardous Installations Division
To Whom it May Concern	Statutory Consultee	West Midlands Fire Service
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To Whom it May Concern	Statutory Consultee	Powergen UK plc
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To Whom it May Concern	Statutory Consultee	nPower
To Whom it May Concern	Statutory Consultee	Department of Health
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To Whom it May Concern	Statutory Consultee	Department for Children, Schools and Families
To Whom it May Concern	Statutory Consultee	DEFRA
To Whom it May Concern	Statutory Consultee	Home Office
To Whom it May Concern	Statutory Consultee	Department for Transport
To Whom it May Concern	Statutory Consultee	Department for Culture, Media & Sport
To Whom it May Concern	Statutory Consultee	Oil & Pipelines Agency
To Whom it May Concern	Statutory Consultee	Department for Works & Pensions

Email

Ashley Baldwin	Adjoining Council	Nuneaton & Bedworth Borough Council
Mr Azim Walimia	Adjoining Council	Coventry City Council
Mrs Lizz Clarke	Adjoining Council	Brandon & Bretford Parish Council
Dave Nash	Adjoining Council	Stratford upon Avon District Council
David Carter	Adjoining Council	Birmingham City Council
Dorothy Barratt	Adjoining Council	North Warwickshire Borough Council
Dave Simpson	Adjoining Council	Solihull Metropolitan Borough Council

Mr Jim Newton	Adjoining Council	Coventry City Council
Kelly Ford	Adjoining Council	Nuneaton & Bedworth Borough Council
Paul Harris	Adjoining Council	Stratford upon Avon District Council
Sarah Fisher	Adjoining Council	Rugby Borough Council
Tim Willis	Adjoining Council	Warwickshire County Council
Tracy Darke	Adjoining Council	Coventry City Council
Mrs Monica Howat	Adjoining Council, Individual	
Mrs Anne Oakes	Adjoining Council, Individual	
Alison Biddle	Adjoining Parish	Bishops Itchington Parish Council
Mr James Parker	Adjoining Parish	Chesterton & Kingston Parish Council
Mrs S Wyldbore-Smith	Adjoining Parish	Berkswell Parish Council
Alison Biddle	Adjoining Parish	Harbury Parish Council
Mrs J M Patrick	Adjoining Parish	Harbury Parish Council
Mrs Deborah Wellings	Adjoining Parish	Charlecote Parish Council
Mrs Hilary Goodreid	Adjoining Parish	Hockley Heath Parish Council
Mrs Jenny Walsh	Adjoining Parish	Beaudesert Parish Council
Paul Manley	Adjoining Parish	Chesterton & Kingston Parish Council
Michael Woodman	Adjoining Parish	Hampton Lucy Parish Council
Becky Howes	Adjoining Parish	Tanworth in Arden Parish Council
Pam Routly	Adjoining Parish	Newbold Pacey & Ashorne Parish Council
Ms Shafim Kauser	Adjoining Parish	Balsall Parish Council
Mrs Lynda Scriven	Adjoining Parish	Wellesbourne Parish Council
Chris White MP	MP	
Mr J Wright MP	MP	
Mr C Stevens	Organisation	Hampton Magna Action Group
Mr A Hodkinson	Organisation	Health and Safety Executive
Andrew Day	Organisation	Parochial Church Council of St Chad's
Alan Mayes	Organisation	Conservation Advisory Forum
Andrew Spencer	Organisation	St. John's Church
Mr Archie Pitts	Organisation	The Leamington Society
Richard Ashworth	Organisation	The Leamington Society
Mr Brian Melling	Organisation	Leek Wootton Parish Plan Working Group
Paul Evans	Organisation	Smith Street Traders Association
Malcolm Baxter	Organisation	Victorian Society
Birgitta Ashworth	Organisation	Friends of the Earth
Mrs Michelle Brewer	Organisation	
John Brightley	Organisation	Friends of the Earth
Charles Smith	Organisation	Kenilworth Chamber of Trade

Mr Jonathan Chilvers	Organisation	Green Party
Chris Carragher	Organisation	Lend Lease
Mr Chris Lambart	Organisation	The National Trust
Mr Neil Denison	Organisation	WYG Planning & Design
Christine Hodgetts	Organisation	Warwickshire Gardens Trust
Clare Skeels	Organisation	
Mr Clayton Denwood	Organisation	Bath Place Community Venture
Mr Craig Callingham	Organisation	Callingham Associates
Mr Dave Squires	Organisation	British Transport Police
David Cox	Organisation	National Landlords Association
Mr David Goodwin	Organisation	NHS Property Services
Dr Katharina Dehnen-Schmutz	Organisation	Cycleways
Mr Denis Secher	Organisation	SPAce
Deryk King	Organisation	Lapworth Parish Plan Steering Group
Mrs Alice de la Rue	Organisation	Derbyshire Gypsy Liaison Group
Mr Roger Yarwood	Organisation	National Federation of Gypsy Liaison Groups
Sir John Egan	Organisation	Warwick Castle Park Trust Ltd.
Ginny Hall	Organisation	Mono Consultants Ltd
Emily Smith	Organisation	Warwickshire Public Health and South Warwickshire Clinical Commissioning Group
Ewan Calcott	Organisation	Forestry Commission
Gaynor Matthews	Organisation	Hosted IP communications (Europe) Ltd
Gemma Yardley	Organisation	Nuneaton & Bedworth Borough Council
Geoff Southgate	Organisation	BLAST (Bringing Leamington Allotment Societies Together)
Geoff Wiggin	Organisation	Parichial Church Council Of St James Church
Mr Gerry Adderley	Organisation	Health and Safety Executive
Gillian Jackson	Organisation	Cubbington & District OAP Association
Gina Rowe	Organisation	Warwickshire Wildlife Trust
Tessa Mckenzie	Organisation	Goldstraws
Helen Winkler	Organisation	Tyler-Parkes Partnership
Harry Wilson	Organisation	Metropolitan and Scott Ltd
Miss Helen Cork	Organisation	National Farmers' Union
Mr Mike Hitchins	Organisation	Kenilworth Allotment Tenants Association
Mr Michael Hobday	Organisation	SPAce
Mr David Joseph	Organisation	Bloor Homes
Ian Davison	Organisation	Warwick and Leamington Green Party
Mr Geoff Southgate	Organisation	B.L.A.S.T.

Mr David Morpew	Organisation	Photography by David Morpew
Joel Hancock	Organisation	Hancock Town Planning
mr keith smith	Organisation	warwick books ltd
Ms Ruth Beer	Organisation	RNID
mr james dewhurst	Organisation	J & A Growers Ltd
Jane Coates	Organisation	Kenilworth Community Forum
Paul Gethins	Organisation	Environment Agency
Jane Coates	Organisation	Whitnash Community Forum
Mr Jim McCarthy	Organisation	Kenilworth Golf Club
Mr P Hunt	Organisation	
Mr John Ruddick	Organisation	Brindley Twist Tafft & James
Mr Jonathan Chilvers	Organisation	Warwick & Leamington Green Party
mrs judy cooper	Organisation	Friends of Oakley Wood
Mrs Julia Leask	Organisation	Leask Accountancy Solutions
		Warwickshire Race Equality Partnership (WREP)
Junaid Hussain	Organisation	
Mr Justin Milward	Organisation	Woodland Trust
Mr Kevin Porter	Organisation	Leamington Gospel Hall Trust
Linda Fayolle	Organisation	Kenilworth School & Sixth Form
Professor Les Clark	Organisation	Kingswood Residents Group
Linda Davis	Organisation	Alvis Sports Club
Mrs Linsey Luke	Organisation	Federation of Small Businesses
Lynda Harris	Organisation	Circles Network and Sydni Centre
M Wahlberg	Organisation	Offchurch Plan Implementation Group
Mrs Marianne Pitts	Organisation	Leamington Society
Miss Marie Meade	Organisation	Faro Technologies UK Ltd
Mr Mark Griffin	Organisation	Expo Management Ltd
Mrs Margaret Begg	Organisation	Hill Close Gardens
Mr Malcolm Hoggins	Organisation	Leamington Gospel Hall Trust
Mr Michael Wellock	Organisation	Kirkwells
Mr Michael Jeffs	Organisation	CPRE Warwickshire
		Midland Red (South) Ltd. dba Stagecoach Midlands
Dr Nicholas Small	Organisation	E C Drummond (Agriculture) Ltd
Mr Jon Pope	Organisation	CPRE Warwickshire
Mark Sullivan	Organisation	Kenilworth Society
Mrs Patricia Cain	Organisation	Kenilworth Runners
Peter Bryan	Organisation	
Mrs Annette Jackson	Organisation	SPAce
Peter Findley	Organisation	St Johns Westwood

Mr Peter Garrison	Organisation	Warwickshire County Council
Mr Kevin Waters	Organisation	Adlington
John Holmes	Organisation	Holmes Antill
Parminder Singh	Organisation	Royal Leamington Spa Chamber of Trade
Raj Bahey	Organisation	Rugby Borough Council
Rebecca Probert	Organisation	Kenilworth Society
Richard Hancox	Organisation	Amey
Richard Wheat	Organisation	Warwickshire Wildlife Trust
Mr Rob Eaton	Organisation	Birmingham International Airport Ltd
Mr Robin Cathcart	Organisation	Binswood Ex Servicemen Allotments Association
Robin Lock	Organisation	Parichial Church Council Of St James Church
Mr Roger Dowthwaite	Organisation	Coventry & Warwickshire Local Enterprise Partnership
Roger Clay	Organisation	Stratford and Warwick Waterways Trust
Mr Roy Mowbray	Organisation	Waterloo Housing Group
Ms Samantha Hinton	Organisation	81G
mrs sarah brooke-taylor	Organisation	WRCC
Scott Carpenter	Organisation	Jehovah's Witnesses
James Mackay	Organisation	The Warwick Society
John McTavish	Organisation	
David Malcolm Beck	Organisation	Leamington and County Golf Club
MS S MARTIN	Organisation	LIBRARY SUPPLY INT LTD
Mr Stephen Wheatcroft	Organisation	Coventry Gospel halls Trust
Mr Stephen Stacey	Organisation	Baginton Green Ltd (Focus School)
Steve Scaysbrook	Organisation	Warwickshire Association for the Blind
S.G. Wallsgrove	Organisation	The Ramblers' Association
Sue Caldwell	Organisation	Cliffe Allotments Association
Sue Fitton	Organisation	Finham Brook Flood Action Group
Sue Butcher	Organisation	Warwick Chamber of Trade and Commerce
Tim Chudley	Organisation	Sundial Group
Mr David Chirnside	Organisation	Cubbington Methodist Church
Trevor Seeley	Organisation	University of Warwick
Welfare Officer	Organisation	Warwick SU
Mrs Catherine Wenman	Organisation	
Mr William Clemmey	Organisation	WAYC
	Organisation, Residents' Association	BLAST (Bringing Leamington Allotment Societies Together)
Ms Juliet Carter		
Bob Crowther	Organisation, School	Governors of Champion School
Mr Andr�� Davis	Parish / Town Councillor	Whitnash Town Council
Mr Colin Smith	Parish / Town Councillor	Leek Wootton & Guy's Cliffe Parish Council

Sean Deely	Parish / Town Councillor	Bishop's Tachbrook Parish Council
Mr Graham Harrison	Parish / Town Councillor	
Mrs Alison Biddle	Parish / Town Councillor	Harbury Parish Council
Mr John Holland	Parish / Town Councillor	
Mrs A Coleman	Parish Council	Rowington Parish Council
Mrs Katherine Skudra	Parish Council	Hatton Parish Council
Mr A W Winterburn	Parish Council	Eathorpe, Hunningham, Offchurch, Wappenbury JPC
Rosemary Woodforth	Parish Council	Bubbenhall Parish Council
Mrs Alex Davis	Parish Council	Budbrooke Parish Council
Mrs Louise Baudet	Parish Council	Burton Green Parish Council
Mrs Sylvia Green	Parish Council	Beausale, Hasely, Honiley & Wroxall Parish Council
Mr Robert Inman	Parish Council	Cubbington Parish Council
Mrs Eileen Clayton	Parish Council	Leek Wootton & Guy's Cliffe Parish Council
Mr Graham Cooper	Parish Council	Old Milverton & Blackdown JPC
Mrs J Bendall	Parish Council	Norton Lindsey Parish Council
M C L Le Tocq	Parish Council	Hatton Parish Council
Mr J F Johnson	Parish Council	Barford, Sherbourne and Wasperton Joint Parish Council
Mrs Elaine Priestly	Parish Council	Lapworth Parish Council
Mrs P.A. Maddison	Parish Council	Ashow & Stoneleigh Parish Council
Mrs L Mathers	Parish Council	Baddesley Clinton Parish Council
Ms Corrine Hill	Parish Council	Bishop's Tachbrook Parish Council
Eleanor Choudry	Parish Council	Shrewley Parish Council
Mr Steve Williams	Parish Council	Baginton Parish Council
Maria Norman	Parish Council	Weston-Under-Wetherley Parish Council
Mr Adrian Pauling	Residents' Association	Southern Windy Arbour Area Residents' Association
Professor Leslie Clark	Residents' Association	Kingswood Residents Group
Mr Nick Hillard	Residents' Association	Crackley Residents Association
David Hull	Residents' Association	Cannon Park Community Association
Mr Philip Morris	Residents' Association	Barford Residents Association
Jan Gillett	Residents' Association	Central Leamington Area Residents Association
Judy Falp	Residents' Association	Whitnash Residents Association
Cllr Arthur Taylor	Residents' Association	Burton Green Residents' Association
Mr Peter Gogerly	Residents' Association	Hampton-on-the-Hill Residents Association
Mr Rod Scott	Residents' Association	Barford Residents Association
Rona Taylor	Residents' Association	Burton Green Residents' Association
G Swards	Residents' Association	Finham Residents Association

Mr Adam Harrison	Statutory Consultee	Centro Warwickshire County Council (Minerals Policy Team)
Adam James	Statutory Consultee	West Midlands Chief engineers and Planning Officers Group
Mr Andy Donnelly	Statutory Consultee	Warwickshire County Council
Anna Stocks	Statutory Consultee	Environment Agency
Becky Clarke	Statutory Consultee	Sport England
Mr Bob Sharples	Statutory Consultee	
Chrisine Hemming	Statutory Consultee	British Waterways Warwickshire County Council - Environment & Economy Directorate
Ciaran Power	Statutory Consultee	
Mr Damien Holdstock	Statutory Consultee	AMEC
David Westbrook	Statutory Consultee	Natural England
Mr David Lowe	Statutory Consultee	Warwickshire County Council
Diane Clarke	Statutory Consultee	Network Rail
MS Elaine Bettger	Statutory Consultee	Warwickshire County Council Warwickshire County Council - Environment & Economy Directorate
Eva Neale	Statutory Consultee	Warwickshire County Council
Garry Palmer	Statutory Consultee	Environment Agency (Biodiversity)
Giles Matthews	Statutory Consultee	
To Whom It May Concern	Statutory Consultee	Mobile Operators Association
Jim Kitchen	Statutory Consultee	Environment Agency
Janet Marsden	Statutory Consultee	Warwickshire Police
Janet Neale	Statutory Consultee	Warwickshire County Council
Jasbir Kaur	Statutory Consultee	Planning & Development Group
Mrs Jayne Blacklay	Statutory Consultee	South Warwickshire Foundation trust
Jonathan Haywood	Statutory Consultee	Centro
Katherine Burnett	Statutory Consultee	British Waterways
Miss Katherine Burnett	Statutory Consultee	Canal & River Trust
Kathryn Burgess	Statutory Consultee	Highways Agency
Kim Auston	Statutory Consultee	English Heritage
Laura Perry	Statutory Consultee	Environment Agency Warwickshire County Council - Environment & Economy Directorate
Louise Wall	Statutory Consultee	Warwickshire Police
Mr Mark English	Statutory Consultee	NHS Warwickshire
Mel Duffy	Statutory Consultee	Highways Agency
Neil Hansen	Statutory Consultee	Warwickshire Public Health
Mrs Nicola wright	Statutory Consultee	
Dr Richard K Morris	Statutory Consultee	Ancient Monuments Society
Ms P Neal	Statutory Consultee	Warwickshire County Council
Paul Gethins	Statutory Consultee	Environment Agency

Mr Paul Webster	Statutory Consultee	Forestry Commission
Piotr Behnke	Statutory Consultee	Natural England
Ms Rose Freeman	Statutory Consultee	The Theatres Trust
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Tim Sanders	Statutory Consultee	Warwickshire Police
Tony Lyons	Statutory Consultee	Warwickshire County Council
Helen Davies	Statutory Consultee	Centro
Town Planning Team LNW	Statutory Consultee	Network Rail
Dr Will Pascoe	Statutory Consultee	Health and Safety Executive
	Statutory Consultee, Statutory Consultee - SA	
Consultation Hub	Only	Natural England
	Statutory Consultee, Statutory Consultee - SA	
Clare Saint	Only	English Heritage
	Statutory Consultee, Statutory Consultee - SA	
Rohan Torkildsen	Only	English Heritage
Nina Hamlett	Town Council	Royal Leamington Spa Town Council
Mr Derek Maudlin	Town Council	Warwick Town Council
Mr Robert Nash	Town Council	Royal Leamington Spa Town Council
Mrs Jenny Mason	Town Council	Whitnash Town Council
Mr G D Symes	Town Council	Kenilworth Town Council
Michael Coker	Town Council	Kenilworth Town Council