

**South Warwickshire Local Plan  
Scoping and Call for Sites Consultation  
10 May to 21 June 2021**

**Consultation Statement  
January 2022**

# Contents

1. Introduction and Background .....	3
1.1. Introduction .....	3
1.2. Background to the Scoping and Call for Sites Consultation .....	3
1.3. Stages of Consultation for the South Warwickshire Local Plan .....	4
2. Methods of engagement .....	5
2.1. The Scoping and Call for Sites consultation document.....	5
2.2. South Warwickshire Local Plan Website.....	5
2.3. Consultation Methods .....	5
2.4. Duty to Co-operate.....	7
2.5. Feedback Survey.....	8
3. Analysis of responses received to the Scoping and Call for Sites consultation .....	9
3.1. Response Numbers.....	9
3.2. Duty to Co-operate Responses.....	9
3.3. Responses received to the scoping consultation questions .....	10
3.4. Call for Sites Submissions .....	10
4. Next Steps: How the responses will help shape the South Warwickshire Local Plan .....	11
Appendix 1.....	12
Summary of the key strategic and cross-boundary issues raised from Duty to Co-operate bodies to the Scoping Consultation	
Appendix 2.....	19
Summary analysis of the responses received to the 53 Scoping Consultation questions	

# 1. Introduction and Background

## 1.1. Introduction

This document provides a summary of the consultation undertaken on the first stage of the production of the South Warwickshire Local Plan – the Scoping and Call for Sites consultation - which ran for 6 weeks from 10 May to 21 June 2021.

Section 2 of this report details the methods that were used to promote the consultation and explains how our Duty to Co-operate partners were engaged in the consultation process. Following the consultation a feedback survey was sent to respondents, this has identified a number of actions that we will take forward to improve our communications for future consultations, this is explained further in section 2.5.

Section 3 provides information on the responses received to the consultation and the submitted call for sites, with guidance on how to access this information online. An analysis of the responses received from our duty to co-operate partners and the scoping document questions are detailed in Appendices 1-2.

Section 4 of the report provides information on how the feedback from the consultation will inform the next steps in the production of the South Warwickshire Local Plan.

## 1.2. Background to the Scoping and Call for Sites Consultation

A local plan is a legal document that councils are required to prepare, and which sets out the future land use and planning policies for the area over a set period of time. A local plan typically corresponds to the boundaries of local planning authorities e.g. Stratford-on-Avon District Council and Warwick District Council. Both Councils have committed to undertaking reviews (i.e. replacements) of their existing respective Core Strategy and Local Plan. The Stratford-on-Avon Core Strategy runs to 2031 and the Warwick District Local Plan runs to 2029. New plans are needed to plan for the development challenges beyond these dates.

We think that we should prepare a single Local Plan for the whole of South Warwickshire. Aside from the common history of being within Warwickshire, Stratford-on-Avon District and Warwick District have similar economies, demographics and face common challenges. Many of these challenges such as climate change, biodiversity and infrastructure, do not stop at the District boundaries. Plan-making is also expensive. We think preparing a single plan for a larger geography will be both more effective and efficient.

This work is being done in advance of any formal merger between Stratford-on-Avon and Warwick district councils. It is entirely separate to the proposal that sees Stratford-on-Avon and Warwick District Councils becoming one single organisation. Many councils across the country work together on joint plans for their areas e.g. South Worcestershire Development Plan, Leicestershire Strategic

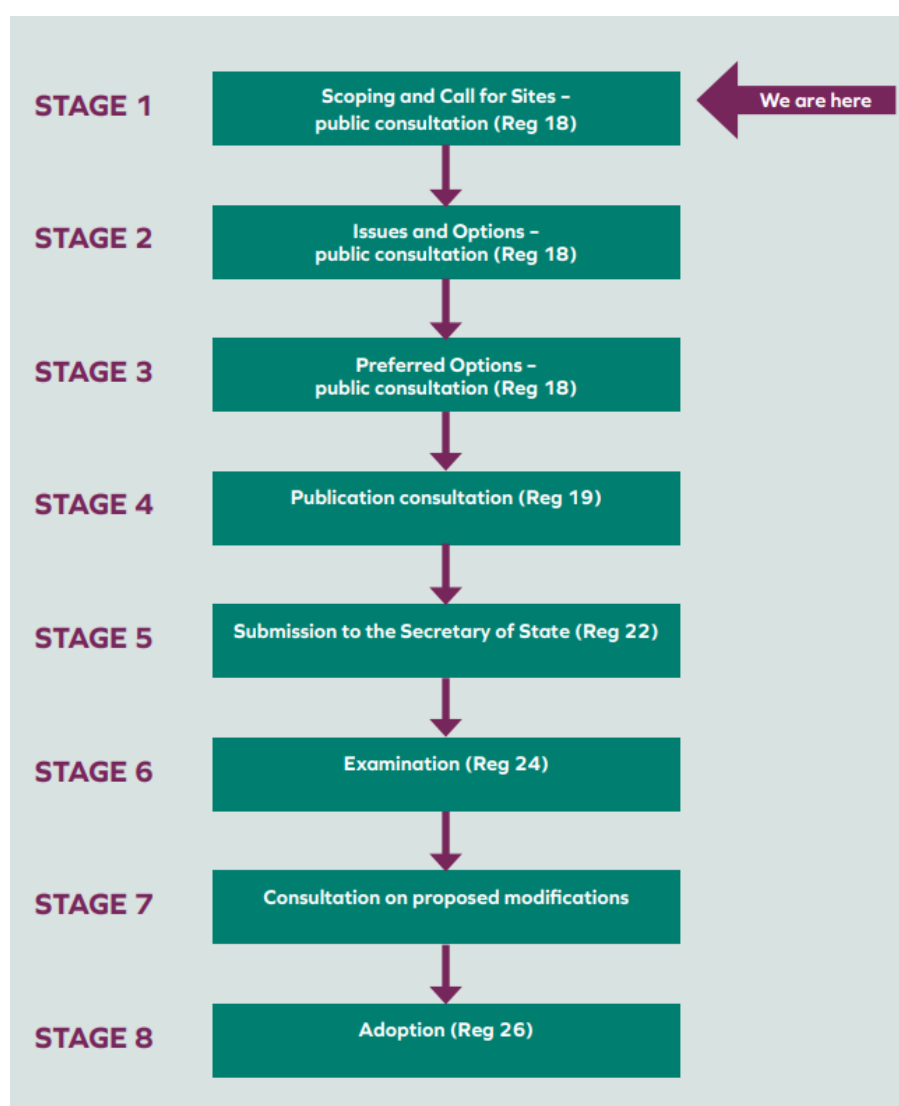
Growth Plan. A single South Warwickshire Local Plan could still be prepared therefore, even if the merger between the two councils were not to go ahead.

The National Planning Policy Framework (NPPF) sets out how Local Authorities should achieve sustainable development through the preparation of Local Plans and decisions on planning applications taking into account the economic, social and environmental roles of sustainable development. Local Plans are considered to be 'sound' where they have been positively prepared, justified, effective and consistent with national policy. The preparation of the South Warwickshire Local Plan will be guided by national planning policy and legislation in this respect.

### 1.3. Stages of Consultation for the South Warwickshire Local Plan

The figure below outlines the eight stages we are required to follow to prepare the South Warwickshire Local Plan. The Scoping and Call for Sites consultation was the first stage in the plan-making process.

The latest timetable is available to view at: [South Warwickshire Local Plan](#).



## 2. Methods of engagement

### 2.1. The Scoping and Call for Sites consultation document

The consultation document aimed to guide interested parties through the main issues and identified a range of possible growth options in an easy to read format with the use of images, diagrams and maps to assist in its readability. Section 1 of the consultation document set out the ways in which people could view and respond to the consultation.

The consultation document was 107 pages long and included within it a series of 53 questions to help respondents in focusing their responses. These were interspersed throughout the document and also listed within Appendix 2 of the consultation document.

Information on the Call for Sites was set out within section 3.7 of the consultation document and a Call for Sites Proforma was included at Appendix 3.

An online version of the document was available on the SWLP website which enabled comments to be submitted directly online.

### 2.2. South Warwickshire Local Plan Website

A dedicated website [www.southwarwickshire.org.uk/swlp](http://www.southwarwickshire.org.uk/swlp) was set up and included full details of the consultation including:

- Consultation document, key diagram map and supporting technical work
- Facility to make comments online
- Comments Form and Call for Sites Proforma
- Videos, leaflet and links to public Q&A events
- FAQs and information on the process, governance and timetable
- Opportunity to sign up to be kept informed on the progress of the SWLP

In addition, a range of activities were undertaken in a variety of formats to promote the consultation is set out in the table below.

### 2.3. Consultation Methods

The aims of the consultation strategy were to:

- Promote the consultation to residents and businesses
- Reach different and more hard to reach groups by using a variety of communications channels
- Promote the consultation to partners who can inform local residents and businesses
- Provide opportunities for people to ask questions about aspects of the consultation and to encourage discussion

## Summary Leaflet

135,000 A4 sized leaflets were distributed by Royal Mail to all households across South Warwickshire

## Videos

Two videos were produced which were added to the SWLP webpage and promoted through social media:

- Animated Video
- Portfolio Holder Video

## Press Releases

Two press releases were issued:

- April 2021 after approval for consultation at Joint Cabinet/Executive Committee
- May 2021 at the start of 6-week consultation period

## Paid Adverts

Paid adverts were placed into local papers in the first and fourth weeks of the consultation.

## Statutory Notices

Statutory Legal Notices were placed in local papers in the first week of the consultation.

## Social Media

Social media strategy was developed with regular posts on the Councils social media accounts.

## Emails/Letters

A wide range of stakeholders and individuals on the Councils planning policy consultation databases were notified of the consultation via email or letter.

## Posters

Printed posters were sent to all Parish Councils to encourage them to put them up in noticeboards etc. around their parish.

## Deposit Points for paper copies

Paper copies were placed in the main libraries and the Councils office receptions, along with copies of the comments form.

## Online response portal and Comments Form

The online consultation portal was promoted throughout the consultation period for responses, however for those not willing or able to respond online a comments form was made available on the website which could be downloaded and emailed or posted. Copies were made available at deposit points.

## Call for Sites

The Call for Sites was promoted through the various methods and a proforma was available on the website to download and email and post.

## Consultation Events

Given that the consultation was undertaken during a time when pandemic restrictions were in place, it was not possible to have a face-to-face launch event or smaller sessions. As such all of the events were held online.

A total of 16 x 1 hour online Q&A Sessions were held during the consultation as follows, the numbers in brackets indicate the approximate number of people that attended the sessions.

- 4 public
- 5 with Parish Councils - Avon, Arden, Itchen, Stour and Leam
- 1 with Citizens Panel representatives
- 1 with the SWLP Place Board
- 1 with Business Forum
- 1 with Green and Blue Infrastructure Providers
- 1 with Developer Forum
- 1 with Community Infrastructure Providers
- 1 with the Infrastructure Partnership

## Youth Engagement

A short questionnaire, based on the questions in the full consultation document, was distributed among the organisations that sit on the Stratford Youth Network. These organisations were asked to send the questionnaire to the individuals they work with and forward any responses directly to us. No responses were received in this way.

## 2.4. Duty to Co-operate

Local Planning Authorities are bound by the statutory duty to co-operate whereby strategic policy-making authorities are required to co-operate with each other when preparing policies which address strategic matters. The aim is to ensure effective cooperation to enable strategic policy-making authorities and infrastructure providers to establish whether additional strategic cross-boundary infrastructure is required.

Introduced by the Localism Act 2011, the Duty to Co-operate places a legal duty to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

The National Planning Policy Framework (NPPF) sets out that these authorities should produce, maintain and update one or more statement(s) of common ground throughout the plan making process in order to demonstrate that a Plan is based on effective co-operation. Such statement(s) provide a written record of progress made on strategic cross-boundary matters and demonstrates where effective co-operation is and is not happening throughout the plan making process. They form part of the evidence required to demonstrate that a Local Planning Authorities has complied with the duty to co-operate.

All Duty to Co-operate (DTC) partners were emailed a Duty to Co-operate form to identify and strategic cross boundary issues that need to be addressed and/or delivered through the SWLP. Specific DTC responses and/or other more general responses were received from the following twenty DTC bodies:

Bromsgrove District Council	Homes England (joint response with Morris Homes)
Cherwell District Council	Natural England
Cotswold District Council	North Warwickshire Borough Council
Cotswolds Conservation Board	Nuneaton and Bedworth Borough Council
Coventry City Council	Redditch Borough Council
Coventry and Warwickshire Clinical Commissioning Group (CCG)	Solihull Metropolitan Borough Council
Coventry and Warwickshire Local Enterprise Partnership (CWLEP)	South Worcestershire Councils
Environment Agency	Transport for West Midlands
Highways England	Warwickshire County Council
Historic England	Warwickshire Wildlife Trust

An analysis of the Duty to Co-operate responses is set out within Section 3 of this report.

## 2.5. Feedback Survey

After the consultation period had closed, a Feedback Survey was sent to those who had made comments on the Scoping Consultation in order to help identify any ideas for improvement for future communications on the SWLP.

A total of 118 full responses and 31 partial responses were received.

Following analysis of the responses a number of actions have been identified for further investigation/action by officers in order to improve future communications on the SWLP:

- Introduce an E-Newsletter to keep those signed up informed about the plan
- Improve the readability and length of the consultation documents
- Improve the functionality of the interactive consultation document to improve usability
- Run a number of in person consultation events alongside the use of online sessions and increase the advertisement for both.
- Improve youth engagement
- Enhance engagement with Parish Councils to enable an increased level of involvement
- Develop a more enhanced social media strategy making the most of the technology this channel offers
- Investigate the use of interactive maps on the SWLP website

## 3. Analysis of responses received to the Scoping and Call for Sites consultation

### 3.1. Response Numbers

The number of responses to the Scoping and Call for Sites Consultation is as follows:

- Respondents to the Scoping Consultation document = 561
- Submitted Call for Sites = 555

The number of interactions to the various engagement methods is as follows:

Social Media	During the consultation there were 84,535 impressions via the Councils social media channels: <ul style="list-style-type: none"> <li>• Instagram – 7,078</li> <li>• Facebook – 38,176</li> <li>• Twitter – 32,655</li> <li>• Linked-In – 6,626</li> </ul>
Videos	During the consultation, there were 2,527 views of the videos - 1,556 for the animated video and 971 for the portfolio holders video.
Consultation Events	Approximately 152 people attended one of the 16 events. The key comments coming out of these sessions were noted and will be taken into account in the preparation of the Plan.

### 3.2. Duty to Co-operate Responses

**Appendix 1** sets out a summary of the following 14 key strategic and cross-boundary issues that Duty to Co-operate respondents, in response to the Scoping Consultation, consider are important to be addressed through the SWLP:

1. Housing and Employment requirements and impacts
2. Addressing climate change and ecological emergencies
3. Transport Infrastructure
4. Cotswold National Landscape/Cotswold Area of Outstanding Natural Beauty
5. Increased recreational pressure in Worcestershire
6. Health needs
7. Changing market trends and covid recovery
8. Power and Broadband
9. Green Belt
10. Flood Risk
11. Water Resources and Wastewater
12. Education needs
13. Strategic Design Principles to enhance regional connectivity
14. E-Infrastructure and other low-emission vehicles

### 3.3. Responses received to the scoping consultation questions

There were a total of 561 written respondents to the consultation. All of the responses received are available to view on the [South Warwickshire Local Plan website](#).

This facility allows users to search by Question Number to see what responses were received to any particular question and it is also possible to search for responses by surname or organisation.

**Appendix 2** provides a summary of the responses to each of the 53 consultation questions contained within the Scoping Consultation document.

### 3.4. Call for Sites Submissions

There were a total of 555 Call for Site submissions. These sites have now all been mapped and are available to view on our interactive mapping facility on the [South Warwickshire Local Plan website](#).

Further information on how to view and search for specific areas and Call for Sites submissions is available on the website at the above link.

## 4. Next Steps: How the responses will help shape the South Warwickshire Local Plan

The consultation responses and call for sites submissions will be used to inform the next stage in the preparation of the South Warwickshire Local Plan – the Issues and Options Consultation Document.

This will propose more specific issues for the Plan to address, and set out some potential options as to how the Plan could address these issues. This will include more refined growth options following an analysis of the call for site submissions and other identified land that may be suitable for future development.

In addition to being informed by the consultation responses and call for sites submissions, a wide range of evidence will need to be collected or commissioned to help identify issues and support arguments for and against potential options. This evidence base will be crucial in providing use with as much up to date information as possible to help us make informed decisions.

The meaningful involvement of relevant stakeholders throughout the plan-making process is essential. Further engagement with key partners will continue over the next few months to help align the various strategies, including infrastructure requirements, and thereby help shape the content of the Issues and Options consultation document. As the plan-making process continues, the preparation of appropriate Statement(s) of Common Ground will be established with regards to the key issues identified.

Further rounds of consultation on the Local Plan will take place as summarised in Section 1 of this report. When finished and formally adopted by both Councils, the South Warwickshire Local Plan will replace the equivalent policies in the adopted Stratford-on-Avon District Core Strategy and the Warwick District Local Plan. It can then be used to shape development and assess planning applications across the South Warwickshire Plan area.

## Appendix 1

### Summary of the key strategic and cross-boundary issues raised from Duty to Co-operate bodies to the Scoping Consultation

#### **1. Housing and Employment requirements and impacts**

- It is important to ensure that the position in relation to meeting housing and employment shortfalls from elsewhere is clear at the very earliest stage of local plan preparation for South Warwickshire.
- Memorandum of Understanding (2015) in accommodating the arising unmet housing need from Coventry City, and the need for future cross-boundary housing provision. Whilst at this stage the quantum of this need is yet to be established, through both the emerging SWLP and any future review of the Coventry Local Plan, it is considered that incorporating this continued relationship early on in the SWLP is appropriate. It is likely that such matters can be agreed through a Statement of Common Ground.
- Meeting the needs of Gypsies, Travellers and Travelling Communities - Consideration of future joint working on future accommodation needs if GTAA studies show there is a cross boundary requirement
- Impact of housing and employment growth on infrastructure and services within neighbouring areas
- Growth options along the A435 (Studley, Alcester and further south) to the south of Redditch, or to the East/South-eastern edge of Redditch. These options have the potential to significantly impact on Redditch, through new residents using existing services and facilitates in the Borough, as well as traffic implications through travelling along the A435 north to the M42 Junction 3 and beyond.
- Effect of new development on traffic movements on local roads, particularly important consideration in the Cotswold National Landscape and its setting.
- Expansion or further allocations of the new settlement allocation at Long Marston - Infrastructure implications for roads, services etc, for neighbouring parishes in Wychavon. Economic Development opportunities associated with the expanded new settlement population for Evesham and nearby local centres in the district.
- Both WDC and SDC are active participation in the sub-regional planning and commission of a HEDNA. It is therefore anticipated that employment and economy will be explored thoroughly in future consultation rounds. The economic growth opportunities associated with the HS2 interchange station being progressed through the UK Central Growth Hub area within Solihull. These proposals are of wider regional and national significance.
- Enabling business growth and ensuring that there is an adequate supply of employment land available within South Warwickshire. This includes all levels of the market, from the small and cheapest to the largest and biggest. The C&W Authorities Market Signals Report (2019) emphasises the importance of small business units to enable SME's and increasing levels of economic growth. A continuing shortage of affordable space hampers this growth and Allocations and employment space should not be solely left to

the market and there should be adequate planning for different use classes, not an allowance of B2/B8 and enabling the market to decide in all situations.

## **2. Addressing the climate change and ecological emergencies**

- Opportunities to work together to mitigate and adapt to climate change and to promote nature based solutions such as biodiversity net gain, habitat creation and improvements to the green infrastructure network.
- Strategic level focus should have clear links with emerging nature recovery strategies looking at better protection and management of biodiversity resource, and increasing the amount and links between wildlife sites.
- The Environment Agency is in the process of updating the allowances for peak river flow and Flood risk assessments: climate change allowances following research completed in 2020. Consideration should be given to the mitigation for increased magnitude and frequency of flood events as a result of climate change.
- Opportunities for linking up, across boundaries, strategic green infrastructure should be considered to enable connectivity between habitats and areas of significance.
- Addressing any impacts of development on the Severn Estuary Special Area of Conservation (SAC), Ramsar Site functionally linked watercourses.
- Opportunity to assess cross boundary green and blue infrastructure in a more strategic and joined up way.
- Net biodiversity gain and large scale tree planting could be achieved through a cross boundary approach.
- There is a need for detailed studies backing up green infrastructure policies in order to ensure meaningful corridors can be worked up to achieve real gains.
- Conflict between growth and how far policies will go in terms of stopping development on and nearby important wildlife sites, only using mitigation as a last resort and achieving biodiversity net gain.

## **3. Transport infrastructure**

- Transport links between growth sites in Warwickshire and neighbouring authorities are important, especially with new sustainable transport advances such as Very Light Rail in Coventry. Cross border discussions will be an important factor in the next stage of considering the potential impact of growth and the viability/suitability of proposed sites.
- Highlight the need to take account of significant transport and infrastructure projects which could have implications for growth opportunities within the Joint Local Plan. These include the A45 / A46 junction improvements connecting the M5 and M40, the Balsall Common by Pass and the delivery of HS2 and the HS2 interchange station. Consideration should be given to how both the Chiltern and Stratford rail corridors work and any potential to make sustainable links to the West Coast Main line.
- A focus on infrastructure such as bus, train road links may also have implications beyond the South Warwickshire boundary, and opportunities for access via cross boundary cycle routes should be considered.
- Reinstating the rail line from Honeybourne to Stratford-upon-Avon - Matters relating to the planning, safeguarding and delivery of the rail line to reconnect to wider regional and national rail network. Implications for

economic development opportunities. Future working on this issue to be informed by the Stantec 'Reopening Stratford-upon-Avon to Honeybourne Railway Line Strategic Outline Business Case' study June 2021.

- Provision of rail services between Moreton-in-March and Stratford-upon Avon
- Future capacity and impacts on the M40 between Banbury (junction 11) and Gaydon (Junction 12) resulting from any future growth at Gaydon/Lighthorne Heath
- There are known and evidenced capacity issues at junctions within Moreton-in-the-Marsh and along the Fosseway and further growth in the southern part of Warwickshire will need to consider the degree of impact on highways infrastructure in Cotswold District.
- There is a need to mitigate the impact of HGV traffic in the Vale of Evesham.
- Park and ride at key interception locations serving commuters from the South Warwick area travelling into the Metropolitan area maybe something the plan should explore in more detail. Stations such as Whitlocks End and Dorridge are good examples of interception locations.
- The recently published National Bus Strategy presents opportunities for enhanced regional bus services through simpler fares, improved routes and higher frequencies; through the rural mobility fund, Warwickshire County Council has been awarded a significant grant to improve rural services. There are also new micro mobility modes such as demand responsive transport services, e scooters, and e-cargo-bikes to name just a few and how enhanced ticketing, mobility credit schemes and new technologies such as Mobility as a service (MaaS) could support more sustainable travel.
- There are a number of current cross boundary issues, such as the KRN network which crosses into South Warwickshire including the A429 (serving North to South Coventry), the A34 south of Birmingham and the A46. Such routes provide north to south regional connectivity for commuters, leisure journeys and supporting supply chains across our region. Need to consider how such boundary sections (and local feeder routes) could be impacted through future development including HS2 construction.
- Any additional phasing of the A46 Strategic link road should see sustainable travel measures fully incorporated within the proposed options including bus priority, Very Light Rail and active travel infrastructure.
- The importance of regional transport is emphasised and development should focus closely on existing rail networks and urban centres. Development along busy rail corridors would stimulate more investment and improvement in train services and there are several enhancements proposed in the West Midlands Rail Investment Strategy (produced by the West Midlands Rail Executive) which will enhance a number of services, especially along the following lines:
  - Birmingham Snow Hill/Moor St - Stratford-on-Avon line
  - Birmingham Snow Hill/Moor St - Leamington Spa Line
  - Leamington - Stratford Line
  - Leamington - Coventry Line

#### **4. Cotswolds National Landscape /Cotswolds Area of Outstanding Natural Beauty**

Opportunity to emphasise a shared designation and the duty placed on both councils to preserve and enhance the beauty of the AONB.

#### **5. Increasing recreational pressure in Worcestershire**

The increasing recreational pressure in Worcestershire is adversely impacting existing facilities and there is a need for the additional informal recreational resource. In particular, of interest could be the results of the currently on-going Malvern Hills visitor survey and potential for the zone of influence to reach across border. We will be updating Councils when the results of this survey are finalised.

#### **6. Health needs**

Accessibility to acute care services is a strategic issue given the focus on acute care at larger health centres, this includes the catchment of University Coventry & Warwickshire Hospital as the main hospital for the city and wider sub-region.

For development close to County Boundaries, thought will need to be given to where existing and future residents access their health services.

Existing primary medical care and health and care services capacity in South Warwickshire will not be sufficient to meet the housing growth proposed. The CCG will require suitable provisions put in place and adequate allowances made in S106 and CIL approaches within South Warwickshire. The CCG does not expect additional physical infrastructure to form the whole solution, as increased health and care capacity required to meet the needs of South Warwickshire's growing population will not be created by built space alone. Health and Care Partners are working together to explore how the following will contribute to creating a proportion of the required capacity:

- Different/new ways of working through integration, and population health management approaches
- The innovative use of digital technology

#### **7. Changing market trends and Covid recovery**

The pandemic has supercharged trends and created a challenge to ensure that plans are tailored to reflect market trends and developments. This is important if Coventry & Warwickshire is to remain competitive within both UK and international markets. A strategic planning approach offers the chance to look at issues and opportunities in a wider context which involve investment across boundaries.

#### **8. Power and Broadband**

Power and broadband are two pieces of critical infrastructure which are often left until the last, or difficult to plan for. The local plan should ensure that energy

distribution and supply and broadband are factored into the planning process and consultation with the relevant infrastructure providers considers future demands and requirements. Historically shortages of key infrastructure particularly road capacity, water and sewage services and power has negatively impacted on the ability to accommodate growth. The problem is well known but the solutions are often complex.

The creation of a new development plan framework for SW to 2050 offers an opportunity to try to match proposed future growth with the investment in future infrastructure –this would include power provision but would also apply to all forms of infrastructure provision. A number of exciting opportunities require infrastructure, specifically but not limited to power, mainly referencing the west midlands Gigafactory on the Coventry/Warwick Border.

## **9. Green Belt**

It is important to take the opportunity of the new local plan to re-examine the current Green Belt boundaries and test these against the need to accommodate growth close to where it occurs. For example, the South Warwickshire Plan area contains parts of the urban fringes of Coventry and indeed the growing Warwick University campus. In addition, the proposed new Gigafactory development at Coventry Airport is in the Local Plan area and has selected a site in the Green Belt.

Enabling expansion and transport infrastructure to connect into the University of Warwick (as within the call for sites) will be very important to the future success of the university and create growth options within the sub region. If the full benefit of the Gigafactory location is to be achieved, it seems likely that additional land around the proposed Gigafactory will need to be identified to make full use of the economic benefits of this nationally significant investment. This will include supply chain opportunities within the local area which will need space to take advantage of, and make a success of the Gigafactory within the bordering authorities (including South Warwickshire). More work needs to be done to recognise the potential supply chain implications of the Gigafactory,

Growth options in Green Belt locations should be considered but non-Green Belt sites in sustainable locations should be prioritised, in accordance with advice contained within the NPPF.

## **10. Flood Risk**

There are 31 main rivers with extents wholly or partially within the South Warwickshire Plan area. A number of communities and areas are affected from fluvial flood risk from the above watercourses as well as a number of ordinary watercourses. These include: Long Compton; Lower Brailes; Tidminton; Shipston-on-Stour; Tredington; Crimscore; Alderminster; Wimpstone; Clifford Chambers; Barton on Avon; Bidford on Avon; Alcester; Stratford-on-Avon; Henley-in-Arden; Eathorpe; Kenilworth; Long Itchington; Wootton Wawen; Bidford-on-Avon and Snitterfield. This is not an exhaustive list and is based on fluvial flood risk. As the Environment Agency's understanding of flooding in the area improves and is updated to account for recorded flood events, the communities at risk may change.

Welcome the proposal to update the existing Strategic Flood Risk Assessment (SFRA) as part of the new evidence base to support the South Warwickshire Local Plan. The Local Plan boundary falls within the Humber, Severn and Thames (Stratford-on-Avon District Council only) River Basin Management Plan catchments. The Severn catchment is within both the Warwick District Council and Stratford-on-Avon District Council administrative boundaries which therefore presents an opportunity to consider cross-boundary management of flood risk issues.

The Environment Agency have a number of schemes currently at various stages of development within the Plan area. Third party external funding towards these flood risk management schemes should be sought to support the catchment wide approach to reducing flood risk.

## **11. Water Resources and Wastewater**

The Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the Plan area. A catchment-based approach to properly reflect water resources is advocated.

The Local Plan boundary falls within the Humber, Severn and Thames (Stratford-on-Avon District Council only) River Basin Management Plan catchments. Regulation 17 of the Water Environment (England and Wales) Regulations (2017) places a duty on each public body to have regard to the River Basin Management Plan when exercising their functions. The Water Framework Directive aims to protect and improve the water environment. Under the WFD there is a requirement for all waterbodies to meet 'Good Ecological Status or Potential' by 2027. The Plan must ensure that proposals do not jeopardise the current status of a WFD element or cause deterioration to a receiving waterbody.

The Local Plan and major developments should identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings / phasing of development.

It will be necessary to determine whether foul drainage infrastructure is in place or viable for allocated sites. Some areas may drain to the foul main sewer system to be treated by Severn Trent Water, but the transmission infrastructure or treatment facility may not be sufficient to handle the additional load created from growth and may in turn cause a pollution of the water environment. Where growth will be putting additional pressure on the Severn Trent Water foul mains, it must be demonstrated there will be no significant deterioration in current spill frequency/volume from storm related discharges (CSOs, storm tanks, pumping stations) as a result of any growth. This will require hydraulic modelling from Severn Trent Water to demonstrate no risk of deterioration. There is the assumption that all allocations will drain to the foul main sewer, however where the main sewer is not available for small or windfall sites it must be ensured that the water environment has the ability to accommodate discharges from packaged treatment plants and other non-mains solutions.

## **12. Education needs**

Access to school places does not restrict itself to administrative boundaries. Parental preference means that pupils can access places at schools if there are places irrespective of the geographical location. The potential impact of growth on neighbouring authority school provision needs to be considered for Gloucestershire, Worcestershire, Solihull and Coventry in particular. The impact of selective education within Stratford District is also an issue with places allocated across a wide geographic area based on ability rather than priority areas.

A number of pupils travel across the border from Worcestershire to access Warwickshire Primary Schools to support transfer to secondary school at age 11. Parts of Worcestershire operate a 3 tier education system. The provision of a Catholic Secondary School in Alcester attracts significant numbers from Worcestershire. Proposed growth cross boundary also needs to be considered when planning the provision of school places within Warwickshire. New schools across the border for example could have a short term impact on the provision of the places within Warwickshire but it is vital that thought is given to the longer term need for school provision. It is imperative that the implications of growth is shared with neighbouring Education Authorities. A reduction of available places for out of area children could have a positive impact on the immediate highways network around schools but could have financial implication for neighbouring Authorities.

## **13. Strategic Design Principles to enhance regional connectivity**

New growth locations must contribute to enhancing regional connectivity by integrating with existing and planned transport networks, thinking beyond both site and administrative boundaries. As the West Midlands conurbation is a key journey to work area for South Warwickshire, it is important that good interchanges are provided, and that local links are made with regional transport opportunities.

## **14. E-infrastructure and other low-emission vehicles**

The acceleration of electric charging and enabling energy infrastructure throughout the West Midlands and beyond is of strategic importance to improve on cleaner air and tackle climate change. The use of e-scooters, e-cargo freight options and other micro mobility modes should also be explored along with the infrastructure required and the regulatory frameworks such as the need for road space reallocation.

There should be a shift to ultra-low emission fleets across the region. Because the switch to ULEVs and carbon benefits will take time, we need to reduce the energy we use for transport. Even with accelerated shifts to ULEVs, the energy reduction required in passenger transport could be equivalent to reducing the number of miles driven by cars by 60% by 2030 from today. To achieve this, we need a significant change in travel behaviour and vehicles used.

## Appendix 2

# Summary analysis of the responses received to the 53 Scoping Consultation questions

Within the analysis for each of the consultation questions, information has been provided as to the number of responses received to each question. As there were a number of duplicate submissions these figures are approximate.

## Contents

Q1. Do you agree that we should prepare a Local Plan for South Warwickshire? If not, why not? .....	22
Q2. Do you agree with our approach of starting with a high-level, strategic part 1 Local Plan? If not, why not? .....	26
Q3. Do you agree that the Local Plan should run to 2050? If not, what alternative end date do you suggest and why? .....	27
Q4. Do you agree that this is the right evidence that we need to inform the Local Plan? Is there further evidence that you think will be required? .....	30
Q5. Do you have any comments on the impact assessments that accompany the South Warwickshire Local Plan? .....	35
Q6. Call for Sites .....	39
Q7. Do you agree that the SWLP should address social isolation and loneliness? How should this be done? .....	40
Q8. Do you agree with encouraging connectivity and ensuring key infrastructure is in place to support this? How should this be done? .....	45
Q9. Housing: Do you agree that the local plan should seek to address these issues? If not what is the alternative? Are there any particular approaches we should consider? .....	50
Q10. Do you agree that the strategic design principles above should inform directions/locations for growth? If not, why not? .....	56
Q11. Do you agree with the emphasis on connectivity? If not, why not? .....	62
Q12. Do you agree that the Local Plan should seek to explore ways in which the reliance on the private vehicle may be reduced? If not, why not? .....	67
Q13. Do you agree that enhancing connectivity and prioritising active and sustainable travel are the best ways to achieve this? Please explain your answer .....	78
Q14. Are there any additional transport issues or priorities you think that the Local Plan should address? Please explain your answer .....	87
Q15. Do you agree that the Local Plan should seek to improve infrastructure, such as charging points, for electric vehicles and e-bikes? Please explain your answer .....	96
Q16. Are there any other ways you think the Local Plan could encourage the increased uptake of electric and other low-emission vehicles? Please explain your answer .....	99

Q17. Do you agree that the South Warwickshire Local Plan should seek to diversify the local economy by supporting growth in new industrial sectors? If not, what other ways should the Local Plan support economic growth?.....	102
Q18. Do you agree that new employment opportunities should mainly be focussed in existing employment locations? If not, what other locations should be considered?.....	105
Q19. Do you agree that the affordability of employment land and premises is a key issue that the Local Plan should address? If not why not? .....	107
Q20. Do you agree that the Local Plan should seek specific opportunities to support small and emerging businesses? If not, what do you suggest?.....	110
Q21. Do you agree that the Local Plan should seek to build on South Warwickshire’s existing cultural and heritage assets in order to enhance the economy? If not, what alternative do you suggest? .....	113
Q22. Do you agree that the Local Plan should aim to reduce skills ‘leakage’ and provide greater opportunities for education and training? If not, what alternative so you suggest?.....	116
Q23. Do you agree that the Local Plan should seek to adapt to the changing role of town centres? What do you suggest? .....	119
Q24. Do you agree that congestion and car dominance of town centres are key factors to address when considering enhancement of town centres?.....	122
Q25. Do you agree that the provision of sufficient utilities infrastructure is a key issue for the Local Plan to consider? If not, why not?.....	125
Q26. Do you agree that the Local Plan should encourage the use of the ‘energy hierarchy’ in developments, aiming to reduce the use of energy in the first instance wherever possible? If not, what approach do you suggest?.....	128
Q27. Do you agree that it is important to protect natural resources and that mineral resources are extracted before development commences? Please explain your answer. ....	131
Q28. Is it important to ensure that the development of best agricultural land is avoided wherever possible? Please explain your answer.....	134
Q29. Do you agree that development should provide compensatory measures/enhancements to compensate for their impacts (including biodiversity offsetting/landscape restoration)? Are there any other matters that should be considered?.....	137
Q30. Is the protection of, and enhancement of our green areas and associated habitat / biodiversity a high priority for the Local Plan? Are there any other matters that should be considered?.....	142
Q31. Do you agree that wherever possible and practical, large-scale developments should also deliver substantive areas of green space (such as country parks etc.)? If not, what is your alternative? .....	145
Q32. Is tree planting an important issue that the Local Plan should seek to encourage? How should the Local Plan achieve this? .....	148
Q33. Do you agree with the proposed ways in which the Local Plan should tackle climate change? What other ways can the Local Plan help us achieve Net Carbon Zero? .....	152
Q34. Do you agree that flood mitigation should be a major priority for the Local Plan when delivering new housing? How should the Local Plan achieve this?.....	165

Q35. Do you agree that the provision of health facilities should be a major priority when delivering housing? How should the Local Plan achieve this? .....	169
Q36. Do you agree that the South Warwickshire Local Plan should look to address congestion in town centres in order to improve air quality? If not, what is your alternative? .....	173
Q37. Do you agree that the Local Plan should prioritise and support additional guest accommodation in South Warwickshire? If not, why not?.....	176
Q38. Do you agree that the provision of education facilities should be a major priority when delivering new housing? How should the Local Plan achieve this?	179
Q39. Do you agree that the four overarching principles will deliver the South Warwickshire you want? If not, what changes would you like to see? .....	183
Q40. Do you agree with this approach to establishing visions for those key places identified in the South Warwickshire Local Plan? If not, what is your alternative?.....	192
Q41. Do you agree that these should be the strategic objectives for the Local Plan? Are there any others?.....	197
Q42. How do you think we should best address the affordability of housing? .....	204
Q43. If we are required to meet housing shortfalls from elsewhere, how best should we accommodate such shortfalls? .....	208
Q44. Do you agree with prioritising jobs by increasing employment opportunities and therefore potentially increasing the minimum housing requirement for South Warwickshire? If not, what alternative do you suggest?.....	211
Q45. Are there any locations in South Warwickshire where you have specific infrastructure concerns? Please specify. ....	214
Q46. Do you agree with the initial findings of the high-level Sustainability Assessment of the Growth Options? If not, why not? .....	217
Q47. Do you agree with the initial findings of the climate change analysis of the Growth Options? If not, why not?.....	228
Q48. What is your favourite Growth Option and what do you particularly like about this option? .....	234
Q49. What is your least favourite Growth Option and what do you particularly not like about this option? .....	238
Q50. Do you agree that we should be considering densification as part of our Growth Option? If so, where in South Warwickshire should they be located?.....	243
Q51. Do you agree that we should be considering new settlements as part of our Growth Option? If so, where in South Warwickshire should they be located? ...	247
Q52. Notwithstanding your preferred Growth Option, do you agree that we should explore growth opportunities in Green Belt locations? If not, why not? .....	251
Q53. Are there any other options or approaches for meeting our development needs within South Warwickshire that we should consider? Please give details.....	276

## Q1. Do you agree that we should prepare a Local Plan for South Warwickshire? If not, why not?

### General overview

There were 327 respondents to this question. A variety of points were raised under 'other' and these ranged from there not being a requirement for another Plan due to the existing Plans still having time to run, there being concern that local distinctiveness may be lost, that it is only a savings exercise and the quality of the service will erode. It was also clear from some responses that there may be a misunderstanding about what the Local Plan is and the role that it plays which is something that should be considered for future consultations in terms of communications and key messages. Below is a breakdown of some of the recurring themes.

### Demographic of both areas

A number of the responses received expressed a view that both Warwick and Stratford share similar demographics both geographically and economically as well as sharing similar issues such as environmental and social, which each of the districts will need to address. One of the points raised in relation to shared demographics was that whilst the two districts do share similarities there should also be acknowledgement of the crossover of housing market areas and that there may also be a number of differences. There were a number of comments that did not agree with this and those respondents did not feel that the two districts do share similar characteristics but that they actually have different needs, for example Warwick being more akin to North Warwickshire than rural South Warwickshire and Warwick being more affluent.

### Collaborative working

There was strong support for collaborative working and that the combined SWLP would allow opportunities for this in line with the NPPF. Working collaboratively will ensure that the strategic issues across South Warwickshire can be addressed and would be helpful in delivering unmet needs from neighbouring authorities. This was very clear in perhaps half of the respondents who were in support of a Joint Local Plan. Further, there would be an opportunity for appropriate infrastructure to be provided to accompany development and that the shared infrastructure connections from South Warwickshire to key destinations would be taken into account. A joint Local Plan would ensure that both district councils had an up to date Plan in place based on sound, robust and up to date evidence. One respondent felt that a Joint Plan would provide a better view of needs and options for the area and would hold more weight.

### Greenbelt

A number of views stated that there was concern over merging the two districts in relation to the Greenbelt. This is because large parts of Warwick District sit within the Greenbelt and there was a view that this would mean that most of development would be directed to Stratford district. Another of the respondents

made it clear that the Plan should be fair and equitable and that as much of the Greenbelt should be protected as possible.

## Local identity

A number of respondents raised a concern over the loss of identity of the respective areas should there be a Joint Local Plan, particularly in relation to history, development and character of an area. In relation to this point one of the respondents also requested that local issues are not lost through this process. Another issue that was raised was that a Local Plan should be determined for the district and not joined up to another, given the wide diversity of landscape, built environment, economy and politics across both SDC and WDC. The Plan should be local, specific and not generic. The individual character of each village/town should be considered and not treated the same as other parts of the districts.

## Cost savings

This theme provided a mixed response. A number of respondents thought that by producing a joint Plan it would allow cost savings to be made by both authorities. However, there were also a number of respondents who acknowledged that there would be cost savings but at the expense of quality of the Plan and frequency of services delivered. A number of respondents felt like a Plan would be a good idea but only if the cost of one could be justified. In relation to cost, there was reference to the proposed merger of the two councils and that given this proposal it would make sense to have a Joint Plan, another felt that it was a logical step in creating a joint council, however one respondent felt that the scope of the Plan was wider than just a district Plan and that it is no more than the first step to pre-empt the unitary authority consultation. Another felt that it was a good idea if it were to save time and money but not if Stratford were to become subservient to Warwick's needs. The Plan should be meaningful and useful and not just have millions spent on consultations that don't mean anything.

## Existing Local Plans

A number of respondents were not clear as to why a new Joint Local Plan is required given that both respective authorities already have an existing Local Plan/Core Strategy which is still within the current time period. It was felt that the current Plan/Core Strategy should be allowed to run its course and that once these come to an end a new Plan should be devised. One respondent raised the point that there wasn't an explanation within the consultation document as to how the Joint Local Plan relates to the existing Core Strategy/Local Plan.

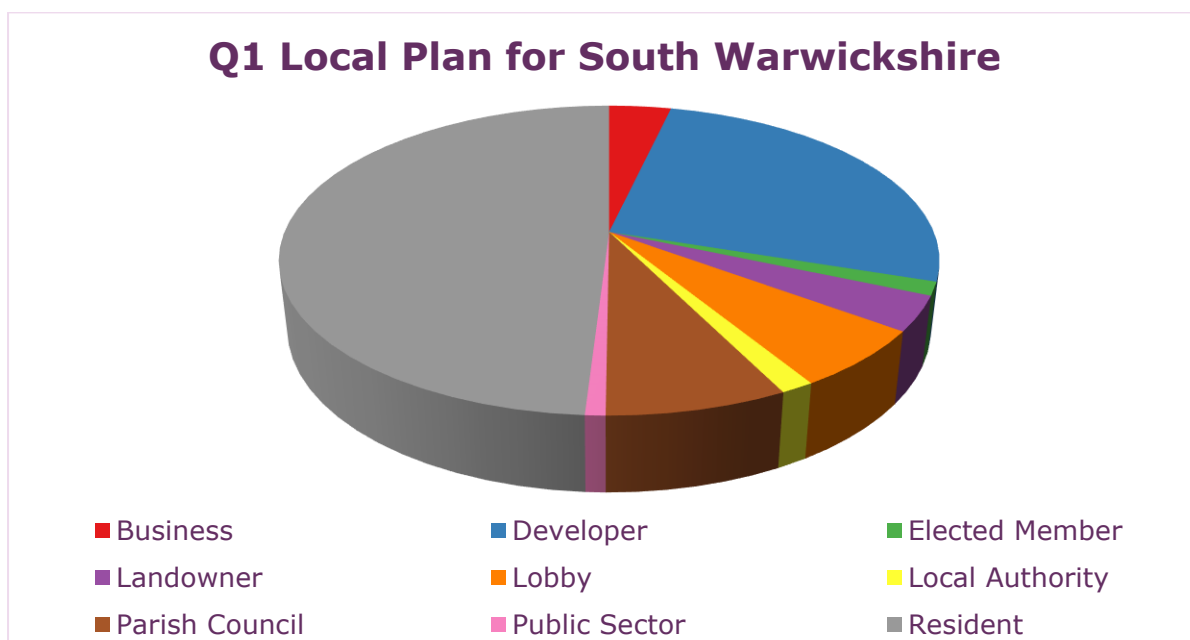
## Other issues

A few respondents asked how Neighbourhood Plans for their respective areas would be considered as part of the Joint Plan moving forward. There was a view that the Local Plan should be produced in a timely manner and that local people must be consulted throughout. In relation to the document itself a couple of residents felt that the language used was full of jargon or was not easy to understand with one respondent who felt that it was a badly conceived document with major omissions. Further, the consultation period was too short. A few comments received stated that there was not enough information provided in

order to make an informed decision on whether a Joint Plan is a good idea. There was one comment that stated support would be given for the Joint Plan if it meant that there wouldn't be any more development but if there would be then support would not be given, again another respondent was in support of a Joint Plan as without one there is a fear that the countryside would be overdeveloped. Before rushing to identify sites, the starting point should be the identification of land banks and unused permissions before moving on to detailed planning matters. The Plan should include all planning aspects such as upgrades to existing road network and not just housing and a couple of responses reinforced the issue of Climate Change and how that should be the most important issue within the Joint Plan. A number of generic comments were made in support of the Joint Plan and that there was an understanding as to why a Joint Plan is required.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.6%
Developer	26.5%
Elected Member	1.4%
Landowner	3.6%
Lobby	6.1%
Local Authority	1.4%
Parish Council	7.5%
Public Sector	0.8%
Resident	49.0%



## Q2. Do you agree with our approach of starting with a high-level, strategic part 1 Local Plan? If not, why not?

There were 230 respondents to this question.

In total there were 151 respondents supporting the approach of a strategic part 1 plan, 43 objecting and 36 did not provide conclusive answers either way.

The two primary arguments in support of a strategic part 1 plan, is that it will expedite the plan making process, in turn providing clarity and certainty for developers and communities, and that it will allow the Councils to focus on the strategic priorities of the area. There is also an understanding that having a high-level plan allows a level flexibility in the plan making process should there be any drastic changes or reforms.

Interestingly many of the arguments against a 2 part plan are direct opposites of the arguments above. Many respondents believe that a 2 part plan will cause confusion and uncertainty, particularly for smaller villages who will need to wait for the part two plan to come forward before they understand the full extent of development across the district. However, the most prolific argument against a 2 part plan, is the time taken for the second plan to come forward. Many respondents believe that a two part plan will take too long to be adopted and there are concerns that this may cause shortfalls in the 5 Year Housing Land Supply which may result in unplanned development. Many respondents pointed to the difficulties Stratford-on-Avon District Council have had with the Site Allocations Plan. The view of these respondents is that a 'full' plan should be progressed.

For those that did not provide conclusive answers they share many of the views presented above. Most understand the sentiment behind the high level strategic part 1 plan, but they also have some concerns. For some, it was unclear what the Part 1 plan would contain, and what 'strategic matters' it would cover, and whether a part 1 plan might lack the necessary detail; greater clarity over its contents were requested. Many respondents suggested that the part 1 plan would need to cover strategic allocations and have a conclusive development strategy. For those that were concerned about the timescales, it was commonly stated that part 2 would need to come forward in a timely manner so that the detailed matters were not delayed.

Overall, the vast majority of respondents understood and agreed with the approach of a two-part plan.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.0%
Developer	38.4%
Elected Member	0.8%
Landowner	5.0%
Lobby	6.2%
Local Authority	2.7%
Parish Council	6.6%
Public Sector	0.8%
Resident	34.5%



### Q3. Do you agree that the Local Plan should run to 2050? If not, what alternative end date do you suggest and why?

There were 235 respondents to this question.

In total there were 127 respondents supporting the proposed end date, 71 objecting and 37 did not provide conclusive answers either way.

Of those supporting the proposed 2050 end date the majority agreed that this would provide an opportunity to consider strategic growth options and to plan more sustainably. A longer plan period would allow the delivery of significant developments, and even new settlements, in full, which would help meet the needs of both districts and the unmet need across the Housing Market Area. A longer plan period would also help in bringing forward the necessary infrastructure, as well as provide certainty to local communities and developers.

Many respondents made reference to the proposed NPPF changes, and how the direction of travel seems to be the creation of longer plans, especially if large scale developments are included. Whilst it was acknowledged that these changes have not been formally adopted it was also noted that a plan period of 30 years is not forbidden by the current NPPF.

Respondents also commented on the importance of a longer plan period when a review of the Green belt is considered. Any changes to the green belt boundary would need to endure well into the future, and to prevent piecemeal release in the future, a realistic understanding of future development is required.

It was also commonly acknowledged that 2050 aligns with the national targets to be carbon neutral.

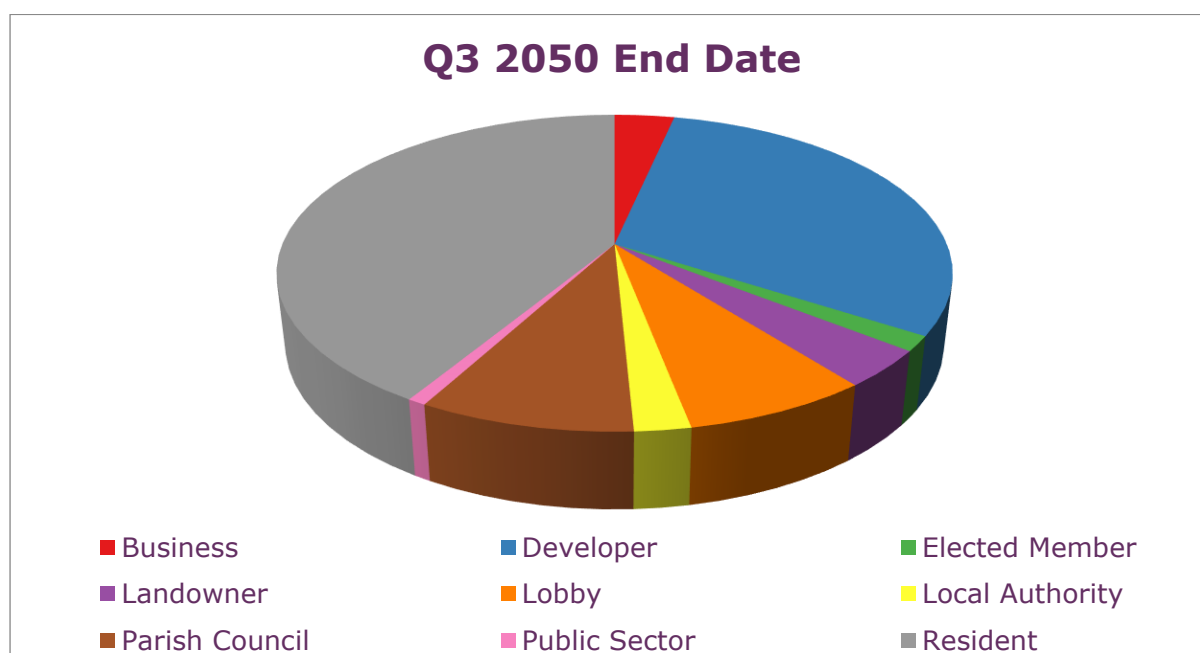
The arguments against the proposed end date are largely centred around the uncertainty of the future and the pace at which society and technology can change, as shown by the recent pandemic. As such, it is believed the plan would become out of date too quickly. There are also concerns that a long term plan would not meet short term requirements, and there is a strong feeling that quicker action needs to be taken to combat climate change.

Another strong argument against the proposed end date, is that both existing plans are being 'replaced' 4/5 years after they were adopted, despite still having approximately 10 years left of the plan period. There is therefore concern as to how a new plan, with an even longer plan period can remain relevant, when the existing ones are being replaced so soon after adoption.

With regards to the 38 respondents who did not provide conclusive answers either in support or against the proposed end date, most believed 2050 should be the absolute minimum end date, and it should in fact extend beyond this date. There were also comments relating the rigidity of the plan, and how it would be important to ensure adequate review mechanisms to make sure we are not 'stuck' with an out of date plan based on out of date evidence

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.4%
Developer	30.7%
Elected Member	1.5%
Landowner	3.8%
Lobby	7.6%
Local Authority	2.3%
Parish Council	8.7%
Public Sector	0.8%
Resident	41.3%



## Q4. Do you agree that this is the right evidence that we need to inform the Local Plan? Is there further evidence that you think will be required?

There were 254 respondents to this question. 98 agreed with the evidence base, 23 objected and 133 suggested other necessary evidence. The below summary includes all of the suggested necessary evidence. For ease, the proposed evidence has been broken down by key themes, as identified within the 'Wheel of Sustainability' of the consultation document.

### Social People

- Behavioural studies of how people live in the area
- Review of equality data
- Demographic Information
  - Analysis of information from the recent census
  - Population growth projection
  - Net immigration predictions post Brexit including detailed analysis on inward/outward commuting flow change
- Detailed activity of criminal activity needs to be collated and considered
- Clear analysis of 'hidden homeless'
- Safety of women in public spaces

### Cultural

- Historical Landscape and evolving historical context
- Built heritage assessment
- 'site selection methodology' as set out in Historic England's Advice note 3 The Historic Environment and Site Allocations in Local Plans, 2015.
- Heritage Impact Assessments
- Advice of chosen specialist Archaeological advisor
- Tourism strategy for south Warwickshire
- Updated WDC Conservation Area Assessments

### Health

- Open Space, Sports and Leisure Study
- Playing pitch strategy
- Air quality assessment & management plan
- Up to date pollution levels measured for traffic hot spot, and to include air pollution in residential areas.
- Pollution Study: Air, Water, Land
- Use and appreciation of the land for leisure activities such as walking, running, exercise and dog walking
- Overdevelopment assessment and its effects on mental health
- Health Needs Assessment including Pandemic resilience
- Health and wellbeing assessment, including social wellbeing
- Prevalence of gyms, outdoor trails and other fitness related infrastructure

## Natural Environment

### Water

- Strategic flood risk assessments and water cycle study to be informed by proposed development locations

### Climate

- Impact of activities (commercial and domestic) on natural resources
- Information on carbon emissions
- Habitats Regulations Assessment
- Scoping for SEA and SA
- Impacts of climate change on South Warwickshire
- Environmental study into the impact of HS2 on local biodiversity
- Climate Change Impact Assessment
- Assessment of Biodiversity Net gain in relation to strategic allocations
- Environmental Impact Assessment

### Land

- Green Belt Review
- strategic housing and employment land availability assessment (SHELAA)
- Agricultural land use assessment
- Food production and the changing rural economy
- Inputs from the Cotswold Natural Landscape (AONB)
- Updated Warwickshire Rural Growth Plan

## Economic

### Resources

- Settlement Study of Town and Village Services
- Settlement Audit
- Settlement Sustainability Study
  - specifically strengths/weaknesses and capacity to grow and provide the associated facilities (schools, town centre vitality)
- Settlement role and function study, particularly in respect of the villages
- Survey to identify the communities/ areas where the social, environmental and connectivity infrastructure is inadequate
- Surveying residents of new-build developments to measure their employment, education, transport & social needs to give a data-based indicator for future requirements
- Assessment to determine need for retail, leisure and community use, arising from the demand created by the significant residential developments
- Built facilities strategy
- Education provision assessment
- School Capacity assessment
- Technology Assessment

## Utilities

- Energy Management, renewables, and low carbon Energy assessment
- Communication Networks (road transport, internet infrastructure)
- Electricity grid and broadband/5G-6G connectivity capacity
- Waste Recycling and Landfill management study

## Economy

- Economic needs assessment
  - Including the type of employment land required
  - Employment type and commuting requirements
  - affordability of employment land
- Town Centre Strategies/BID forward plans
- Space needs for home working post-covid

## Built Environment

### Transport

- Infrastructure delivery plan
  - To identify existing and proposed transport infrastructure
- Mobility Report (including virtual mobility)
- Traffic Modelling
- Accessibility Studies
- Cycle paths assessment
- Post Covid working patterns
- Electric vehicle growth projections, including Hydrogen power

### Design

- Warwick University 'Scenicness' Data

### Housing

- Housing Needs Assessment
  - Including affordability issues
  - Including 'types' of houses (e.g. passivhaus and older people's housing)
  -
- Urban Capacity assessment
  - To identify available brownfield sites across the plan area
- Strategic Housing Market assessment

### Other

- Statements of Common Ground
- Duty to cooperate statement

A number of respondents also referred to existing documents and assessments that they believe should be considered as part of the plan making process. These are listed below:

- HM Government Industrial Strategy 2017
- West Midlands Strategic Employment Sites Study 2021
- West Midlands Land Commission Report 2017

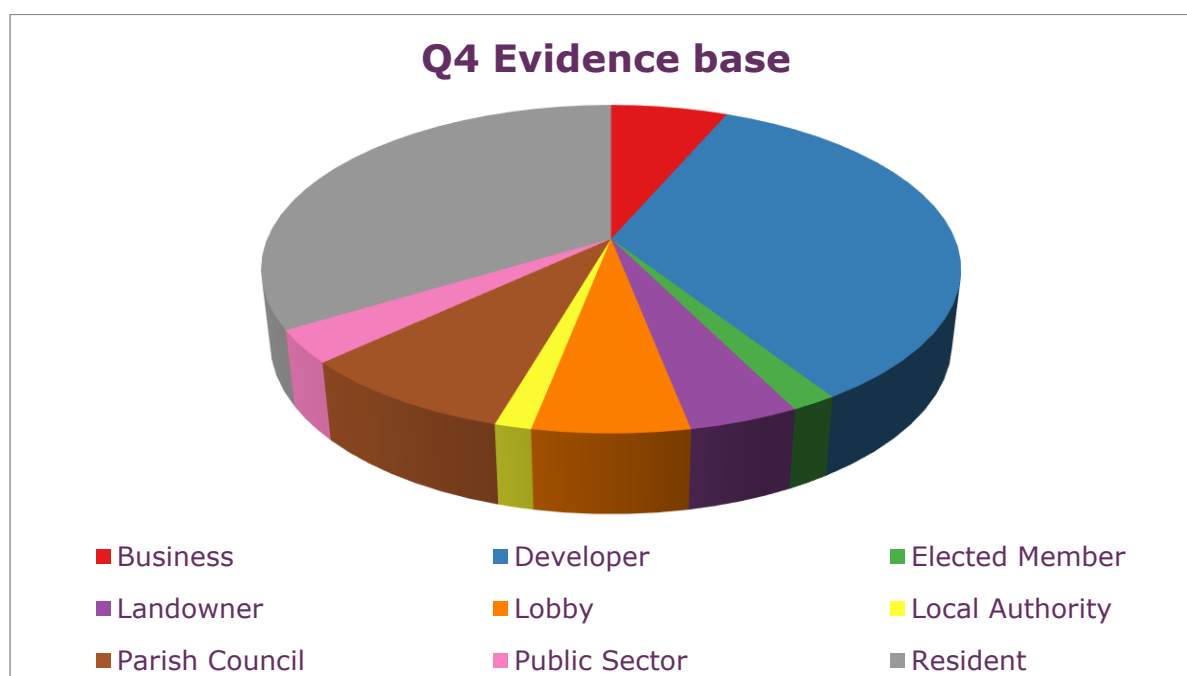
- West Midlands Combined Authority Strategic Economic Plan
- West Midlands Local Industrial Strategy 2019
- Midlands Engine Strategy 2017
- Coventry and Warwickshire LEP Strategic Reset Framework
- Coventry and Warwickshire Sub-regional employment market signal study 2019
- Coventry and Warwickshire LEP Updated Strategic Economic Plan 2016
- Joint Strategic Needs Assessment (JSNA)
- WCC Local Cycling and Walking Infrastructure Plan - upcoming
- WCC Transport Strategy
- Warwick Districts Climate Emergency Action plan
- Assessments and projections of regional climate change impacts from Climate Change Committee and the Met Office
- Areas of Tranquillity - as provided by CPRE
- Light Pollution Mapping

Whilst the majority of respondents made reference to specific assessments or types of evidence, a number made reference to specific actions and approaches. These can be seen below:

- Previous plans should be reviewed to identify the lessons learnt
- Case studies of successful developments and relevant schemes across the country should be used to offer inspiration
- Should engage with representatives/advocates of different groups (e.g. blind, deaf, limited mobility, young, old)
- Should have regard to wider sub-regional and regional needs given strategic position.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	6.4%
Developer	34.3%
Elected Member	1.8%
Landowner	4.3%
Lobby	6.4%
Local Authority	1.4%
Parish Council	8.6%
Public Sector	3.2%
Resident	33.6%



## Q5. Do you have any comments on the impact assessments that accompany the South Warwickshire Local Plan?

### General overview

There were 107 respondents to this question. In terms of responses to this question it was very mixed and there were a large number of generic responses about the Plan which were not necessarily specific to this question. Where there were specific answers based on the different assessments these have been summarised under headings and any additional assessments that people feel have been missed off are listed as bullet points. Overall, there was a general view that some of the assessments at this stage made general assumptions.

### Sustainability Appraisal/SEA

A few respondents stated that the SA makes general assumptions in terms of advantages and disadvantages without having the evidential justification. Further, it was suggested that the steps highlighted in the NPPF (paragraph 13) should be followed with all baseline information being required so that evidence gathering informs the context and Local Plan objectives moving forward. This would mean that a framework can be developed and a meaningful assessment of the options made.

A further response suggested that the SEA MUST consider the implications of Warwick District's boundary with Coventry and sustainability must take into account different people but still be flexible.

### Climate Change Impact Assessment

One of the responses suggested that whilst this assessment considers the options it does not fully consider or expand on climate change adaptation or mitigation measures against the plan objectives and growth scenarios. Further, it is important to reflect the policies but not duplicate existing requirements. Climate Change policies must consider Part L of the Building Regulations and Future Homes Standard and there should be adequate flexibility on technologies to be used for the lifetime of the Plan. Options should be considered for new technologies to build and heat homes as well as options for retrofitting existing buildings. Domestic Energy Impacts such as Cooling and Electric Charging Points at home should also be included.

Another response raised concern with the Climate Change study and it not reflecting the situation that will be so in 2050. Decisions made now could be detrimental to what is achieved by 2050.

One of the responses requested an explanation as to what is meant by the term 'well designed'. It was suggested amending to say 'well designed net zero carbon new places'. Zero carbon was raised a number of times by respondents and that if zero carbon development is a must then maximum adaptation and mitigation measures must be in place in order to meet zero carbon targets.

Housing and Affordable Housing is referenced several times throughout the document, however it was suggested that reference is also made to Social Housing as well as Utilities which are important considerations.

Another respondent suggested that within the analysis, densification of the Urban Areas can also allow for a betterment to be provided in terms of existing water surface drainage by providing attenuation and reducing brownfield discharge rates. Further in relation to Main Urban Areas, they perform well in relation to other locations and therefore, a strategy including growth around these areas is likely to perform well in the Sustainability Appraisal.

There was a response which suggested that the document as a whole is not consistent with the Climate Change Impact Assessment and another would like inclusion of the content of the recent Athesis report and the targets that are proposed within this report, which should be more clearly reflected in the detail of the SWLP.

Issues such as habitats being disturbed/killed, trees being felled, the change in historic landscapes and the absence of playing fields and play areas and the mental impact this can have on people has not been addressed in much detail within the Climate Change Assessment.

The Impact Assessments assume that strategic sites or new settlements may not be delivered against some of the options with more linear and smaller scale development expected. This results in some negative sustainability scores being identified for Growth Options and the Climate Change Assessments not reflecting the ability of larger scale sites to plan for mitigation measures. Option B scores negatively in relation to housing but no advantages are list and the same as with Growth Option D.

One suggestion was that this topic is quite confusing and that it would be better to hold a specific workshop on Climate Change to discuss the issues further.

## Health Impact Assessment

One response suggested that the HIA should include specific issues such as noise, light and particulate pollution especially around high traffic roads and commercial and industrial development. There was also a suggestion that where health is referenced it should explicitly consider fitness and related activity.

One response asked whether the HIA explores different options for Air Quality and the impact of new projections for reduced commuting.

The HIA should ensure that there is input from Coventry and Warwickshire CCG. Public Health are in support of working with South Warwickshire on the Health Impact Assessment moving forward.

## Additional Impact Assessments

A number of responses felt that there were assessments missing and these suggestions have been listed as bullet points below. One of the responses suggested that the list may need to be expanded as the Plan progresses.

- Economic Assessment
- Town Centre Impact Assessment
- Ecological Impact Assessment
- Heritage Impact Assessment
- Transport Impact Assessment
- Population Growth Assessment
- Crime/Safety Assessments

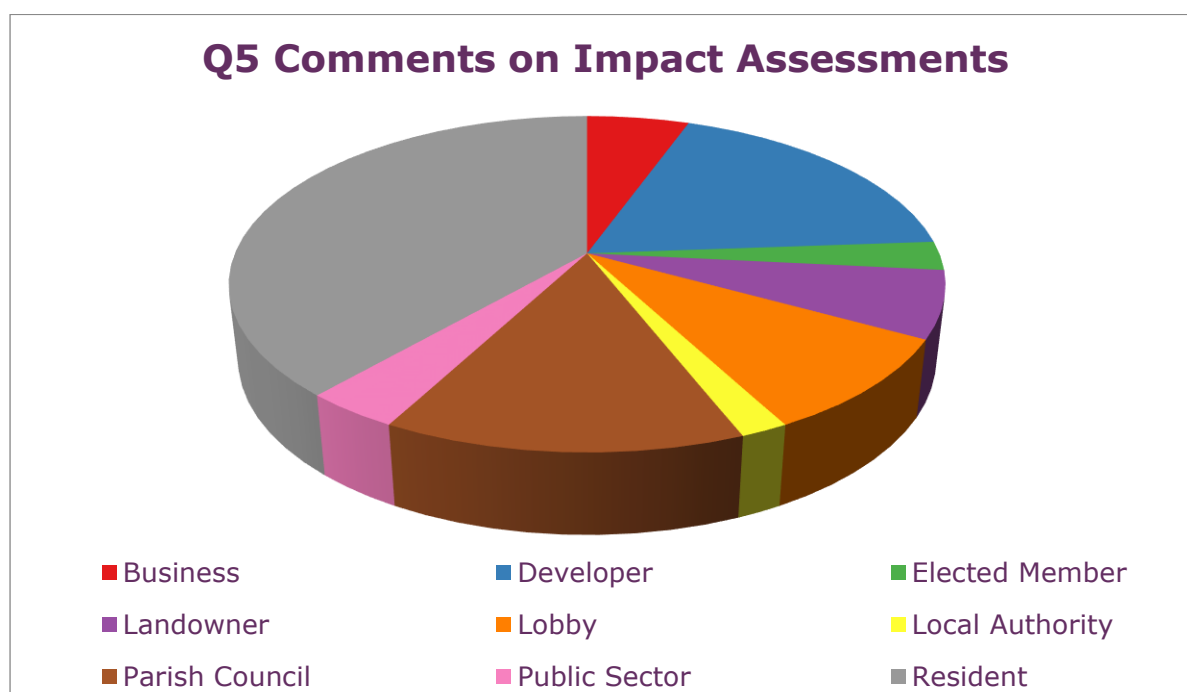
## General comments

In addition to specific comments on some of the Impact Assessments there were a number of comments on other aspects of the document which are summarised as bullet points under this heading.

- Neighbourhood Plans should be referenced.
- Current Assessments are too high level.
- Traffic Impacts and Options for movement around the location should be considered.
- There is a risk that the assessments may discount options early on without there being proper consideration.
- Rural villages and how development will impact on these and rural areas. Rural Communities should be included in the assessments.
- Historic Environment is not well focussed throughout the document so it is difficult to determine the impacts of the Plan on this.
- Travellers, it was suggested that there should be a more up to date approach on Travellers into the area.
- Women's safety needs to be considered e.g. lighting.
- Travelling Entertainers and Boat people not included in the Plan.
- Should be the impact of Climate Change of the development rather than the impact on Climate Change by developments.
- All new housing should be as accessible as possible.
- Provision of care in institutional settings should be avoided as far as possible meaning design and location of new homes should be optimised to facilitate independent living.
- Lack of acknowledgement of HS2.
- Stronger language is needed to enforce the assessments and ensure the reflected outcomes are in the document.
- Impact that development has on the communities in provision of suitable community buildings and facilities.
- Should have a clear policy for CIL and S106 money.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.5%
Developer	18.3%
Elected Member	2.8%
Landowner	6.4%
Lobby	9.2%
Local Authority	1.8%
Parish Council	13.8%
Public Sector	3.7%
Resident	38.5%



## Q6. Call for Sites

Call for Sites submissions are available to view at: [South Warwickshire Local Plan](#)

## Q7. Do you agree that the SWLP should address social isolation and loneliness? How should this be done?

### General

- Support – 81
- Object – 5
- Other/comment – 52
- Total responses -138

### Reasons for support

- An important issue.
- Issue known to have been exacerbated by the pandemic, and likely to be under-reported.

### Reasons for objection

- Not for the local plan to address, but is certainly a national issue. It should be considered at a national level
- "It is not the job of "Big Government" to get involved in such issues."
- Not sure this is an issue for a local plan. It might be better addressed at a more local level, such as neighbourhood plan and parish council/parish precept.
- "Loneliness is outside the scope of the plan, but settlements and dwellings could at least be designed to facilitate neighbourliness."
- "I do not feel this should be a priority of the council."

### Themes/comments

#### The extent to which the SWLP can address this issue

One respondent explicitly questions what land use policies can directly impact this issue, whilst another suggests the SWLP should not make matters any worse but does not have a major role in resolving this issue in itself. One town council also highlights the multifaceted complexities surrounding this issue. Others may not always query the potential role of the SWLP in this so directly, however, it is a recurring comment that there is a role for community groups, the voluntary sector generally, charities, and public and private initiatives to tackle this issue. There is therefore general acknowledgement that despite support for the SWLP to address this issue, it cannot 'solve' it alone. The issue must instead be tackled through a combination of "hard provision" (physical infrastructure) and a need for groups to work together.

Funding and grants are also referenced as necessary by a small number of respondents. One suggests that developers should fund activities to help existing and new elements of communities to integrate, and another suggests the creation of 'Community Champions'.

One respondent identifies that GP services are now developing 'social prescribing' to identify people in need. They advocate for a holistic approach, incorporating the SWLP but also wider service providers.

### Relative importance

Some commenters suggest that whilst they support tackling isolation and loneliness in general, they do not consider it more important than other matters, or feel the emphasis is misplaced. One respondent suggests this should form part of creating '*inclusive communities*', which tackles a broader range of issues, and is phased as a positive, rather than tackling a negative. This, they state, should also tackle accessibility, removing obstacles in the environment to the benefit of all elements of society.

A different respondent points to other elements in the 'Wheel of Sustainability', including safety, community and equality, which they say should also be equally considered in the SWLP. Another suggests that reducing wealth inequality is key to reducing isolation.

### Location and scale of development

Many comments in response to this question refer to the potential spatial strategy of the plan, and the need for development to be 'suitably located, mixed and varied with access to sustainable infrastructure'. This, some respondents assert, can address a range of issues, including loneliness, and responds more generally to the 3 pillars of sustainability set out in the NPPF.

One individual suggests that part of the spatial strategy should be based upon 'gap analysis' – i.e. that there should be an evidence based analysis of locations deficient in different types of social infrastructure, and the plan should put in place 'measures' to address this, albeit the respondent is not explicit about the nature of those measures. Numerous others follow trends in other questions and suggest that directing growth to rural locations could help support and even improve facilities and services in those areas (see below: rural isolation).

Several developer interests highlight their view that strategic sites offer the best opportunity to tackle loneliness and isolation by providing mixed use schemes with appropriate infrastructure, including green infrastructure and community facilities. They however highlight that policy requirements must take account of viability and deliverability of strategic sites.

One town council response however offers a contradicting view that small scale design and development would be a better way to tackle this issue, as opposed to large scale housing estates.

### Rural isolation

A large proportion of responses to this question highlight rural isolation brought about by reduced facilities and services in the immediate locality, and often inadequate public transport services to enable access to the same further away.

Some responses advocate for a greater level of facilities and services at a more local scale in rural communities, which is sometimes linked to a suggestion that some limited growth in these locations might help deliver and support this.

Other responses seem to place greater emphasis on improving public transport (principally through frequent and reliable bus services) to access existing provisions further away.

### Different types of housing provision

A number of comments and suggestions focus on rethinking and reimagining some of our housing provision. The following suggestions are made:

- Support the delivery of annexes on existing plots – enable multigenerational living
- Specialist older persons housing with communal facilities
- Identify specific locations for extra care and assisted living – ensure delivery
- One respondent advocates for more communal style housing provision generally. Shared tenancies, multigenerational living and community living are all suggested, with the additional benefits asserted to be that fewer new homes overall would be required.
- Women only housing for survivors of domestic abuse. This could include shared facilities such as a laundrette, sitting room and play space. This would enable safe social interaction and create bonding opportunities.
- Provide shared social housing where younger people provide social care for older residents whilst paying little or no rent.

### Suggestions for tackling isolation and loneliness within the responses

#### Connectivity and movement

- Redevelop inner city sites
- Connectivity in its broadest sense. Physical connectivity at different scales and digital connectivity.
- Cycle lanes in rural areas for greater connectivity
- Fear keeps people isolated – make streets feel safe through good lighting, reliable public transport, and more visible police presence
- Frequent and reliable public transport. Greatest emphasis placed on bus services for rural areas. One respondent points out that car journeys are in themselves socially isolating, and bus provides connectivity as well as opportunity for social interaction.

#### Meeting places

- Ensure a greater proportion of development sites is given over to green space
- Keep libraries, shops, post offices and places where people meet open
- Schools could be co-located with other services such as libraries so that they become more of a community hub.
- Outdoor gyms provide social spaces
- Need some places where people can meet but aren't obliged to purchase refreshment
- More places to sit within green spaces

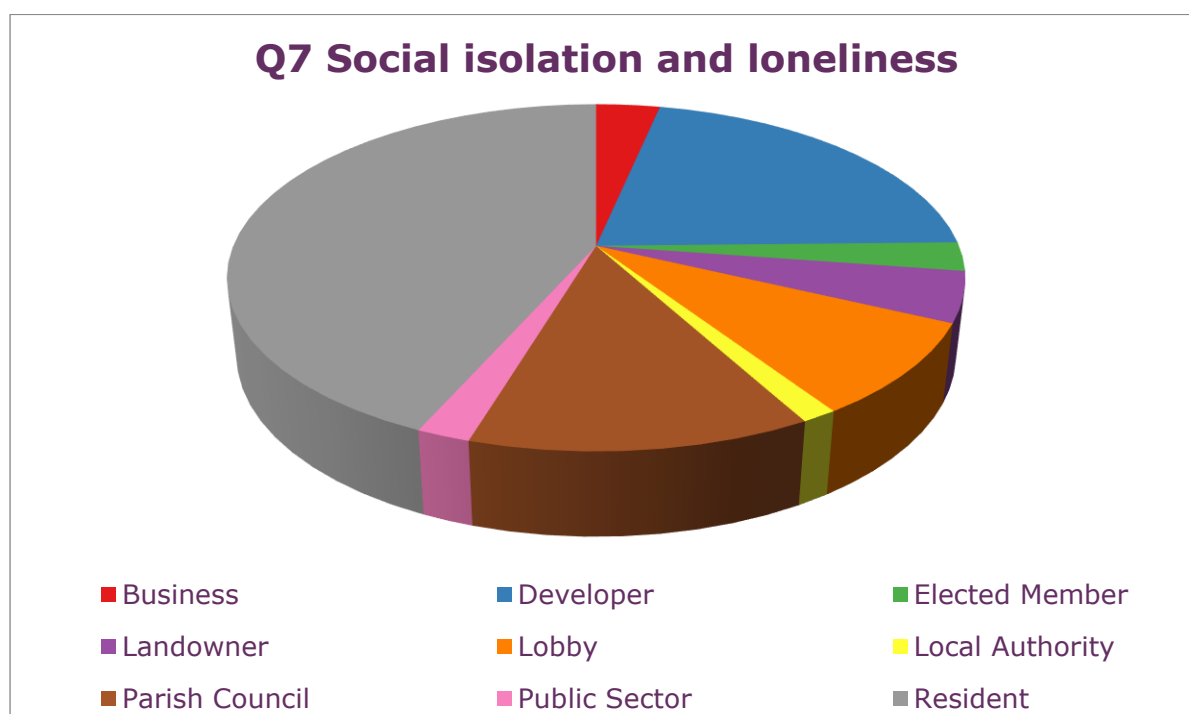
- Places to meet, chat and play sport (promote sport and provide playing pitches)
- Include community centres on all large developments
- Allotment provision and protection.
- Community run/managed centres and gardens
- Promote places of worship in acknowledgement of the role they can play.

## Other

- New developments should be assessed on how they will contribute to community creation and development.
- Align with WCC Social Services
- Mobile services – take them to the community. For example mums and tots, health amongst other things
- Better broadband, and lessons on Zoom
- Rows of terraces that open onto the street encourage neighbours to meet and interact.
- Provide more affordable housing (because some loneliness amongst the elderly is a result of their children not living locally because they can't afford to live in the locality and to tackle homelessness)
- Support cultural events such as festivals in the rural areas, as these are largely currently the preserve of the urban areas.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.3%
Developer	21.3%
Elected Member	2.7%
Landowner	4.7%
Lobby	8.7%
Local Authority	1.3%
Parish Council	12.7%
Public Sector	2.0%
Resident	43.3%



## Q8. Do you agree with encouraging connectivity and ensuring key infrastructure is in place to support this? How should this be done?

### General

- Support: 93
- Object: 5
- Other/comment: 57
- Total responses: 155

A number of respondents seek to explain how and why they consider particular sites they are promoting to meet the suggested objectives around 'people and connectivity' when answering this question. Comments referring to specific sites have not been included in this analysis, as the sites will be assessed separately.

### Reasons for support

- Connectivity is vital
- The importance of connectivity in social interaction (physical and digital)
- Welcome this area of policy and emphasis on younger and older people
- Key to delivering a zero-carbon future
- All types of connectivity are vital to economic growth

### Reasons for objection

- "Definitely not. There are better things to spend tax-payers money on?"
- "I do not support investment in "key infrastructure" at all".
- Housebuilders promise to deliver wider benefits, but in reality deliver little more than houses for profit. "They don't care about 'people and connectivity'..."
- "There is insufficient planning for infrastructure in this area."

### Themes/comments

There is overriding support for connectivity in responses to this question in its broadest sense, though many infer that the plan should seek to clarify the definition and how elements of connectivity may be prioritised. Connectivity is noted within the comments to encompass matters of travel, employment, community, service provision, and utilities, specifically digital connectivity.

### Digital connectivity

This is recurring throughout the comments, with many stating that they consider this more important, or at least as important, as physical connectivity. This; it is widely highlighted; has been compounded and expediated by the Covid 19 pandemic and the increase in home working, and it is regularly stated as a significant contributor to tackling climate change, as it reduces the need for people to travel.

In addition to the importance of digital connectivity generally, many respondents express a need to ensure that "no one is left behind virtually". In general, these

refer to providing high speed connections to all existing and new developments, particularly in rural areas, and ensuring that the connections are delivered prior to development. Rural areas are noted to have been behind the urban areas/remain behind urban areas in terms of connection speeds. 4G and 5G connectivity are (less frequently) also identified as important for the same reasons.

Inequalities heightened by the Covid 19 pandemic are highlighted directly by a handful of respondents, with one suggesting that the plan should capture and seek to address these. Inequalities in the ability to work from home is cited as one of these. In addition, one medical centre highlights that the elderly community in its location is further isolated by a lack of IT skills and equipment.

Beyond infrastructure connectivity to high-speed internet, the following suggestions have been made to assist groups and individuals with digital connectivity, with a view to reducing the above inequalities:

- Ensuring that community spaces at least are connected, to support individuals without internet access at home.
- Provide computer hardware where needed
- Community support and training to help those less IT literate.

### Locations for growth/Site selection

A recurring comment throughout response to this question (and indeed other questions), is that opportunities should be taken to utilise existing physical connections and improve them where necessary. Some suggest this should underpin the strategy of the SWLP, in terms of determining where growth might be directed, whilst others frame it in opposite terms of wanting 'no more isolated developments'. Some respondents phrase this more generally, for example: "Choose the right sites in the right locations." There are also multiple comments advocating for consideration of movement networks (and infrastructure more generally) as a whole – i.e. looking at the connection potential of locations both at a strategic scale and a much more localised scale.

In addition, a handful of respondents suggest that providing sufficient 'critical mass' of development is one way to achieve some of the objectives, and that this should be given weight in allocating sites.

One respondent suggests that growth and infrastructure improvements should be focussed on 'key corridors'. A different respondent suggests that rural infrastructure (particularly public transport) might best be supported by directing appropriate levels of growth to rural locations. This principle is reiterated through a number of comments, with various emphasis on different perceived benefits. For example, a different respondent emphasises a need to provide realistic entry to the housing market in locations people want to live, so they don't need to relocate.

### Reducing isolation and loneliness

Some respondents highlight that social interaction is and key component of the social dimension of sustainability. They assert that this has an increased emphasis since the start of the pandemic, with increased home working and an enhanced

sense of locality/place. This in many comments goes beyond the digital connectivity outlined as important above. One respondent (in the medical sector), points to a heightened sense of isolation amongst people in the local community, and that those who have become isolated need a “place to go and a reason to go out”. A sense of purpose and belonging is considered essential. The same respondent goes on to suggest that once a community can get together and get to know each other, greater reliance in the community flows from the ability to provide mutual support.

In light of the above, the following suggestions are made within the comments of various respondents to address this issue (many of which also apply to other themes within this question):

- Prioritising local access to services and jobs. This is sometimes linked to the principles of 15/20 minute neighbourhoods, and a general overarching sense that infrastructure should be highlight localised.
- Ensure that new developments include meeting spaces/community hubs
- Prioritise sport and youth centres
- Engage with and support existing groups who can help reach out within the community – e.g. village halls and community centres.
- Some point to the volunteer help brought about by the pandemic and suggest similar continues
- Align with and compliment Warwickshire County Council’s social services

### Encouraging active travel

Support is expressed for 15/20 minute neighbourhoods throughout response to this question, and others related to it. Where 15/20 minute neighbourhoods are not mentioned explicitly, many responses refer to one or more of the principles which underpin them, as the majority recognise that structural elements of neighbourhoods have an impact on whether people will walk or cycle. These include:

- Mixed uses – ensuring that key local infrastructure is located close to where people live. This includes (but is not restricted to) jobs, doctor’s surgeries, open space, schools, community centres/hubs.
- Joined up layout with emphasis on walking and cycling

Other suggestions in relation to encouraging active travel relate principally to creating an attractive and safe environment for walking and cycling. These include:

- Giving streets back to people – reallocating more road space for active travel
- Making use of green infrastructure
- Lighting and other safety measures for travel at night/after dark
- Appropriate maintenance of paths
- Better inclusion of children and those with disabilities
- Maintenance and enforcement of Public Rights of Way (which one respondent is concerned is currently insufficient based on reduced funding and increased usage since the start of the pandemic)

- Cycle storage improvements
- Greater use of canal towpaths

## Public transport

A number of respondents consider public transport to be a key priority within the umbrella of connectivity. In rural areas, bus routes are regularly emphasised as most important, with references not just to the quality and extent of the current services, but also the cost of using them.

One of the most recurring themes on bus services is a desire to be better joined up with healthcare provision in particular, in addition to more general desire for better connecting rural settlements. Some make general comments about a desire to be able to access GP and hospital services easily by bus, whilst others cite specific examples, such as a three bus journey trip from Shipston to the hospital in Warwick. In this example, the respondent highlights the view that more services should be available at the Ellen Badger hospital which is more conveniently located to their locality.

Rail is also referenced in numerous comments, both as a driver for locating growth, and in improvements that could benefit existing and future communities. There is support for the principle of new services wherever possible to counter what one respondent states is the 'neglect of the railways'. The reinstatement of disused lines is suggested, as well as a new parkway station near Whitnash on the Fosse Way.

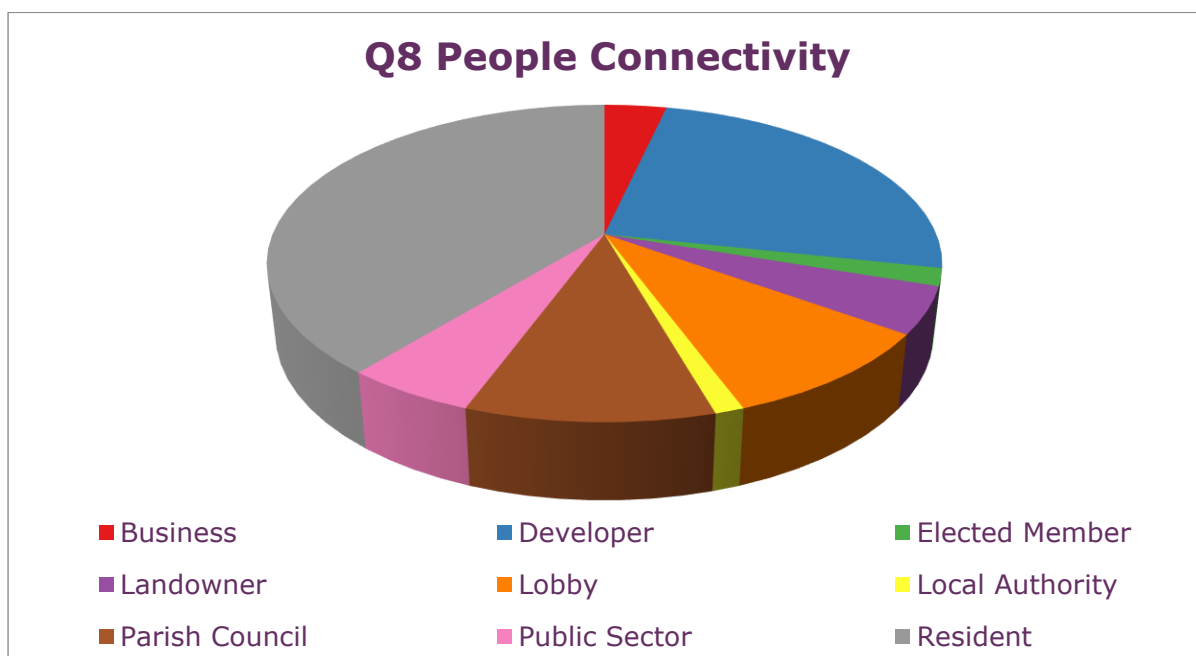
Other respondents caution however that transport infrastructure has the potential to substantially change over the plan period. The possibility of driverless cars (and 'demand transport' generally) is highlighted to have a potentially liberating impact on those without access to private transport, in addition to references to e-bikes and e-scooters. This has the potential to impact how people move, and infrastructure may need to adjust accordingly.

## Additional comments

- Whilst some respondents talk about utilising the existing highway connections, a number of respondents express a desire for growth not to significantly expand the road network. One respondent even suggests a complete moratorium on road building.
- One respondent emphasises the need to improve connectivity with people and nature, principally for the benefits to health and wellbeing. This advocates for priority to be given to open spaces and links with other themes addressed above, but with a slightly different emphasis.
- One respondent suggests a local education facility specifically aimed at encouraging/enabling young people to remain in the area, and create a better balance in the demographic of the local population.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.6%
Developer	24.9%
Elected Member	1.8%
Landowner	4.7%
Lobby	9.5%
Local Authority	1.2%
Parish Council	10.1%
Public Sector	5.3%
Resident	39.1%



## Q9. Housing: Do you agree that the local plan should seek to address these issues? If not what is the alternative? Are there any particular approaches we should consider?

### General

- Support: 89
- Object: 8
- Other: 98
- Total responses: 195

NB. this question is closely linked with question 42, and cross reference was encouraged in the Scoping Consultation. Therefore the summary should be considered alongside that for question 42.

### Reasons for support

- The matters raised align with the requirements of the NPPF, therefore it is appropriate that the South Warwickshire Local Plan should address them.
- Agree with recognition that there is no 'one size fits' all for housing.

### Reasons for objection

- Query population growth projections, and associated 'need' for housing. More housing in South Warwickshire caters to people's desires, not need.
- Too many points to answer – they just raise more questions.
- Reconciling national, regional and local requirements is a challenge. There are several references to national government having access to the levers that can impact affordability, and many of the possibilities are beyond local control.
- Building more houses doesn't drive prices down.
- Multiple references to unattractive urban sprawl.

## Themes

### Amount of housing

A number of respondents highlight that the Scoping consultation does not define a housing need figure, and they acknowledge that this will need to be derived from a robust evidence base. A handful of these responses suggest they consider all other matters relating to housing as secondary to this issue.

The minimum housing figures included (based upon the Standard Methodology) polarise views within the responses. Some assert that they already consider there to be sufficient evidence to adjust the housing need upward from the Standard Methodology. Those of the opposing view, question how population growth is calculated (and generally express a view that projections are significantly overestimated), and reject any need to accommodate inward migration to the area where this is perceived to demand more greenfield land, and in their view, 'degrade' South Warwickshire.

A small number of responses highlight that housing need, might also have to be adjusted dependent on the growth strategy selected. For example, an employment led strategy (which a number of respondents explicitly support), might need to make adjustments to both housing and employment land need to meet these policy objectives. One respondent advocates for the clear alignment of economic and housing strategies in order to reinforce the achievement to the overarching principles of the plan.

The relationship between housing and the growth strategy options is further explored in question 42.

## Affordability

Responses are generally consistent in recognition of the particular challenges of affordability in South Warwickshire. Several note that affordability is an even more acute issue here than in the greater West Midlands based upon the salary multiplier, and one respondent refers to there being “no housing crisis, just an affordability crisis”.

Whilst numerous respondents subscribe to the conventional view that delivering more housing overall should have the effect of driving house prices down, others express an opposite view that recent mass building has not served to reduce house prices in the area. On this basis, many argue that much of the local affordable housing delivery is not truly affordable.

Those of the later view, generally express desire for greater intervention (both through the plan, and through other means), to deliver more housing that is truly affordable.

Numerous responses however, caution against highly prescriptive policy in this area, instead advocating a more flexible approach based on responding to up-to-date evidence. These responses point to the length of proposed plan period, and changes that may occur over that time.

## Locating housing

Some responses note the national policy emphasis that, amongst other things, has expressed support for diversification and delivery of smaller rural sites, by smaller scale housebuilders. The potential benefits of delivering small scale housing developments in the rural areas is a recurring theme within the responses to this question, as access to housing within rural areas is largely regarded as ‘problematic’. There is however repeated emphasis that this should respond to local need and be proportionate to the scale of the settlement, and its role in the overall settlement hierarchy. There is a general inference within a large number of responses (with some explicitly stating) that there is little appetite for large homes to be built in these rural locations. Instead, they should meet local need.

There is general support (particularly amongst the responses of individuals) for directing housing to brownfield sites and strictly limiting allocation of greenfield sites. One respondent points to work undertaken by the CPRE and suggests that all housing can and should be accommodated on brownfield sites. Some however, highlight associated remediation costs of many brownfield sites and the associated

impact on viability, in addition to highlighting the role that greenfield sites have to play in delivering a range of housing.

There is general support for converting existing buildings to accelerate delivery of social and intermediate housing. Suggestions include converting redundant retail and commercial floorspace, and existing housing stock.

There are comments supportive of continuing to 'mix' market and affordable housing on new sites.

## Size of housing

The most recurring comment in respect of housing size is overwhelmingly that too many large executive homes/mansions are being built across South Warwickshire, with one Parish Council advocating for a policy requiring justification for any 5 bed homes proposals in the rural areas (see also *housing location* above). The overwhelming response is an expressed desire for the plan to require a substantially greater proportion of smaller dwellings, with significant emphasis on 1 and 2 bed dwellings, to accommodate singles, young couples and first-time buyers.

A number of responses suggest that the traditional 'measurement' of the size of houses based on the number of bedrooms is now outdated, and perhaps measurement in square metres would be more appropriate. Furthermore, a number of respondents (predominantly developers) highlight that the traditional bedroom count no longer equates to the use of new homes, nor does it allow for non-traditional household formation. As an example, they identify that in homes with open plan downstairs space, it is common that occupiers will use one of the upstairs bedrooms as a study/office/workspace.

Related to the size of new dwellings, is an expressed concern that extension and redevelopment of homes in some rural and semi-rural locations is depleting the stock of smaller dwellings, further exacerbating choice and affordability concerns.

Numerous respondents suggested 'encouraging' people to live in appropriately sized homes for their needs. For example, encouraging older people to downsize to free up family sized homes.

## Housing type

It is suggested amongst the responses that where there is identified and quantified need for specific types of housing (for example 'Extracare', specialist housing for the elderly, or self-build housing), appropriate sites should be identified and allocated specifically for this to ensure the need is met.

A handful of responses advocate building at higher densities, including "up not out", and support greater emphasis on terraces and apartments with appropriate green space around them. Highrise however, is explicitly not supported.

## Bungalows

With reference to an aging demographic in South Warwickshire, broad support for the provision of more bungalows was expressed, with the exception of one respondent who considers them wasteful of land and suggests mixed age

maisonettes as an alternative. One respondent wants bungalows to be of sufficient size to enable elderly residents to host guests.

### Gypsy and Traveller Accommodation

One respondent highlights that there are currently no authorised traveller sites within Warwick District, and requests that this matter be urgently addressed.

### Park Homes

The matter of 'park homes' has brought out conflicting views in the responses received. Two suggest that static caravan parks; originally for tourist accommodation but now often occupied by older people; make a positive contribution to meeting local housing need, and that as such the SWLP should consider this approach. An alternative view however, is that they are already providing 'back door' housing for the retired, who unofficially live in them but don't pay tax.

### Student accommodation

Approximately three respondents specifically want to see housing policy address issues around student accommodation. The emphasis of these comments is generally placed on the town centre of Leamington Spa. They express concern about the loss of family homes through conversion of existing stock to HMOs or other student accommodation, and the proliferation of 1 bed and studio flats in the town centre which largely target the transient student population, to the detriment of those in local need.

### Co-housing

One respondent advocates for the inclusion of co-housing in the SWLP. This is where people have their own home, but share communal spaces with their neighbours. This type of housing; it is suggested; has the potential to reduce loneliness and isolation, and foster a greater sense of community.

### Housing tenure

A range of views are expressed regarding the tenure priorities for affordable housing, albeit that there is general support to boost supply in this sector overall. A large number advocate for a wider range of tenures. Others support increased intermediate housing, whilst others reject that in favour of prioritising secure rental properties. In practice, others note that local need and the local market circumstances ought to be the focus.

### Housing quality

The following comments summarise a range of comments made about housing quality. These respond to a common sense that some recent development is 'unimaginative', and that we should be "building communities not boxes".

- Need to answer the question - what should the contemporary contribution to these places be?
- All homes should be net zero carbon.
- A spiral of improvement is linked to improved design quality.

- National space standards or higher should be required (though other responses state that affordable housing should not be expected to exceed technical standards, without robust evidence and viability assessment).
- Lifetime Homes standards should be adopted.
- Ecovillage type development should be encouraged.
- 'Place' should be second only to 'people'. Housing is only a part of 'place'.
- Require new building techniques (e.g. modular housebuilding)
- More pet-friendly social housing required

## Housing delivery

There is general support and encouragement for the Councils to design and deliver social housing, in order to increase supply and retention of affordable housing.

A small number of respondents suggest that the competency and accountability of local affordable housing providers should be considered as key to delivery.

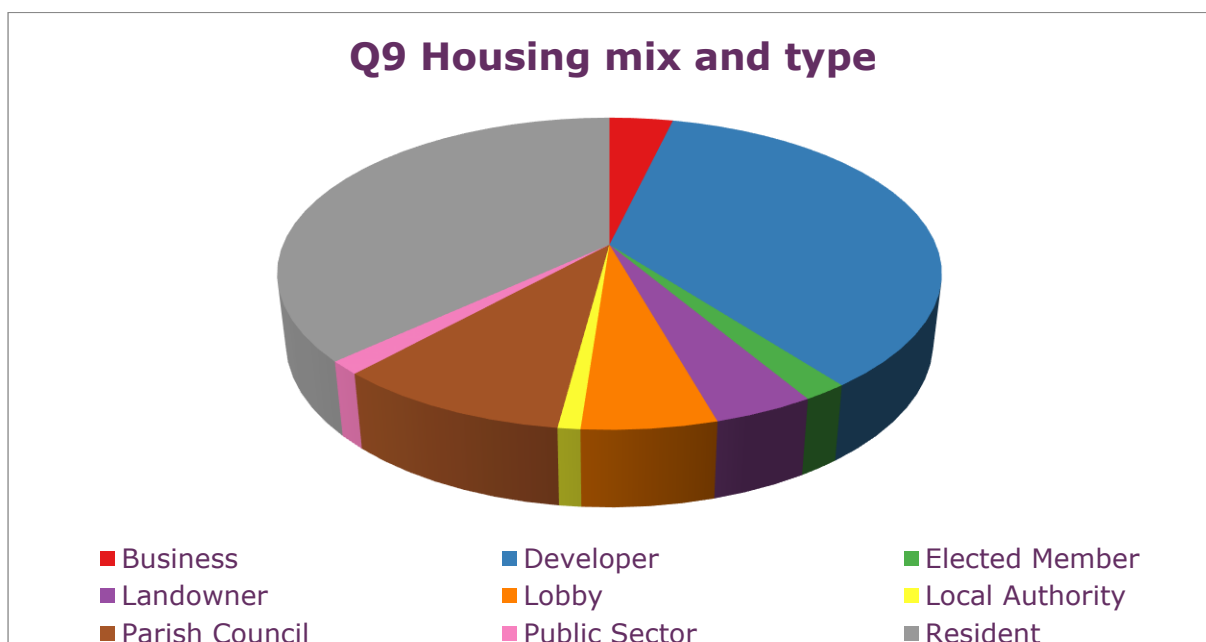
The CPRE states that it would like to see sites already granted planning consent delivered. In addition, any developer found to be 'holding land' should not be granted any further permissions until the matter is resolved.

## Other wider comments on housing

- Support multi-generational living – enable people on large plots to develop 'granny annexes'.
- Homelessness should be eradicated.
- Remove buy-to-let mortgages
- Counter greedy private landlords
- Discourage second home ownership
- Stop right-to-buy
- Estate management fees are a barrier to some on new build estates. Councils should adopt roads and open spaces to stop this.
- Many publicly owned homes are not occupied by people that still need them. Allocations and management (including ongoing means testing) should be reviewed first.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.7%
Developer	35.9%
Elected Member	1.8%
Landowner	4.1%
Lobby	5.5%
Local Authority	0.9%
Parish Council	9.7%
Public Sector	1.4%
Resident	36.9%



## Q10. Do you agree that the strategic design principles above should inform directions/locations for growth? If not, why not?

### General

- Support - 82
- Object - 12
- Other/comment – 57
- Total responses – 151

A number of the responses submitted sought to highlight how particular site proposals might achieve the strategic design principles suggested in the Scoping Consultation Document. Whilst these are noted, they have not explicitly been included in the thematic commentary below, as sites will be considered separately.

### Reasons for support

The following form a summary of the key themes in support of the strategic design principles:

- By ensuring that locations/areas are served by existing infrastructure or with appropriate infrastructure investment to upgrade or develop new infrastructure, new development can be more successfully integrated.
- Supports businesses, shops and facilities, and strengthens cohesion adding to the vitality of settlements.
- Other associated benefits follow on from the reduction in the need for the private car, such as reduced carbon emissions and improved air quality.
- Reduce need to travel and infrastructure to travel between places.

### Reasons for objection

The following form a summary of the reasons for objection:

- The principles miss the key issue that the provision of services usually dictate the hierarchy of settlements within the local plan.
- Some of the issues are local to particular settlements and not strategic
- Why would we promote policies which enhance land values? It's already massively overpriced.

## Themes

### Scope of the principles

There was general support for the approach, and the strategic design principles set out. A number of respondents however suggested that the scope of the principles might be expanded:

- 1) To reflect the 10 characteristics of 'Well Designed Places' in the National Design Guide (approximately 11 responses directly cite this), and/or
- 2) To respond to the 'Pillars of Sustainability' (NPPF paragraph 8): Economic, social and environmental (approximately 8 respondents)
- 3) To respond to Building for Life 12 (Building for Health), (1 respondent)

Respondents referring to the economic elements of site selection and deliverability implied that these should have equal weight to the strategic design principles. In contrast however, at least three respondents highlighted objection to economic considerations ‘trumping’ the climate agenda, of which the connectivity principles are broadly considered an essential part. One response expresses the view that connectivity and economic considerations cannot be siloed, as “...the best connected places are those that enable more levels of prosperity”.

Another respondent highlighted additional principles of ‘mixed use, polycentric habitation, urban greening and renewable energy installations’.

## Character

The inclusion of principles referring to the character and identity of place were queried within two responses. The view expressed suggested that taking into account the wider carbon neutral development agenda and the development lifespan, that these should not be considered integral to the strategic development principles as “measures which influence resident’s behaviours”.

This view is contrasted by the aforementioned suggestions of expanding the scope of the principles, as both the National Design Guide and Building for Life 12, both include character considerations. In addition, others explicitly support the reflection of local character as a design principle generally, with one even suggesting that new developments should benefit from and be able to contribute to the character and identity of place.

## Net zero carbon development

A number of responses query why the design principles do make refer to requiring net zero development.

## Mixed use

A number of respondents highlight potential benefits of mixed-use development and the important role this can play in ensuring local infrastructure and services can be located close to housing, facilitating greater opportunities for walking and cycling. References to 15 or 20 minute neighbourhood recur through the responses.

## Appearance of development

7 respondents expressed the view that design principles should also address build quality and beauty, with some citing perceived homogenous developments, and poor quality design and materials. One suggested that design principles should encourage more beautiful design and inform decisions, but not locations for growth.

## House-types

One respondent suggests that diversity of house-types for all user groups and pockets is key to good design. Another expresses concern that the principles should not come at the expense of affordable housing provision.

## Digital connectivity

Numerous respondents referenced the need for digital connectivity to be a strategic factor in delivering growth, with the ability to learn and work from home generally considered desirable. CPRE goes even further in its response suggesting that this should be even higher priority than physical connectivity, to reduce the need to travel at all.

In addition, the rise in online shopping and delivery of goods to the home is identified by some as a reason to reconsider the need for and role of traditional local centres.

## Applying the principles to places

### Urban and rural contexts

A commonly expressed concern was that the level of emphasis on well-connected places might imply that only larger settlements with key strategic infrastructure and transport networks might be deemed suitable for growth (10 comments). As a result, there was a general request for further consideration/recognition of the variation in how this might be applied in urban and rural contexts, so as not to exclude smaller rural settlements from the process. Three responses explicitly expressed the view that smaller settlements should be considered for expansion to support greater services and infrastructure within them (and potentially therefore move up the settlement hierarchy), although this is contrasted by one resident's group which is concerned that "over-development" of its village could 'destroy' the existing community cohesion, and the character of the village.

One respondent explicitly stated that in their view peripheral growth to existing urban centres can never be connected, citing large scale expansion of Warwick and Leamington as an example. Instead, the respondent suggests growing new communities would be a better option.

The potential for new communities is also raised by others, with queries about how these principles might be applied. A different respondent also determined that the approach seems to indicate the development of one or more new communities is the logical conclusion.

### Brownfield land

A number of comments wanted to emphasise support for the reuse of previously developed land, and associated benefits, as there will be a degree of infrastructure around these sites/locations. This came through in a number of different comments with varying emphasis, which are summarised below:

- Changing nature of retail and office space
- Role of town centres

### Employment and housing proposals

It is highlighted in some responses that greater distinction should be made between the application of the strategic design principles for housing and employment sites. Whilst connectivity is identified as fundamental to both, it is suggested that the fundamentals of those connections are different. Connections for housing sites need to be centred around everyday living, including work and

play, whilst employment sites need to consider market connectivity. One respondent queried for example, whether linkages to town centres would be directly relevant to potential employment sites (albeit another queried whether town centres, and therefore access thereto will be relevant to any use given their ongoing decline).

### Greenbelt

One respondent in support of the strategic principles suggested that “...the greenbelt must be the servant of getting growth in the right place, not the other way around”.

### Applying the principles in practice

A number of comments were received relating to how the principles might be applied both in evolving the SWLP, and in guiding future decision making. One requested that the principles should be developed to provide very clear objective criteria to support decisions in the plan. This is similar to two other responses requesting a predictable approach to design quality and standards.

Two further responses express a desire for support mechanisms, such as design codes, to support the delivery of the principles.

St Modwen support the principles, but suggest that for specific sites consideration must be given to the scale and nature of development and its ability to mitigate impacts.

Two responses highlight a view that allowing the Call for Sites exercise to lead the allocation of sites is too reactive, and instead suggests a more proactive approach to determining where growth should be located to achieve the strategic principles.

### Comments on connectivity

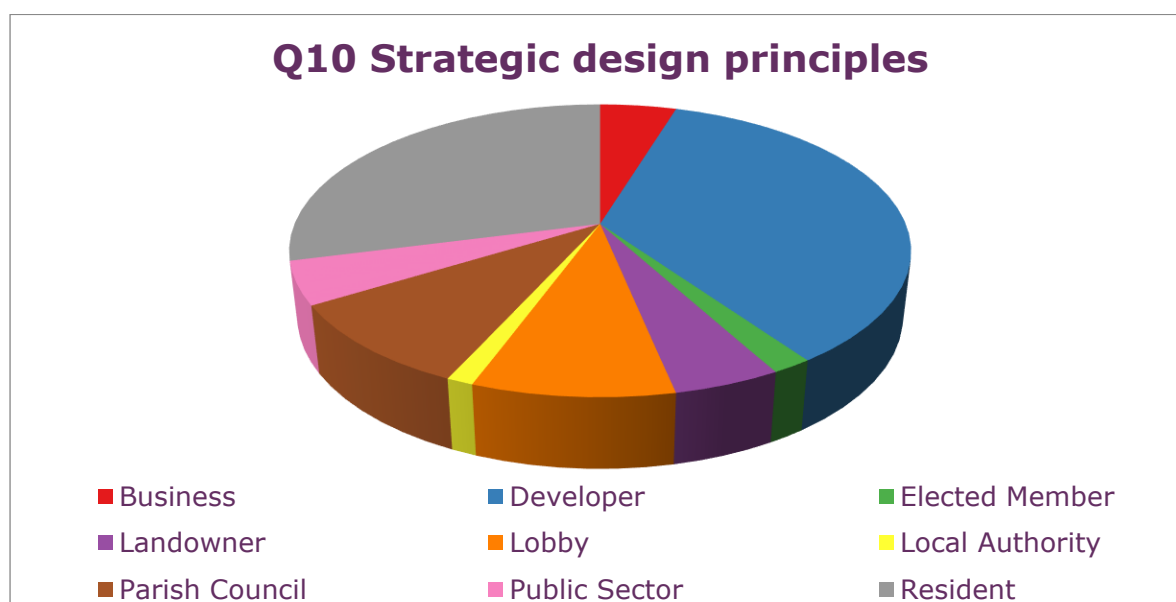
A number of other comments within the responses express views on the topic of connectivity generally, which do not fall within the above themes. These are summarised below:

- National connectivity is not within the remit of the Local Plan (1).
- Growth locations should contribute to regional connectivity (1).
- Support the inclusion of canals as a connector. Opportunities for canalside development and enhancing access to towpaths should be explored (1).
- Welcome the inclusion of green and blue infrastructure as connectors. This should include Nature Reserves, Local Wildlife Sites, and Potential Wildlife Sites (1).
- Most people will still want a car due to the dispersed nature of South Warwickshire (2). If they are electric/renewably powered, they should be able to choose where they live (1). Charging points should be a key consideration of the plan (1).
- Schools are significant generators of peak time travel. Greater emphasis should be placed on locating schools so that it is easier to walk and cycle to and from them (3).
- Local villages should be connected to ‘Rural Centres’ via safe walking and cycling routes (1).
- Recreational running and cycling should also be considered (1).

- There should be a cycle route and footpath separate from, but near to the A44.
- Accessibility in its broadest sense should be considered, so it is inclusive for all (1).

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.7%
Developer	35.5%
Elected Member	1.8%
Landowner	4.7%
Lobby	8.9%
Local Authority	1.2%
Parish Council	9.5%
Public Sector	4.7%
Resident	29.0%



## Q11. Do you agree with the emphasis on connectivity? If not, why not?

### General

- Support: 88
- Object: 8
- Other/Comment: 53
- Total responses: 149

Multiple respondents addressed questions 10 and 11 together. As a result there is significant overlap in the answers to both questions. As far as possible, this summary aims not to labour points already highlighted in the summary to the previous question (q10).

### Reasons for support

Multiple respondents identify agreement with the emphasis on connectivity, though many do not state specific reasons why. Of those that did however, this section will set out reasons given.

- Connectivity should form part of policy in physical, functional and economic capacities. This is also inferred more generally through a range of other responses, and links to the 'three pillars of sustainability' highlighted through the answers to question 10. There are also multiple responses suggesting that digital connectivity should be considered at least as important as physical connectivity, and possibly more important.
- Directing developments to locations already served by services, facilities and public transport presents the most efficient way of creating sustainable communities, reducing car use, and encouraging uptake of public transport.
- One respondent cited personal experience in a village where the effects of poor connectivity have been felt, and the associated problems – access across busy roads, feeling isolated and challenges getting small children to school.
- Connectivity brings opportunities to reduce isolation and loneliness.
- Good connectivity should assist the more vulnerable and enhance social mobility.
- The current placement of housing developments has led to isolation from work, school and shops etc., which cannot be allowed again.
- Support 15/20 minute neighbourhoods.
- Recommend review of integrated active travel networks in the Netherlands.

### Reasons for objection

- Agree that connectivity is important, but there is nothing in national policy or local circumstances that suggest it should be an overriding factor to inform a growth strategy.
- Connectivity is important but shouldn't be to the detriment of other factors. Other factors referenced through comments include "other design

principles”, inclusivity, green and blue infrastructure, and passive building design and insulation.

- Believe the emphasis should be on ‘place’ instead.
- The British weather deters active travel – need to be realistic.
- Connectivity is a buzz word.
- One response agrees with the principle of connectivity generally, except in respect of attracting foreign tourists. This is in light of the climate emergency.

## Themes

### Nature/definition of connectivity

A large number of respondents question the definition and nature of connectivity and/or suggest more specific emphasis. One response refers to needing ‘sustainable connectivity’ not just connectivity.

Approximately 5 responses explicitly state the view that connectivity should not focus on street and road networks (and another specifically rejects any focus on private motorised travel). Instead, these responses suggest that connecting communities should focus on responding to patterns of behaviour and evolve layouts and settlement patterns to meet the changing nature of transport choices. Additional responses (3); which do not agree that connectivity should be ‘top of the pile’, suggest that transport should not be seen as an end in itself, but instead be considered a means to deliver economic, social and environmental priorities.

Several responses (circa 5) refer to the NPPF and emphasise that significant development should be focussed in locations which are or can be made sustainable through limiting need to travel. As a result, they highlight that options should consider scope to increase connectivity and provide new connections.

Digital connectivity and a suggestion that this should have at least as much emphasis if not greater emphasis in the plan than physical connectivity, is a theme recurring across questions 10 and 11.

### Transport

As highlighted above, the answers in response to this question highlight that people have different ideas and place different emphasis on elements which sit under the ‘umbrella’ of connectivity. Some clearly consider ‘transport’ in its widest sense to be a critical element, whilst others caution against equating connectivity with transport. This section will focus on comments made specific to transport, especially public transport.

One parish council highlights that it is beyond the remit of the district councils to deliver transport connectivity, and this instead falls within the responsibility of Warwickshire County Council.

Integration and interchange between nodes forms part of connectivity some responses assert. In addition, innovative transport solutions such as smart ticketing and real time travel information are advocated, as well as considering other factors impacting public transport take up, including convenience and affordability.

A housebuilder expressed potential need for public transport to provide shorter local routes, rather than intra town and city movements citing the shift in working from home and the nature of town and city centres likely to change. Another respondent advocates for highly localised connectivity generally as the best means to reduce loneliness.

One respondent requests expansion of active travel to include equestrian, so as not to discriminate against horse riders, and highlight the challenges and vulnerabilities they face.

### Rural connectivity

As in the responses to Q10, there are multiple requests to re-examine the differences needed between urban and rural connectivity, and emphasise that there should not be a bias toward directing growth to urban areas. Instead the potential benefits of supporting rural infrastructure and communities are highlighted.

A number of priorities are raised for rural connectivity by different respondents. These are summarised below, and require functional rural relationships to be assessed.

- More emphasis on smaller villages and links to nearby villages rather than larger centres.
- Access to larger towns, healthcare, schools (particularly secondary schools) and entertainment is required
- Safe cycling routes needed to secondary schools.

In addition to all of the above, one respondent also emphasised the desirability to retain a sense of 'semi-remoteness', and highlights the 'downsides' of unlimited connectivity, citing large numbers of walkers and cyclists that have caused some issues in the countryside and local areas during the pandemic.

### Connectivity and the greenbelt

There are conflicting views expressed in response to this consultation question in respect of its relationship with the greenbelt. One developer interest expresses the view that the SWLP should consider sites which are not within the greenbelt (or the AONB) but are in sustainable and connected locations first (i.e. before releasing any land from the greenbelt). Conversely a different respondent would support greater emphasis on selecting sites close to public transport, even where those sites might be within the green belt.

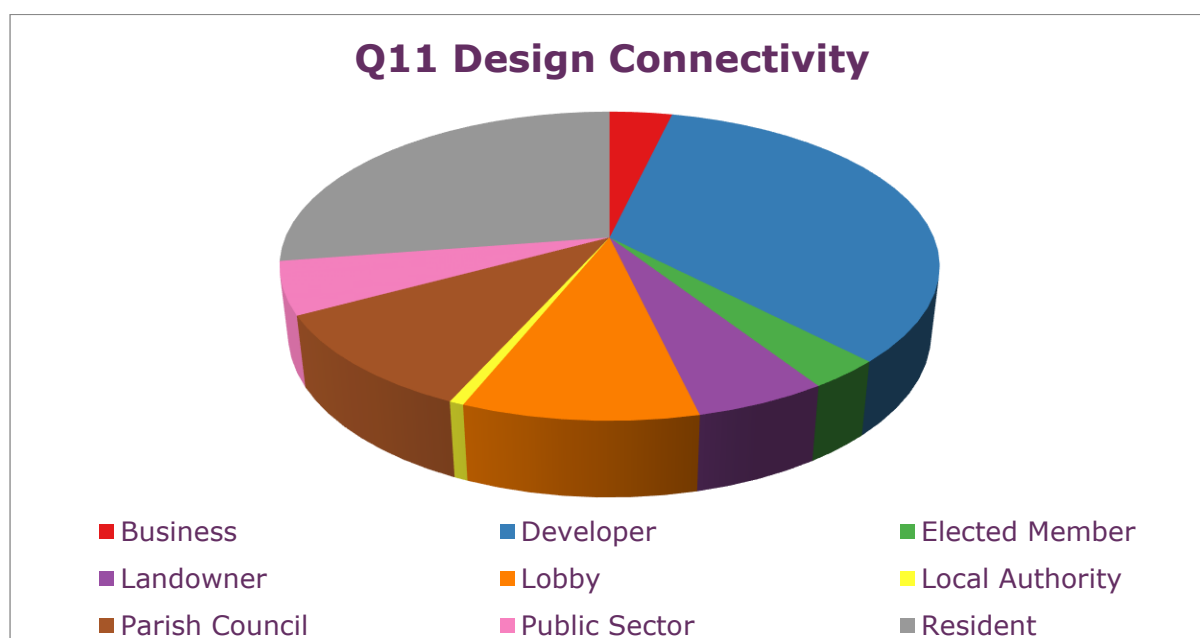
### Other points raised

- Accessibility should be given equal weight to connectivity according to one response. For example, as density increases, public transport accessibility should also increase.
- There should be greater emphasis on quality public realm for a safe and pleasant environment.
- Measures such as reallocation of road space for sustainable transport and innovation are particularly important and should be explored.
- Agree with the principles, but how are these to be controlled other than general statements?

- Local distribution hubs will be required to reduce need to travel.
- Town centre car parks should be for those with mobility issues only. Town centres should be largely car free zones.
- Must be the right connectivity – the Park and Ride in Stratford is cited as a bad example.
- Reinstate the rail link south from Stratford.
- Negative perception of the 'pattern' of bypassing settlements expressed. The bypass was constructed, housing developed up to it, and then a further bypass needed.
- Safety is a recurring issue raised – sustainable affordable and safe **by design**. This relates to concerns regarding the safety of existing routes.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.7%
Developer	34.1%
Elected Member	3.0%
Landowner	5.5%
Lobby	9.8%
Local Authority	0.6%
Parish Council	10.4%
Public Sector	5.5%
Resident	27.4%



## Q12. Do you agree that the Local Plan should seek to explore ways in which the reliance on the private vehicle may be reduced? If not, why not?

There were 198 respondents to this question.

Key Themes	Number of Respondents
<b>Sustainable transport</b> <ul style="list-style-type: none"> <li>Limited capacity in network for more private vehicles so sustainable travel options need to be encouraged</li> <li>It is considered that promoting all forms of sustainable transport should be a strategic focus of the SWLP, in line with Chapter 9 of the NPPF.</li> <li>Use of private car can be reduced through sustainable travel and Plan should seek to reduce use of private car</li> <li>Promoting better and more sustainable connectivity for short trips is key</li> <li>The draft Plan should recognise the definition of sustainable transport in the NPPF: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.</li> </ul>	10
<b>Location of Development</b> <ul style="list-style-type: none"> <li>Development should be focussed in sustainable locations                             <ul style="list-style-type: none"> <li>Increasing build density in the most sustainable locations will reduce need for car journeys. Specialist older people accommodation can reduce need for cars as it is usually sited in town centres.</li> <li>Development should be directed to towns and larger villages</li> <li>Should seek to focus housing around larger development in South Warwickshire</li> <li>Growth should be directed to locations with educational facilities, especially primary schools</li> <li>Locating development next to services and facilities</li> <li>Designate local centres such as Leamington Shopping Park to support future growth in retail/leisure and community uses within easy walking/cycling distance of recently established residential populations.</li> </ul> </li> </ul>	20

Key Themes	Number of Respondents
<ul style="list-style-type: none"> <li>• Draft plan should recognise benefits of strategic sites in their potential for significant infrastructure provision, including sustainable travel options, and providing facilities that reduce need to travel.</li> <li>• Locating sites next to transport infrastructure                         <ul style="list-style-type: none"> <li>○ Development should be directed to locations that offer genuine transport choice.</li> <li>○ Benefit of sites in proximity of new and potential connectivity infrastructure should be recognised when selecting spatial strategy.</li> <li>○ Development should be next to train stations</li> <li>○ Development needs to be focussed on settlements which provide genuine alternative modes of transport to the private car. Development around transport hubs, including those in green belt e.g. Henley.</li> <li>○ Future development across area should be based on access to high quality public transport and good walking and cycling infrastructure.</li> <li>○ SWLP should allocate housing and employment growth near existing sustainable transport infrastructure that offer the best connectivity.</li> </ul> </li> </ul>	
<p><b>This is not a role for SWLP</b></p> <ul style="list-style-type: none"> <li>• Plan cannot impose change but can help widen choice</li> <li>• Purpose of a Local Plan is not to rectify the mistakes, under-provision and missed opportunities of the past</li> <li>• Place for Plan to consider ways to maximise green travel options but not place of Planning Authority to drive national policy on car use.</li> </ul>	6
<p><b>Active Travel</b></p> <ul style="list-style-type: none"> <li>• Stratford-upon-Avon can easily be crossed by bicycle and largely flat. Ideal for active travel will improve health as well as reduce congestion. Active travel not currently encouraged by facilities and infrastructure of town. E.g. no cycle bridges across river Avon. Parking should be restricted in town centres to discourage car use for short journeys.</li> <li>• Active travel should be encouraged and more emphasis on safe sustainable methods across plan area.</li> </ul> <p><b>Walking and cycling</b></p> <ul style="list-style-type: none"> <li>• Developments should have footpath and cycle provision built to Gear Change standards.</li> </ul>	19

Key Themes	Number of Respondents
<ul style="list-style-type: none"> <li>• More off road cycle routes. Join some of villages with routes. Encourage activity for health and minimise vehicle use.</li> <li>• Essential we reduce need for so much car travel. Make shared cycle and walking paths wide enough to accommodate both cyclists and walker simultaneously.</li> <li>• Need more safe cycleways <ul style="list-style-type: none"> <li>◦ Endorse the provision of safer cycling routes within settlement of Wellesbourne.</li> </ul> </li> <li>• Able bodied people should be encouraged to do small journeys walking or by bike. Community bike repair workshops.</li> <li>• Better cycling provision in all towns of South Warks should be priority.</li> <li>• The mindset of developing policies need to change. Currently the emphasis is on vehicles and cyclists and pedestrians are a poor second.</li> <li>• Makes it safer for pedestrians</li> <li>• Focus on walking and cycling should be priority.</li> <li>• Designing new cycle routes so people can safely cycle to facilities and interlinking these routes is a priority to achieving this.</li> <li>• Cycle infrastructure should be considered for every new road. Study Holland and Germany to see how cycle lanes can be integrated. Ask cyclists how to design cycle lanes. In towns cycle storage should be provided and electric bike charging. To combat climate change VED needs to be scrapped and tax put on fuel.</li> <li>• Provision of joined up cycle routes essential.</li> </ul>	
<p><b>Changing Trends</b></p> <ul style="list-style-type: none"> <li>• Home working will reduce need to travel, however increasing population will also mean more journeys</li> <li>• Work hubs should be provided on large development schemes</li> <li>• Premature to refer to trends such as working from home when long term transport strategy is over 15 years</li> <li>• Design home working into new homes</li> <li>• Scoping documents fails to pick up on ways we can reduce frequency of travel, how we can consolidate trips or replace need to travel through embracing technologies including 5G and superfast broadband.</li> <li>• Suspect that use of private vehicles will fall as self-driving vehicles become prevalent. Vehicle pollution likely to become less of an issue as electric vehicles become the norm.</li> </ul>	22

Key Themes	Number of Respondents
<ul style="list-style-type: none"> <li>Plan should recognise change in working/education patterns as a result of Covid and ensure new housing has sufficient space for an office/study Fibre broadband should be a priority.</li> <li>Covid has changed many ways in which we work so transport is less of a priority than internet connectivity.</li> </ul>	
<b>Needs of Disadvantaged</b> <ul style="list-style-type: none"> <li>Plan doesn't discuss role of parking in determining car usage or how innovation such as Mobility as a Service and smart ticketing options could impact on private vehicle usage. Current trends of reference for older people to live rurally, needs of younger people who don't drive or needs of women, will lead to continued car usage if not addressed.</li> <li>Disabled parking spaces in front of schools.</li> <li>Need use of own car as can't get on and off of buses in wheelchair.</li> </ul>	3
<b>Needs of commercial/employment development</b> <ul style="list-style-type: none"> <li>Acknowledge reference to Transport for Business – as important as active and sustainable travel is needed to identify sites for commercial/employment development near to SRN allowing for quick transport of goods and being close to consumers and supply chain.</li> <li>Development with 'Golden Triangle' would assist with sustainability.</li> </ul>	2
<b>Rural areas</b> <ul style="list-style-type: none"> <li>Nature of SWLP area which is largely rural means that public transport is not economically feasible for all areas/settlements. Plan should recognise there will be a continued reliance on private vehicles. Focussing on reducing reliance on private vehicles could concentrate development in urban areas, which would be of detriment to those areas and starve rural communities of development.</li> <li>Agree with general aim of reducing reliance on private car, enhancing connectivity and encouraging sustainable travel, although concerned at growth being directed to main urban areas as would prevent small settlements benefitting from development and associated infrastructure improvements, and would need private car to reach employment, shopping and other facilities.</li> <li>Should recognise rural areas rely more on cars</li> <li>Public transport inconvenient</li> </ul>	22

Key Themes	Number of Respondents
<ul style="list-style-type: none"> <li>• A reasonable aspiration in urban locations but not in rural areas</li> <li>• Not realistic with such a large rural area to cover. May be a moot point with electric/hydrogen cars coming onto market, reducing pollution.</li> <li>• Nearest bus to us is a mile away – rely on cars. Anti-car attitude could make our lives more difficult. More roads needed along with better parking facilities otherwise we will have gridlock and town centres will die. Plan should encourage motorists not demonise them.</li> <li>• Difficult target to achieve across South Warwickshire as it is a predominantly rural area with large number of remote dwellings. Using public transport to work or shop is difficult.</li> <li>• Rural areas do not have connections and services as in urban areas. Rural communities rely on private vehicles. Council should not penalise this group as it would be discriminatory. If Council looked more favourably on rural housing and local places of employment there would be less need to commute and more public transport could be justified.</li> <li>• Rural public transport is inadequate and people do not live where work is</li> <li>• in particular providing options for rural villages to reduce dependence (public transport, cycle paths, pavements etc)</li> <li>• The buses that serve Stockton appear quite empty. In rural locations cannot come close to being as convenient as cars. Focussing resources on buses is not beneficial to residents in reality.</li> <li>• Electric cars great for cities but not for rural areas. Towns should have charging facilities but in major South Warks towns there should be no punishing of those who cannot fully support electric vehicles.</li> </ul>	
<p><b>Important for climate change/climate emergency</b></p> <ul style="list-style-type: none"> <li>• Plan provides opportunity to meet government climate change goals by reducing dependency on private car</li> <li>• climate change and global warming most important global environmental issue to be addressed</li> <li>• A legal obligation of part of UK target for Net Zero carbon emissions.</li> <li>• Road transport responsible for 80% of nitrogen dioxide emissions and rail just 1.6%. Transport emissions account for 28-35000 premature deaths in the UK. As the Council has declared a Climate</li> </ul>	10

Key Themes	Number of Respondents
<p>Emergency, planning and transport policies need to be radically changes so that alternatives to road construction are prioritised</p> <ul style="list-style-type: none"> <li>• Reducing car dependency will reduce carbon emissions.</li> <li>• Plan provides opportunity to meet climate change goals by directing development to most sustainable locations, enhancing active and sustainable travel and reducing dependency on private car.</li> <li>• Something must be done to reduce emissions – road transport responsible for 80% of nitrogen dioxide emissions. Long Marston – Honeybourne railway reinstatement could mitigate impacts of Long Marston development.</li> <li>• Only way we can reduce carbon emissions.</li> <li>• Government climate change targets to meet, yet transport systems support the economy. Many options – EVs, hydrogen vehicles etc. SWLP should anticipate ahead of central government and trends to ensure local population is encouraged in alternative feasible ways to become less reliant on private car. Use of mix of legal and economic local instruments.</li> <li>• Vital to meet climate change targets</li> </ul>	
<p><b>Better Public Transport needed</b></p> <ul style="list-style-type: none"> <li>• Generally agree with emphasis on trams, cycle lanes home working and re-opening rail routes</li> <li>• Reliance on private vehicle should be reduced by positive improvement of public transport infrastructure</li> <li>• Remember most of local population do not use a bicycle – public transport needs to be reliable and cheap and available in the evenings for people to sue it.</li> <li>• Only going to improve if viable alternatives are available. Bus routes need to be hugely overhauled to connect smaller villages and run at appropriate times and include sensible routes.</li> <li>• Alternatives to private vehicles in South Warks should be strengthened considerably. Particularly frequency and connectivity of public transport network</li> <li>• Better bus and rail transport.</li> <li>• Public transport needs to be improved before private vehicle use can be reduced in countryside.</li> <li>• Yes, however will only work if there is a viable alternative. Park and Ride has not proved viable.</li> </ul>	23

Key Themes	Number of Respondents
<p>Smaller buses (better suited to country lanes) could run more frequently and cost effectively.</p> <ul style="list-style-type: none"> <li>• More should be done to ensure bus services run at time and on routes people need.</li> <li>• Greater reliance on other forms of transport means that the transport should be regular with integrated public transport system, and affordable – not through s106 or CIL payments but part of wider programme of sustainability</li> <li>• Thoughtful investment in widespread public transport will be required. Many older people living in Shipston and surrounding villages do not have own vehicles, and are reliant on neighbours and family to get to medical appointments.</li> <li>• Should be done through environmentally friendly EV buses.</li> <li>• Subsidised flat fares.</li> </ul> <p><b>Trains</b></p> <ul style="list-style-type: none"> <li>• Need to improve rail services/ reopen railstations</li> <li>• Long Marston – Honeybourne railway reinstatement could mitigate impacts of Long Marston development</li> <li>• Growth Plan A should not be considered as cars will go electric but trains will not, trains not reliable or efficient. EVs more efficient.</li> <li>• Greater use of railways, particularly in upgrading key stations within SWLP area</li> <li>• Investment in rail over road construction needs to be key policy change. Restoration of Stratford-Honeybourne-Worcester/oxford rail link.</li> <li>• Railway station on HS2 line would reduce car use</li> <li>• Much scope for improvement to rail services. Stratford-upon-Avon poorly served. Connections to Leamington and London are poor. Open to reopening of Honeybourne line but against loss of Greenway and important for people's wellbeing.</li> <li>• Railway has never been reliable or efficient. Extending the SUA to Long Marston line seems a waste of money when you can drive it in 10 minutes in an EV. Better use of money would be park and ride to train stations. Losing Greenway to railway would be contrary to health aims of Plan due to additional noise and air pollution to countryside and damage to wildlife.</li> <li>• Greater use of railways, particularly in upgrading key stations within SWLP area. SWLP has no real way of influencing people's reliance on private car which has</li> </ul>	

Key Themes	Number of Respondents
<p>to come from government and provision of better transport facilities.</p> <ul style="list-style-type: none"> <li>• Restoration of Stratford-Honeybourne-Worcester/oxford rail link.</li> </ul>	
<p><b>Cars should not be discouraged/cannot be reduced</b></p> <ul style="list-style-type: none"> <li>• More roads needed along with better parking facilities otherwise we will have gridlock and town centres will die. Plan should encourage motorists not demonise them</li> <li>• It is appropriate to plan for range of transport methods but do not agree with emphasis of policy that seeks reduced reliance on private vehicle. Section 9 of NPPF does not require this. Plan should seek to prioritise travel by sustainable transport modes and shift towards electric vehicles.</li> <li>• Car transport needed for economy and commuting.</li> <li>• Neither practical nor realistic. People are not going to use alternative forms of transport in significant numbers due to convenience of private cars. Better to improve road networks to reduce congestion.</li> <li>• Private vehicles encompass a variety of transportation methods e.g. mopeds, scooters, and unfair to demonise all private vehicles.</li> <li>• Most people in South Warwickshire want own private vehicle. Will not be a problem when everyone has EVs.</li> <li>• Prioritising active and sustainable travel should be done with improved services rather than penalising car travel</li> <li>• Public transport is non-existent so unwise and impractical</li> <li>• Can't turn back the clock – people will not give up cars without a fight. You can persuade them to switch to electric vehicles and reduce number of cars through taxation but unrealistic to think you will significantly reduce car use.</li> <li>• Do not believe use of private car will diminish</li> <li>• People will always want flexibility of own car. To move people from cars you need sufficient and suitable public transport that is reliable and cost effective.</li> <li>• The car is not going away we need to accommodate it. Can't do weekly shopping on a bike but could in an electric vehicle. EVs only carbon neutral after 58,000 miles and will need a new battery by then.</li> </ul>	12

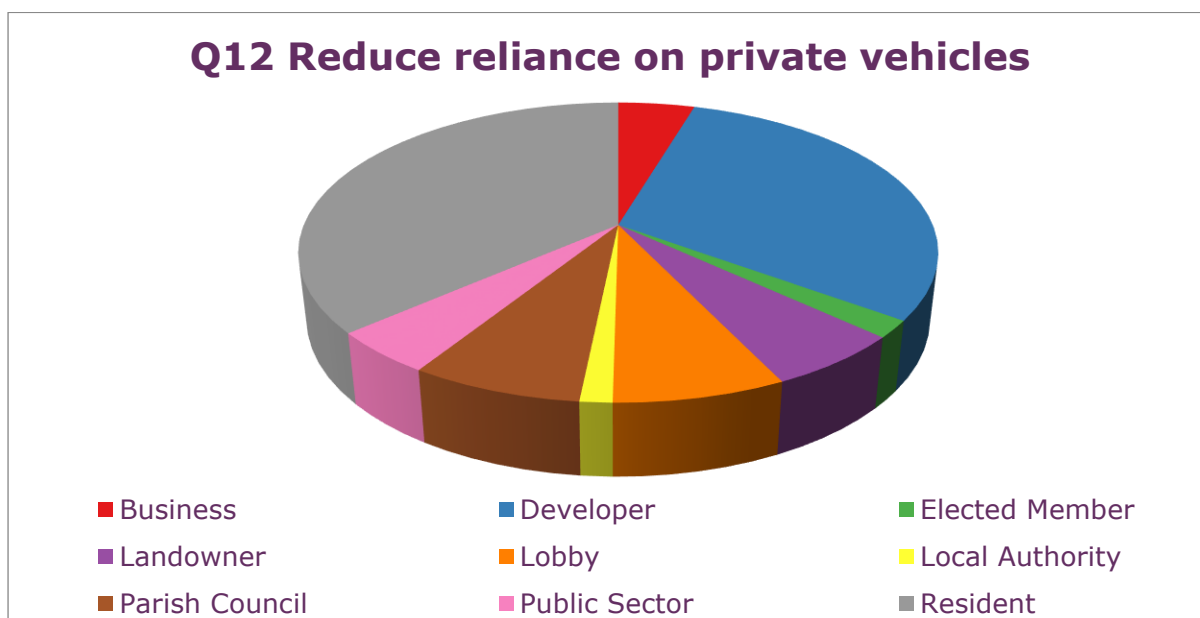
Key Themes	Number of Respondents
<p><b>Balanced Approach Needed</b></p> <ul style="list-style-type: none"> <li>• Use of car cannot be eradicated completely</li> <li>• Balance needs to be struck between requirements of different groups of people and requirements for journeys.</li> <li>• Promoting all forms of sustainable transport should be key focus of SWLP. However continued use of private vehicles is inevitable and something that should be accounted for. Future residents should have a choice of travel in developments.</li> <li>• The requirements to reduce reliance on private car depend on nature of development, from an air quality perspective will reduce in 10 years.</li> <li>• Agree but should not be at expense of improving existing connections and making enhancements where there is opportunity to do so.</li> <li>• Unlikely that alternatives will have any major impact unless offer same level of convenience and time taken to complete journeys as private vehicles.</li> <li>• Partly agree – difficult to achieve in predominantly rural area and should not be at expense of promoting sustainable development in rural areas (NPPF para 78). Local Plan should take more nuanced approach to reducing reliance on private vehicles in rural areas. In many villages, there are adequate services to support immediate needs. Allowing rural growth to support these services is vital to maintain sustainability of these settlements.</li> <li>• Supported as an aspiration, could be of particular benefit to many households on Council's waiting list who lack access to private vehicles. However, expect the reality will take some time to achieve, especially given rural character.</li> <li>• Yes, however balance needs to be struck between requirements of different groups of people and requirements for journeys. Reliance on transport for economy of South Warwickshire and commuting patterns. EVs, WFH and changing travel requirements will reduce carbon emissions and importance of private car reduction. Geography of area means private car will still be needed.</li> <li>• Taking very narrow view of a minority. The motorist is already penalised in many ways. Geographic spread of county and lack of public transport means there is a need for private vehicles. Balanced approach needs to be taken.</li> <li>• Could prove to be a very dangerous objective. If pursued with care will improve the environment, but</li> </ul>	<p>28</p>

Key Themes	Number of Respondents
<p>if enforced carelessly could have negative impact of quality of life of rural areas. Local rail services inaccessible to many Warwickshire residents, bus services dwindling every year. Should have integrated transport system – eg adequate and reasonably priced parking at rail hubs, more frequent and reliable public transport. Punitive measures will destroy town centres.</p> <ul style="list-style-type: none"> <li>• Private transport will be only option for many where public transport is not available. Costs and lack of coverage need to be considered. Developer contributions only short term solution.</li> <li>• Private vehicles are essential in both rural and small town environments as public transport will always be limited.</li> <li>• Should recognise that rural areas should not be penalised for requiring a higher level of private car usage.</li> </ul>	
<p><b>Impact of EVs/ULEVs</b></p> <ul style="list-style-type: none"> <li>• EVs will become more popular- will reduce environmental impact of the private car.</li> <li>• Will private car use still be an issue over lifetime of Plan? <ul style="list-style-type: none"> <li>○ Next decade will see significant changes in terms of banning internal combustion engine vehicles. Significant in terms of reducing emissions.</li> <li>○ Not convinced by need to reduce reliance on private vehicles. Over period of Plan transport will decarbonise and move to electric or hydrogen powered. Air and noise pollution will be less of an issue. Far more important will be facilitating use of low carbon vehicles through provision of charging infrastructure in towns.</li> <li>○ Public transport only works where there are centres of mass employment – people don't want to move where they live to work. The most sensible solution is to encourage individual transport solutions using 'green solutions' (electric cars)</li> <li>○ Should have policy requirement for EV charging infrastructure</li> <li>○ While focus will be on reducing internal combustion engine cars, will look at opportunities to increase use and uptake of electric vehicles. Key to this is provision of EV charging infrastructure within developments</li> </ul> </li> </ul>	45

Key Themes	Number of Respondents
<ul style="list-style-type: none"> <li>○ EVs will ensure that emissions associated with hydrocarbon engines are no longer emitted. Charging points should be part of Local Plan. Growth should be directed to locations with educational facilities, especially primary schools, to reduce use of private car (irrespective of EVs to promote healthy lifestyles).</li> </ul>	
<p><b>Evidence Base/ Policy Background</b></p> <ul style="list-style-type: none"> <li>• Needs to be done in conjunction with WCC transport plan to ensure adequate public transport and cycle networks</li> <li>• Reduced reliance on the private vehicle is encouraged both within NPPF and WCC LTP.</li> <li>• TfWM Green Paper on refresh of our LTP presents several themes on reducing single occupancy vehicles e.g. changing where people travel to/from, encouraging shorter journeys through public transport, walking and cycling. Considering the spatial proximity of homes to key services and amenities.</li> </ul>	3
<p><b>Health/Wellbeing</b></p> <ul style="list-style-type: none"> <li>• An important factor in improving health/wellbeing, air quality and highway congestion</li> <li>• Cutting use of cars and introducing more electric buses/charging points will lead to an improvement in air quality.</li> </ul>	2
<p><b>Parking/Traffic Management</b></p> <ul style="list-style-type: none"> <li>• Shared or pooled cars could be encouraged.</li> <li>• Also creates parking issue with households having 2 or 3 cars</li> <li>• focus on how to reduce business transport too</li> <li>• Traffic management has to be improved. Acres of valuable land given over to the private car. Cars too fast and dangerous.</li> <li>• Yes but get it wrong and town centres will decline further, means less money in local economies.</li> <li>• Free P&amp;R and banning cars in town centres. Provision of joined up cycle routes essential. Stop providing parking in town centres.</li> </ul>	6

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.6%
Developer	30.4%
Elected Member	1.8%
Landowner	6.0%
Lobby	7.4%
Local Authority	1.4%
Parish Council	7.4%
Public Sector	4.6%
Resident	36.4%



## Q13. Do you agree that enhancing connectivity and prioritising active and sustainable travel are the best ways to achieve this? Please explain your answer

There were 168 respondents to this question.

### Key Themes and Number of Respondents (in brackets)

#### Directing Development to Sustainable Locations (46)

- Directing development to areas with services and facilities **(20)**
  - Higher order settlements that provide a variety of services and facilities whilst being compact enough for services and facilities to be in walking distance of new allocations on edge of the settlement.
  - Consider densification of areas close to key service and facilities crucial to reducing reliance on private vehicle
  - Residential led urban extensions to existing settlements can offer clear sustainability benefits from being close to built-up area and having on-site infrastructure, reducing need to travel
  - Opportunity should be taken to consider growth at larger village which possess a range of local services.
  - Locating development at established locations, locating proposed development close to planned development to enhance connectivity and reduce car use
- NPPF Paragraph 103 – Development should be directed to sustainable locations or those which can be made sustainable **(18)**
- NPPF Paragraph 72– homes often best delivered through large scale schemes, such as new settlements or significant extensions to existing settlements – should also support sustainable communities **(5)**
- Development should be directed near train stations **(8)**
  - Large development should assess impact on local stations
- Development should be directed near to infrastructure
  - Development should only be in areas with existing infrastructure near rail infrastructure, major road network and main settlements/facilities.
  - Sites that benefit from enhanced connectivity/sustainable travel should be prioritised
  - Plan presents opportunity to direct development to sustainable locations with access to walking, cycling and/or public transport. Development should be directed adjacent to settlements where it is possible to use other transport methods other than car to access services and facilities. Development should also be located near train stations and major transport links for travel outside SWLP area
- Whilst it should be given merit, should not be priority of Local Plan. SWLP should make commitment to focus development on existing sites and buildings within towns first – a 'brownfield first' commitment that allows houses to replace empty shops on high streets.

<p><b>Key Themes and Number of Respondents (in brackets)</b></p> <ul style="list-style-type: none"> <li>Directing development across Plan area key for connectivity for all residents, in particular those who experience connectivity challenges which tend not be in the largest main urban areas. MRCs will play an important role in enhancing connectivity and this will need to be reflected by the Plan strategy and proposed allocations.</li> </ul>
<p><b>Mixed Use Developments (8)</b></p> <ul style="list-style-type: none"> <li>NPPF Paragraph 104 – policies should support mix of uses across an area and minimise length of journeys within large scale sites <b>(6)</b></li> <li>Walkability and mixed-use developments will create healthy and valuable communities <b>(2)</b></li> </ul>
<p><b>Requirements of Employment (7)</b></p> <ul style="list-style-type: none"> <li>NPPF Paragraph 82 – planning policies should recognise specific locational requirements of different employment sectors. Storage and distribution operations have a requirement to be within easy access to the strategic highway network (5)</li> <li>Plan also needs to think of existing businesses in countryside away from public transport</li> </ul>
<p><b>Active Travel in Development (12)</b></p> <ul style="list-style-type: none"> <li>New development should place emphasis on walking, cycling and public transport and have infrastructure for electric vehicles.</li> <li>Active travel must be requirement of all medium-large developments. Create good quality transport links to discourage private car. A full review of integrated travel options must be completed. Links at outline planning stage. Footways and cycleways as integral part of development to Gear Change standard.</li> <li>Ensuring developments are designed around walking and cycling and improving linkages to existing services particularly in rural areas is key. Larger more strategic development should provide services and facilities as part of scheme.</li> <li>Particularly for local journeys. Designing new developments around walking and cycling is key and improving linkages to services.</li> <li>New developments can be designed to minimise the need to travel by private car, maximise opportunities for active travel and use reliable and affordable public transport.</li> <li>Broader links should be agreed at outline planning stage not as afterthought (2)</li> <li>Active travel by walking and cycling should be encouraged but need to be separated from sharing roads with large vehicles. No fundamental rule that cycle routes should follow highways.</li> <li>New development should be required to provide EV charging points and secure cycle parking.</li> </ul>
<p><b>Walking/Cycling (24)</b></p> <ul style="list-style-type: none"> <li>Support cycle paths – safer and more efficient paths that will encourage more cyclists. E.g cycle paths should not start and stop at side roads, should be physically protected from vehicles.</li> <li>Increasing choice and opportunity to take sustainable travel and creating safer spaces e.g. cycle lanes, nudging people towards sustainable</li> </ul>

## Key Themes and Number of Respondents (in brackets)

transport options will present new opportunities for people to use sustainable transport options

- Warwickshire poorly connected by cycle routes. Ensuring there is a decent network, linking towns, and enabling people to cycle into and across town safely, will help reduce local journeys by car. Should interconnect schools, towns, leisure facilities etc.
- Safe cycling connectivity designed into new settlements.
- Cycle racks and cycle storage, allocated to proposed housing, schools, commercial and community hubs, etc. e-cargo bikes to be used by residents.
- Have to make roads safe for cyclists and pedestrians. Attitudes to speed need to be changed, safe crossing points provided
- Many people are discouraged by road safety, cycle lanes need improving as currently an afterthought.
- Walking and cycling connectivity to schools should be No.1 priority. Traffic congestion and noise and air pollution in the locality of school grounds is normal. Need safe traffic free cycle routes to schools.
- Agree with the points but ask that you use a different picture to show cyclists. Should show everyday cyclists not sport cycling
- No point in having excellent cycle lanes in new development if there are no cycle lanes within existing highway network. SWLP need to address how barrier to active travel within existing built environment can be overcome.
- Cycling and walking routes between key towns should be built to encourage those activities and existing lanes should have low speed restriction for motorists to make users feel safe.
- Complete network of cycle routes should be created.
- Green footpaths inside of development and away from highways to connect and give sense of community and place.

## Rural Communities (19)

- Rural areas dependent on private car **(4)**
  - In some areas reducing dependency on car will be difficult as alternatives will be more expensive. Especially small and remote villages. May only be places to live for more wealthy. Recognition of less well off especially younger and older residents is essential.
  - Reliance on buses in rural areas difficult. Resources for village run and maintained uber services more helpful.
  - All rural villages are dependent on car. No reduction in car use until really effective public transport introduced (unlikely in short/medium term). Only viable means for sustainability is EVs. Rural villages not large enough to rely on private sector to provide these. Must be clear strategy (financial incentives or directly provided by Districts) to significantly increase number of charging points in rural villages.
  - Realistically, means abandoning many small rural settlements which are dependent on car ownership for access to schools, medical care, shops, culture etc.
- From rural context, priority should be to improve the maintenance of the existing travel network and push to increase broadband connectivity
- Improve connectivity to rural parts of the county.

## Key Themes and Number of Respondents (in brackets)

### Public Transport (12)

- Improve bus services and ensuring bus routes are accessible.
- For long distance travel supports provision of new bus/rail infrastructure to underpin existing allocations and supports delivery of additional growth at locations along sustainable transport corridors, including within the corridor to the south of Stratford-upon-Avon as it relates to LMA
- Important that public transport not removed once in place. Residents need to be assured that public transport will remain in place and is affordable in order for attitudes to change.
- Integrated public transport scheme should be developed including regular subsidised buses, rail shuttles, VLR.
- Enhanced public transport is fundamental to this. Where adequate provision is achieved there should also be discouragement of private vehicles through congestion charging/ eco-tariff penalties with money raised being directed towards supporting public transport.
- Yes but need to be recognised not everyone can walk or cycle. Public transport important
- Provision of sufficient funding for public transport would enhance connectivity and encourage sustainable travel.

### Town Centres (4)

- Supporting public toilets and shelters, parking restrictions/charges, incentives for EVs, making town centres more attractive through restricting traffic in town centres and adding street furniture, etc
- Need to recognise that reducing requirement for residential off-street parking would be challenging within the town – not enough on-street parking provision in many parts of town leading to congestion and potential danger.
- Need disincentives – e.g. limit car parking spaces – single occupancy car journeys discouraged.
- Cars should be restricted from town centres and bus services promoted.

### Disadvantaged Groups (3)

- Consideration to those who have little to spend on travel
- Horse riding helps achieve exercise targets and is accessible to ill and disabled.
- Recognition of less well-off especially younger and older residents is essential.

### Health/Wellbeing (2)

- Health improvements of reducing private car use – increased exercise and less pollution
- increased connectivity and opportunities for active travel not only encourages healthy living but also increases a schemes sustainability and future proofing of developments.

### New technology/trends (8)

- Promote opportunities to work from home in design of new developments and ensuring balances housing stock in type and size.
- The way we work and travel is changing and technology evolving. Technology can enhance connectivity.

## Key Themes and Number of Respondents (in brackets)

- Enhancing internet connectivity and mobile phone networks should be the highest priority
- Improve connectivity including broadband and public transport to give people flexibility about where they live work and travel and avoid new roads
- Emphasis should be on electronic communication rather than motorised travel
- Connectivity including broadband to give people flexibility and avoid proliferation of roads.
- Emphasis should be on all forms of mobility, including virtual mobility and ability to learn and work from home rather than needing to travel. Online shopping also reduce travel. SWLP should consider delivery of high quality internet connectivity as first option for mobility and have policies which are future proofed rather than restrictive.
- Equally important are measure to reduce travel. Providing virtual mobility, specifically faster internet will facilitate home working and online shopping. Covid-19 pandemic accelerated such changes.

### Trains (12)

- Additional funding to support increased train services to Stratford to Birmingham line should be found to give additional support to Stratford town centre.
- S-U-A needs public transport connections as a major tourist destination.
- Development south of Stratford should have appropriate infrastructure e.g. services and facilities. Also light-rail could be used.
- Several enhancements proposed in the West Midlands Rail Investment Strategy to a number of services, especially along the following lines:
  - Birmingham snow hill/ Moor St – Stratford-on-Avon line
  - Birmingham snow hill/ Moor St – Leamington Spa line
  - Leamington – Stratford line
  - Leamington – Coventry line
- These enhancements need to be captured in the local plan and seen as opportunity to support further growth.

### Reopen Train Lines (9)

#### Stratford to Honeybourne (4)

- Stratford part of Golden Triangle between Oxford and Cheltenham but no public transport to these destinations. Lack of rail connectivity south of Stratford. Draft WCC LTP4 highlights significant movement across Warwickshire's borders to surrounding areas. Restoration of the south bound rail link from Stratford-upon-Avon to the North Cotswold Line must be key priority of SWLP.

### Horse Riding (1)

- Plan should include horse riders. Horse riding helps achieve exercise targets and is accessible to ill and disabled. Active travel routes should not compromise access to public rights of way and should link up with these. Where new routes cross existing routes, signal controlled crossings should be introduced. Introduce 'Quiet' Lanes – reduce speed of traffic.

Key Themes and Number of Respondents (in brackets)
<p><b>Incentives/Disincentives (2)</b></p> <ul style="list-style-type: none"> <li>• Should be done with improved services and incentives rather than disincentives – using only disincentives would be totally unacceptable.</li> <li>• Infrastructure must be in place to ensure maximum accessibility and inclusivity for people before disincentives introduced</li> </ul>
<p><b>Climate Change (12)</b></p> <ul style="list-style-type: none"> <li>• Carbon reduction important. Transport is major carbon problem. But also needs to be recognised that effective transport systems are an essential component in modern way of living. Need to find new ways to travel not dependent on private vehicles.</li> <li>• We should only be prioritising non-motorised vehicle travel. Climate emergency declared and need to achieve carbon neutral by 2030.</li> <li>• Essential for meeting climate change targets and personal wellbeing</li> <li>• There is a climate change crisis. Active transport alternatives that breach the barriers between two districts such as motorways and railways must be promoted.</li> <li>• Stratford/Warwick DC declared climate emergency.</li> <li>• Essential if to meet zero carbon target. Should have target of 40% of people commuting by public transport, walking and cycling by 2030 in SDC according to Friends of the Earth</li> </ul>
<p><b>E-bikes/E-scooters (12)</b></p> <ul style="list-style-type: none"> <li>• Electric bikes and scooters have significant potential to enable quick and easy travel. Infrastructure to facilitate this including in LSVs should be encouraged.</li> <li>• Personal travel e.g. electric bikes/scooters, and demand responsive travel also important alongside public transport.</li> </ul>
<p><b>Electric Vehicles (20)</b></p> <ul style="list-style-type: none"> <li>• Provision for EV charging points important.</li> <li>• Enhancing connectivity is important, however Council must listen to what people want, who would use which services. No point building cycle lanes for ageing population. EVs will only be used if enough charging points. EVs unappealing because of having to wait for charging and finding a charge point</li> <li>• Many issues can preclude active travel e.g. age, weather, disabilities, carrying items so comprehensive approach needed.</li> <li>• Cannot be via use of battery powered vehicles, production of batteries harmful to environment</li> <li>• Implementing sustainable travel systems will fail if public don't use them</li> <li>• WCC LTP4 must form important part of overall transport strategy context for the SWLP with improvements to infrastructure such as charging points for EVs and e-bikes.</li> </ul>
<p><b>Reduce Need to Travel (2)</b></p> <ul style="list-style-type: none"> <li>• Village shops could reduce need to travel to supermarkets – could be encouraged as satellites of main supermarkets via business rates. Village schools reduce need to travel.</li> <li>• Reducing need to travel also has important role in reducing need for private car.</li> </ul>

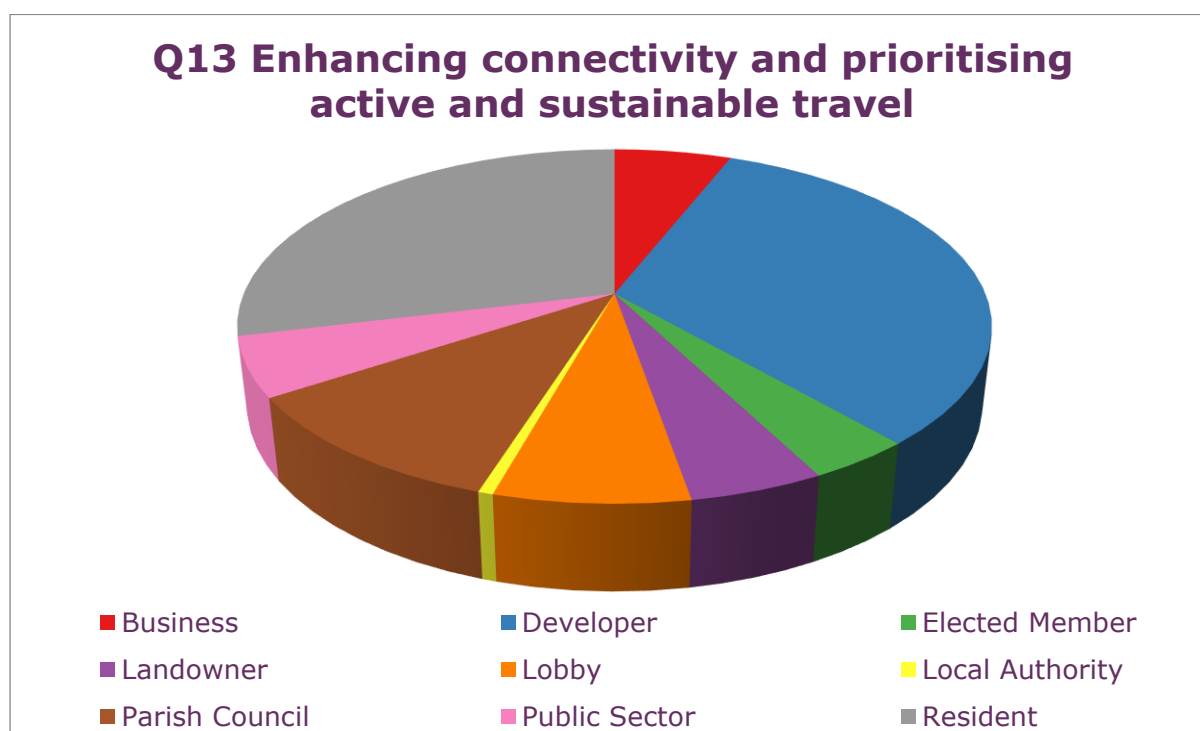
## Key Themes and Number of Respondents (in brackets)

### Roads (5)

- Consideration should also be given to periphery boundaries where people travel across counties.
- Development sites in proximity to SRN junctions are likely to impact on capacity of network and create congestion.
- Only enhance connectivity when there is a clear need – don't need further roads as this doesn't solve underlying issues
- Resolving existing issues, and enhancing connectivity whether that be through improving the strategic road network, public transport or other options, can help to reduce congestion and has environmental benefits. Enhancing connectivity in all forms is best approach.
- Support for new road building should be withdrawn. Disused train lines reinstated.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	6.0%
Developer	32.6%
Elected Member	3.8%
Landowner	4.9%
Lobby	7.1%
Local Authority	0.5%
Parish Council	10.9%
Public Sector	5.4%
Resident	28.8%



## Q14. Are there any additional transport issues or priorities you think that the Local Plan should address? Please explain your answer

There were 161 respondents to this question.

Key Themes/Issues Raised by Respondents	No. of Responses
<b>Development should be in locations with access to key transport networks</b> <ul style="list-style-type: none"> <li>• Locate development near train stations                             <ul style="list-style-type: none"> <li>◦ particularly Warwick Parkway, Bearley and Wilmcote – development of sites at these stations would improve parking and drive further use</li> </ul> </li> </ul>	9 5
<b>Address congestion/safety issues/pollution</b> <ul style="list-style-type: none"> <li>• Consideration should be given to the extent development increases traffic on local roads, inc. HGVs – particularly important in Cotswolds National Landscape. Increase of traffic movement of 10% or more should be considered significant in these locations.</li> <li>• Congestion, pedestrian safety issues and air pollution issues will worsen with housing and educational site allocations around Warwick</li> <li>• Reinstate Stratford-Honeybourne line to reduce congestion in Stratford-upon-Avon and attract tourists.</li> </ul>	15
<b>Improve walking/cycling routes</b> <ul style="list-style-type: none"> <li>• Integrated cycle lanes needed</li> <li>• New footbridge over SUA river that bicycles can use, and footbridge at seven meadows needs wheel trough for bikes.</li> <li>• To encourage walking and cycling dedicated and segregate lanes need to be set up</li> <li>• Strategies such as the Greenway should be mirrored across 2 Districts</li> </ul>	15
<b>Utilise/implement transport infrastructure to support growth.</b> <ul style="list-style-type: none"> <li>• Greater emphasis on linking existing locations for growth</li> <li>• Recognise role of development in delivering infrastructure</li> <li>• South Western Relief Road should be utilised to enable further growth</li> <li>• Plan should set out how transport infrastructure delivered prior to development</li> </ul>	9
<b>HS2 considerations</b> <ul style="list-style-type: none"> <li>• Add a South Warwickshire station</li> <li>• No more road building or HS2 development</li> </ul>	8

Key Themes/Issues Raised by Respondents	No. of Responses
<p><b>Improvements to roads/road safety</b></p> <ul style="list-style-type: none"> <li>• Quieter road surfaces should be used especially on M40</li> <li>• Consideration of road safety issues, public realm and low traffic neighbourhoods should be in the Plan</li> </ul>	8
<p><b>Specific site concerns</b></p> <ul style="list-style-type: none"> <li>• Management of school traffic at Mountford Close, Wellesbourne is a concern; dangerous parking.</li> <li>• Proposed car parking has not come forward with Wellesbourne medical centre</li> <li>• Development of Warwick University Campus will result in increase traffic</li> <li>• Schools with capacity not in walking distance of Tiddington, which causes congestion. Knights Lane is hazardous due to speed and volume.</li> <li>• Clopton Bridge is inadequate for amount of traffic.</li> <li>• Traffic on Cubbington Road is a concern, especially HGVs</li> <li>• Increased development around Kineton, Shipston and Wellesbourne, Chase Meadow and Barford has resulted in major increase in traffic on A429 and Longbridge Roundabout. Proposed sand and gravel extraction at Barford would result in 90+ lorries and environmental impacts and health on residents.</li> <li>• Problems safety and congestion wise with j13 and 14 of the M40</li> <li>• Divert A452 away from Kenilworth town centre</li> <li>• Infrastructure in Leamington cannot cope with additional traffic. Environmental impact, pollution, more road accidents, potholes, congestion.</li> <li>• The Lakes' train station is a request stop – makes travelling by train more difficult. Also have to request help for pushchairs.</li> <li>• Essential to provide extension to proposed A46 link road to run between Stoneleigh Park and A46. Traffic on Coventry Road is already chaotic and vibrations from lorries damaging old buildings. Development in area such as Warwick University, HS2 should be conditional on bypass being built</li> <li>• Safety concerns in Earlswood – roads cannot cope with more traffic. Speed of cars, cars on pavements, no footpaths</li> <li>• A425 through Leamington and Radford Semele to Fosse and Fosse is carrying more traffic than designed to. Congestion is an issue especially post-Covid.</li> <li>• Train services between SUA and Birmingham/Leamington/Warwick are terrible. Night time travel not possible. Rail service too slow and infrequent to be viable over private car</li> </ul>	16

Key Themes/Issues Raised by Respondents	No. of Responses
<ul style="list-style-type: none"> <li>Schools with capacity not in walking distance of Tiddington – cause congestion. Knights Lane is hazardous due to speed and volume. Clopton Bridge inadequate. No capacity for further development at Tiddington due to lack of SWRR bridge.</li> </ul>	
<p><b>Specific Site Comments/Opportunities</b></p> <ul style="list-style-type: none"> <li>Improving sustainable travel infrastructure in MRCs such as Studley would be welcomed</li> <li>Would support delivery of faster growth at LMA, potential enable further growth at LMA allowing critical mass of people for transport; complement and support sustainable travel options between Stratford and LMA area and help fund SWRR; support development of economic cluster around LMA; enable more people live in a masterplanned area with walking and cycling links and near jobs and services.</li> <li>Strategies such as the Greenway should be mirrored across 2 Districts</li> <li>Ban coaches from parking in coach park north of Henley Street to encourage tourism spending.</li> <li>Infrastructure for LMA should be implemented and brought into use. Further delay will risk housing delivery – critical for long term delivery of new settlement.</li> <li>Proposed Kingswood Business Park near to new grade separated junction to be constructed on A46. Will also help opportunity to create new Link Road to B4115. Would enable Stoneleigh Park related traffic to access employment areas without going through Stoneleigh Village – noise, congestion and pollution benefits.</li> <li>Red House Farm site would allow delivery of new junction on M40. To replace j13 and 14.</li> <li>SW Relief Road should be utilised to enable further growth</li> <li>Wellesbourne benefits from bus and rail links. New growth would help deliver enhancement to connectivity and support viability of services</li> <li>Warwick Parkway – provision of active and sustainable linkages to station needed. Allocation of Warwick Racecourse can help.</li> <li>Kenilworth Station – additional growth will help sustain its viability. Land at Rouncil Lane suitable location for growth</li> <li>Land at Aylesbury Road, Hockley Heath is located in a sustainable location near bus services and facilities</li> <li>Land north of Leamington Spa in close proximity to town centre with good accessibility to walking, cycling and public transport network. Would have embedded transportation systems and active travel connections.</li> </ul>	17

Key Themes/Issues Raised by Respondents	No. of Responses
<p>Improvements to the A452 Leamington to Kenilworth corridor in WDC Infrastructure Delivery Plan – proposals provide opportunity for S106 contributions to scheme and cycle improvements on A452</p> <ul style="list-style-type: none"> <li>Proposed new development at Hatton station sustainable location for growth given location next to underused station and can be made more sustainable e.g. cycle links</li> <li>Site at Rumbush Lane Earlswood is able to deliver new services that enhance its accessibility. Near Earlswood train station.</li> <li>Birmingham and Solihull Rugby Club is located near strategic network and 2km from train station. Development could enhance linkages to infrastructure that encourage modal shift i.e. cycle route, provision of showers, e-bike schemes, bus services etc.</li> <li>Safeguarded land at Westwood Heath, Coventry performs well in sustainability credentials and is in walking distance of train stations and close to key bus routes</li> </ul>	
<p><b>Improve public transport</b></p> <ul style="list-style-type: none"> <li>Affordable and regular public transport</li> <li>Sufficient funding to enhance public transport</li> </ul>	51
<p><b>Improve Bus Services</b></p> <ul style="list-style-type: none"> <li>The National Bus Survey presents opportunities for enhanced regional bus services through simpler fares, improved routes and higher frequencies. Currently plan makes little reference to enhancing bus services or bus infrastructure opportunities.</li> <li>Improved bus services and timetabling/flexibility</li> <li>Public bus transport needs to be run by District Council so it can be subsidised and to maximise efficiency</li> </ul>	5
<p><b>Consider light railway</b></p> <ul style="list-style-type: none"> <li>Prepare feasibility survey of using the Greenway and Tramway as light railway</li> </ul>	5
<p><b>Need integrated travel system</b></p> <ul style="list-style-type: none"> <li>Integrated public transport scheme should be developed including regular subsidised buses, rail shuttles, VLR.</li> <li>Introduce parking charges at out of town retail parks and use to subsidise town centre car parks. Must be part of integrated system to improve bus (P&amp;R) and cycle transport options.</li> </ul>	5
<p><b>Trams</b></p> <ul style="list-style-type: none"> <li>Provision of trams esp. Stratford, Warwick, Kenilworth and Coventry</li> </ul>	2
	13

Key Themes/Issues Raised by Respondents	No. of Responses
<p><b>Reopen train lines/new train stations</b></p> <ul style="list-style-type: none"> <li>• Reopen Honeybourne-Stratford line</li> <li>• Reopen Chiltern line stations – extend line from MOD Kineton to create a loop into Lighthorne/Gaydon.</li> <li>• South of Stratford</li> <li>• Capture demand from LMA to prevent it being car dependent - LMA Garden Village should link up with SUA railway</li> <li>• Facilitate second route from Birmingham to Oxford via Stratford</li> <li>• Build on travel opportunities of Worcester Parkway</li> </ul> <p><b>Improve train services/upgrade stations</b></p> <ul style="list-style-type: none"> <li>• Better connectivity needed south of Stratford-upon-Avon</li> <li>• The Plan should do as much as it can to encourage WMT and Network Rail to improve rail services from Kenilworth to Birmingham</li> <li>• Improve frequency/speed of trains from Warwick to Stratford</li> <li>• Upgrading stations, particularly Claverdon</li> </ul>	11
<p><b>Management of school traffic/ active travel for schools</b></p> <ul style="list-style-type: none"> <li>• Issues with congestion and safety around schools</li> </ul>	6
<p><b>Community transport</b></p> <ul style="list-style-type: none"> <li>• Provision of shuttle/dial up buses particularly for elderly and disabled</li> <li>• Transport links and community/volunteer transport to hospitals</li> </ul>	6
<p><b>Transport for rural communities</b></p> <ul style="list-style-type: none"> <li>• Car parking facilities in countryside</li> <li>• Must ensure bus services for rural areas are maintained/enhanced.</li> <li>• Rural transport particular problem – timetables make it difficult for commuters. Lack of joined-up bus and rail. Frequent change of timetables. Issue of weekend and late night transport.</li> <li>• UBUS should be extended to Warwick DC.</li> <li>• Private vehicles more important to rural communities</li> </ul>	6

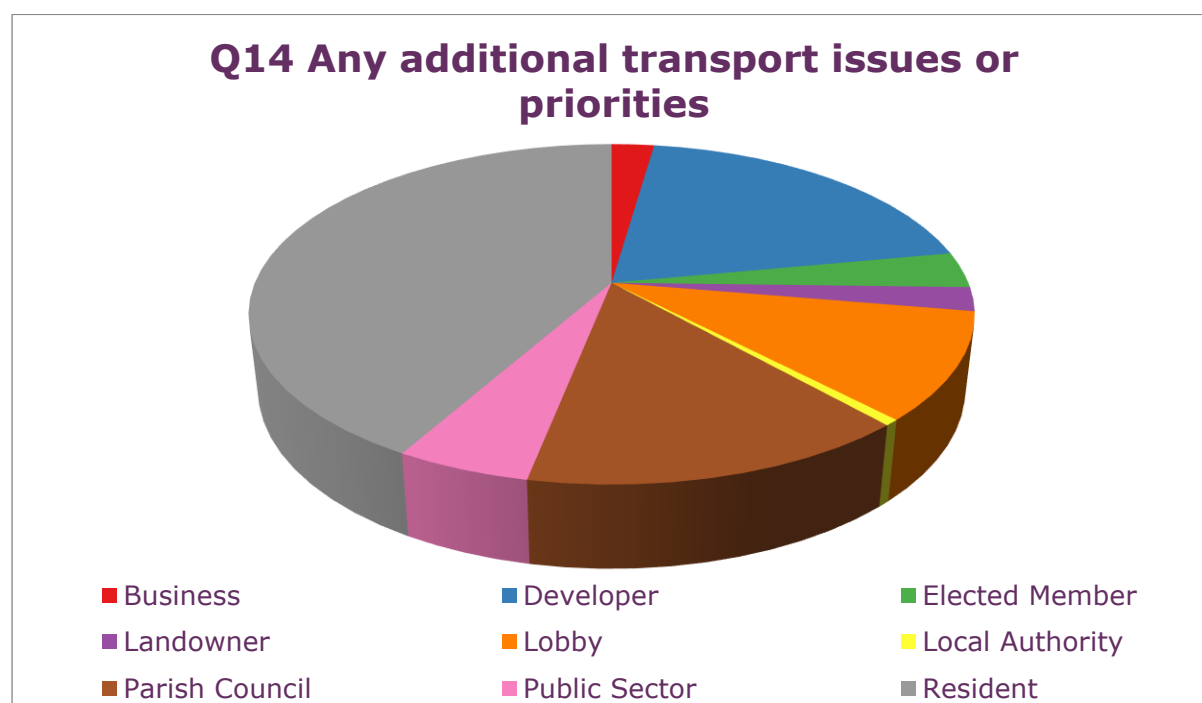
Key Themes/Issues Raised by Respondents	No. of Responses
<b>A46</b> <ul style="list-style-type: none"> <li>Flaws in A46 Link Road consultation process – should not be included in transport plans until consultation re-run</li> <li>Plan will need to reflect Strategic infrastructure projects of WCC inc. A46 link road – implications for Warwick University and south of Coventry in terms of growth</li> <li>Should not be used as Coventry bypass</li> <li>Proposed A46 links will deliver economic benefits and is of strategic importance</li> <li>Any additional phasing should see sustainable travel measures fully incorporated including bus priority, Very Light Rail and active travel infrastructure. The role of Midlands Connect and Highways England to develop work on the proposed A46 Phase 2, together with work on the Warwick bypass and the Stratford northern bypass should be considered in the local plan.</li> </ul>	7
<b>Park and Ride</b> <ul style="list-style-type: none"> <li>Park and ride parking area needs extending.</li> <li>Park and rides needed to south east and west of Stratford-upon-Avon</li> <li>Make Park and Ride free</li> <li>Park and ride at key interception locations serving key intercept locations serving commuters from the South Warwick are travelling into the Metropolitan area maybe something the Plan should explore in more detail. Stations such as Whitlocks End and Dorridge good examples. Developer contributions should be sort for enhancing Park and Ride.</li> </ul>	6
<b>Pedestrianisation of town centres</b> <ul style="list-style-type: none"> <li>Ban cars and car parking in middle of town and make P&amp;R free. E-scooters and mobility scooters for those who can't walk. Cycle paths extended.</li> </ul>	5
<b>Transport requirements/considerations of logistics sector</b> <ul style="list-style-type: none"> <li>Reduce general freight movements through strategic consolidation centres</li> <li>Canals could be used for haulage</li> <li>Consider potential for strategic or non-strategic employment sites located at junctions on M40 or M42 and on strategic positions on A roads.</li> </ul>	5
<b>Transport links needed to key infrastructure/employment centres/town centres</b>	5

Key Themes/Issues Raised by Respondents	No. of Responses
<b>Personal travel planning/electric bikes/scooters/ Demand Responsive Travel (DRT)</b> <ul style="list-style-type: none"> <li>Plan should pick up on new micromobility modes such as demand responsive transport services, e-scooters, and e-cargo bikes and how enhanced tickiting, mobility credit schemes and new technologies such as Mobility as a service could support more sustainable travel. TfWM is currently piloting a range of innovative transport measures and would be happy to share data on these.</li> </ul>	5
<b>More links to areas outside of SWLP area / consideration of cross border travel</b> <ul style="list-style-type: none"> <li>Plan fails to consider cross boundary issues such as KRN network which provides key routes for commuters, leisure journeys and supply chains. Request appreciation of wider regional connections and how these could be impacted by further development inc. HS2.</li> </ul>	4
<b>Electric buses/home delivery vehicles</b> <ul style="list-style-type: none"> <li>Last min deliveries could be made through electric vehicles, reducing congestion and air pollution</li> </ul>	4
<b>Cars</b> <ul style="list-style-type: none"> <li>Car clubs</li> <li>Scrappage schemes</li> <li>Adequate parking needs to be provided at nil/low cost - elderly and disabled can't easily walk</li> </ul>	4
<b>Improve digital infrastructure/ new technologies</b>	3
<b>Evidence Base</b> <ul style="list-style-type: none"> <li>Plan should provide strategic overview of key transport infrastructure required to deliver growth</li> <li>WCC LTP4 important part of strategy</li> <li>WCC giving buses 2 year timeframe to be sustainable – need a feasibility study to determine whether this is achievable and what impact this would have on existing services.</li> <li>Prepare feasibility survey of using the Greenway and Tramway as light railway</li> </ul>	3
<b>Take into account current trends in transport</b> <ul style="list-style-type: none"> <li>Don't overestimate number of people wfh - many will return to office</li> <li>Covid reduction in public transport may change, move towards electric vehicles, self driving vehicles</li> <li>Opportunities for sustainable refuelling on motorway should also be taken.</li> </ul>	3

Key Themes/Issues Raised by Respondents	No. of Responses
Consider the location of emergency services e.g. location of fire stations in town locations or near highway network/developments	1
River Avon between SUA and Warwick can be used for navigation.	1
South Warwickshire needs an exciting campus as in Oxford to attract right companies and opportunities.	1

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.3%
Developer	19.8%
Elected Member	3.4%
Landowner	2.3%
Lobby	10.2%
Local Authority	0.6%
Parish Council	14.7%
Public Sector	5.1%
Resident	41.8%



## Q15. Do you agree that the Local Plan should seek to improve infrastructure, such as charging points, for electric vehicles and e-bikes? Please explain your answer

There were 154 respondents to this question.

A key theme raised by 21 respondents was the government commitment to phasing out internal combustion engine cars, and that it was therefore considered necessary to improve EV infrastructure to align with this. 2 respondents specifically noted the Government Road to Zero strategy, with the core mission of all new cars and vans to be zero emission by 2040. It was noted that Part 35 of this strategy seeks to ensure that local planning policies incorporate facilities for charging electric vehicles.

A further 36 respondents noted that wider charging infrastructure needed to be made available across the SWLP area, not just within new developments. 15 of these related to providing charging points in public car parks. 4 respondents specifically noted the need for on-street charging facilities. 4 considered that charging points should be provided at centres or at facilities including workplaces. 2 considered that community charging facilities should be provided. 2 noted the need for charging points to be provided for apartments. 1 considered a need for charging points to be provided at rural facilities, whilst 1 considered that they should be developed on key motorway and major road service areas across the county. 2 respondents raised the issue that charging points must also be maintained, not just initially provided.

12 respondents considered that the SWLP should have a policy requirement for charging points. 4 considered that all new dwellings should have charging points. 3 considered that all new developments should have or consider the provision of charging points. 1 considered that developments above a certain size should have charging points. 1 considered that new industrial and commercial development should have charging points.

However, conversely, 10 respondents noted that in the Department of Transport consultation on EV charging, the Government's preferred option is the introduction of a new requirement for EVCPs under changes to Building Regulations Part S. As such, these respondents considered that it was unnecessary for the SWLP to duplicate government requirements. 8 additional respondents disagreed that the Plan should mandate that every house should have a charging point. A further 3 respondents considered that there should be no blanket policy requirement for charging points in the SWLP. 1 further respondent considered any requirement should be a government, not a District matter, and 1 did not consider it a matter for the SWLP to address.

14 respondents noted that there would need to be sufficient network capacity in the power grid in order to expand the provision of electric vehicles and charging

points. 4 respondents considered that rapid charging points should be introduced. It was also raised by 12 respondents that there is currently no standard connection point across manufacturers for electric vehicle charging points. Of these, 7 respondents considered that the SWLP could instead require installation of relevant wiring and circuitry so that an occupier could install whichever connection point fits their car. 4 further respondents cautioned against the Plan prescribing redundant technology.

10 raised the issue of viability, cautioning against any requirements that may threaten a site's viability. 5 considered that the SWLP should be accompanied by evidence demonstrating viability in this respect.

9 respondents raised the matter of new technologies/trends, such as hydrogen fuelled vehicles (5), self-driving cars (1) and working from home (1) which should also be considered by the Plan. 7 of these 9 respondents raised the matter that technology is liable to change and therefore the Plan should not overinvest in the long term future of electric vehicles.

In terms of e-bikes, 3 respondents raised the possibility of cycle hire schemes. 1 respondent considered that E-scooters, e-cargo freight options and other micro-mobility modes should also be explored along with infrastructure required and regulatory frameworks such as need for road space reallocation, use of Mobility as a Service and other digital platforms.

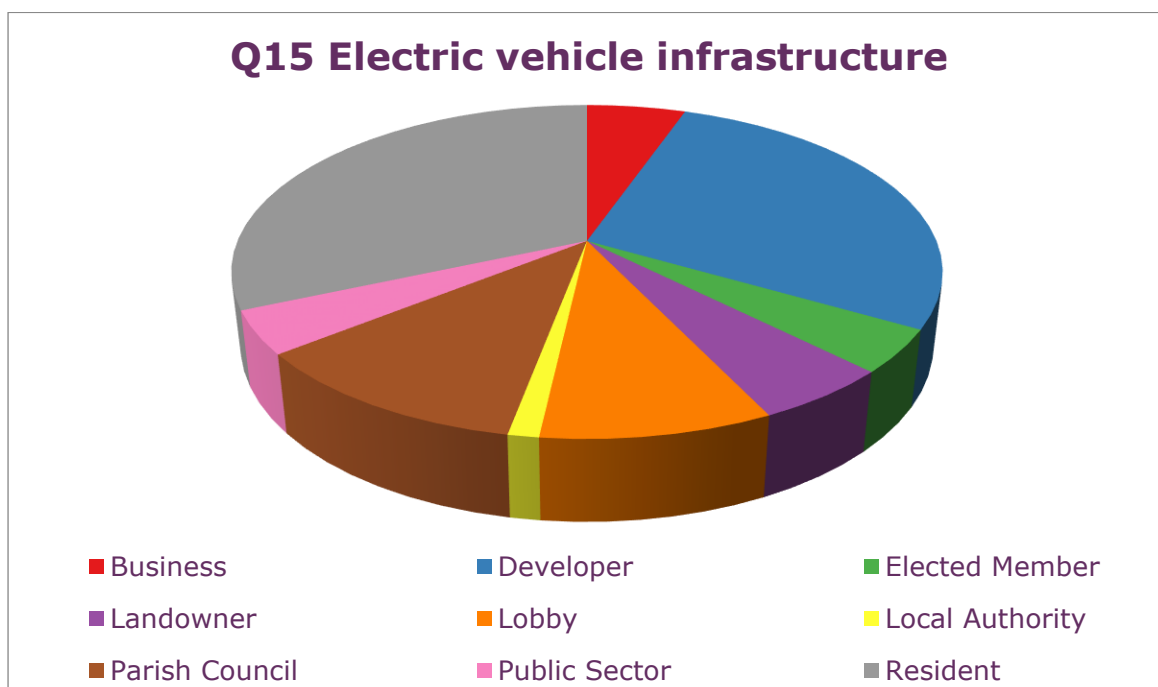
Congestion was raised by 5 respondents. 4 respondents considered that charging points could be provided outside of town centres in order to reduce congestion, with either cycle lanes and e-bike hire (1), pedestrian routes (1), or the potential for self-driving cars to provide routes into town centres. 3 respondents note that electric vehicle infrastructure would be important for the economy of South Warwickshire, as well as for the climate.

The specific requirements of rural areas were raised by 7 respondents in relating to electric vehicle infrastructure, including the need for investment/grants (3) for rural areas and more charging points (3). E-bikes were also raised in relation to rural areas, with one unsure of their practicality in rural locations, and one considering that e-bikes together with cycle lanes could be used to connect villages to towns.

6 respondents specifically noted the air quality and health improvements associated with electric vehicles/e-bikes. 1 respondent raised the issue of the cost of electric vehicle charging points, whilst 1 was concerned about the appearance and impact on the streetscene of charging points.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.4%
Developer	28.0%
Elected Member	4.2%
Landowner	5.4%
Lobby	8.9%
Local Authority	1.2%
Parish Council	11.3%
Public Sector	4.2%
Resident	31.5%



## Q16. Are there any other ways you think the Local Plan could encourage the increased uptake of electric and other low-emission vehicles? Please explain your answer

There were 99 respondents to this question.

A key theme emerging from responses to question 16 is the importance of providing Electric Vehicle (EV) Charging Points which was raised by 30 respondents. 6 respondents referred more widely to providing infrastructure across the Plan area more widely, rather than just in developments. 5 respondents specifically noted the need for recharging infrastructure. This included charging points at supermarkets/key destinations, mass charging at business friendly facilities, and charging in apartment blocks. Two respondents considered that lampposts should be fitted with charging points. Two respondents noted the need to provide charging points ahead of the increase in ULEVs (Ultra-Low Emission Vehicles). Community charging points were raised as something to be supported/provided by 2 respondents.

19 respondents considered that incentives should be provided to encourage uptake of electric / low-emission vehicles. 14 of these were specifically in relation to financial incentives/disincentives. Other incentives mentioned included free/priority EV parking (2), EV access to bus lanes (2), and free rapid charging facilities as an incentive or discounts to local facilities if travel was by ULEV (1). 6 respondents referred specifically to disincentives for non-EV cars, including town centre levies (2) and Ultra-Low Emission Zones (5).

13 respondents did not consider that encouraging the uptake of electric and low emission vehicles was a responsibility of the SWLP. 7 respondents considered that the SWLP should not seek to duplicate national policy. 1 considered that it was the responsibility of manufacturers, such as providing better range for EVs. 1 respondent considered that it may be mistake to discriminate against private car users as it would place a financial burden on rural areas to install EV infrastructure and to buy EVs.

12 respondents referred to considering alternatives to EVs. Nine considered that all car use should be discouraged. Public transport, car sharing, and modal shifts to other forms of travel such as walking and cycling were mentioned. Of particular note, Transport for West Midlands considered that because the switch to ULEVs will take time, it is still needed to reduce energy we use for transport, and that we need a significant change in travel behaviour to achieve this including:

- Changes to where people travel to/from – shorter journeys and/or places more easily accessible by less carbon intensive modes of travel
- Reduction in frequency of travel – consolidation of trips or replacement of travel with use of ICT

- Change to vehicles we use – modal shift to public transport, walking and cycling and micromobility

Transport for West Midlands considers that the popularity of the car has hampered ability to provide high quality alternatives, such as;

- Increased car usage resulted in far less fare paying bus users and reduced bus services
- Congestion, which impacts on reliable bus service
- Heavy traffic, dissuades people from walking/cycling

Two respondents noted that hydrogen will be likely to replace electric vehicles in years to come.

9 respondents stated that policies should not put unnecessary barriers or burdens upon increased uptake of electric and other low emission vehicles. 6 respondents considered that the Councils should take the lead in coordinating provision to ensure accessibility to all.

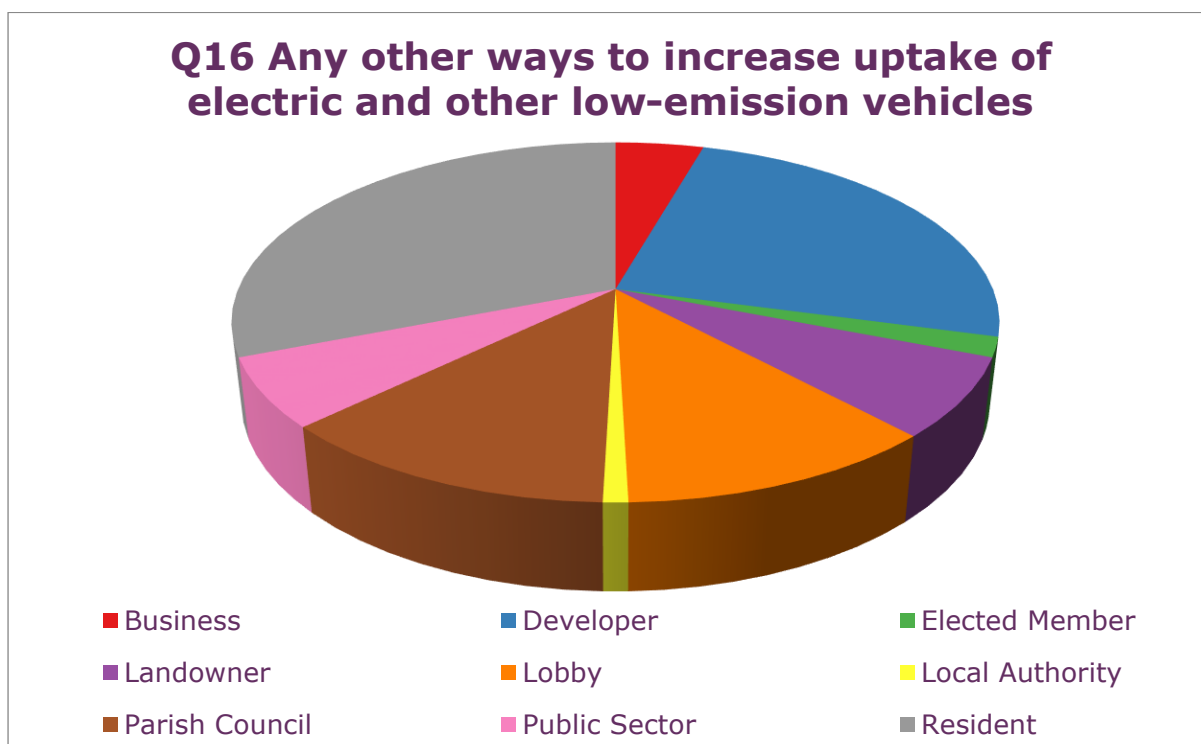
The significance of battery production was mentioned by 3 respondents. 1 considered that battery production should not be encouraged due to the environmental impact. 1 considered that solutions for battery disposal should be implemented before it becomes the next big issue. 1 considered that the Plan should support the Coventry Gigafactory as a necessity to produce the required batteries.

The importance of the dissemination of public information was raised by 3 respondents in relation to climate change (1), provision of EVCPs (1) and town centre levys (1).

E-bikes were mentioned as something to be encouraged by 3 respondents, and e-buses were mentioned by 4 respondents.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.4%
Developer	24.8%
Elected Member	1.8%
Landowner	7.1%
Lobby	11.5%
Local Authority	0.9%
Parish Council	12.4%
Public Sector	6.2%
Resident	31.0%



## Q17. Do you agree that the South Warwickshire Local Plan should seek to diversify the local economy by supporting growth in new industrial sectors? If not, what other ways should the Local Plan support economic growth?

There were 118 respondents to this question.

The most significant key theme emerging from responses to this question is the importance of the location of employment space within the District, which was raised by 23 respondents. 10 respondents considered it was important that the SWLP did not limit new employment space to existing locations or that businesses should have a choice in location. 5 respondents considered it was important for employment sites to be near to the strategic road network for connectivity. 4 respondents raised the locational advantage of South Warwickshire within the 'golden triangle' - the area within the M42, M1 and M6. 2 respondents considered it was important for employment development to be located near to the railway network.

16 respondents raised the need for more employment space to be provided of a range of sizes, but particularly smaller units. Affordability of employment space was also raised as an issue. 4 respondents raised that they thought the SWLP should make employment allocations.

In terms of sectors considered important in diversification, the strongest theme emerging from respondents was the green economy, which was raised by 11 respondents. 10 respondents raised the importance of the proposed Coventry Gigafactory to the local economy, and/or considered that support for further gigafactories should be provided. The logistics/distribution industry was raised by 8 respondents as a key sector for the SWLP to plan for and encourage. Rural businesses were raised by 7 respondents, and 3 specifically raised the need to support agricultural businesses including farm diversification.

Tourism as a general theme was raised by 11 respondents. 8 people thought that the tourism should be strengthened/diversified. However, 3 respondents considered that there was too much reliance on tourism at the moment and that further growth in tourism should be discouraged.

4 respondents considered that diversifying the economy would help to prevent out-commuting and retain residents within South Warwickshire. 4 residents raised the importance of upskilling/training to support new economic sectors. 8 respondents raised the matter of working from home, with 3 considering that this would reduce the need for office space. 5 respondents considered that the increase in working from home may make it more attractive for people to move to South Warwickshire.

The role of town centres was raised by 11 respondents. 8 considered that the economies of town centres should be diversified from retail/tourism to mixed uses, including strengthening the night-time economy in Stratford-upon-Avon and permitting more housing in town centres so that there is population base to use town centre businesses.

The issue of housing in relation to the economy was raised by 10 respondents, in particular providing sufficient housing and affordable housing in the right locations to support economic growth. The impact of Brexit was raised by 5 respondents, and the Covid pandemic by 8.

7 respondents identified that there should be specific policies in the SWLP to address the issue. These included:

- A policy that allows additional land to be released for employment purposes in circumstance where it can be demonstrated that existing employment sites are not suitable or not available to meet requirements. A criteria based policy would be appropriate.
- Policies which are positive and supportive of the changing needs of business.
- A positive policy context to enable Warwick University to continue its important economic role.
- Policies that support the retention, enhancement and expansion of existing tourism attractions such as Warwick Castle, and a specific policy that supports the role of the Castle.
- Policies which make loss of employment space harder.

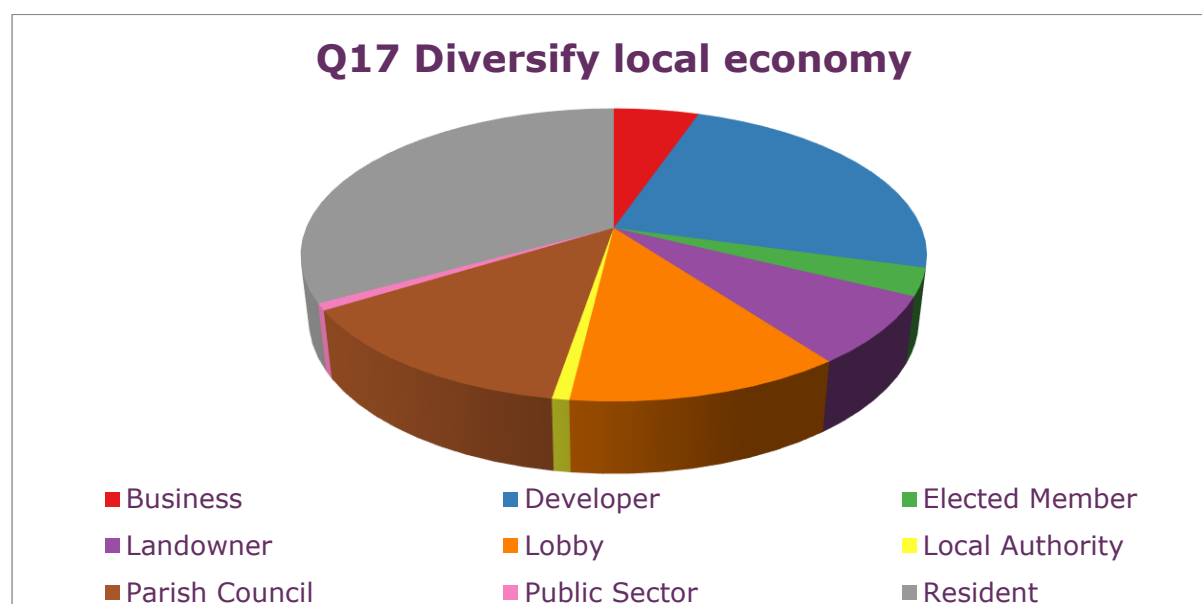
3 respondents did not consider that it was the role of the SWLP to diversify the economy, and considered that it was the markets that would instead dictate the direction of growth. 10 respondents highlighted that it was important that existing businesses were also supported as well as the development of new businesses/employment sectors.

The evidence base behind the SWLP to support this aim was raised by 16 respondents. The following were considered as important considerations in underpinning the SWLP:

- Economic Needs Assessment
- SHLAA
- Local Industrial Strategy
- CWLEPs Strategic Economic Plan, Strategic Reset Framework and Outline Implementation Plan
- West Midlands Strategic Employment Sites Study
- The C&W Authorities Market Signals Report

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.3%
Developer	24.1%
Elected Member	3.0%
Landowner	7.5%
Lobby	12.0%
Local Authority	0.8%
Parish Council	13.5%
Public Sector	0.8%
Resident	33.1%



## Q18. Do you agree that new employment opportunities should mainly be focussed in existing employment locations? If not, what other locations should be considered?

There were 112 respondents to this question.

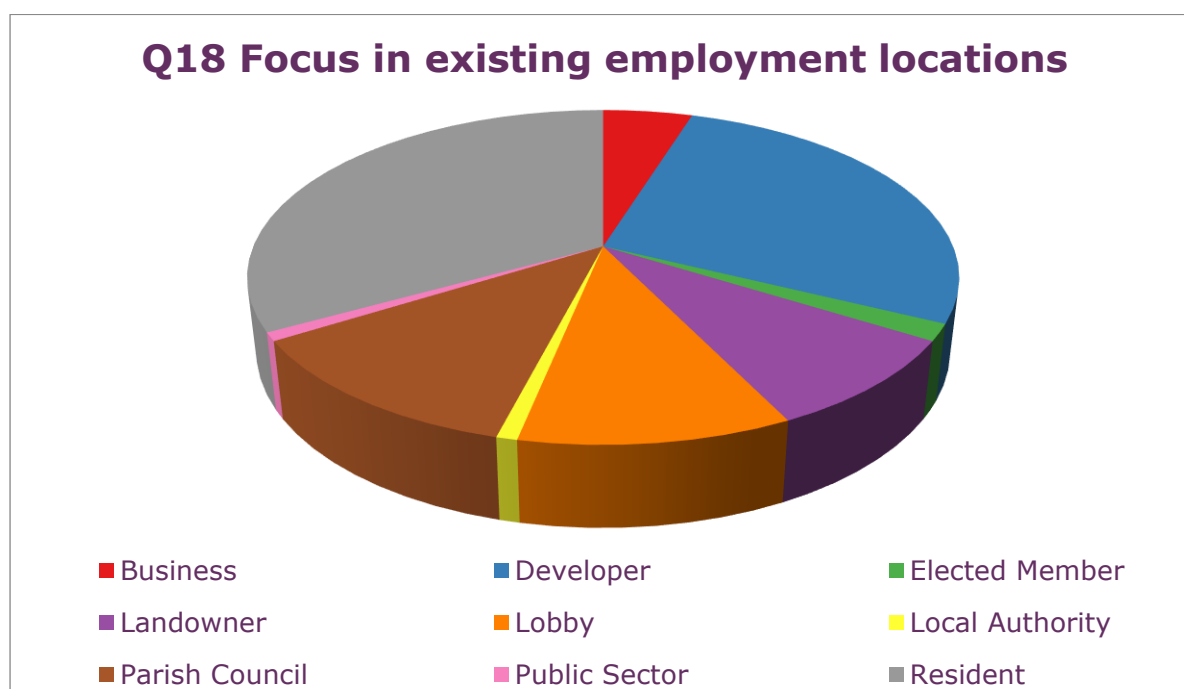
40 people agreed that employment development should be directed to existing locations, however also considered that some flexibility should be built into this to allow employment development in other locations where suitable. A theme raised by 7 respondents was to review existing employment allocations to determine if they still meet business needs. 12 respondents considered that employment development should be directed adjacent to or within towns in the SWLP area. 10 respondents considered that development should be directed to brownfield sites. 8 people considered that the Plan should also consider new strategic sites. 7 people considered that an Employment Land Study should be undertaken as a starting point to determine the area's employment land requirements.

In addition, the following specific sites were raised by respondents as suitable for employment development:

- Coventry Gigafactory
- Land at Loxley Road Wellesbourne considered appropriate for a small employment unit.
- Employment sites such as Stoneleigh Park are long standing hubs of economic activity and should be focus for economic growth.
- Would recommend that new employment development is directed to Stoneleigh Park and proposed Kings Wood Business Park
- Major new employment growth area at J15 M40
- Expansion of the Princes Drive Industrial Estate in Kenilworth
- Warwick University
- Porterbrook Train Leasing company at the Quinton Rail Technology Centre, Long Marston from June 2021 offers major investment and employment potential, starting with their Hydroflex trains
- Wellesbourne Airfield as a mixed use development opportunity which will provide a varied range of employment options including uses for STEM, B8, B2 and smaller employment uses.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.8%
Developer	27.4%
Elected Member	1.6%
Landowner	8.9%
Lobby	10.5%
Local Authority	0.8%
Parish Council	12.1%
Public Sector	0.8%
Resident	33.1%



## Q19. Do you agree that the affordability of employment land and premises is a key issue that the Local Plan should address? If not why not?

There were 87 respondents to this question.

A key theme raised by 15 respondents who disagreed with the question posed was that it was considered that market forces drive the issue and it was therefore not a role for the Plan to address. It was raised by 1 respondent that requiring less than a market rent would be a development risk.

In addition, 2 respondents considered that the Local Plan would be limited in what it could do to address the issue. 1 considered that it was a consideration for an Economic Plan. 1 considered that the Plan should facilitate but cannot force business to relocate. 2 respondents considered that the Plan should set out employment needs.

6 respondents considered that the best approach would be to facilitate new development so as to make second hand units available at a more affordable price. It was considered that the focus should be on delivery rather than affordable rents. To address this, it was considered that a variety of types of employment land need to be allocated to address need. 1 respondent raised that allocations in the Stratford-on-Avon District Core Strategy have not come forward, which is effecting medium sized businesses as they cannot benefit from the infrastructure created from large sites.

3 people considered that this approach was consistent with the local plan having an oversight of land and premises and the needs of different types of business and stages of life. 7 respondents raised the issue of small/medium sized enterprises (SMEs). 4 considered that more needs to be done to support SMEs, such as reduced business rates, cheaper energy pricing, and flexible premises.

3 respondents raised the issue of the environment/ climate change. 2 considered that the Local Plan should be encouraging low-carbon, environmentally friendly and sustainable business, and 1 considered this could be through shared spaces rather than large industrial units. 1 respondent also considered that employment development should be focussed on land with the lowest environmental impact, not the cheapest land, as cheaper land is often not suitable for development

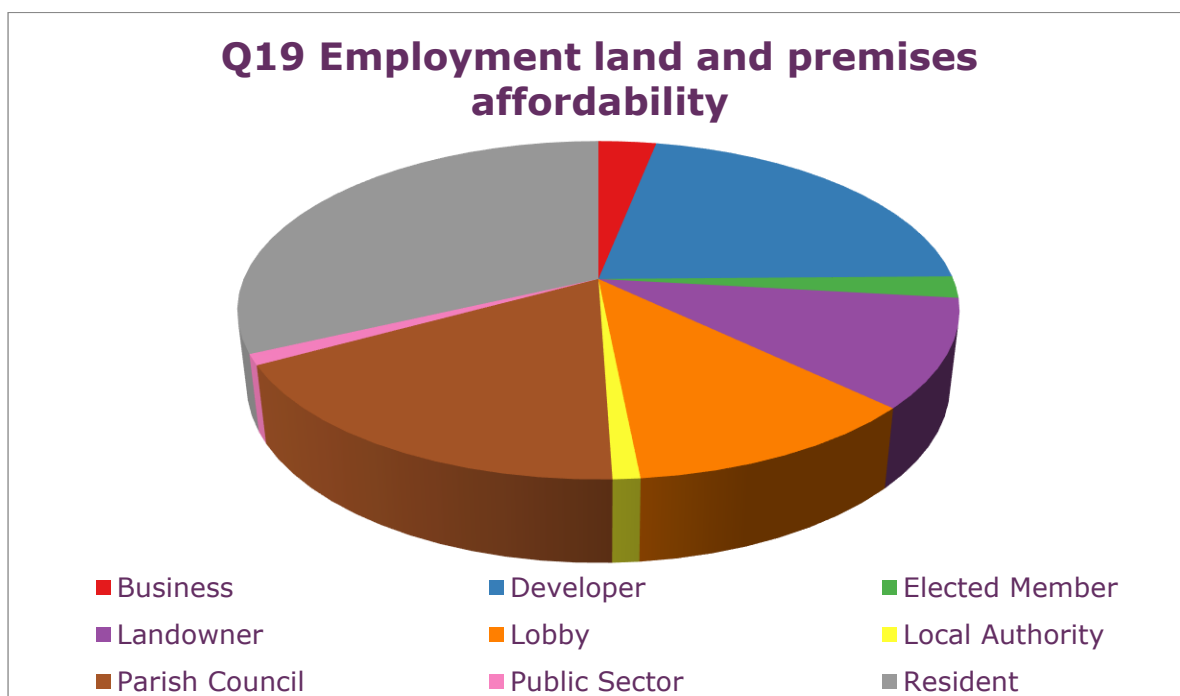
1 respondent considered that an increase in local employment hubs could reduce need for commuting compared to fewer larger sites, which would provide additional sustainability benefits to associated local housing and services. 2 respondents considered that new employment development should only be on brownfield sites.

2 respondents raised the issue of housing. 1 respondent considered that the Local Plan can best work to improve affordability by resisting conversion of land to residential. 1 respondent stated that land will always be worth more if can gain permission for housing.

3 respondents raised the impact of changing trends. 2 considered that the issue may be less important as Covid drives more home working. 1 raised the impact of online retail on town centres and considered that the high street could meet some of need for affordable premises for non-retail businesses.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.1%
Developer	21.6%
Elected Member	2.1%
Landowner	10.3%
Lobby	11.3%
Local Authority	1.0%
Parish Council	17.5%
Public Sector	1.0%
Resident	32.0%



## Q20. Do you agree that the Local Plan should seek specific opportunities to support small and emerging businesses? If not, what do you suggest?

There were 99 respondents to this question.

A key theme raised by respondents was the importance of small businesses to the local economy, which was raised by 15 respondents. 2 highlighted that small businesses would be especially important to the post-Covid recovery. 5 respondents considered that the Plan should support a range of businesses including small, medium and large enterprises. 2 respondents raised that large enterprises can support smaller enterprises through supply chain benefits, and large employment sites have potential to accommodate diverse range of employment floorspace including smaller and affordable units. 1 respondent raised that the District has a higher than average level of small businesses demonstrating importance of supporting small businesses.

6 respondents considered that the Plan should make provision for small and medium sized enterprises (SMEs) across the Plan area to encourage establishment of new businesses and the availability of premises for them to move into as they expand. 5 respondents considered that businesses should be sustainable/carbon neutral in order to be supported. Of these, 1 person considered that businesses of any size should be supported as long as they are 'green' – either in the products they sell/produce, or being zero-carbon. 1 considered that special initiatives for green technologies should be supported. 2 respondents considered that clusters of creative industry.

4 respondents considered that the Plan should specifically support the provision of small/micro businesses in town centres, 1 respondent stated that encouraging a mix of uses would help to support employment. 1 respondent considered that the Local Authority should own more premises and introduce a cap on rents.

8 respondents considered that the Plan should develop policies to support small independent businesses, including:

- Rent holidays
- Starter offices or workshops for rental from the local authority
- Pubs could make desk space available on a per hour basis
- Financial and indirect methods of support
- Reduced business rates
- Business support and advice is important for new businesses
- Coworking hubs

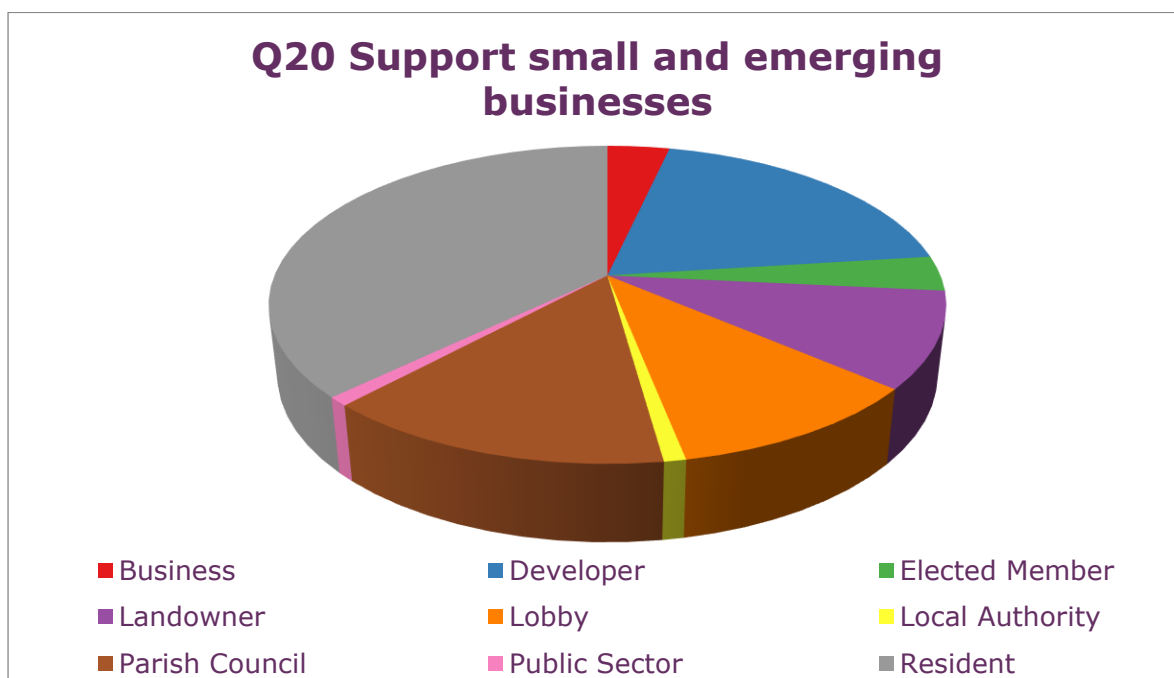
7 respondents raised that small businesses should also be supported in rural areas, as well as urban areas. 2 respondents specifically raised that agricultural businesses should be encouraged, as they are important for reducing food miles and improving sustainability. 2 respondents raised that SMEs are often dependent

on electronic communication, so the emphasis should be on improving infrastructure especially in rural areas. However, 1 respondent stated that supporting small businesses should not be at the expense of the Green Belt.

1 respondent raised that the loss of businesses on brownfield land to housing an issue that can affect SMEs as often cheaper premises. 1 respondent considered that small and emerging businesses should be encouraged by following a dispersed approach to housing.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.5%
Developer	19.5%
Elected Member	3.5%
Landowner	9.7%
Lobby	10.6%
Local Authority	0.9%
Parish Council	14.2%
Public Sector	0.9%
Resident	37.2%



## Q21. Do you agree that the Local Plan should seek to build on South Warwickshire’s existing cultural and heritage assets in order to enhance the economy? If not, what alternative do you suggest?

There were 91 respondents to this question.

A key theme raised by 9 respondents was that the SWLP should recognise the economic benefits of the heritage and cultural sectors to the District. 6 respondents raised that a diversified economy which is diverse and multiskilled has greater resilience, and that overreliance on the heritage and cultural sector should therefore be avoided. 2 respondents considered that the SWLP should set out long-term and strategic measures to support the recovery of businesses in the culture, heritage and tourism industries from the impacts of Covid. 2 respondents also considered that this would need to be supported in the recruitment of staff, particularly local staff. 1 raised that this must be supported by adequate officer time and funds for this.

However, 4 respondents cautioned that the unspoilt and uncommercial nature of the area contributed significantly to South Warwickshire’s appeal as a heritage and culture destination and that the economy should therefore not be overdeveloped. 2 respondents considered that any development of hotels should concentrate on existing sites and avoid countryside encroachments. 1 respondent considered that any new development should concentrate on brownfield sites. 1 respondent considered that new tourism development should be in main settlements and on the primary road and rail network. 1 respondent raised that the strategy should also include small heritage sites as well as just large ones; for example, churches could be emphasised.

It was also raised that schemes needed to appeal to locals as well as tourists by 5 respondents, for example by concentrating on local initiatives and supporting emerging enterprises. 1 person considered that further exploitation of cultural and heritage assets should be avoided, as it was detrimental to resident’s quality of life. 1 person raised that there was a danger of only focussing on the economics of heritage, and that the Plan should focus on high value tourism such as increasing overnight stays and the night-time economy. 1 person stated that more education opportunities for residents should be provided.

1 person considered that instead of encouraging the heritage economy, the Plan should aim to make Warwickshire the green capital of UK instead. 1 person disagreed with the objective as they considered that tourism drives climate change.

6 respondents considered that there should be a greater focus on the arts and creative sectors. 2 respondents considered that policies should provide a justified and flexible approach to arts and cultural uses and hotels and conference facilities and recognise they contribute to economic growth. 1 person thought there was

too much focus on Shakespeare and that other art sectors should be encouraged. The Theatres Trust responded to say that it was essential that the Plan supports the RSC theatre and smaller and local venues. They also stated that the Plan should contain a strong policy which support their development and guards against loss in line with NPPF para 92, and that it should encourage new facilities particularly within town centres. It was also considered that grassroots level organisations such as community venues and pubs should be supported. 1 respondent considered that more support for local libraries should be provided. Warwick Castle and Warwick University were also noted as important heritage/cultural assets.

4 respondents considered that the Plan should set out an approach to avoid harm to designated and recognised heritage assets. 1 respondent stated that the Plan should work with stakeholders in the historic environment to protect it and ensure its economic viability. 2 respondents considered that strategic development opportunities should allow the regeneration, conservation and improvement of key cultural quarters within the District whilst 3 respondents considered that new development and high-quality design has an important role in enabling heritage and cultural assets to continue in operation. 1 respondents considered that strong design guides should be developed.

2 respondents welcomed the Heritage and Cultural Strategy (2020-2025). 1 person stated that more regard needs to be paid to the Culture is Digital project from the Governments Culture White Paper.

1 respondent stated that in order to realise the potential of canals, it is important to encourage appropriate canalside development. 1 respondent noted that increasing tourism and the effects of the pandemic has increased pressure on Public Rights of Way. Therefore, it was considered that PRW should be sufficiently resourced.

Historic England raised concerns that the historic environment is not well focussed in the document and is disparately dealt with. They were also concerned that the document was mainly focussed on the future economic development of the area and does not demonstrate a positive approach to the historic environment. They queried the soundness of the Plan in respect of the historic environment. They were concerned with the intention to “exploit the areas heritage and cultural assets” stated in the Plan, as the NPPF states that economic growth should be balanced against protecting and enhancing the historic environment and there is a legal obligation that plans should be prepared with the objective of contributing to sustainable development.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.8%
Developer	10.6%
Elected Member	2.9%
Landowner	7.7%
Lobby	13.5%
Local Authority	1.0%
Parish Council	16.3%
Public Sector	4.8%
Resident	38.5%



## Q22. Do you agree that the Local Plan should aim to reduce skills ‘leakage’ and provide greater opportunities for education and training? If not, what alternative so you suggest?

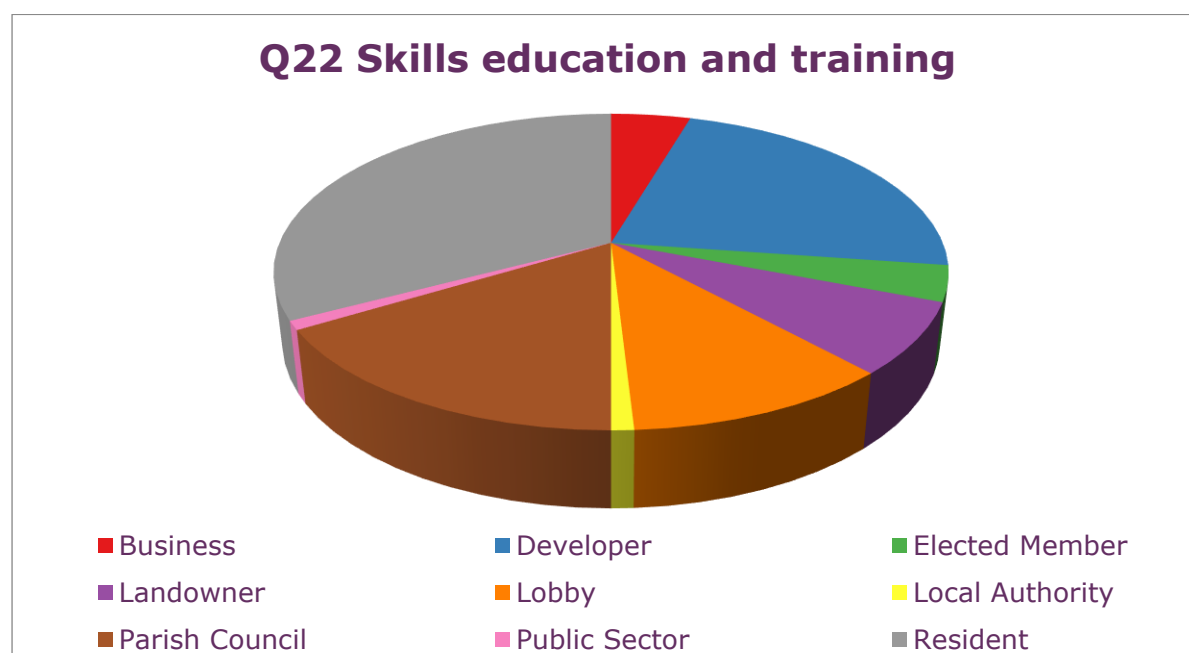
There were 108 respondents to this question.

Key Themes	Number of responses
<p><b>Affordable Housing</b> Should be more available within the Plan Area to encourage people to live and work within the district. Many of the responses have chosen to highlight that one main issue is that the cost of housing within the District lead people to move away. This then influences skills leakage.</p> <p>Various ideas as well as simply the suggestion of more affordable housing is being put forward:</p> <ul style="list-style-type: none"> <li>• Co-housing so that they can integrate into the community and afford to stay here.</li> <li>• Not just market but affordable rentals</li> </ul>	16 (Subject may also have been mentioned elsewhere without using the term “affordable”).
<p><b>Encouragement of a Green Economy</b> Comments have suggested that this could be done in a number of ways such as:</p> <ul style="list-style-type: none"> <li>• gigafactories</li> <li>• house retrofitting</li> <li>• building construction</li> <li>• Renewable energy generation supported by new educational and training opportunities for upskilling. (Upskilling another point brought across in the comments).</li> </ul>	4
<p><b>Apprenticeships</b> Encouragement of and focus on, no massive in-depth comments but it is strongly felt across the responses that apprenticeships should be strongly encouraged and time and resources put into this.</p>	9
<p><b>Rural industries/Encouragement of business in rural areas</b> For example - improving opportunities to enable business to flourish in the rural parts of the local plan area should be encouraged.</p>	6
<p><b>Yes/support</b> These comments offered no further information other than simply yes/ support.</p>	21

Key Themes	Number of responses
<p><b>Upskilling</b></p> <p>It is felt that there should be an investment and a commitment into upskilling. So tapping into residents and skills that already exist within the District. Many of the responses have voiced that there is skill already within the district it just isn't being managed or utilised effectively and upskilling would have a positive impact on this.</p> <p>It is also mentioned that a focus on Upskilling may well have a place in seeking to reduce out-migration of younger people.</p>	14
<p><b>The need for an Economic Needs Assessment</b></p> <p>Main comments put forward in regard to this as it would provide a robust evidence base that could underpin the plan itself.</p>	9
<p><b>Giga factories</b></p> <p>This has been mentioned a few times in various comments – Giga factories are used to create batteries for electric vehicles. They appear to create these in vast numbers so in theory should drive down the cost of electric vehicles whilst speeding up production. The responses feel this would obviously have a positive contribution towards tackling climate change. It is also felt they would leave to reduced skill leakage within this industry that plays a part in the future of vehicle manufacturing.</p>	4

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.5%
Developer	22.7%
Elected Member	3.6%
Landowner	7.3%
Lobby	10.9%
Local Authority	0.9%
Parish Council	16.4%
Public Sector	0.9%
Resident	32.7%



## Q23. Do you agree that the Local Plan should seek to adapt to the changing role of town centres? What do you suggest?

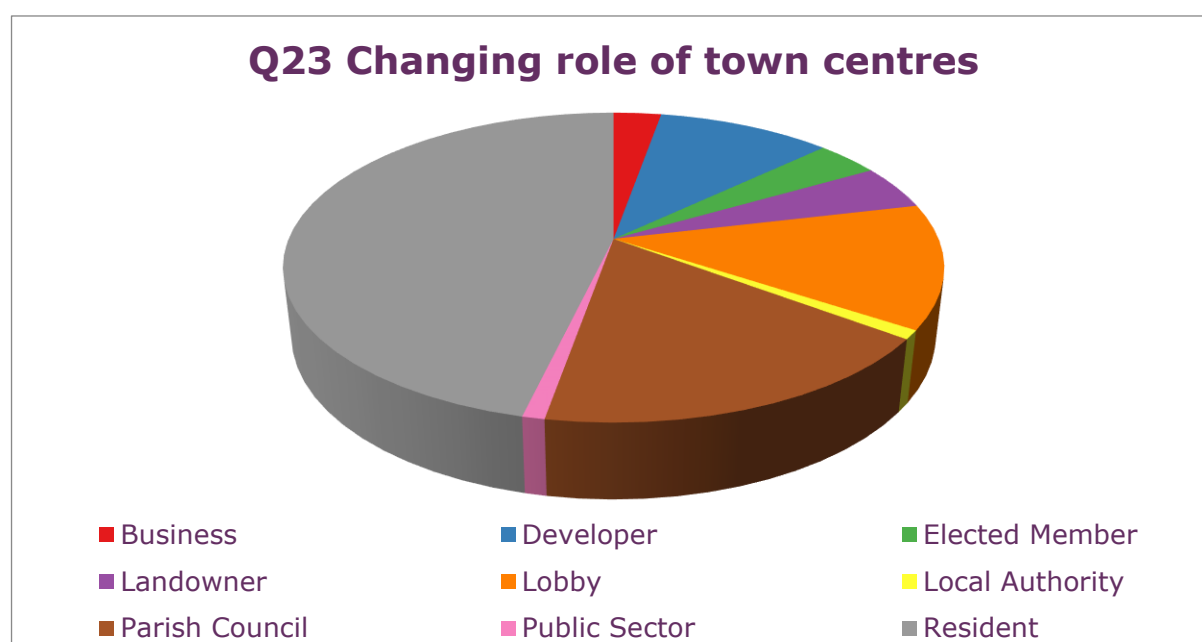
There were 98 respondents to this question.

Key themes	Number of responses
Yes/ support with no further comment	10
<b>Pedestrianised areas</b> Different suggestions are made such as: <ul style="list-style-type: none"> <li>• Completely pedestrianised areas within all town centres.</li> <li>• Certain days of the week such as weekends where town centres become a pedestrian only area.</li> <li>• Suggesting recent street closures to cars that occurred due to covid should be kept- as it was felt this was of benefit to local business such as cafes and restaurants.</li> <li>• Also suggested that streets not dominated by traffic would there for be more pleasant places to be and somewhere people would want to send days out.</li> <li>• The low traffic neighbourhood model</li> </ul>	18
<b>Adapting to online shopping</b> Various response highlight that now online shopping is more prevalent there is a need for businesses to adapt to this and the town centre as a whole. Ways in which changes could be made to accommodate this are suggested as: <ul style="list-style-type: none"> <li>• Revisions to use classes order recognise this by combining a number of different town centre use including shops, cafes and restaurants, offices, gyms and health centre as Class e. enabling a shift towards mixed use and multi purposes spaces.</li> <li>• Make certain that they remain vibrant hubs of commercial activity which meet the needs of local neighbourhoods, workers and visitors. The district should consider the benefits of providing mixed-use centres where people can easily walk and cycle.</li> <li>• It is essential that the plan retains sufficient flexibility to allow organic change as well as planned changed.</li> </ul>	5
<b>Supporting reduced rates</b> A number of respondents felt it was important to reduce or support reduced business rates. It is suggested that this would be key in keeping shops on the high street whilst allowing smaller businesses or retailers such as independents the chance to have a physical presence.	5

<p><b>Conversion of commercial units into residential</b></p> <p>Several responses felt that the conversion of existing commercial units to residential would improve town centres. The reason being with people living within the centre they would then use the town centre more. Others also felt it was a useful tool to help tackle issues with affordable accommodation.</p> <p>It should also be noted that one additional response felt that doing the above would in term have a negative impact on town centres particularly those seeking to be vibrant and have a night time economy.</p>	8
<p><b>Cycling</b></p> <p>As mentioned further up several responses suggested making town centres more cycle friendly. This would not only encourage people in to the centre but also be positive for climate change.</p>	7
<p><b>Independent shops and pop-up facilities</b></p> <ul style="list-style-type: none"> <li>• Perhaps town centres could encourage more opportunities for independent traders including pop-up facilities so local businesses from across a wider area could raise awareness of their products and services.</li> <li>• The Council needs to support smaller independent businesses setting up in their stead.</li> <li>• Using Leamington Spa's independent shopping unit as a good example of independent trade within a town centre.</li> <li>• Stratford should be encouraged by giving encouragement to "quirky" independent retail shops.</li> </ul>	<p>13</p> <p>10 regarding independent retailers and 3 regarding pop-up facilities</p>

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.8%
Developer	10.2%
Elected Member	3.7%
Landowner	4.6%
Lobby	13.0%
Local Authority	0.9%
Parish Council	17.6%
Public Sector	0.9%
Resident	46.3%



## Q24. Do you agree that congestion and car dominance of town centres are key factors to address when considering enhancement of town centres?

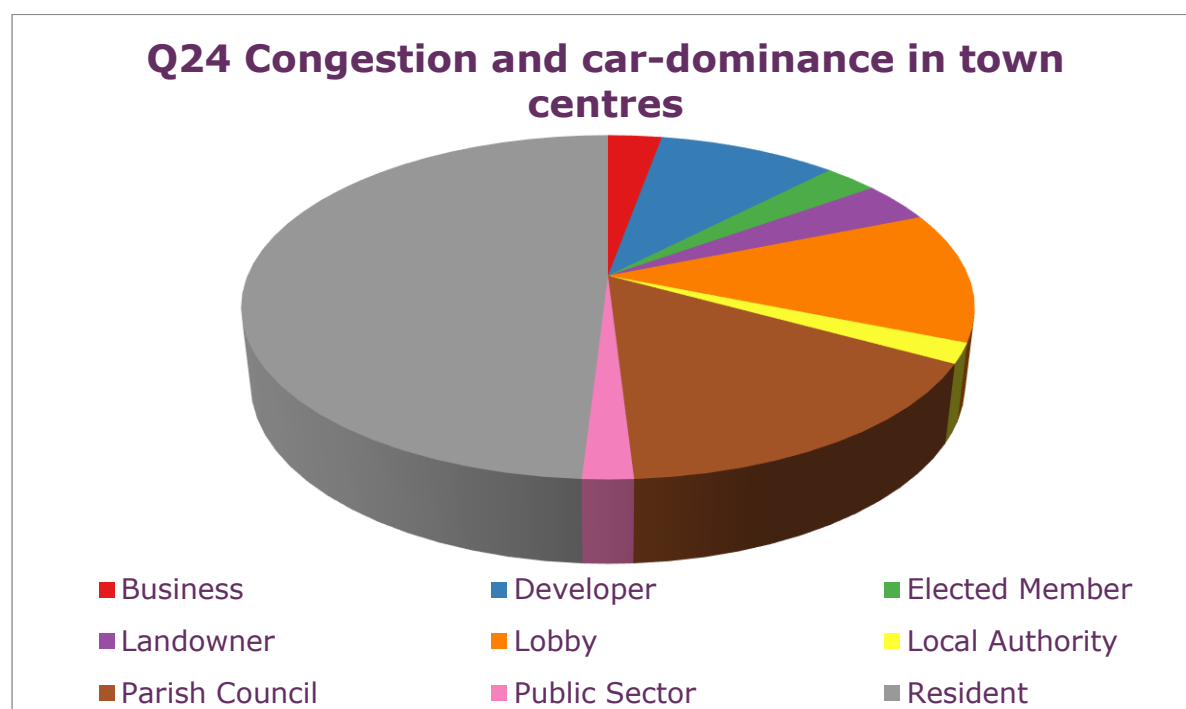
There were 98 respondents to this question.

Key themes	Number of responses
<b>Public transport</b> Several responses highlighted that they felt a need for general improvements to the public transport network within the district. Some specific points raised can be seen below- <ul style="list-style-type: none"> <li>• Planning policy should ensure that a positive contribution is made towards the improvement of the Districts public transport nodes in terms of accessibility and legibility.</li> <li>• New bus services run by the district council will provide subsidised public transport between settlements and greatly reduce the need for car-dominance.</li> <li>• Tourists should be encouraged to come by public transport through making the rail timetable more sensible.</li> </ul>	17
<b>Support or Yes with no additional comment</b>	15
<b>Economic needs assessment and strategic housing and employment land availability assessment</b> It is suggested that this should be carried out in order to underpin the strategic aim of boosting and diversifying the economy. It is felt that this is a key component is ensuring enough housing in provided in the right locations to support businesses, as set out in NPPF paragraph 20.	7
<b>Housing locations</b> It is suggested within the responses that the location of future residential development would be a key issue when trying to tackle the issue of car dominance within town centres- <ul style="list-style-type: none"> <li>• Ensuring enough housing in provided in the right locations to support businesses, as set out in NPPF paragraph 20.</li> </ul>	6

<p><b>Parking</b></p> <p>Various points were mentioned within the responses regarding parking as an issue in relation to this questions. They vary in terms of encouraging and discouraging parking. The main points raised have been listed below-</p> <ul style="list-style-type: none"> <li>• don't offer any parking facilities except to residents</li> <li>• make park and ride free or extremely cheap</li> <li>• Improved public transport and facilities for the parking of electric biked and scooters- in relation to becoming a pedestrian friendly town.</li> <li>• If town centres restrict access via private vehicles, they will simply travel to out of town destinations where parking is free and easy access is guaranteed. This will kill what remains of our town centres and particularly impact those without their own transport as the variety of shops will diminish. Leamington Spa has maintained vitality largely because parking is adequate and is accessible within the town.</li> <li>• Suggested that many - Town centres have pedestrianised and provided good parking at reasonable cost have been successful. As well as stating that parking shouldn't be considered a revenue stream but looked at as a way to facilitate the town centres.</li> <li>• Having safe evening parking near restaurant areas would be helpful, i.e. parking restrictions finishing after 6pm.</li> <li>• Reducing car-use and car-parking in town centres would free up space for human activity</li> </ul>	<p>25</p>
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## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.8%
Developer	9.4%
Elected Member	2.8%
Landowner	3.8%
Lobby	12.3%
Local Authority	1.9%
Parish Council	16.0%
Public Sector	1.9%
Resident	49.1%



## Q25. Do you agree that the provision of sufficient utilities infrastructure is a key issue for the Local Plan to consider? If not, why not?

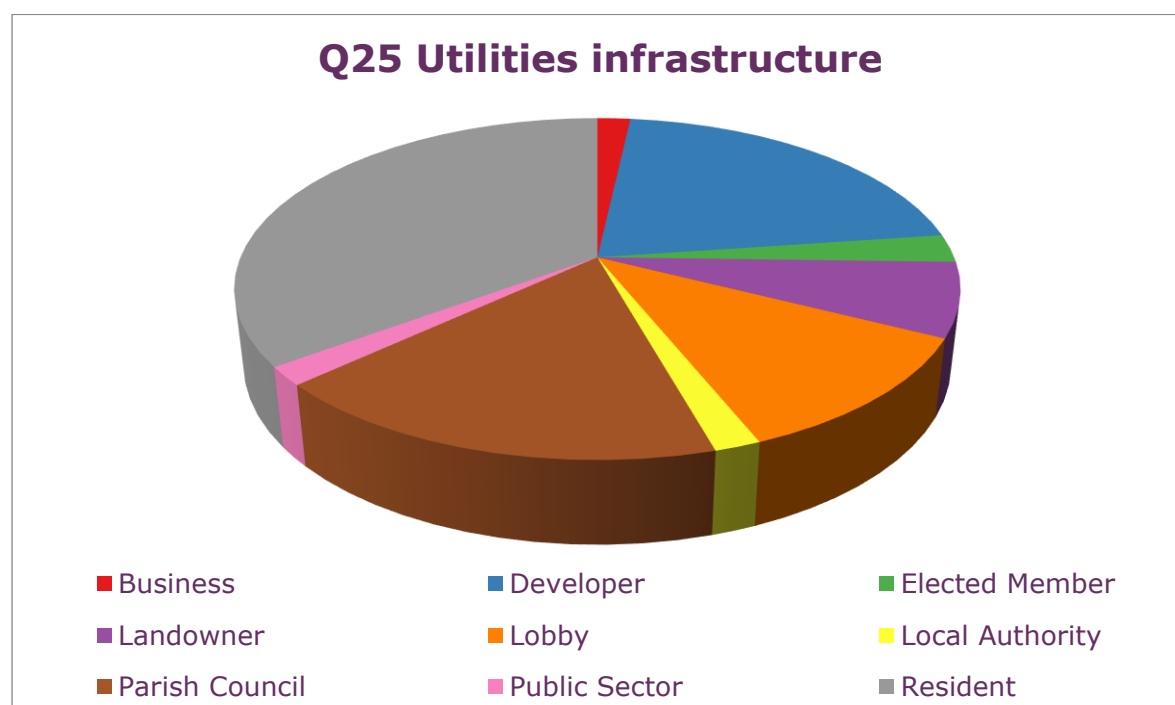
There were 104 respondents to this question.

Key themes	Number of responses
<b>Yes/support with no other additional comment</b> (or very little additional comment)	43
Some responses were concerned this was a topic that the Local Plan did not need to concern itself with such an issue - We would agree therefore that utilities infrastructure is a key issue, we would support the Councils approach that these are not issues for the Local Plan to be concerned with.	9
<b>Sewers</b> The topic of sewers came up in multiple resources in terms of the current infrastructure in place wasn't adequate..Not only for the amount of development occurring but also due to the age of the current system. Concerns such as the following were raised – 'to foul flooding during flood events and sewer overflows which are damaging to the environment.'	7
<b>New development</b> Various points were raised in relation to this question and new developments within the plan area. Some of the points highlighted are as follows – <ul style="list-style-type: none"> <li>• Locality – needs to be really considered in terms of how to deliver infrastructure as well as the strain on existing infrastructure. Suggesting – 'the Council is encouraged to engage with infrastructure providers as part of the plan process to understand any constraints or capacity issues'</li> <li>• Ways in which new developments can help- water harvesting/solar panels. Energy hierarchy in developments. New housing must embrace green energy initiatives in response to climate changes agenda which includes the phasing out of fossil fuels.'</li> <li>• Concerns about the grid with more development/ reliance on ev -. As to power supplies due to electric vehicles and home heating by heat pumps, then grid reinforcement will be necessary to transport power from distant green generators such as wind and solar.</li> </ul>	18

<p><b>Superfast broadband</b></p> <p>Mentioned in terms of a utility that needs to also be considered and updated not just the 'traditional' utilities. Is an issue within rural areas of the District also with a move to more home working more important.</p>	<p>10</p>
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## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	1.8%
Developer	21.1%
Elected Member	2.6%
Landowner	7.0%
Lobby	11.4%
Local Authority	1.8%
Parish Council	17.5%
Public Sector	1.8%
Resident	35.1%



**Q26. Do you agree that the Local Plan should encourage the use of the ‘energy hierarchy’ in developments, aiming to reduce the use of energy in the first instance wherever possible? If not, what approach do you suggest?**

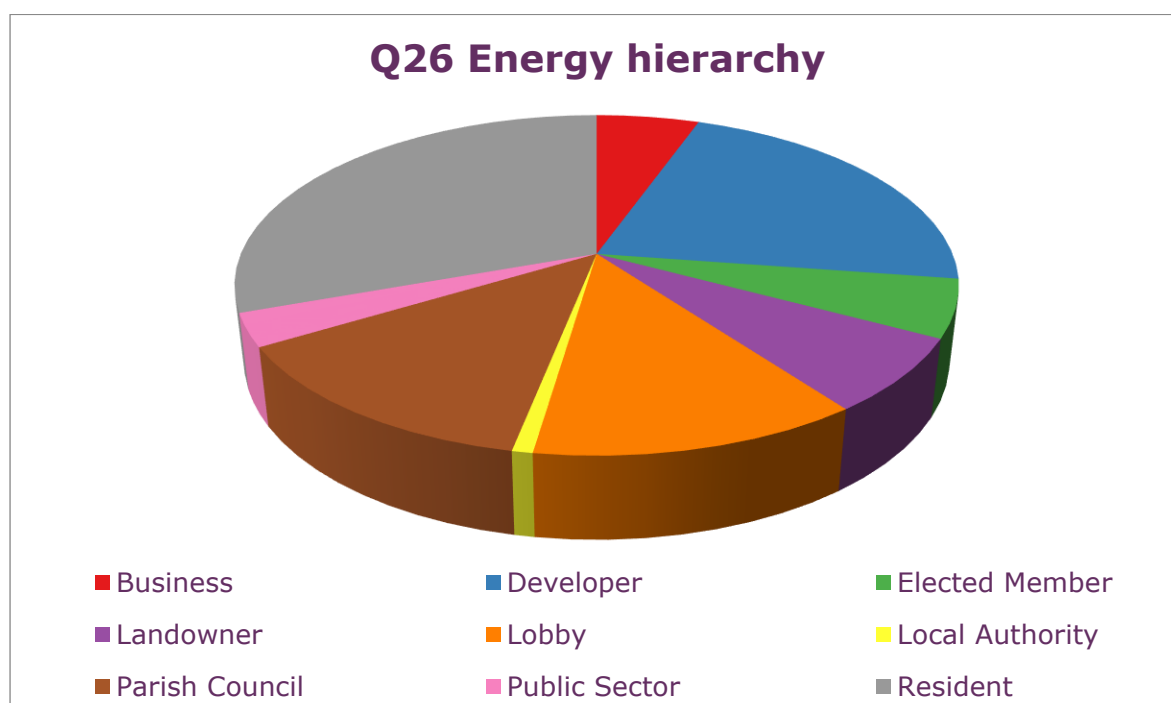
There were 114 respondents to this question.

Key themes	Number of responses
<p><b>Fabric first approach</b></p> <p>Many respondents felt that taking this stance would set a precedent for moving forwards:</p> <ul style="list-style-type: none"> <li>Fabric-first approach given that this intrinsically reduces the use of energy in the first instance, at the point of development. This is considered the most sustainable approach rather than just relying on energy- saving technology or renewable energy generation. Adopting a fabric first approach for new developments by integrating energy efficiency in to the building’s energy efficiency.</li> </ul>	8
<b>Yes/support with no or little additional comment.</b>	38
<p><b>Some concerns raised over viability</b></p> <ul style="list-style-type: none"> <li>But must be proportionate to the scale of development involved, justified and not overly prescriptive. The requirement for these measures cannot render proposed new schemes unviable otherwise they will be counterproductive and could act as a deterrent or barrier for development</li> <li>Some respondents agreed providing it has some level of flexibility ( to ensure it didn’t make schemes unviable)</li> </ul>	13
<p><b>Building regulations and being in line with this approach</b></p> <p>Various responses bought up the new building regulations and how it would be wise for the council to be in line with this providing a standardised approach:</p>	16

Key themes	Number of responses
<ul style="list-style-type: none"> <li>• However, we consider that the government’s intention to set standards for energy efficiency through building regulations is the better approach, given it will create uniformity, and the Local Plan should therefore not seek to duplicate this.</li> <li>• Some respondents even felt it was not the place of the council to deal with this issue/ push it further ‘we understand that changes to the building regulations are currently being processes (an interim uplift was implemented in January 2021). We do not consider that it is appropriate for Councils to set additional local energy efficiency standards trough planning policy’</li> </ul>	
<p><b>Energy Hierarchy</b></p> <p>The use of the ‘energy hierarchy’ in developments aligns with national targets and policy as the move to Net Carbon continues. However many agree as it aligns with national targets others felt that this was a national issue and bigger than the Council so Objected ( a further 2 responses)</p>	10

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.5%
Developer	21.9%
Elected Member	5.5%
Landowner	7.0%
Lobby	12.5%
Local Authority	0.8%
Parish Council	13.3%
Public Sector	3.1%
Resident	30.5%



## Q27. Do you agree that it is important to protect natural resources and that mineral resources are extracted before development commences? Please explain your answer.

There were 88 respondents to this question.

39 supported, 6 objected, and the majority (43) did not have conclusive answers. This is largely due to the fact that there was a **disconnect between the views regarding Natural resources and Mineral resources**. Whilst many had strong view over the protection of Natural resources, the arguments towards/against the protection of mineral resources were more varied. Given the natural split in the responses, this analysis will discuss the question in two halves, firstly it will cover the views in relation to the protection of Natural resources, and then it will evaluate the protection of Mineral Resources.

However, firstly I think it is important to discuss the responses which took the question as a whole, and did not separate Mineral from Natural resources. In total there were **24 individuals who unquestionably supported the approach as set out in the consultation**.

### Natural Resources

With the Climate Emergency so high on everyone's agenda, it was unsurprising to see that there was **unanimous support for the protection of Natural Resources**. There was some understanding that not all natural resources could be protected, but this was submitted by one agent on behalf of one Developer. There were also calls for enhancement as well as protection of natural resources, and a special mention was given to the protection of soil and water, the latter of which can have positive impacts on recreation if managed well.

### Mineral Resources

The arguments around the protection of mineral resources are more nuanced. For those that supported the approach as set out in the consultation, they agree that it made sense to extract before development (4). However, it was acknowledged that whilst this will maximise land use, it may delay development (1). The point was also raised that the **impacts of extraction on the community and surrounding infrastructure would need to be considered**, and any extraction would need to be economically viable, which may not be possible on smaller sites (2). It was therefore suggested that any **policies would need to be suitably flexible** (1).

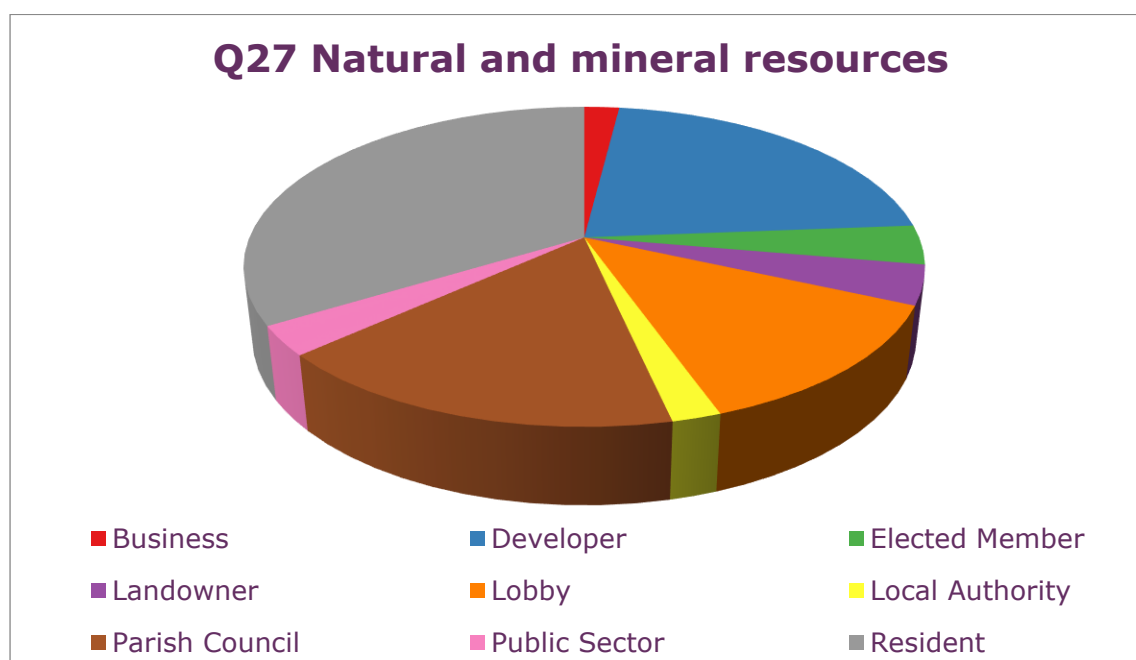
The strongest argument in objection to the proposed approach, was that we **should no longer be extracting mineral resources** (4) and that they should be left where they are and protected unless extraction is absolutely necessary (2). There were also concerns over a blanket approach. The point was raised that the **Mineral Safeguarding Area covers much of the South Warwickshire Local Plan Area and a requirement to extract minerals may prohibit**

**development across the locality** (1). Concerns were also raised in relation to the impact extraction may have on the environment, and whether the need for the mineral justifies the short and long term harm (3).

For those who did not explicitly agree or disagree there were a number of different thoughts and opinions raised. For some, it was believed that the current approach, where development is allowed providing an assessment is undertaken and appropriate measures are put in place for extraction before development, should continue (4). There were also a number who thought we should not needlessly prevent the future extraction of mineral resources (4). A prominent thought, which was raised in multiple different ways, is **that all impacts of extraction need to be considered very carefully** (5). What might be suitable on one site, may not be suitable on another. As per the NPPF mineral extraction should take place prior to development where practicable and environmentally feasible. Such considerations need to include, environmental impact, economic viability, social and community impact. The type of mineral to be extracted was also deliberated. There was a common theme raised that we need to be **reducing our reliance on mineral resources, particularly coal** (3) and instead we need to be using recycled minerals (1). It was also raised that wholesale extraction of minerals may render a site unsuitable for development afterwards, so careful management is required to ensure that mineral safeguarding is not a significant constraint to development (2). The possible disruption of Public Rights of Ways was also mentioned (1). However conversely, it was acknowledged that mineral extraction can create wealth and jobs (1) and that mineral extraction prior to development can be a sustainable option. One response discussed how **minerals extracted prior to development could be re-used in the development itself**, thus reducing the need to order in materials (1). This would be a particularly sustainable option, and would reduce the carbon footprint of a site. It was also acknowledged that any **policies relating to Mineral extraction within the South Warwickshire Local Plan need to take direct guidance from the Warwickshire County Council Minerals Local Plan**, as this is their area of expertise (4).

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.0%
Developer	21.8%
Elected Member	4.0%
Landowner	4.0%
Lobby	12.9%
Local Authority	2.0%
Parish Council	16.8%
Public Sector	3.0%
Resident	33.7%



## Q28. Is it important to ensure that the development of best agricultural land is avoided wherever possible? Please explain your answer.

There were 135 respondents to this question. 70 supported, 3 objected, and 62 did not have conclusive answers either way.

The 3 objections were largely due to the terminology used within the question. The respondents who objected did not think that the protection of agricultural land should not be an overriding factor in the consideration of land for development (1), and instead we needed to consider whether the land parcels were productive and commercially viable (2).

Starting with the respondents who supported the question, 21 did so unquestionably and without further comment. Of those who elaborated further the majority were in support of the protection of agricultural land so that we could produce food locally, thus reducing food miles (10), and so that we could become self-sufficient, and not have to rely on imports (5). There was also a strong argument for protecting the rural agricultural economy (9), which has a significant contribution to the national food production economy (2). A number of respondents believed that all agricultural land should be protected (4) and a number thought that we should be enhancing existing agricultural land (5) given that it is a finite resource (3). It was also suggested that Allotments should be considered best agricultural land (2). There were also many references to the environmental benefits of agricultural land, and in particular the importance of its hedgerows. The existing hedgerows on agricultural land are often rich in biodiversity and flora and provide many other benefits such as reducing soil erosion, absorbing carbon from the atmosphere, reducing flooding and in some instances, feeding the population (4). With the ecological benefits of agricultural land in mind, there were calls to assess the biodiversity potential of poorer agricultural land, which could be used for rewilding purposes (3). With the importance of agricultural land apparent among respondents, it is unsurprising to see that many wanted to see development on brownfield prioritised over development on agricultural land. (6).

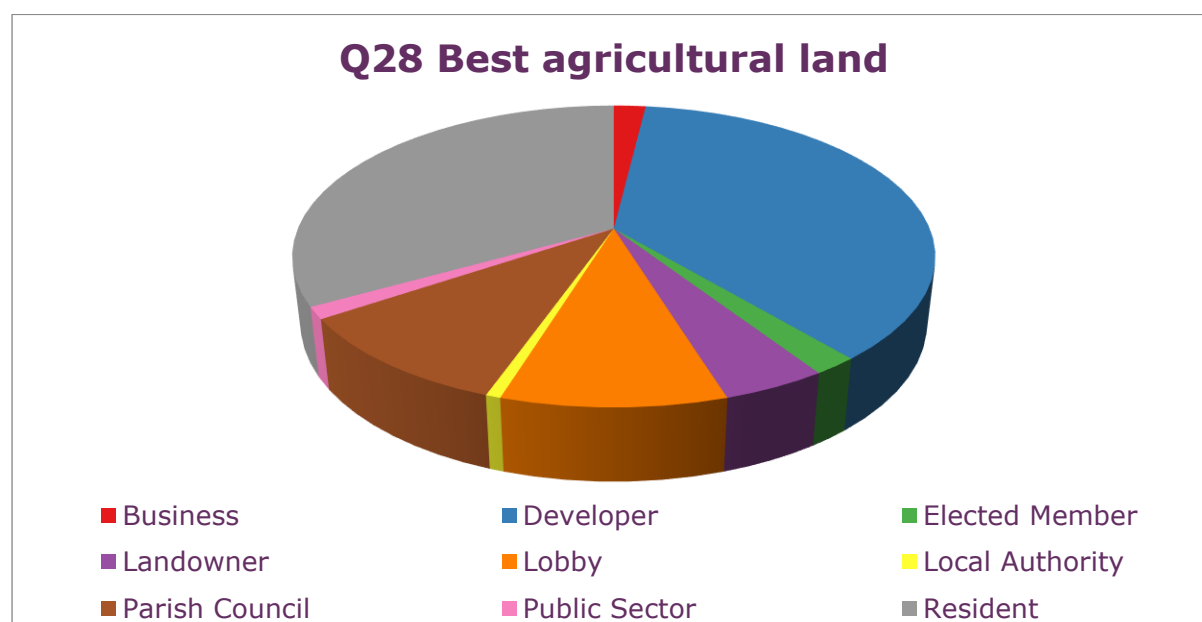
For those who took a more deliberative approach to their response, and did not explicitly agree or disagree with the question, a number of points were raised. Many acknowledged that multiple factors need to be considered and suggested that a blanket approach would be inappropriate. One of the key themes that people raised was that a balance would need to be struck between preserving Best and Most Versatile (BMV) agricultural land and ensuring development is located in the most sustainable locations (19). It was acknowledged that land on the edge of settlements is usually the most sustainable, but often, land on the edge of settlements is also Best and Most Versatile Agricultural Land. It will be up to planners to consider the advantages and disadvantages of developing different land parcels to meet wider planning objectives.

A number of respondents also referenced National Guidance and the National Planning Policy Framework (NPPF). It was widely agreed that the approach in the NPPF - where high quality soil should be protected, or where necessary, loss should be considered in relation to social, economic and environmental benefits - should be followed (19). However, it was also acknowledged that the consultation goes beyond the NPPF (2). There were also a number of responses which noted that Agricultural land is not defined as an asset of particular importance and therefore there is no strong reason to restrict development on it (6). A point was also raised regarding the accuracy of the Agricultural Land Classification maps, which were created in the early 1970's. These maps do not disaggregate grade 3 into 3a and 3b and were also prepared for the entire country, so caution should be employed when using them (1).

As is evident above, there is a relatively equal split between those that agree that Agricultural land should be protected wherever possible, and those that understand agricultural land should be protected, but that there are other factors which need to be considered. It is worth mentioning that this split can generally be separated into developer and resident responses. Developers were the group that looked at the sustainability of sites and discussed how in some instances the most sustainable sites would result in the loss of BMV agricultural land, and residents believed that the BMV agricultural land needs to be protected at all costs.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	1.9%
Developer	36.9%
Elected Member	1.9%
Landowner	4.5%
Lobby	9.6%
Local Authority	0.6%
Parish Council	10.2%
Public Sector	1.3%
Resident	33.1%



**Q29. Do you agree that development should provide compensatory measures/enhancements to compensate for their impacts (including biodiversity offsetting/landscape restoration)? Are there any other matters that should be considered?**

There were 158 respondents to this question. 105 supported, 4 objected, and 49 did not have conclusive answers either way.

The overriding response here is that the majority of respondents are in favour of suitable compensatory measures/enhancements to compensate for development impacts. For the few that did oppose the following points were raised. A number of people noted that development should not be occurring in locations where their impacts need compensating (3). Sites should be chosen where compensation is not required, and if compensation is required then the location is inappropriate for development. There were arguments that development should not be allowed to compromise the natural environment at all, as compensatory measures are never enough to restore environments and valued landscapes to their original (or to an improved) state (3). The question was also opposed on the basis that it implied compensatory measures are needed to maintain the status quo, rather than to achieve net gain (1).

For those that supported the question the majority agreed providing it was in accordance with the NPPF and other national policy (15). Whilst there was strong support for compensatory measures it was acknowledged that this can be challenging for smaller sites constrained by the existing urban environment (6) and when balancing other land use policies (2). There was a desire to ensure that development is directed away from land and landscape with high value, and instead should be directed to areas of lower landscape value such as brownfield (9). One suggestion to encourage this, was to have differential rates of compensation in place. This would discourage development on Greenfield sites, and encourage Brownfield/retail conversions/town redevelopment where the net impacts on the environment are low, and if well executed, could have a positive net gain (1).

When considering where to locate compensatory measures there was significant support for ensuring these measures occurred on site (4) or within close proximity to the area of development ensuring those affected by development are benefitting from the compensatory measures (3). However it was acknowledged that for smaller sites this may not always be possible and off-site provision should be allowed in certain instances (4). Some respondents provided examples of the type of compensation that should be considered, and how we can create developments that have a lower impact on the environment, these include: ensuring developments build carbon zero buildings that have electric charging

points; including hedgehog holes, bat and bird boxes, bee and bug hotels; leaving green areas for wildflowers; and ensuring more trees are planted than are taken away. A point was also made to ensure connectivity of sites is considered to ensure wildlife corridors are maintained (1). It was also recommended that the Council's work with organisations such as Wildlife Trusts who have experience in enhancing the natural environment (1).

Another theme raised by those in support of the approach, was that suitable measures need to be put in place to ensure that agreed compensatory measures come forward, and that they are effectively managed (4). There were however concerns that management costs may be passed to households after the initial management period, and this may have an effect on affordability; endowments were recommended as a way forward (1). An approach to ensure compensatory measures are enforced, would be to prosecute developers who do not provide the agreed measures (1).

Some respondents were keen to see that the approach went beyond that which was suggested within the document and a number wanted to see biodiversity net gain across the area, and not just in response to development (5). Particular measures include: improvement of existing green spaces; more nature reserves; creating new country parks; improving footpaths and bridleways; enhancement, creation and protection of wildlife corridors; planting of semi mature trees, with a commitment to care for them for at least 10 years; 'no-mow' areas; crop pest and disease control; natural river management; and urban shade. There was a strong emphasis on protecting what we have, and also to ensure 'ordinary' habitats are preserved/conserved and that measures are not reserved for 'priority' habitats (1). One reason given for the provision of green space and biodiversity areas is that they can help create attractive and desirable places.

For the 46 that did not have conclusive answers the majority made reference to the existing requirements for compensatory measures and the Environment Bill which is set to cement the requirements in law (14). A specific mention was made to the proposed mandatory requirement in the emerging Environment Bill for developments to deliver a 10% biodiversity net gain, which is to be managed for at least 30 years (4). However, half of the respondents that mentioned this stated how this was not yet a requirement, and we should not be pre-empting the governments decisions (2). In addition there were individuals who believed we should not duplicate provisions in this forthcoming Environment Bill (2) and we should not go beyond the existing legal requirements (6).

In terms of employing the compensatory measures, a number of individuals noted how they should be the last resort in the mitigation hierarchy, adopted only after all measures have been taken to avoid and minimise development impacts and to rehabilitate or restore biodiversity on site (8). It was suggested that the local plan should include a suitably worded policy requiring a mitigation hierarchy, to encourage minimising the environmental impacts of a development (7). Following this, should the compensatory measures be deemed necessary, there were many comments relating to the practicalities of delivery and the viability of the site. Many noted how compensatory measures and any net gain needs to be proportionate, justifiable, viable and deliverable (9). Care must be taken not to

set the requirements too high and to burden schemes with too many measures as this may prevent otherwise sustainable developments coming forward, particularly smaller sites that would not be able to provide on-site enhancements (3). Some noted that there will need to be a level of flexibility to account for site complexities (2). A number of respondents also made reference to the calculation of ecological gains and losses, which they stated is currently over complicated and not transparent (7).

If compensatory measures are agreed there was significant concern over how effective these measures would be. A number of respondents noted how often, the compensatory measures are not adequate and do not provide a net gain (9). Biodiverse habitats take many years to mature and there is great concern that the compensatory measures would not be able to replace or restore existing habitats that are destroyed through development. It was frequently noted that development in rich habitats should be avoided as much as possible (5).

Whilst there was much concern, there were suggestions of how to best deliver compensatory measures. Many respondents made reference to Biodiversity Net Gain (BNG) which is a credit based approach operated by Warwickshire County Council and is already supported by the National Planning Policy Framework (NPPF) (6). It was also suggested that this method is likely to become mandatory for developments through the Town and Country Planning Act (1). Reference was also made to the 'Biodiversity Metric 2.0' (1).

Other suggestions to provide compensatory measures and enhancements included ensuring sensitive design (2); providing public open space and landscaping (1) and also providing adequately sized, multi-functional private gardens (2). It was commented that measures such as these can often improve the biodiversity value of land that has been intensively farmed (1))

For sites that might require off-site enhancements it was suggested that a bank of strategically located habitats needs to be established (2). There was also a suggestion that money received for biodiversity offsetting needs to be pooled and used on landscape scale projects rather than diluted individual schemes (1).

An interesting point was also raised regarding the terminology used, and how 'compensation' and 'enhancement' are different things. It was noted that 'enhancement' refers to proposals that seek to improve the landscape resource and the visual amenity of the proposed development site and its wider setting, over and above its baseline condition. As such enhancement can be addressed even if adverse impacts have been avoided and/or minimised. In addition enhancement involves implementing improvements that are over and above the baseline condition, whereas compensation measures might not necessarily require this baseline to be exceeded. Based on this definition, enhancements should be delivered either on site or within the wider setting of the site, whereas compensation can potentially be delivered further afield. (1)

Finally, a number of comments were made regarding 'Landscape Restoration' and what this explicitly implies. Further clarity was sought regarding 'landscape restoration' and whether this will only be required on sites with high landscape

value (1). It was also noted how landscape restoration is complex and there is no adopted or emerging policy guidance (2).

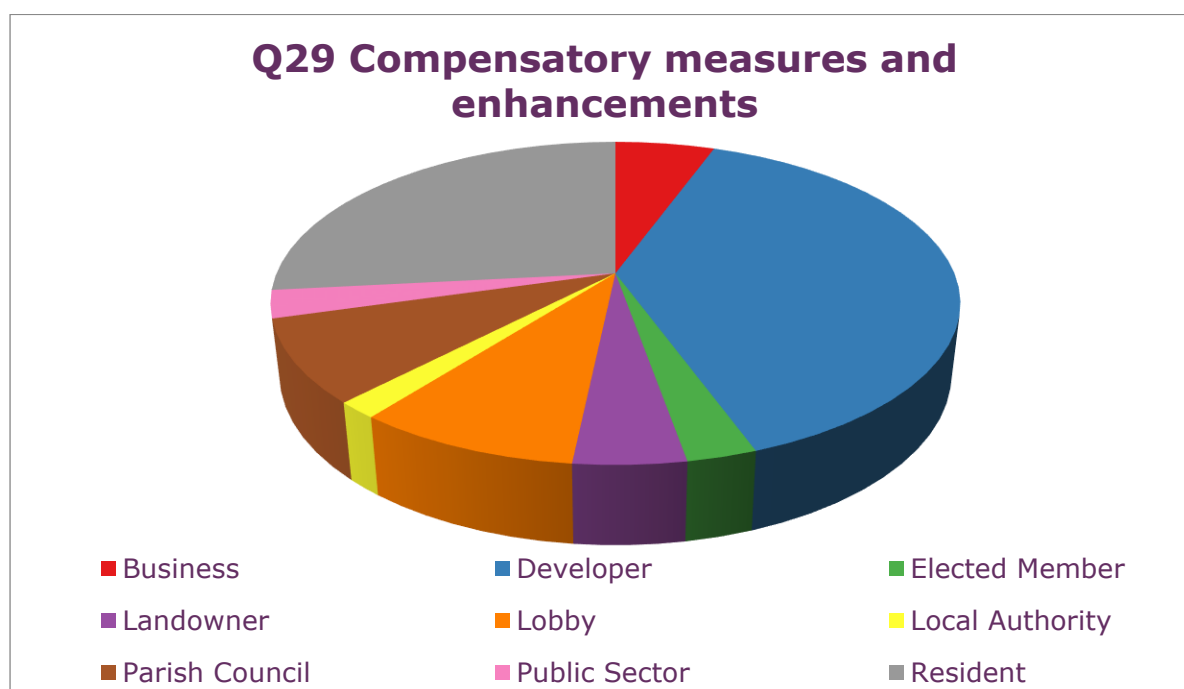
In terms of moving forward a number of respondents made reference to varying organisations, documents, and sources of information. It is believed that the following should be consulted and considered as part of any policy approach regarding compensatory measures:

- Local Nature Partnerships
- Nature recovery Networks
- Chartered Institute of Ecology and Environmental Management's 'Good practice principles'
- Natural England's 'Nature Networks Evidence Handbook: Summary for Practitioners' and 'Natural Capital Atlases'
- Local Nature Recovery Strategies
- Biodiversity Action Plans
- Rights of Way Improvement Plans
- Green Infrastructure Strategies

Overall, there is support for the approach outlined in the consultation document, however there are many respondents who have concerns regarding the practicalities of applying such policies.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.6%
Developer	38.9%
Elected Member	2.8%
Landowner	4.4%
Lobby	8.9%
Local Authority	1.7%
Parish Council	8.3%
Public Sector	2.8%
Resident	26.7%



## Q30. Is the protection of, and enhancement of our green areas and associated habitat / biodiversity a high priority for the Local Plan? Are there any other matters that should be considered?

There were 161 respondents to this question.

It is clear from the figures that there was overwhelming support for the protection and enhancement of our green areas and associated habitat/biodiversity. The majority of these supported with no further comments (66) and a significant number specified that existing natural spaces, including agricultural land, allotments and the green belt, should be protected (16). Whilst there was overwhelming support, there was an acknowledgement that a balance would need to be struck between the need for development and the protection of the local environment (9). To overcome this it was suggested that the Local Plan will need to contain a suitably worded policy which takes a measured approach to requiring the protection of such against the needs to develop the site (7). It was also acknowledged that protection and enhancement areas should be fully justified and proportionate to the size of development proposed and varying site circumstances (7).

A number of reasons were given for the protection and enhancement of our green areas and associated habitat/biodiversity, with the most common being the wellbeing of residents, particularly those in urban areas, or in areas of deprivation (8). The other common responses included the protection and enhancement of the areas biodiversity, which is a very important goal in the current climate (3). Consideration was also given to the importance of green areas in absorbing carbon and acting as a carbon sink (5). It was also noted that open spaces are key to the rural heritage of South Warwickshire (2).

A number of approaches to protecting and enhancing our green areas were suggested. Most notably it was identified that green infrastructure could be provided as part of large scale developments (5) and how open space should be provided on all new developments (2). It was also mentioned how we should be prioritising and expanding existing green areas (2). The use of the BNG credit scheme was also mentioned and there was a suggestion to re-establish the Forest of Arden (5). There was even one suggestion that we should be encouraging farmers to plant a tree for every 20m of hedgerow, as this will help achieve the government's plan to plant 30,000 hectares with trees by 2025, without repurposing a single hectare of agricultural land (1). In the first instance however, it was suggested that development should be directed to sites with a low biodiversity value in the first place (1) which may include the redevelopment of empty shops and other buildings to create high-density housing (1).

The importance of watercourses and green corridors was also discussed. Specific references were made to natural management of canals and rivers (2) and how developers should maintain and enhance smaller watercourses and ditches on

their sites (1). Specific reasons for the maintenance of blue and green corridors includes preventing culverts, which can increase flood risk and reduces biodiversity amenity (1), and supporting wildlife through wildlife corridors, which incidentally can be created along existing rights of way and other shared routes (1).

A few respondents did express opinions that we should be more ambitious and visionary with our approach and that we should take inspiration from the Warwickshire Wildlife Trusts plan to have 30% of the land managed for biodiversity by 2030 (2).

Whilst there was overwhelming support for the approach a number of respondents considered the practicalities of such a policy. A number raised how any policies should have regard and be in line with any relevant, existing and forthcoming national policies (12), in particular NPPF paragraph 170, which states how policies and decisions should 'contribute to and enhance the natural environment' (6).

Some respondents also identified a number of risks. It was noted that an overemphasis on protection of biodiversity may preclude development and make it unviable (1). There was also a concern with using the term 'green areas' which, it was perceived, may attach a disproportionate level of weight to locations which are on a lower level of the landscape hierarchy (3). The final 'risk' identified, related to the perceived liability that some forms of green infrastructure can cause (e.g planting of trees within highway land) and how this perceived risk will need to be overcome (5).

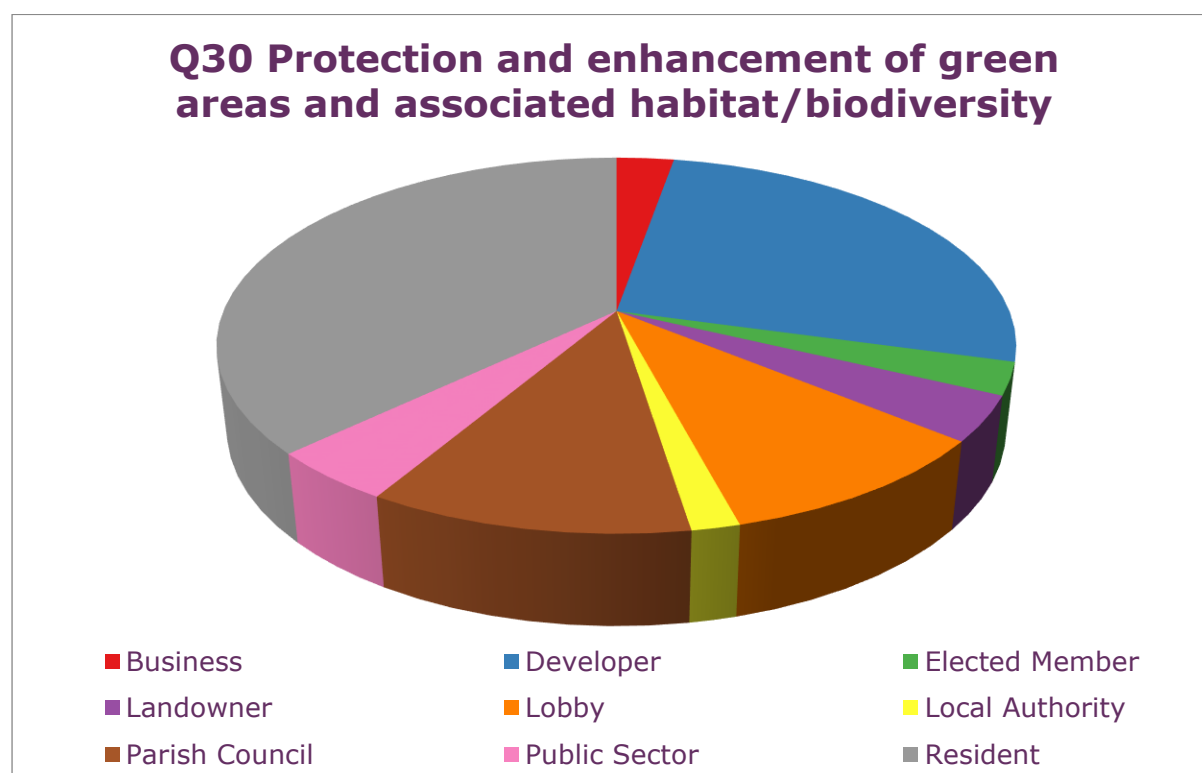
Certain 'issues' with the proposed approach were also raised through the consultation process. It was noted that one size will not fit all and each site will have different constraints and opportunities (4). It was also raised that a blanket approach of 35dph may not be achievable on sites if 40% of the site has to be left for biodiversity net gain and mitigation purposes. It was noted that this may result in a need for more sites and land in order to meet desired number of dwellings and employment sites (1).

Other points that were raised included the need for public sector funding to implement the approach (4) and skilled labourers devoted to the management of the green spaces (1). It was also acknowledged how heritage matters need to be considered and how open space and green infrastructure can assist in safeguarding heritage assets and their settings (3). The other interesting consideration related to the 'green pound' which shows how habitats can bring in tourism and finance to the area, as well as improving wellbeing and health and general quality of living (1).

Overall, the approach for the protection and enhancement of green areas and associated habitat/biodiversity as set out in the consultation document was widely supported.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.8%
Developer	26.5%
Elected Member	2.8%
Landowner	3.9%
Lobby	9.9%
Local Authority	1.7%
Parish Council	11.0%
Public Sector	4.4%
Resident	37.0%



## Q31. Do you agree that wherever possible and practical, large-scale developments should also deliver substantive areas of green space (such as country parks etc.)? If not, what is your alternative?

There were 150 respondents to this question.

Largely, respondents agreed that large-scale developments should deliver substantive areas of green space, such as Country Parks. A number of individuals raised additional points and alternative suggestions, hence the number of 'other' respondents is so high.

For the individuals that objected to the approach a number of reasons were given. Some objected to the idea of development altogether, both of a residential nature and in changing existing green areas (2); others had concerns about access to the Country Park if it is in an out of town location, thus causing congestion and pollution (1); and another believed that money should be spent creating green spaces in urban areas, rather than throughout Districts that are green and rural by nature.

For those that agreed, the majority did so without any further comments (42). Many others stressed the importance of green open space and its benefits to society. Such benefits include providing a connection to nature; improving physical and mental health; providing habitats for wildlife; providing cleaner air; protecting against flooding, and promoting active travel (20). The effects of COVID and the importance of open space during this time were also stressed. Others expressed how the open space will need to be multi-functional (2), and how in order to improve and support biodiversity, a wide range of environments will be required, and wildlife corridors will be necessary to link them (2). The point was also made that if these spaces are not provided it will put additional pressure on the existing open spaces and habitats (1).

A number of respondents also expressed how such an approach is possible, as there are existing examples within South Warwickshire (E.g. Gaydon Lighthorne Heath) (5). Going further, some expressed that all developments should provide significant open space, and it should not just be a requirement of large scale developments (6).

For those that raised additional points a number considered the practicalities of applying such a policy. The majority believed such an approach would be suitable in some circumstances, but not all, and that substantive areas of green space should only be provided where possible and practical (8). It was expressed that there needs to be a balanced and measured approach with a level of flexibility to take account of differing site constraints (13). A 'site by site' approach would be necessary (5) and all requirements would have to be fully justified and viable (8). All matters and priorities need to be considered as per the PPG (4) and the scale

of provision would need to be supported by the evidence base for open space, sport and recreation needs (2). It was also noted that from conducting open space assessments, it may be determined that there is no need for open space provision, and in these instances, where there are facilities nearby, substantial open space should not be required (2). It was also raised that open space need only be provided on sites to meet the needs of the new residents (8).

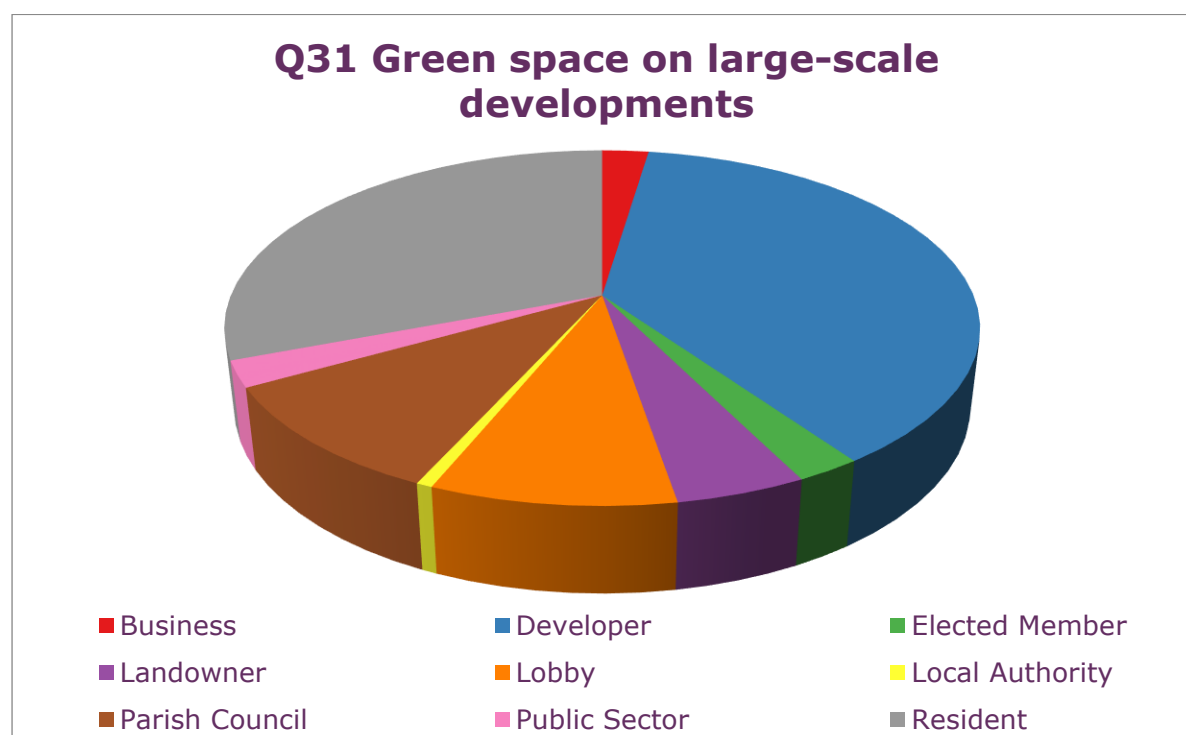
Another common thought was that instead of requiring numerous parks, it would be more appropriate to focus on the provision of one or two large country parks that will serve the whole area (9). Conversely, a number of respondents also emphasised the value of smaller green spaces, particularly in urban areas (3). Measures to enhance biodiversity can be integrated into the built environment, and large swathes of land is not necessarily the only option (1). One such approach would be to provide suitably sized gardens (1). A further point made in relation to urban settings, was that large scale developments in town centres and on brownfield land, should not be required to provide substantive areas of green space (2).

Finally, a number of respondents sought further clarification of the question, including what constitutes as 'large scale', 'substantive areas of greenspace' and what 'green space' is defined as in this instance (4). Others believed the question was not strong enough and believed 'where possible' should be replaced with 'must' to create a greater sense of urgency (5).

Overall, there is support for the approach, but further information is sought on how this will be put into practice.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.4%
Developer	37.9%
Elected Member	2.4%
Landowner	4.7%
Lobby	8.9%
Local Authority	0.6%
Parish Council	10.1%
Public Sector	2.4%
Resident	30.8%



## Q32. Is tree planting an important issue that the Local Plan should seek to encourage? How should the Local Plan achieve this?

There were 136 respondents to this question.

As is clear from the above, the majority of respondents agree that tree planting is an important issue that the local plan needs to address. Many respondents agreed with this without further comment (28) but some expressed specific reasons as to why tree planting was of the upmost importance (27). Specific reasons given for the importance of tree planting include: improving the appearance of development; providing character; providing shade; acting as a screen in front of static plants and/or tanks; acting as a barrier to sound and air pollution; providing habitat for wildlife; improving mental wellbeing, particularly in deprived areas; reducing levels of CO<sub>2</sub>; improving air quality and helping to reduce flooding.

As per the question, numerous respondents suggested different ways to encourage tree planting in the area, these are listed below:

- Embedding within policy (5)
  - Sites for tree planting should be incorporated into the Local Plan (6)
  - Having a policy requiring street trees in new developments (3)
  - Detailed design policies (1)
  - Having regional objectives for tree coverage, mix, priority areas/wildlife routes in conjunction with WWT (1)
  - Should set 20% tree cover on the land to be developed (1)
  - Work with Parish & Town Councils to increase urban tree planting (1)
- Having quantitative thresholds
  - A certain number of trees should be planted for every house built (2)
  - Planning requirement that 'x' sq feet of property, funds the planting of 'x' trees locally (1)
  - Specifying minimum level of tree planting for any development greater than 20 houses (1)
- Incentives
  - Encourage residents to plant trees in gardens with a cash incentive (2)
  - Local landowners could be given incentives to re-wild and plant native trees (2)
- Identifying suitable land
  - Council land suitable for tree planting must be identified and used for tree planting (2)
  - Place trees in big areas of tarmac (e.g. schools and playing fields) (1)
  - Henley Golf and Country Club could be used (1)
  - Landscaped infrastructure can be integrated within green corridors (1)

- Working with organisations
  - Making substantial contributions to, and working with the Heart of England Forest (3)
  - Work with Woodland Trust, Wildlife Trusts and RSPB (2)
- Community involvement
  - Volunteer groups
  - Festival 'planting days'
  - Involve Countryfile to promote schemes (1)
  - Involve residents in selection and planting (1)
  - Local communities (1)
  - Involve not for profit organisations and education establishments (1)
- Scheme funding
  - Using the Biodiversity Net Gain (BNG) Credit scheme to fund tree planting, perhaps supporting re-establishment of the Forest of Arden (5)
  - Local Authority should lead on funding the establishment of new woodland and wildlife habitats (1)
  - CIL monies could be used (1)
  - Grants to local communities to facilitate tree planting (1)
  - Developers should fund but not be involved in the tree planting process (1)
  - Severn Trent's 'Boost for Biodiversity' funding scheme where sites can be submitted for funding opportunities where there is likely to be biodiversity benefits available (1)

In addition to the suggested approaches, a number of respondents also had other considerations. Numerous respondents were concerned that the plan would be overly prescriptive and state that a certain number of trees would have to be planted. Some respondents objected to the idea of a numerical approach (4) and others believed that a flexible approach would be more appropriate, where the number of trees would be agreed at the time the application was consented (8). Given varying site constraints it was considered that one size does not fit all and the plan should avoid a blanket approach (3).

There were a number of respondents who expressed that existing trees should be retained where possible (12) especially Ancient Woodland. This could be achieved by either directing development to brownfield sites (1), or enforcing penalties for the removal of trees, hedgerows and larger woodland (2). It was also mentioned that any trees cut down would need to be replaced (1). The importance of other types of landscaping was also raised, with a number of people stressing the importance of hedges because of their numerous environmental benefits (4). It was raised that alongside tree planting soft landscaping should also be used as it may be equally effective at carbon capture (5). It was also raised that in certain circumstances it may be more appropriate to provide wildflower meadows or water bodies (1).

When it comes to choosing and planting the trees a number of points were raised. It was considered that tree planting programmes need to be undertaken by professional and experienced personnel (1), and also that great consideration

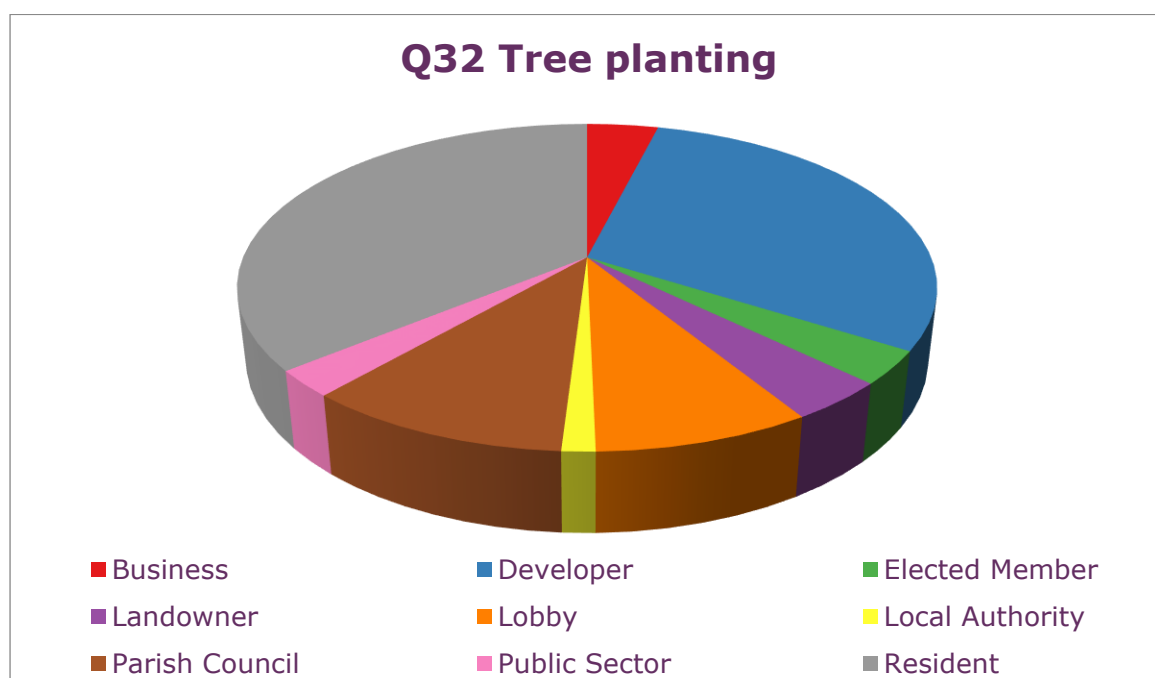
needs to be given to the type, location and age of trees (13). It was believed that native trees should be planted, but we also need to ensure there is variety, and older trees may be better than saplings, which often die within the first few years. It was suggested that specific requirements could be included as part of the Biodiversity Net Gain requirements (1), and information could be obtained from the England Trees Action plan which was recently adopted (1). Many respondents also raised the importance of having a suitable management/maintenance plans in place to look after the trees in their first few years in situ (6).

Despite widespread support there were a couple of respondents that objected. This was done on the basis that such policies can often be counterproductive, especially on brownfield/urban sites where tree planting requirements can be an impediment to development (1), and due to the fact that our focus should be on maintaining and creating spaces for biodiversity rather than planting trees (1).

Overall, there is clear support for the planting of trees within the Districts and the majority of respondents believe that it is an important issue that the Local Plan should encourage.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.9%
Developer	30.1%
Elected Member	3.3%
Landowner	3.9%
Lobby	8.5%
Local Authority	1.3%
Parish Council	10.5%
Public Sector	2.6%
Resident	35.9%



## Q33. Do you agree with the proposed ways in which the Local Plan should tackle climate change? What other ways can the Local Plan help us achieve Net Carbon Zero?

There were 141 respondents to this question.

Whilst most respondents agreed that the measures proposed within the scoping consultation would assist in tackling climate change, a range of further suggestions were put forward. In addition, a significant number of respondents suggested that the Plan should give more priority and urgency to the need to address climate change.

A number of respondents considered that any approach taken forward within the Plan needs to be workable, deliverable and follow a flexible approach.

A number of respondents considered that the Plan should not seek to replicate or conflict with government legislation or building regulations in relation to the energy efficiency of buildings and buildings meeting net zero carbon standards.

### Comments that more action/priority is required

- More urgent and radical consideration should be given to climate change with a view to attaining net zero a lot earlier than 2050.
- The implications are enormous and there is a need to think outside the box in terms of what the area can do to achieve net zero through innovative transport strategies and planning
- It is not about contributing to net zero carbon it is about delivering net zero carbon. The Plan needs to ensure that developments are net zero carbon not just quote 'climate responsive'
- Climate change should be made a matter of utmost priority.
- There is no mention of the Warwick People's Inquiry, a document that sets out the urgent actions that the people of Warwick District saw as being important to address the climate emergency.
- There is insufficient emphasis on linking all the different plans that may actually undermine a reduction in carbon emissions.
- The Plan makes no reference to removing carbon from the atmosphere, which is just as important, as reducing the amount of new carbon added to it.
- Should start with a vision that accurately reflects the climate emergency and develop policies and options that are based on that vision. The emergency must be the key driver of the Plan demonstrating how both Councils intend to meet the challenge.
- The vision should be at the front of the document closely followed by climate. The Local Plan has the most important part to play in the contribution to the transition to a low carbon future and the climate emergency.
- The principles of the energy hierarchy should be applied.

- It should help drive the shape of the whole Plan, cross-cutting themes, move away from the old planning silos. Need to integrate much more to address this over-riding issue.
- The vision for South Warwickshire should be that it leads the way in these sustainable solutions and becomes a radical exciting area at the cutting edge of all things green.
- Climate change should be at the forefront of all issues in the Plan. There are numerous reports such as the Dasgupta Review, the WCBSD COVID-19: a dashboard to rebuild with nature – World Business Council for Sustainable Development which gives guidance on how to respond to climate change and diversity which need to be part of the planning process. There is also the Doughnut Shaped Path to Recovery doughnut-shaped-recovery-report.pdf (leeds.ac.uk) which gives a framework to planning within the constraints of planetary resources.
- The move towards a low carbon future should run through all aspects of planning. The key is to develop achievable, realistic and affordable policies. The area needs to have experts on hand to guide implementation and continually review and refine the approach.
- There are many places where the wording needs to be stronger and more forceful than it currently is, eg in relation to active travel. Expressions like 'seek to' 'encourage' 'to be explored' and 'informed by' are too weak. The final iteration must give much more confidence that the climate emergency and the decline in biodiversity are being taken sufficiently seriously, and their overriding importance is fully reflected in both word and deed.
- The scoping consultation lacks urgency and the language must be tighter to reflect the aspirations of both Councils.
- Tackling climate change and increasing biodiversity should be elevated to be given primary importance.

## Need a workable, deliverable and flexible approach

- The Local Plan must evidence and explain policies, whilst reflecting the costs in viability evidence. Policies will need to be workable and effective to ensure that the development industry is capable of supporting delivery. If zero carbon standards are not compatible with development, then delivery will not be maintained and this could represent soundness issues.
- Any policies that are contained in the Local Plan should be sufficiently flexible to allow for a continued evolution of these policies during the Plan period.
- Planning policy expectations need to be realistic taking into account the changing economic circumstances facing the area as a result of the pandemic. This is to ensure that the future financial viability of residential schemes is not adversely affected and harmed. As such, a precautionary policy approach is advised.
- The impact of any of the proposed policy measures should be considered through the viability assessment to ensure that they would not undermine the deliverability of the Plan, as required by paragraph 34 of the NPPF and the PPG.

- In line with the NPPF and PPG any requirements for individual developments should be fully evidenced by supporting assessment work, including a Viability Assessment. This should ensure the cumulative requirements of the Plan policies do not undermine the deliverability of the plan overall.
- Any requirements proposed which are above national guidance need to be supported by robust and sufficient evidence particularly in regards to its potential impact on site viability. Any proposed policy within the Plan also needs to be flexible to adapt to changing circumstances across the plan period.

## Should not replicate or conflict with government legislation or building regulations

- The Plan must ensure that it does not attempt to pre-empt any future legislation and should be led by the Government as opposed to try to lead. If other authorities follow this approach, it would lead to either inconsistencies across the Country in net zero carbon approaches and/or would have a greater impact on certain developers financially that are looking to invest into the local area.
- National policy and guidance is expected to identify measures to achieve net Zero Carbon. The Local Plan should be consistent with national policy rather than seek to establish local requirements which may result in a competitive disadvantage.
- The most effective approach in achieving national net zero commitments by 2050 is through the application of Building Regulations which provide universally agreed standards of development which adds certainty to what is expected on all schemes. This would allow for a transition to higher standards of energy efficiency incrementally whilst preserving supply chains to avoid delay in housing delivery.
- The Local Plan should not look to duplicate controls on how development should achieve net zero carbon and this objective should be dealt with via Building Regulations which are outside of the planning system and best placed to deal with how a building is constructed, what energy it uses and how over time new buildings can be made to achieve higher environmental standards with the aim of achieving net zero carbon by 2050. If the Councils decide to apply such a policy that requires more than Building regulations then this will have an impact on viability and could, therefore, affect the delivery of sites as a result. There is a balance to be struck between sustainably designed but not going so far as to making this an onerous requirement that could stifle development as a result.
- Building Regulations are reviewed more frequently and easily than Local Plans and as such this aspect of development is best served outside of the planning and Local Plan system.
- Climate change requires national policy consistency. There is no scope for local variations.
- The most effective approach in achieving national net zero commitments by 2050 is through the application of Building Regulations. Building regulations provide universally agreed standards of development which adds certainty to what is expected on all schemes. This would allow for a transition to

higher standards of energy efficiency incrementally whilst preserving supply chains to avoid any delay in housing delivery.

- In relation to standards for individual developments, the Plan should look to align with the national timetable for net zero carbon development, as set out in the emerging Future Homes Standard. The principles of the energy hierarchy should also be applied.

## Suggestions for how the Plan can tackle climate change

### Net Carbon Zero building standards

- That reflect the need to minimise the use of carbon and other resources in both the build stage but also the 'in-use' stage in order to meet WDC's net zero carbon targets
- Passivhaus and fabric first are not optional they are essential. This is particularly important for affordable housing where energy costs are a much higher proportion of household income.
- Need to be adaptable to higher temperatures.
- Rainwater harvesting for toilets and washing machines.
- Need to maintain historic character which will be difficult.
- Need to be well designed, including retrofitting such as the installation of solar panels which can be ugly.
- There is insufficient evidence or assessment to justify the policy intention to require non-residential development to be net zero carbon. There is a significant cost differential between BREEAM Excellent and BREEAM outstanding, which less than 1% of new buildings achieve. Net Zero Carbon is another step change in cost
- Renewable energy – when developments are net zero carbon decentralised energy will not be required
- Higher temperatures – need to include thermal mass
- Mitigating flood risk – need to include green roofs to attenuate flow as achieved in mainland Europe
- Development must be limited, this is the easiest way to reduce harm to the climate and environment. It would reduce the need for commuting.
- Should be mandatory to include solar or air source heat pumps in all new build, along with first class insulation. Houses have to be carbon zero.
- Greatly enhanced building standards are required to create zero carbon homes
- Ensure that future housing developments are subject to the highest possible environmental standards
- Should build zero-carbon/passivhaus housing – as well as commercial/employment development – which will be able to cope with increased climate change during their lifespan, with car-free communal areas and more natural wild green spaces.
- Changing the way we build and what material we use in the near future, including ensuring in policy that there is re-use and recycling of building materials, minimising waste.
- Renewable energy technology, and other low carbon energy technologies must be provided in new developments.
- EV charging points must be provided for all dwellings.

- Micro-generation requirements – such as solar powered schemes for new builds/substantial refits – should be required

## Location of new development

- Should promote development that has the potential not only to promote alternative modes of transport but development where existing green infrastructure is established and/or can lead to enhancement
- In places that enable the appropriate growth or creation of new communities who can live in a sustainable way, with housing, services and employment sites in close proximity.
- The strategy should focus on strengthening locations to avoid the need for using resources to build new infrastructure where possible, avoiding the need to travel in the first place, and where travel is necessary, reducing the distances and providing alternative modes to the car. Growth on the edge of major settlements can help respond to the environmental challenges of SW and help achieve net zero carbon.
- Agree with the emphasis on reducing travel by petrol/diesel fuelled cars through intentional design at the earliest development stages. The 20 minute neighbourhood concept is extremely relevant here as are circular economy models for employment land designations, whereby businesses sited together have an inherent symbiosis to reduce net carbon impact – one business using the waste of another, for example.
- The Plan must acknowledge that the area, whilst in part is relatively accessible, is nonetheless largely rural in character and, on that basis, must have regards to national policy (NPPF para 103) which recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- The Plan should allocate growth near existing sustainable transport infrastructure that offer the best connectivity. It is an essential element of planning for future sustainable communities that residents are able to make choices that minimise emitting activities.
- Support is given to providing practical and sustainable alternatives to the private car, without suppressing development in more rural areas or more dispersed locations where new families, investment and support for local services is still needed.
- Caution is expressed at focussing all development reliant on traditional transport modes which served employment centres, rather than the pattern of behaviour of communities where access to education, leisure and services in other location is also important. Caution is also expressed in 'tick box' standards being employed rather than deliverable, long term strategies to change behaviour.
- The approach towards carbon-based fuels for vehicles does not reflect the likely rapid introduction of electric vehicles (including electric bikes and scooters) and associated technologies (driverless, shared rather than privately owned vehicles) which could significantly reduce the current disparity of accessibility between urban and rural areas.

- Integrated enterprise hubs, especially to enable people to live and work within their communities thereby strengthening them.
- Densification in urban brownfield sites are best for reducing climate impacts with a focus on high quality accommodation. Increase housing density and making working and home closer together.
- Key sites should be those within easy walking/cycle distance of substantial residential catchments
- There should be rural development to improve the provisions of public transport as the use of private vehicles is a necessity in rural areas.

### Creating good quality transport links that promote active travel and encourage the use of public transport

- Improving connectivity (technology including broadband and public transport) across the district to give people the flexibility about how they choose to live, work and travel and avoid the constant proliferation of roads at the expense of quality of life.
- Supporting the switch away from petrol and diesel cars to EVs, and the wider application of battery technology.
- Increasing accessibility and reducing the need to travel by private car
- Offer free or reduced fee parking for EVs in council owned car parks.
- Consider better integration of transport, easier interchange between modes.
- Restricting parking in the places that people want to go in order to shop does not mean that they go to a park and ride – it means that they don't come to the town to shop.
- Do not increase road capacity. New roads create new traffic and do not provide solutions. When a new road is built new traffic will divert onto it. Many people may make new trips that they otherwise would not make, and will travel longer distances just because of the presence of the new road.
- Invest in new EVCP and electric buses
- Should encourage cycling
- Parking is a major pressure in many town and village centres, and the new Local Plan must address this by reducing the need for car travel wherever possible.
- Practical and sustainable alternatives to the private car, without suppressing development in more rural areas or more dispersed locations where new families, investment and support for local services is still needed.
- The only way to stop people driving in town centres is to ban cars and car parking in town and instead make Park and Ride a free service. Make e-scooters and mobility scooters available for those who can't walk and cycle paths should be greatly extended.
- Bus and train services need to be more flexible, with the introduction of dial a bus eg, and by sharing out the seniors subsidies among the total population to reduce fares.

## Green and Blue Infrastructure

- The social and communal spaces such as allotments or community orchards must be integrated in and central component of any new development
- Besides any wetlands/multifunctional SUDs, natural or open green spaces should also consist of areas such as woodlands which can be accessed easily by the new community.
- New developments should seek to enhance and expand the District's tree and woodland resource.
- Tree planting as an efficient way to cool the environment, absorb pollution and support impacted biodiversity. Trees are important in terms of reducing carbon but also in terms of climate change adaptation by providing shading and cooling, can reduce flooding, provide habitats for wildlife and are good for people's mental health and wellbeing.
- Allotments contribute to reducing carbon emissions (see evidence [www.farmgarden.org.uk](http://www.farmgarden.org.uk) and [www.gov.scot/policies/community-empowerment](http://www.gov.scot/policies/community-empowerment)) by:
  - Encouraging plot holders to walk and cycle thereby minimising vehicle journeys
  - Growing of crops and produce helps to fix carbon dioxide
  - Using solar power devices for lighting
  - Recycling and upcycling of materials for water collection, construction of sheds etc
  - Composting
  - Use of green manures to incorporate carbon in plant material into the soil
  - Processes involved in agriculture, food and waste also generate carbon emissions
- Natural England, the Environment Agency and the Forestry Commission recently produced a shared vision to use nature-based solutions to tackle the climate and ecological emergency. This includes through delivering woodland planting in the right places, working with nature to manage flood risk, taking a strategic approach to land use and encouraging the use of less carbon intensive materials.
- Natural England provides some resource links.
  - [Climate Change Adaptation Manual](#)
  - [YouTube webinars](#). Natural England ran a series of webinars last summer where we provided a baseline level of understanding about climate change and Natural England's role.
  - Landscape scale climate change assessment method (found in the Adaptation Manual) which is based on the [NCA method](#).
  - [Climate change vulnerability assessment](#)
  - [Nature Networks Evidence Handbook](#)
  - [Carbon Storage and Sequestration by Habitat](#)

In addition the following sources may prove useful:

[Net Zero- The UK's contribution to stopping global warming](#)  
[Cities on the route to 2030 -Building a zero emissions, resilient planet for all](#)

Healthy ecosystems, particularly forests, take up and store significant amounts of carbon in soils and trees. One hectare of natural woodland can take up carbon dioxide roughly equivalent to an average person's carbon dioxide emissions over the course of a whole year. Trees are therefore important in terms of reducing carbon but also in terms of climate change adaptation by providing shading and cooling, can reduce flooding, provide habitats for wildlife and are good for people's mental health and well-being.

[Introducing England's urban forests](#)  
[Forest Research- Urban Tree Manual](#)

## Improving Water Resource Efficiency

- New development in the area will result in a need for an increase in the amount of water to be supplied across the Severn Trent (ST) region.
- Issues with the sustainability of some of the water sources are placing our supply resilience at risk. It is therefore vital that we reduce the amount of water used. Whilst there are a number of steps ST is undertaking to reduce this risk such as reducing leakage, finding alternative sources of supply and investing in new technologies such as increasing metering coverage, there is also a role to be played by new development in reducing consumption of future customers by using readily available technology of water efficient fittings and design.
- Enforce a master planning approach to strategic developments, particularly where there are likely to be multiple developers across a large site. Encourage a masterplan led approach to infrastructure provision, particularly relating to new sewerage infrastructure to avoid a piecemeal approach of multiple small pumping stations, where one larger pumping station or gravity fed system is possible with a site wide strategy.
- Supportive of SUDS, water efficiency and water harvesting measures.
- ST are developing options and strategies to address flood and pollution risk the Drainage and Wastewater Management Plan (DWMP) – and are keen to work with stakeholders to develop and share the outputs.

## Retrofitting buildings and streets

- Need a comprehensive programme making it easier for homeowners to insulate the older housing stock and install, for example, solar panels on all or most home owners roofs.
- Use developer contributions for funding energy efficiency improvements to privately owned residential properties in the local area.
- Need to be well designed, including retrofitting such as the installation of solar panels which can be ugly. Who pays for retrofitting?
- Existing streets need to be retrofitted to allow for safe cycling and walking
- In order to adapt to higher temperatures, retrofitting existing buildings may not be appropriate in many aged rural buildings. It can be better to build new buildings than invest heavily in labour and materials in certain properties for a minimal/limited gain. So in some cases new development can be the most sustainable option.
- Micro-generation requirements – such as solar powered schemes for new builds/substantial refits – should be required
- Retrofit is good but need to take into account the unintended consequences of driving net zero carbon and not taking into account the health of the occupants otherwise people will die
- There is a large amount of old rural housing that was constructed that it is not ideal for improving energy efficiency – schemes should be promoted to help all residents improve these. It should be recognised that rural housing, not on the gas network, will face additional costs in removing oil storage and associated pipework in favour of air/ground source pumps. This factor will deter residents from voluntarily converting to alternative low carbon heat sources.

## Improving air quality

- To enhance the quality of our neighbourhoods and improve the health of our residents by genuine action eg fast EV chargers, incentives
- Impose no car zones around primary schools

## Committing to a biodiversity net gain

- Not only on all new developments but across the whole of the plan area throughout the course of the plan (to compensate for organic declines). This goes beyond tree planting and must include a multivariate approach with appropriate environmental stewardship in agriculture and properly planned open spaces to provide for recreation and community use.
- Set aside land for rewilding and biodiversity
- There is little mention on how the Plan will lower agricultural emissions as they are one of the heaviest polluters. Also there is no mention on the demand we give for plastics.
- Mitigating biodiversity loss should also include crop pest and disease control, Natural River Management, urban shade, and aesthetic/leisure reasons.
- Trees that are cut down must be replaced and ancient woodland protected because of its ecoculture.
- The rural and agricultural base of the Stratford part of the district is an important environmental and climate asset and should not be neglected in the plan.
- Agricultural practices need addressing to improve soil quality, reduce carbon emissions, improve water quality and enhance biodiversity.
- Biodiversity needs to be defined for South Warwickshire in terms of number/area of green spaces, woodland area, numbers of bird/flower/insect species, total carbon storage etc (or in combination) otherwise, like 'sustainability', it becomes meaningless.
- Mitigating biodiversity loss needs to include actions not connected with housing development, such as the creation of many new Local Nature Reserves and the transformation of low grade agricultural land to habitat rich meadows.
- Reducing the impact on important habitats and designated sites such as Local Wildlife Sites, Potential Local Wildlife Sites and Nature Reserves is important to support changes to the environment and impact on important and protected species.
- Mitigating biodiversity loss should not start from a position of mitigating loss, but rather protecting existing biodiversity by preventing development on land which has a demonstrable existing biodiverse setting.

## A detailed strategy for a Green economy

- Gigafactories, house retrofitting, building construction and renewable energy generation supported by new educational and training opportunities for upskilling.
- Attraction and support of businesses looking at new technologies.
- Financially support green business in the area

- Encourage all businesses and employment land freeholders to improve energy efficiency of buildings and use renewable energy
- The green economy is important to the future of the area's economy and thus support decentralised, low carbon and renewable energy generation and community initiatives.
- A major strand in our response must be to stop hankering after economic growth. Instead we now need to quickly adapt to living sustainably. Reduce consumption and waste and develop a green economy.
- Vision for the area should be that it becomes famous for being a centre for Green Excellence, that it leads the UK in seeking green solutions to every problem, and that at every point it priorities and targets green endeavours. That it truly does what it says on the tin, rather than simply paying lip service to sustainability.
- The transition to e-commerce plays a role in achieving net carbon zero as numerous individual journeys are replaced by fewer journeys by distributors.
- The Plan should support the requirements of the logistics sector comprehensively to ensure that all aspects of distribution are made as efficient as possible. This is likely to involve allocating land for major and last mile hubs within the area.
- Creating new investment opportunities from within and outside the District to generate good quality sustainable jobs, with an emphasis on localism.
- Encouraging the creation of small and micro-businesses through appropriate land use in our town centres avoiding fragmented initiatives.

## Flood mitigation

- For increased magnitude and frequency of flood events as a result of climate change.
- Houses should not be built on flood plains
- Many plants can be used to soak up water and wetland habitats could be created to absorb excess water and create a wildlife reserve, possibly by introducing beavers who are good at stopping flooding.
- Development alongside watercourses and their associated floodplains should be restricted as to mitigate against the effects of climate change on the frequency and magnitude of flood events to allow for the free flow of water.
- Suggest more natural solutions approach to flood management, that addresses the worsening flood issues and also increase biodiversity and long term environmental damage control.
- The Environment Agency are in the process of updating the climate change allowances for peak river flows.
- Mitigating flood risk within the Plan should also include undertaking the SFRA to identify areas at highest risk with the latest data from Risk Management Authorities such as the EA, WCC and ST Water. Scoping should consider flood risk as an integral part of deciding if a site is suitable for development.
- SUDS should be provided in all new developments

- Making provision for the possible future relocation of vulnerable development and infrastructure.
- Natural River Management techniques to slow runoff from land through alternative farming practises, tree planting, rewilding and restoration of original meanders
- Support the mitigation of flooding, encourage rural on-farm reservoirs to store water, as well as greening projects to benefit agricultural productivity and wildlife in local watercourses.
- The Plan should have a clear policy to resist development on land that has a record of flooding.
- Planning must recognise that flooding always seems greater than perceived risk as science seems to lag actual events.
- Build flood alleviation systems larger than current regulations and before building the development to prevent neighbouring areas flooding during site works.
- Have independent modelling to demonstrate impact of developments on flooding of current and future properties and infrastructure
- Too often new developments don't flood but by removing soakaway land they create floods and push the water to neighbouring properties. The same for impact of run off into watercourses from new developments.
- Protect water quality in watercourses by reducing the damaging erosive and polluting potential of water in flood and releasing water to wildlife and watercourses in time of drought.
- Farmers could be encouraged to block up field drains which would alleviate flooding into the rivers.
- Road drains need to be maintained and SUDS shouldn't just discharge negligently onto agricultural land with no consideration for the localised flooding created.
- Handling flood risk is not best done by mitigation measures. Flood risk means that new housing should not be in flood plains or locations which have a record of flooding. The Plan should have a clear policy to resist development on land that has a record of flooding.
- Mitigating flood risk should be achieved primarily by preventing development on land which has any recent or past history of flooding. Historic flooding should not be ignored or purely attempted to be mitigated in order to meet a housing supply demand. Mitigation has been proven not to work on many occasions. Alternative sites should be chosen and sites with any flooding history should not even be considered in order to protect the environment and entire SW area.

## Generation of renewable energy

- The Plan should not support the generation of renewable energy in the countryside – wind turbines are intrusive and generate little electricity relative to the harm that they cause to local landscape. Solar panels also harm the landscape and use good quality agricultural land unless confined to factory and farm roof buildings. Anaerobic digesters generate lorry and tractor trailer traffic on minor roads than thus has impacts that outweigh their benefits.

- List/map of places for renewable energy plant locations rather than react to planning applications
- The statement that refers to proposals for standalone renewable energy generation in appropriate locations across South Warwickshire’ requires clarification. Appropriate locations for the production of renewable energy also has to mean that they are appropriate in ensuring that there are no negative impacts on the landscape, or that there can be genuine mitigation for negative impacts.

## Education

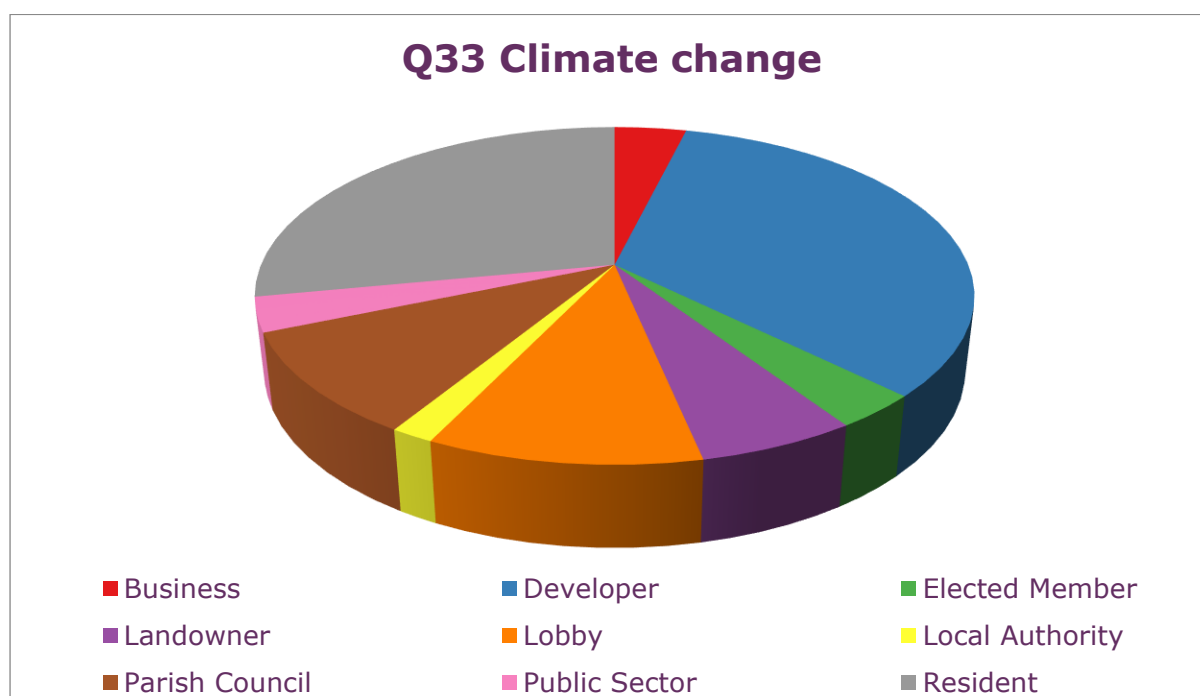
- Support green education - awareness of tackling climate change is one of the best ways to tackle it – eg schools.

## Recommendations must be mandated with measurable targets.

- There is no section on targets. How are people to know if progress is being made if KPIs are not highlighted at the beginning and reported on throughout the process.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.8%
Developer	33.5%
Elected Member	3.3%
Landowner	6.0%
Lobby	10.4%
Local Authority	1.6%
Parish Council	9.9%
Public Sector	3.3%
Resident	28.0%



## Q34. Do you agree that flood mitigation should be a major priority for the Local Plan when delivering new housing? How should the Local Plan achieve this?

### General overview

There were 133 respondents to this question. There were a range of views and responses received, however also a number of recurring themes which are summarised below.

### Existing flood plain

A large number of responses made specific reference to development on existing flood plains and that the starting point should be to avoid building new development on these areas in the first instance. It should not be done by 'mitigation'. However, there were other respondents who felt that development should not be precluded in flood risk areas as it is possible to incorporate flood risk mitigation measures within new developments.

### Flood Attenuation Measures

A number of responses made reference to Climate Change considerations and the integration of SUDS on developments being made a priority to mitigate against impacts. Whilst some responses specifically made reference to SUDS, others did not, however there were other suggestions raised which fit within this theme and have therefore been included.

SUDS should be located within the development in its green areas and not substantial areas such as country parks and parks. They should also be built to the approved standards with consideration also being given to SUDS retrofitting. Natural attenuations should be considered such as green roofs and planting trees and hedging in appropriate locations to assist with alleviating impacts as well as promoting water efficient design of buildings such as water harvesting and grey water recycling. Areas that are prone to flood risk should be used for appropriate uses such as public open space and where there are reasons as to why this can't happen, a sequential approach should be taken. Areas where there is a decrease in ground penetration or low areas should avoid being built upon. Another option for development could be to build homes on stilts with car ports/garages beneath and all homes should be provided with a water butt. Existing communities should be given the resources to protect their properties. Permeable surfaces and landscaping should be considered and favoured when looking at new developments as well as the options for looking at possible eco-systems for recycling water.

One of the responses felt that areas such as Lench Meadows in Stratford should be identified, rewilded and managed to provide flood alleviation schemes. In addition, farmers and landowners could be encouraged to allow some land around water courses to be used in a similar way. There were also a number of similar

responses encouraging use of farm land even though specific references to areas were not mentioned.

Another suggestion was that flood mitigation should be around slowing water down, as well as the introduction of beavers when putting together policies also taking into account other schemes that are in place around the country. Land drainage is an important factor and there should be more porous surfaces so that the rainwater can soak naturally into the ground.

Adaptation to higher temperatures should include passive design to minimise the heat extremes with least carbon emissions. Mitigation should include Natural River Management Techniques, a number of which have been mentioned above. Mitigating biodiversity loss should include crop pest and disease control, urban shade and aesthetic and leisure reasons.

Protection should be given to existing housing and not just new developments.

## Guidance

Reference within some responses was made to flood mitigation and how this should be a priority in accordance with the National Planning Policy Framework and paragraphs 155-165 on planning and flood risk as well as using the sequential approach. Policies should take account of the Drainage Hierarchy whereby surface water that drains to the sewerage system is avoided and allocations in areas where there is not sustainable outfall is avoided. A Local Plan should provide strong conditions on flood risk and ensure they are enforced. There is guidance on SUDS which can be found in Warwickshire County Council guidance or in SUDS Manual Circa C733. It is important that a Strategic Flood Risk Assessment (SFRA) is undertaken to identify areas at high risk using appropriate available data from agencies such as the Environment Agency, Warwickshire County Council and Severn Trent Water. One response also made reference to Neighbourhood Plans being a useful resource in identifying areas that may be at risk of flooding.

Guidance produced by the Environment Agency should also be strictly adhered to for long term impacts and this should take account of fluvial flooding as well as surface water and ground water flooding. In addition to this guidance, the Pitt report and subsequent reports also provide clear messages on this topic area.

The relevant River Basin Management Plans should inform development proposals within the Plan and the Plan should contain policies which protect habitats from water related impacts and where possible seek appropriate enhancement.

## Infrastructure and viability

One of the respondents felt that it was important to ensure that the existing infrastructure has the capacity to be able to deal with the potential flood water and also that it is maintained. Where there are capacity issues especially in relation to sewage these should be upgraded.

In terms of viability this was raised in one of the responses. The viability assessment is at the Plan Making stage and should not compromise sustainable development but should be used to ensure that policies are realistic and that the total cost of all relevant policies will not undermine the deliverability of the Plan.

Existing drains and watercourses will need to be maintained in order to mitigate the impacts of flooding on developments.

## General

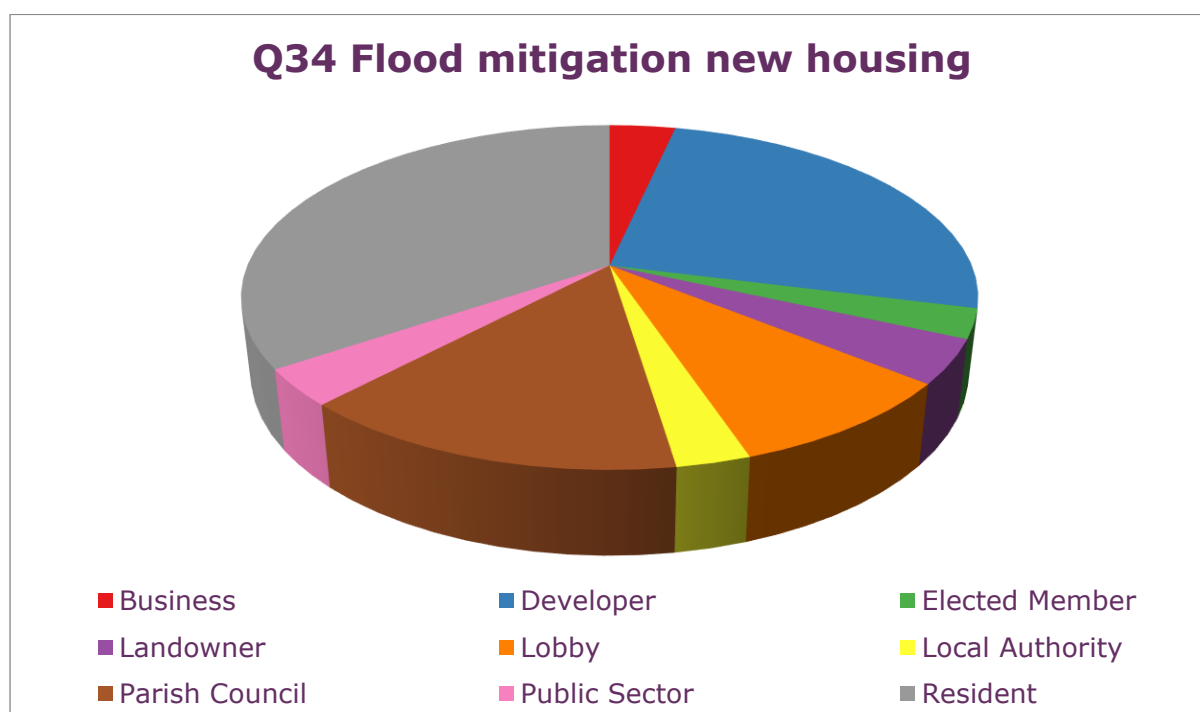
A number of other issues were raised which do not fall within the main themes and these have been summarise briefly below.

To date the local views of people have not been taken into account but they should be. Consideration should be given to the impact of flooding, the damage to nature as well as residents homes and the mental health impact.

Flood mitigation is also relevant to sports facilities and should not be forgotten about. There are a few existing clubs that are sited on areas susceptible to flooding which results in issues relation to insurance, disruption of playing seasons and increased maintenance costs.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.4%
Developer	25.5%
Elected Member	2.8%
Landowner	4.1%
Lobby	9.0%
Local Authority	2.8%
Parish Council	14.5%
Public Sector	3.4%
Resident	34.5%



## Q35. Do you agree that the provision of health facilities should be a major priority when delivering housing? How should the Local Plan achieve this?

### General overview

There were 125 respondents to this question. Most of the responses made were mainly in relation to health facilities and infrastructure, however there were a number that referred to the quality of housing as well as the importance of open space, exercise and walking and cycling.

### Infrastructure

A large number of the responses received noted that health facilities and infrastructure is a key consideration for the SWLP, however there was a strong message that this should be backed up with appropriate assessments and evidence. For example, there would need to be information on capacity for the areas that would be taking development in order to ensure that facilities are not built which are then not viable later on because there is not a need for them. In relation to this point there was an emphasis on the need for the Council's to ensure that early engagement and ongoing discussions take place with the relevant health providers and partners to ensure this doesn't happen. Further, the CCG suggested in their response that physical infrastructure is not expected to form the whole solution in response to additional development and that other opportunities should be explored through S.106 and CIL. There needs to be a whole system approach. Whilst physical infrastructure will be a consideration, services to help people stay healthy and maintain independent living should also be considered such as signposting people to help for housing and food banks.

One respondent suggested that there is a need for a private hospital which would help to deliver health facilities to support the population close to people's places of work in sustainable locations which are easily reached by existing infrastructure.

Another response suggested that there should be a distinction between local infrastructure and shared services. The former is necessary to relieve pressure on existing provision at full capacity and the latter part of mainstream provision funded by the general population.

### Guidance

Health Impact Assessments were strongly encouraged and the CCG would like to work proactively with the District Council's to develop and inform future Health Impact SPDs. Consideration of Joint Strategic Needs Assessments with the aim of improving mental health through access to green space and promoting healthy behaviours should inform the Plan. One of the responses was surprised to see the omission of reference to both a Playing Pitch Strategy and also a Built Facilities Strategy. Information from both of these can be used to determine what open space/sport and recreational provision is required across the South Warwickshire

area. Another response supports this by suggesting that existing sports facilities, parks etc are improved.

## Accessibility

Although a large number of responses recognise that there would be a requirement for health facilities, a key message was that these facilities would need to be accessible by other means rather than just a private car. This is particularly pertinent in rural areas where accessibility is difficult. As well as accessibility to physical infrastructure, access to services, communities, green space was also stated as an important consideration in order to reduce social isolation and mental well-being.

## Housing

This issue was raised numerous times in responses received. It was suggested that the benefits of extra care provision are explored which relates to social isolation and loneliness in older people as well as the physical health benefits. The associated benefits of specialist housing provision for older people should be considered as a mechanism through which to address the impacts of an ageing population in South Warwickshire.

In addition to this point, the quality of affordable rural homes for elderly and young people was raised as well as ensuring that modern housing provides a much improved environment such as prevention of damp and opportunities for improved natural daylight.

Housing should prevent issues of insecure housing and homelessness.

## Other

As well as the key themes above, there were also a number of other key points raised. A number of respondents felt that green spaces need to be protected for people's mental health and well being such as parks, allotments, open space, sports facilities, cycling and walking facilities. As well as mental health benefits it was also suggested that these areas would help to encourage people to stay active and healthy and allow people to make healthy lifestyle choices. There should be a healthy streets approach.

One respondent felt that hotels or other larger establishments should allow the communities to be able to share and use the facilities such as gym equipment or swimming pools. Could these be a condition of developments moving forward?

Another suggestion was that the topic of Health should not be a separate chapter and that it should form part of the 'Place' section of the document. Health should be a fundamental aim of places to enable and support healthy lifestyle choices moving forward.

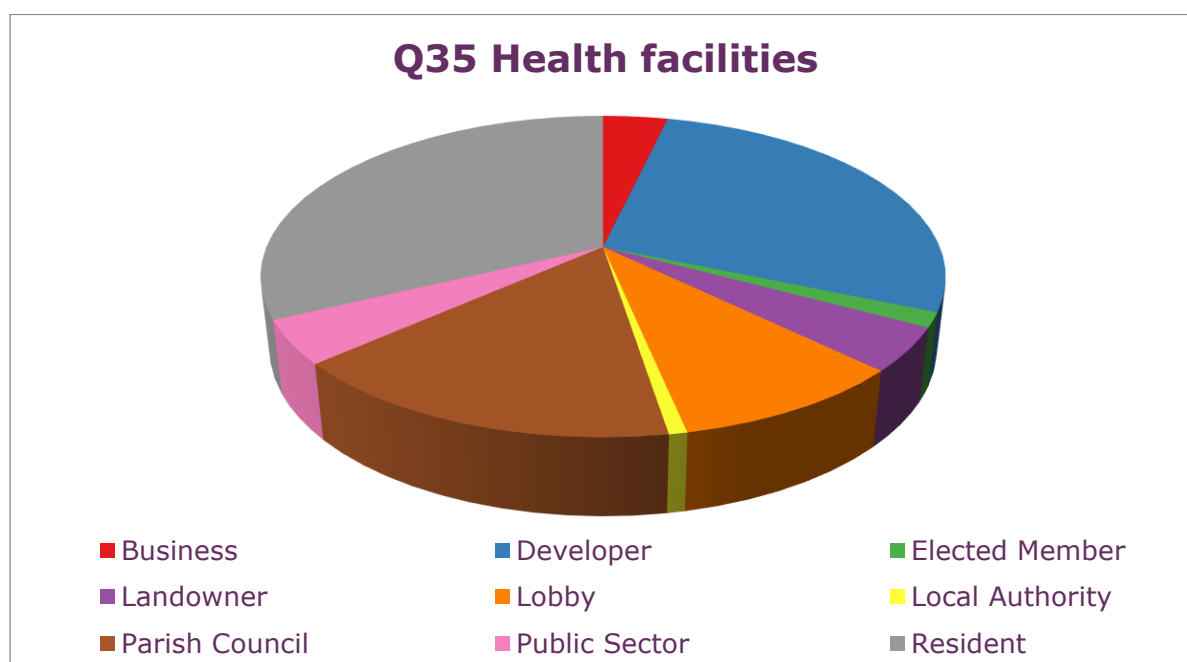
There should be greater flexibility for change of use to support accommodation in highly accessible sections of town centres.

One response was in relation to a specific development at Long Marston whereby it was felt that the emphasis was on physical provision for Public Health infrastructure rather than providing services for older people.

Overall most of the respondents were in support and agreed with the importance of providing health facilities albeit not necessarily just in a GP/hospital form but through other means such as open space, allotments etc. and housing and other services.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.6%
Developer	27.7%
Elected Member	1.5%
Landowner	4.4%
Lobby	9.5%
Local Authority	0.7%
Parish Council	16.1%
Public Sector	4.4%
Resident	32.1%



**Q36. Do you agree that the South Warwickshire Local Plan should look to address congestion in town centres in order to improve air quality? If not, what is your alternative?**

### General overview

There were 89 respondents to this question. There were a range of comments in response to this question but again a number of recurring themes which are summarised below with any other comments categorised under a more general heading.

### Enhancement of Town Centres

Perhaps one of the most common responses was in relation to the Town Centres and the importance of ensuring that these are enhanced and promoted as places that people wish to visit. This would then allow for a more pleasurable walkable environment for people. A couple of respondents made reference to the change in consumer habits following covid and that these should be considered and taken into account such as more people doing internet shopping. One point was raised which is in relation to town centres and that people should be welcomed and not made to feel like they are being turned away because they are causing congestion. Related to this was support for interventions in locations where impacts are adequately assessed in terms of air pollution and traffic domination but ensuring that this does not harm vitality of businesses as this would be detrimental.

### Sustainable Travel

A number of comments received felt that there needs to be a vast improvement to public transport and the infrastructure in order to encourage active travel and put people off using their private cars. There should be more convenient options for transport and these should be provided across the whole of South Warwickshire. Sustainable transport should be promoted and several responses made reference to Park & Ride facilities into the town centres using electric buses but services would need to be regular. There was one suggestion of only allowing residents and guests to park in town centres and for hotels to provide parking so that people do not need to move their cars. Investment in rail over the private car should be a priority.

### Electric vehicles

In a number of responses, reference was made in relation to Electric Vehicles and it was clear that people felt that this would help with the issues of Air Pollution and congestion in the future. However, in order to be able to encourage more people to switch to Electric Vehicles there would need to be better infrastructure to support this such as electric charging points. A couple of responses seemed to suggest that if there is a switch to electric vehicles that there will be less of a need for congestion to be a major factor in air quality in future.

## Congestion in other areas

Although this question specifically made reference to Town Centres, a number of respondents highlighted the fact that it is not just congestion and air pollution in Town Centres that is an issue. There can often be issues in village centres and new development attracts commuters who don't always have vehicles that are suitable for the narrow lanes and roads. Some responses requested that other areas are addressed such as schools and supermarkets as air quality is also an issue in some of these locations. Another suggestion in terms of trying to reduce congestion was to look at initiatives that try and address one person occupancy in cars.

## Other

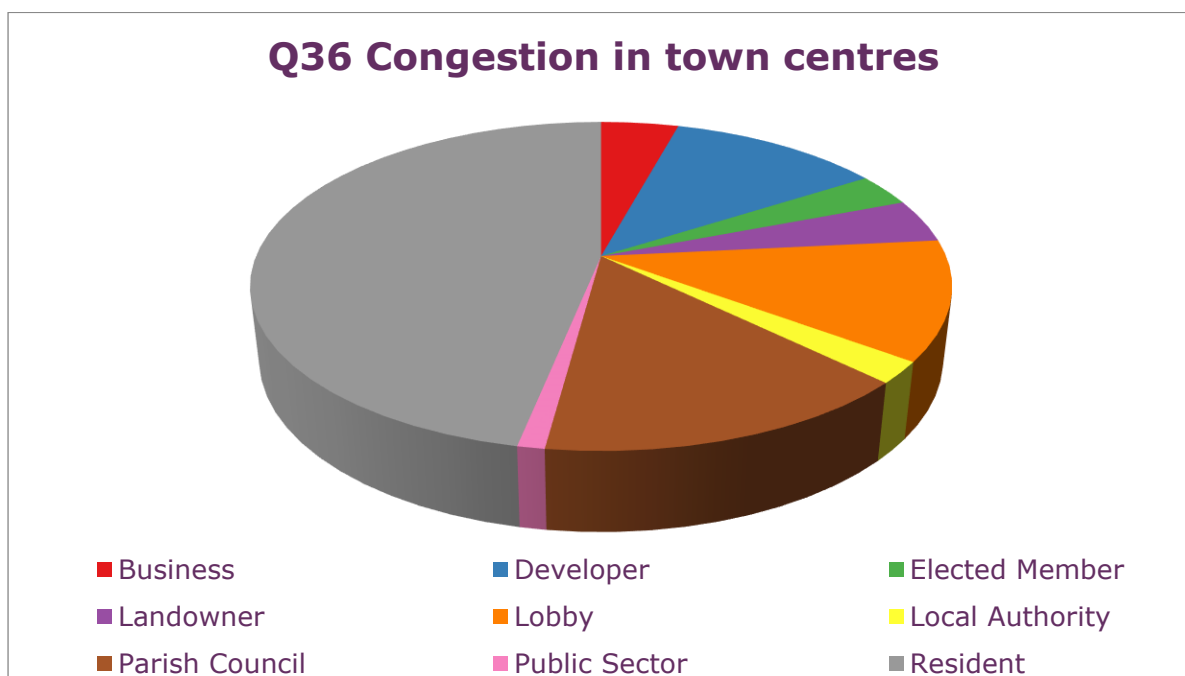
A number of other issues were raised that did not fall under one or other of the key themes. One response suggested that the Local Plan should look to support the Logistics industry to ensure that all aspects of distribution are made as efficiently as possible whether this be by electric vehicles, distance etc.

A couple of responses raised issues in relation to heating systems being a cause of pollution, e.g. from wood burning stoves and another response suggested banning all gas heating of buildings in areas where there is high pollution.

One of the respondents felt that there are insufficient Air Quality Monitoring Stations within the district and there were a number of responses which made reference to congestion charges and the potential introduction of these in South Warwickshire.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.3%
Developer	11.7%
Elected Member	3.2%
Landowner	4.3%
Lobby	11.7%
Local Authority	2.1%
Parish Council	14.9%
Public Sector	1.1%
Resident	46.8%



**Q37. Do you agree that the Local Plan should prioritise and support additional guest accommodation in South Warwickshire? In not, why not?**

### General Overview

There were 75 respondents to this question. A large number of respondents who objected to this question stated that it was not that they did not support the principle of what was being asked but mainly that there are other priorities such as climate change and transport that are more of a priority for the Plan to address. The analysis has been split into some of the recurring themes from responses and where there are individual issues these have been categorised under the heading of 'other'.

### Tourist/Visitor Facilities

In general most of the responses support the need for Guest Accommodation as it will help to enhance provision and vitality of other services on offer as well as strengthen the economy and vitality of town centres. In addition there was support for the expansion of tourist and visitor facilities in appropriate locations which will help to support the Heritage and Cultural Strategy. On the other hand, there were a number of respondents who questioned the evidence that Guest Accommodation is lacking in South Warwickshire given that hotels are left empty and there was also a view that this was not a priority for the Local Plan when there are issues such as climate change and transport to address.

### Day Trips

A number of responses raised concern over the negative impact of day trippers to the area and that they should be reduced. This was for a number of reasons including the fact that they do not feel that day trippers contribute to the local economy and that it creates a lot of pollution. The message was strong by a number of respondents that visitors only spending limited time in one area or place has an impact on the wider economy with it being significantly reduced. This was linked to support to try and encourage more visitors to stay for longer periods of time including overnight. One response stated that it was pleasing to see that there is an acknowledgement within the document of the lack of tourist accommodation within Warwick and Stratford. There needs to be a greater incentive to get groups to stay in the area for longer such as improvements to public transport, better and improved way finding and more coach parking. There was one response which stated that day trips are an important part of the economy but that overnight trips should aim to be increased.

In terms of encouraging people to stay for longer, there were a number of responses that suggested that the area should be promoted and more done to market all of the attractions on offer throughout South Warwickshire.

## Local Plan Policies

A number of responses included reference to the Local Plan Policies and how these should assist in promoting tourism and Guest Accommodation. There was reference to ensuring that a flexible approach is taken when devising specific tourism policies which support a variety of guest accommodation and delivery of ancillary facilities. The specific locational and operational requirements of tourism facilities should also be taken into account acknowledging that sometimes these can be outside of the settlement boundaries. The Policies should also be explicit in supporting businesses to invest in their existing assets and recognise the importance that business tourism has on the economy of South Warwickshire. Another of the responses suggested that there should be a supportive framework that expects/welcomes change and investment and ensure the area remains attractive to visitors both domestic and overseas.

Policies should allow for high quality facilities that enhance rather than detract from the character of an area. They should also encourage and allow campsites, Guest Accommodation and other opportunities within rural areas. This would enable diversification of the rural economy and within the urban setting would help to diversify.

The buildings that are left empty in town centres should be utilised for Guest Accommodation.

## Other

A number of issues were raised by a number of respondents. There was a suggestion that existing homeowners on large greenbelt plots of land should be allowed to install annexes in their gardens.

In terms of additional guest accommodation, rather than encourage large establishments and big hotels more should be done to support local small businesses such as bed and breakfast, local cottages and pubs in villages and rural locations.

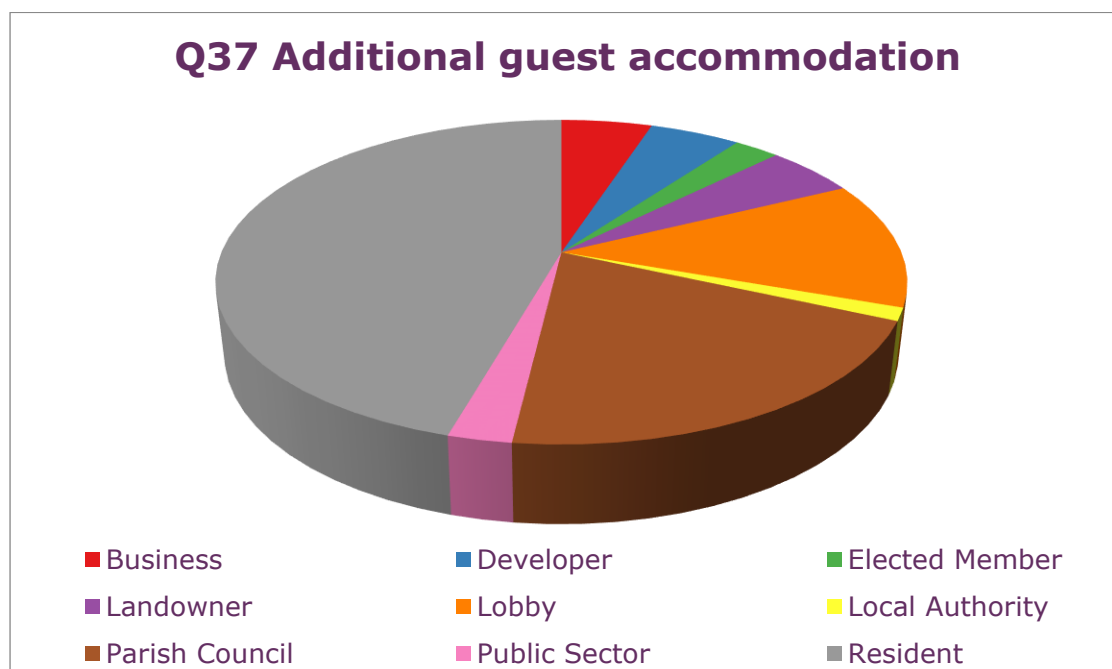
One respondent felt that the answer to encouraging more tourism would be to build an educational establishment that would attract both students and parents to the area.

There was a concern that Heritage is not identified as a key strategic issue in its own right which the respondent felt was very disappointing. Further, if the South Warwickshire Local Plan only refers to tourism accommodation under 'culture', it lacks a positive strategy for conservation and the enjoyment of the Historic Environment and it therefore is not compliant with the NPPF.

Another point of consideration was that will people still be travelling as much as previously particularly from overseas and therefore will this affect the need for Guest Accommodation.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.1%
Developer	5.1%
Elected Member	2.5%
Landowner	5.1%
Lobby	12.7%
Local Authority	1.3%
Parish Council	20.3%
Public Sector	2.5%
Resident	45.6%



## Q38. Do you agree that the provision of education facilities should be a major priority when delivering new housing? How should the Local Plan achieve this?

### General overview

There were 108 respondents to this question. A summary of the key themes is listed below and where there were individual points to note these have been summarised under a more general heading. Generally most people who responded were supportive of such issues and agreed that they should be included within policies, however there was again an emphasis on the needs being justified. Another key and fundamental point was that the Local Authority must communicate with the Local Education Authority early on in the process and maintain that level of engagement throughout in order to be able to help identify and resolve capacity issues throughout South Warwickshire.

### Strategic Sites

There was support for strategic sites for a number of reasons including the ability for these types of sites to provide the necessary infrastructure required, the fact that they can then become sites which encourage healthy and safe communities as well as minimising the need for a car and travel. It was stated that they can help to rectify the capacity issues within South Warwickshire. Again another respondent made reference to strategic sites and their ability to deliver the site infrastructure required as opposed to smaller sites.

One respondent felt that every large housing development should have a school which would create a community and would lead to better physical and mental health for communities and sense of belonging. When other facilities are added it would create a village type environment.

### Higher Education and other types of Education

A number of responses made reference to Higher Education and a request for this to be included and thought about as well as the need for the focus to be on secondary school provision and not just primary provision. One of the responses also pointed out that there was no reference in the document to SEN provision and that this also needs to be included and planned for in future decision making. Further, colleges should be built to train students in subjects that would be useful for employment.

Another of the responses did not feel that building new schools was the way forward but rather expanding and enhancing existing provision should be the preferred option.

New facilities and older facilities must be built to zero carbon standards which is visible to the children. They should have sophisticated ventilation systems which have been shown to appropriately deal with the likes of Covid-19. The current

Building Regulations are inadequate for schools. Another response in relation to rural areas and villages felt that education will become more remote and therefore developers should be asked to invest in improved internet connections for these areas and sustainable travel such as improved bus services. Further, in relation to rural locations one of the responses felt that new homes are required in order to fill local schools and keep these communities vibrant and resilient and where there are limitations then the Council and Developers must invest in facilities.

A key point to note is that provision and infrastructure **MUST** be in place before new homes are built and not the last thing to be built. Housing and Education provision should be synchronised so that children can attend school from the day they move in and not need to travel across areas on a temporary basis sometimes at distance so that they can access education.

## Sustainable Travel and connectivity

A large majority of responses made reference to sustainable travel and that all new schools that are built should be well connected to good public transport links including walking and cycling provision. These areas should be seen as important in creating communities and providing infrastructure.

Again as mentioned, early engagement and planning of schools is important to ensure that there is good connectivity through the development sites for pupils and staff who are using sustainable transport modes.

## Safeguarding Land

There is support for the principle of safeguarding land for the provision of new schools where the demand indicates that it may be necessary. It was also brought to the councils attention that due regard should be given to the Joint Policy Statement from the Secretary of State for Education which sets out the Government commitment to support development of state funded schools and their delivery through the planning system.

## Identifying specific sites

The next iteration of the Local Plan should seek to identify specific sites (both new and existing) that can deliver school places needed to support growth, based on latest evidence of identified need and demand in relevant Infrastructure Development Plan. The Plan should also seek to clarify requirements for delivery of new schools, including when they should be delivered to support housing growth, minimum site area required, preferred site characteristics and the requirements for safeguarding additional land for future expansion.

Viability assessments should inform option analysis and site selection with site typologies reflecting size and type of developments envisaged in an area. This enables judgement about which developments would be able to deliver infrastructure required such as schools leading to policy requirements that are fair, realistic and evidence based.

The Department for Education would like to ensure that there are early discussions on potential site allocations as there are central wave free school projects in South Warwickshire which may be appropriate for specific designation.

## Financial contributions

There is an initial assumption that applicable developments will provide both land and funding for construction of new schools. The total cumulative costs of complying with all relevant policies should not undermine the deliverability of the Plan so it is important that anticipated education needs and costs are incorporated at the outset. Also need to retain a degree of flexibility about site specific requirements for schools.

The next version of the Local Plan should include specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at the application stage to ensure the latest data is used on an identified need. The requirements to deliver schools on some sites could change in the future if it were demonstrated and agreed that the site had become surplus to requirements and id therefore no longer required for school use.

There is a need to ensure that the education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand. There is support for the use of Planning Obligations to secure developer contributions.

Infrastructure requirements should be set out in the Infrastructure Funding Statement and should identify anticipated CIL funding towards Infrastructure which should be reviewed annually. There should also be reference in policies or supporting text to explain that developer costs may be secured retrospectively, where it has been necessary to forward fund infrastructure.

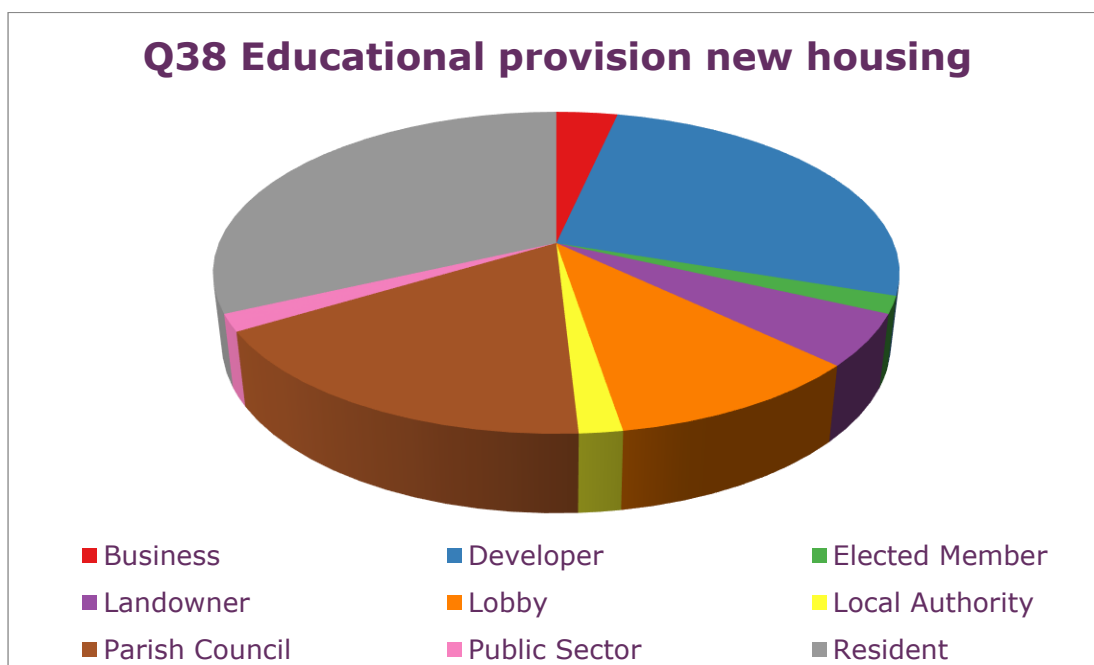
## Other

One response suggested that it is important that outdoor learning space is encouraged as much as educational facilities.

One of the responses touched on dispersed growth and that on occasions it can help to sustain small primary schools, however if this is spread across a number of villages it can have a detrimental impact on the provision of secondary school places. Schools can also create substantial travel and highways infrastructure demand.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	3.4%
Developer	26.7%
Elected Member	1.7%
Landowner	5.2%
Lobby	10.3%
Local Authority	1.7%
Parish Council	17.2%
Public Sector	1.7%
Resident	31.9%



## Q39. Do you agree that the four overarching principles will deliver the South Warwickshire you want? If not, what changes would you like to see?

There were 133 respondents to this question.

There was general support for the four principles set out within the scoping consultation, however there were three areas where there were multiple responses suggesting that there were omissions and further principles and/or reference in the vision should be added, namely Sustainable Development, Housing and Economy & Infrastructure:

### Omission - Sustainable Development (26 respondents)

- Numerous comments were received suggesting that reference to the need for sustainable development should be included within the vision and/or as an additional overarching principle. This is in line with NPPF para 11a and 35 requiring the plan to be positively prepared and provide a strategy which as a minimum seeks to meet the areas' OAN. Without an overarching principle which actively seeks to deliver sustainable development there are grounds to say that the Plan has not been positively prepared and will therefore be found unsound at examination.
- The scale of new homes and jobs that will be identified by evidence should feature prominently in the principles.
- The lack of reference to sustainable development conflicts with para 8 of the NPPF which advises that sustainable development comprises 3 overarching objectives – economic, social and environmental objectives – which are independent and need to be pursued in mutually supportive ways.
- Sustainable development is at the heart of the planning system and the economic dimension of sustainable development and is not picked up by the existing principles.
- This should include reference to the scale of new homes and jobs that evidence will lead us to. This is the very reason for the Plan and it will be influential to the 4 existing principles.
- As currently written, the principles could be read as seeking to prioritise natural environment and cultural issues at the expense of delivering housing, employment and other growth. The 4 principles must be read in the context that change is inevitable and the planning process functions to support sustainable growth and should not be applied to stymie or otherwise place unnecessary obstacles in the way of new development.
- A fifth principle could refer to the need to deliver housing, employment and other growth in an appropriate way, in the right locations and at the right time.

## Omission - Housing (35 respondents)

- Numerous comments were received suggesting that reference to the need for housing growth should be included within the vision and/or as an additional overarching principle.
- An overarching principle to ensure sufficient housing growth is delivered where it is needed to meet demographic and economic needs. Without sufficient house growth, housing will become even more unaffordable, leaving many more working families trapped in the cycle of rent, unable to get a foothold on the housing ladder or forced to move to more affordable areas. Housing growth is directly linked to economic growth and to ensure there is the ability to diversify the local economy there must be the available workforce in the area. Lack of available working population will see new companies look elsewhere or encourage new staff to make unsustainable longer journeys from outside of the areas as part of their regular commute.
- Para 15 of NPPF states that succinct and up to date plans should provide a positive vision for the future of each area. A framework for addressing housing needs and other economic, social and environmental priorities, and a platform for local people to shape their surroundings. There should be an additional principle for the delivery of housing need within the Districts.
- The vision has no reference to housing, it should be amended to make clear the need to “boost and to diversify the local economy and housing stock by meeting our development needs”
- Some reference to meeting housing needs is required otherwise there is no direct link to the Strategic Objectives. There should be a specific bullet point in the vision such as “Meeting Housing Needs – providing opportunities to deliver homes across SW to meet the communities’ housing needs.”
- The Vision should also reflect the need to accommodate any growth needs from outside of South Warwickshire.
- Securing and maintaining housing land supply and providing access to a home is a fundamental concept of wellbeing. It is therefore important that the component or key elements of delivering against these principles are recognised and addressed.
- Should include a commitment to delivering a range of housing growth taking into account the area’s rural nature and ensuring the benefits of development are distributed accordingly.
- Need to include a principle for the provision of high quality homes and communities – ensuring that homes are delivered in communities where people feel that they belong to connected and thriving communities. The aim should be for people of all ages and abilities to feel safe and have a sense of belonging and enjoyment. Being able to connect with other people will forge communities, improve wellbeing and reduce social isolation.
- An additional principle is required to state that housing will not be over delivered.
- There is no way to achieve the green low-carbon, sustainable future we all need if we continue to chase economic growth per se. Need to challenge the assumption that so many more new homes are needed. This is not a responsible way to move forward.

## Omission - Economy and Infrastructure (13 respondents)

- Numerous comments were received suggesting the inclusion of an overarching principle of providing the environment and infrastructure for significant high value economic investment and growth within the context of the other principles cited in the vision.
- Suggest an additional principle 'maintaining a vibrant economy' – adapting to the evolution of business needs and natural population growth in order maintain full employment while meeting our climate change, biodiversity and quality of life objectives.
- Suggest an additional principle that everyone should be able to reach their employment potential without having to leave the area
- Delivering the requisite boost to South Warwickshire and diversification of the local economy will be dependent on securing the provision of appropriate infrastructure at the right time.
- Need to also include the promotion of new technology businesses and employment opportunities to boost economic growth
- It is important to ensure that the Plan takes a proactive position relating to economic growth. Development need infers a reactive response to a current position. The Plan should be bold with its economic growth aspirations. The area has a significant opportunity to become one of the UK's leading new sustainable technology research and development hubs and should be developing a land use strategy to deliver and support this. An overarching principle of providing the environment and infrastructure for significant high value economic investment and growth should be set out clearly within the context of the other principles cited in the vision.
- The link between the vision to boost and diversify the local economy and the 4 principles is not wholly clear and needs to be further expanded. At present it seems possible that the principles could be in conflict with the economic vision.

## Other suggested omissions:

- Equality (1 respondent)
- Design (2 respondents)
  - "Creating spaces that people want to be." – get developers to raise the bar and produce quality, beautiful buildings that reflect the outstanding buildings of our history.
  - The government proposal of 'build back better' and to aim for beauty appears to be missing from this strategic vision.
- Environment (2 respondents)
  - The Plan is lacking a vision for the holistic environment of the area. The area is blessed with a beautiful natural landscape and many attractive buildings. There appears to be no call for them to be preserved or protected.
  - Should be another principle – conserve and enhance the area's natural, cultural, historic and landscape assets.

There was general support for the four principles set out within the scoping consultation, however a number of comments were received on each, summarised below:

## Tackling Climate Change

### Prioritise climate change above other principles

- Numerous comments received suggesting that because of the climate emergency, addressing this should be the main priority/principle and set out more boldly within the vision and be elevated above all other principles. Suggested that the overall vision can be achieved by having the priority as tackling climate change and the stemming objectives supporting the other items in the vision.
- Tackling climate change should explicitly prioritise actions that reduce carbon emissions.
- Climate Change should be big and bold as item one and should structure the whole document.
- Description for climate change should make reference to the climate emergency. It is the most important principle and must be threaded through the document to stress its importance.
- The Vision should include that the area becomes an area famous for being a centre for green excellence, that it leads the UK in seeking green solutions to every problem and that it prioritises and targets green endeavours.
- The climate and ecological emergency is very real and threatens us and all future generation in a very immediate way. Addressing this has to be the main priority. Despite the fine rhetoric in this Plan its emphasis on economic growth and excessive development is still sending us on a path towards climate disaster. The 4 principles are not enough if they are not given priority.

### Need to take into account viability considerations:

- However a number of comments were also received suggesting that tackling climate change cannot be at the expense of delivering new housing, employment retail and other space.
- A precautionary approach is suggested given the significant and rapid change in the economic circumstances caused by the pandemic. It is suggested that delivering new-build residential schemes to net carbon zero standards could potentially significantly increase financial build costs and that the Plan's approach needs to reflect para 11a of the NPPF.

### Other comments relating to climate change:

- The Plan could provide both climate change adaptation and mitigation measures but how these would be enforced is questionable. They need to be enforced through legal or economic instruments.
- Combating climate change is more than achieving zero net carbon, it is about planning for new jobs and homes in the right places and to create the economies of scale for sustainable transport infrastructure. Major settlements benefit from the services, strengthening these locations

(consistent with national policy and the current distribution of housing numbers) to avoid the need for using resources to build new infrastructure where possible, avoiding the need to travel, and where travel is necessary, reducing the distances and providing alternative mods to the car. This, in combination with other factors such as building efficiencies will achieve net zero carbon.

- Tackling climate has to do more than contribute to net carbon zero, it has to reach an already laid down target within the lifetime of the Plan.

## Promoting Wellbeing

- Should make more explicit reference to the importance of providing for housing needs, which is a key factor in achieving overall wellbeing. This should include reference to addressing the significant housing affordability issues referenced throughout the Plan.
- Suggest adding 'reducing health inequalities' as a priority in promoting both health and wellbeing across the region.
- Suggest an emphasis on co-production to improve the likelihood of positive outcomes.
- Should add something about reducing pollution in the air, land and in our water systems.
- Wellbeing principle needs strengthening, as it is a bit vague and weak. We want people to enjoy living here and feel safe, contented and heard.
- Vision should be "to enhance the wellbeing of all members of our community" and not "to boost and diversify the local economy".
- Suggest reference to policing, public safety and public services
- A sense of community, pride and ambition need to be fostered
- This should be a people centred Plan and not an economy centred Plan

## Improving Connectivity

- The issue of connectivity has revealed a major imbalance in the overall objectives of the Plan. You can't treat the area covered in one strategy with the same objectives. For example the development of the north of the plan area needs to be approached differently that the south, simply because of the population and commercial activity in the two areas.
- Improving connectivity should be restated as 'improving sustainable connectivity'
- Although geographically in South Warwickshire, a substantial part of the southern area is connected to Oxfordshire and Worcestershire and that connectivity will remain for some time. In the north the Stratford, Wawick and Leamington axis will be the base of commercial and cultural development, joined in aims by Kenilworth and a developing Gaydon and nearby small towns/large villages of Wellesbourne and Kineton.
- Believe the south should be seen as a primary candidate for the growth of tourism, using the close proximity of the Cotswolds, with the attraction of Stratford cultural heritage and the attractive villages that do not lend themselves to large population and housing development, but of the organic and careful growth to enhance their environment.

- Suggestion to remove connectivity as an overarching aim on the basis that it is really a rather broad strategic objective not a vision.
- Connectivity should include the concept of reducing distance and time, such as the 20 minute neighbourhood.
- Improving connectivity will not be delivered by major infrastructure projects such as new roads, rather should be achieved through spot improvements and maintenance across the networks.
- Must prioritise digital connectivity
- Need adequate health facilities and/or transport to villages otherwise rural areas will be poor relations to the towns.
- Reducing the need to travel has an important role to play in reducing reliance in the use of private vehicles and should be reference in the vision.
- Need to explain 'active travel'

## Increasing Biodiversity

- Biodiversity should be elevated to be given primary importance and not sacrificed to more unwanted development. Priority should be given to retention of existing trees, woodlands and green spaces and increasing biodiversity
- Preservation of green space, greenfield land and best and most versatile agricultural land must be accommodated to achieve all of the overarching principles.
- The vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The Plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.
- There should be linkages with the Biodiversity Action Plan, Local Nature Partnership, AONB Management Plan, ROW Improvement Plans and GI strategies, Nature Recovery Strategy.

A number of other general comments in relation to the vision and overarching principles were received:

## Disconnect between vision, principles and rest of scoping consultation

- There is disparity between the vision and over-arching principles. The 4 principles do not address the vision itself and will not deliver it by themselves, they are influences about how the vision may be delivered but it is important to make clear that the principles do not override the vision.
- Vision seems to be totally disconnected with rest of document. Can't just be about optimising the economy by applying 5 principles. In line with the rest of the document the vision must be for a sustainable and diverse community, supported by the principles, including a diverse and vibrant economy.
- There is tension in some of the principles for example tackling climate change reads differently to the potential policy earlier in the document.

- Less convinced that they are represented in the document – a need for greater clarity and more courage in convictions required.
- They should be informed by the key strategic issues

### Monitoring and delivery

- Need to ensure that they are delivered and that the Plan is seen to be transparent and accountable with effective and efficient outcomes.
- For a Plan to have teeth recommendations must be mandated with measurable targets.
- The Plan should have goals within the period so suggest a breakdown in the timescale and measures which monitors the progress of the Plan.

### Need for them to be approached comprehensively throughout the Plan

- It is important that these principles are approached comprehensively and one principle should not be to the detriment of another.
- Must be clearly and effectively be put at the heart of the plan, and the vision must be bold, radical and ambitious.
- Need to ensure that these visions and principles are translated into detailed policy according to the NPPF.
- They are interconnected and require joined up thinking. Too often, each development is considered in isolation, particularly in relation to traffic and roads. To develop the area we all want means that all agencies need to work to a plan encompassing all these areas and bearing in mind all developments that are to come so that any provision will meet the future needs of the area. Piecemeal developments have been all too frequent and with them come many of the problems we face as communities.
- Make sure they are not contradictory – eg achieving a net increase in biodiversity should not be at the detriment of promoting wellbeing by the loss of or reducing existing green spaces, and tackling climate change should not be achieved by reducing emissions in town centre and dispersing that into rural areas by developing large sites outside of town centres which are not served by existing infrastructure. This would be counterproductive.
- The overarching principles are not particularly driving policies forward but are more consideration to bear in mind when making decision. Would like to see more proactive policies and action taken by the council to address these issues

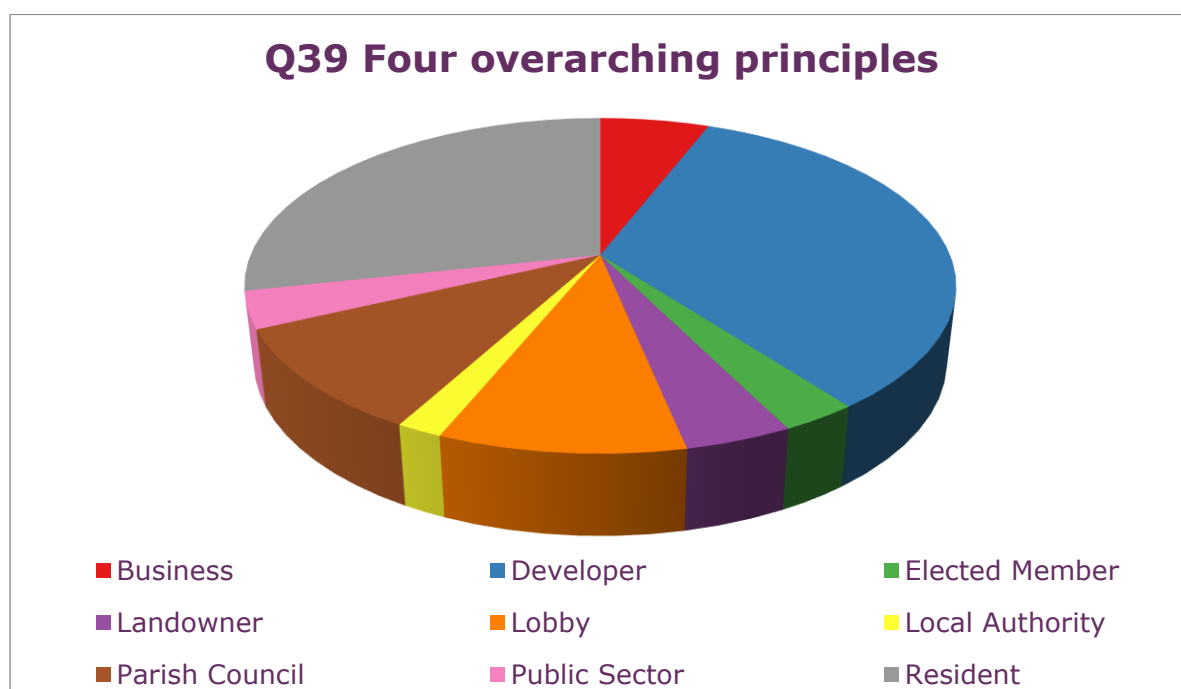
### Other

- The 4 principles come across as being subservient to boosting and diversifying the local economy and to meeting development needs. Whilst economic and development needs aspirations merit inclusion in the vision they should not necessarily be over-riding considerations. The 4 principles should merit inclusion in the Vision in their own right and not as means by which the economic aspirations for the area would be delivered.
- It is unclear how these will be delivered to the rural population
- The Plan needs to reference the extensive work done on Neighbourhood Plans with regards to visions and principles.

- As the Plan develops it is important that there is a change of tone in the language being used to be more directive.
- The canal and river network has the potential to contribute positively towards helping to apply the principles.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.9%
Developer	33.7%
Elected Member	3.0%
Landowner	4.1%
Lobby	9.5%
Local Authority	1.8%
Parish Council	10.1%
Public Sector	3.6%
Resident	28.4%



## Q40. Do you agree with this approach to establishing visions for those key places identified in the South Warwickshire Local Plan? If not, what is your alternative?

There were 99 respondents to this question.

A quarter of the respondents (25) were satisfied with the proposed approach to establishing place visions as set out with the Scoping Consultation. Suggested advantages and disadvantages are summarised below, along with suggestions for alternative approaches, specific sites proposed for visions, along with ideas for what elements should be included within a place vision.

### Advantages of having area-specific visions:

- Provides certainty to residents, business owners and potential developers and provide a useful framework for site allocations and site-specific policies
- Too often it is piecemeal. However, each place needs to be considered alongside adjacent villages/towns so again the thinking and planning is joined up.
- Creating a vision for key places is central to then being able to design a strategy to deliver that vision.

### Disadvantages of having area-specific visions

- There should only be one vision. Inviting local visions risks divergence but the vision should be one that all users of the area can aspire and relate to.
- If the Dispersal Growth Option is pursued it will not be reasonably possible to provide visions for the large number of smaller settlements, which would collectively accommodate a significant amount of new development
- The Plan should respect and refer to the Neighbourhood Plans which give the vision. The 5 largest towns will already have visions and the Plan will add bits to each of them but not fundamentally change those visions. Visions should be set at a more local level. Need clarity over relationship between these visions and Neighbourhood Plans.
- Can't identify which areas should have place visions until the growth options are fixed.

### Types of areas that should have visions

- Areas identified for strategic development to reflect the opportunities offered by the relevant strategic sites. This will help guide their development and make it clear what forms of development can be expected on the Strategic Allocations.
- The identifiable urban and rural parts of the plan area. Due to the unknown long term impacts of the pandemic it is unclear at present whether focussing visions on the larger towns is the right thing to do.
- There are number of other settlements which are highly sustainable and suitable for taking more growth. The Plan should recognise the contribution

of all settlements to the growth of the area, and ensure that this is not lost through focussing on the 5 main towns.

- Places that will have a key role in shaping the future of the Plan area to 2050 – i.e. places of economic importance or those which will accommodate significant growth.
- Due to each of the 5 largest towns being located with the Green Belt, disagree that these visions will be achievable without conducting a Green Belt review. As such, consider that additional locations within the settlement hierarchy need to be considered for appropriate housing growth. The visions referred to should not be restricted to the 5 key main town areas and should be shared with the small towns/villages.
- Locations that have significant development requirements.
- There needs to be recognition in a plan looking to 2050 that the creation of new places, such as a new settlement, may also be a necessary component of a visionary strategy for the area.
- A vision Local Service Villages (LSVs) should be provided to demonstrate how this settlement category will grow and evolve to 2050
- Villages/small towns with populations over 5,000
- Relationship between the villages and towns is extremely important and so strongly urge avoiding a default town-orientated focus.
- Small rural communities that have an important heritage role
- Restatement of the vision for town centres and what role they play in everyone's lives is now needed. We need to keep the community feel even if the retail use is dropping. Distinctive visions will help drive the identity and success of these spaces that otherwise risk becoming ghost towns/ghettos.
- Areas that are not seen as of economic importance or that cannot accommodate significant growth. Each significant settlement should be able to see clearly what the future for their specific settlement is expected to be like even if it is a specific statement of 'no change'. You can have a vision for change and improvement in the absence of growth.
- Should carefully look to all opportunities rather than being distracted by the sometimes disproportionate needs of only urban settings in decline.
- Need to include a vision for the rural areas in the south. The Plan should identify potential sites for new towns and villages where some growth can take place.
- There needs to be vision for green spaces to accommodate new trees and hedges.

## Specific areas that should have visions

- The list should also include Alcester, Shipston, Southam and the 2 new settlements GLH and LMA
- Support a vision for the University of Warwick to reflect its economic, social and cultural importance and it's significant to the Plan area, as well as its potential to accommodate significant new growth over the Plan period.
- The Long Marston new settlement should be included as it represents a significant strategic opportunity to deliver new growth, housing and associated uses. The vision would help take forward the existing allocation

and enable this to be developed and to direct future growth and development at this important location.

- Given the policy provisions set out in the WDC Local Plan, namely Policy DS20, 'South of Coventry' should also be included within the list.
- There needs to be recognition in a plan looking to 2050 that the creation of new places, such as a new settlement, may also be a necessary component of a visionary strategy for the area. It will be important in choosing a location for a new settlement to select somewhere with a clear place-specific vision capable of creating a unique identity, eg Hatton New Community.
- Warwick and Stratford Districts should consider its own area and devise a vision for the area as a whole, not just the towns.

## Working with stakeholders to develop visions

- Warwickshire County Council is keen to work with the South Warwickshire Councils to develop these visions.
- Warwickshire Rural Community Council has promoted community-led planning for many years and could have a role in bringing these place visions together.

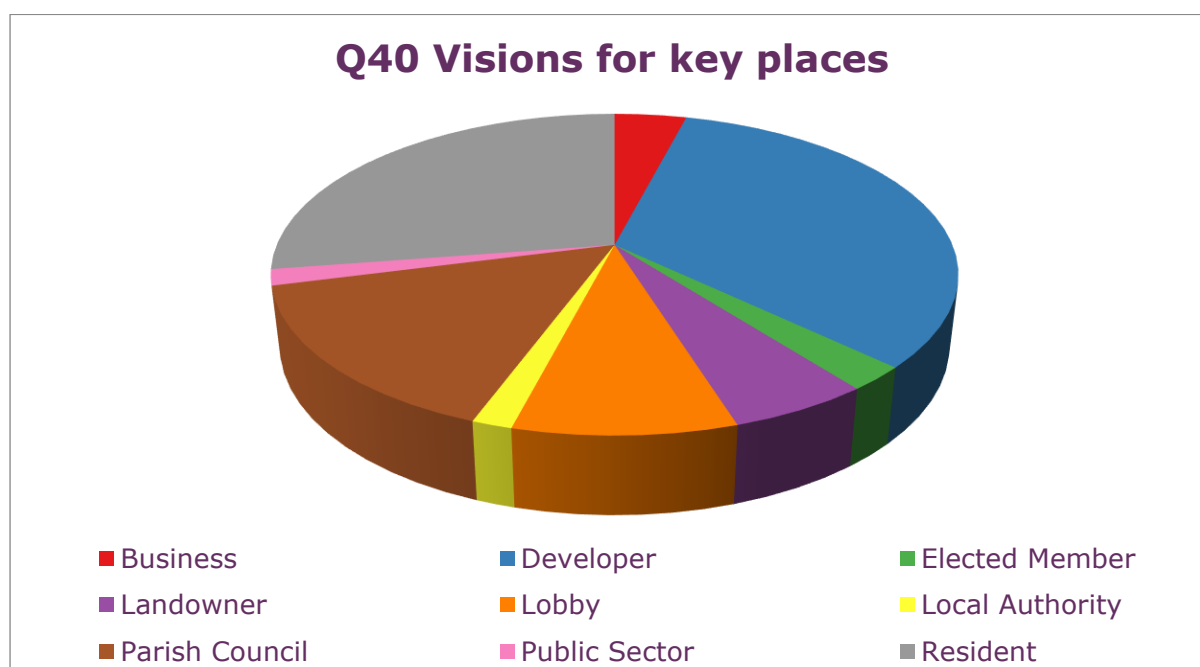
## The remit of each vision:

- Each place specific vision should be led by, and align with, the overarching vision of the Plan
- Needs to set out a clear planning policy framework that is user friendly and clear so that it can inform the development management process at a later stage.
- The visions should set out the following information:
  - Conservation and enhancement of the historic environment
  - land uses that would be considered acceptable
  - matters regarding design, conservation and transport
  - How the area will address the climate emergency
  - detail on other material considerations should be given in supporting text to ensure clarity
- Need to consider whether there should be a criteria based approach based on geographical location, settlement size, settlement sensitivity, quantum of growth directed to specific settlement, or some other approach.
- The key will be the ability to respond to need; and recognising that pressure for development, e.g. created by housing need from adjoining areas, should be accommodated where infrastructure already support developments such as on cross boundary sites
- Needs to reflect the individual circumstances and special qualities of specific areas, and not adopt a 'one size fits all' approach.
- A town centre framework for each town would be ideal, produced with robust evidence that is regularly updated and with a group of key stakeholders who steer the framework and ensure local residents and businesses have a full say regularly in its content and direction..

- A vision should provide an overarching framework for a place with each potential areas for growth having very specific locational challenges, opportunities and aspirations. To plan holistically, it is important that proposed development can contribute, spatially and potentially through delivery of infrastructure, to realising wider local objectives.
- Visions shouldn't just be based on economic visions, but should be based on other aspects also such as environmental enhancements and protecting important wildlife sites and habitats. This will fit with the plan priorities and requirements set out in the NPPF.
- Understanding the functional role of towns and key settlements is vital to ensuring their future vitality and vibrancy. A simple formulaic approach based on applying key principles may stifle imaginative and radical land use planning solutions which could neglect other opportunities.
- Needs to be monitored after certain time milestones.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.0%
Developer	33.1%
Elected Member	2.4%
Landowner	5.6%
Lobby	8.9%
Local Authority	1.6%
Parish Council	15.3%
Public Sector	1.6%
Resident	27.4%



## Q41. Do you agree that these should be the strategic objectives for the Local Plan? Are there any others?

There were 122 respondents to this question.

Half of responses agreed with the strategic objectives as they are presented in the scoping consultation (53%) with the following comments:

- They provide a sound and rounded basis and effectively cover the range of topics expected and provide a helpful steer in identifying suitable policies with which to deliver them
- They will combine to promote sustainable development within South Warwickshire in line with the economic, social and environmental goals of the NPPF
- They are sensible, suitably address the key issues and align with the vision
- The key to the evolution of the Plan is how these Objectives are translated into policies and land allocations.
- There will be tensions between the objectives e.g. delivering housing whilst protecting and enhancing the most important historic and environmental assets. The way in which they are balanced against each other is critical and should be made more explicit in future consultations. EG how much growth can be accommodated without adversely affecting connectivity and quality of life.
- Support the Plan's position that 'do nothing' is not an option
- Welcome that there is an acknowledgment of the importance of delivering homes that meet the needs of all members of communities and the link to providing infrastructure at the right time in the right place.
- Welcome that there is reference to the need to deliver housing to meet all of South Warwickshire's residents
- Canals and Rivers can contribute towards the achievement of many of these objectives
- Prioritisation – A number of respondents considered that the housing objective should be considered the key objective, however other respondents consider that climate change mitigation and adaptation should be the key objective.

A number of comments were received in relation to each of the 10 Strategic Objectives as follows:

### Responses to Housing Objective 1

- Greater emphasis should be placed on addressing the unmet need arising from Coventry and the GB HMA. The Plan should identify assisting its neighbouring authorities to help them deliver the homes that they need as a strategic objective in its own right.
- Housing affordability should be more fully reflected within the objectives.

- Homes should not be a priority - Establishing infrastructure, jobs and an improved cultural/economic and social environment should be priorities.
- The type, placing and affordability of homes is crucial. Housing needs to be genuinely affordable
- Need to consider Gypsy and Traveller communities
- Should reference that new homes will be net zero carbon
- While the Councils should indeed provide housing suited to the actual population, which is not what the current housing market actually does. This does not align with the government's projected aim of providing a fixed quantity of housing.
- Needs to clarify how much growth is required

## Responses to Design Objective 2

- Should make reference to design reducing crime
- Should make reference to good design including proper insulation, the micro-generation of energy and future function/adaptability
- We need communities that are created by good design
- Need to define what 'great' and 'high quality' is in relation to design
- Design principles need to respect local vernacular
- Need to recognise the development mistakes of the past 60 years and demolish poorly designed and low quality legacy buildings with something fit for the 21st century.
- Need to state that the impact on existing residents will be minimised wherever possible

## Responses to Connecting Objective 3

- This objective is effectively covered by objective 5 on infrastructure. If it is retained it should also mention jobs
- Connecting people to places would likely result in more road building and thus encourage more traffic – this would be contrary to achieving net zero carbon.
- Sustainable and active travel options would be nice in the countryside but how will they be funded or provided.
- Consider the need to improve roads

## Responses to Employment Objective 4

- The Plan should not maintain that economic growth in the old model is essential. The climate emergency means that business as usual is no longer an option.
- Not sufficiently ambitious or precise for a strategic objective. It should be to deliver the land and conditions required to encourage and support the levels of economic development identified as being necessary and desirable in the evidence base and national policy.
- Needs to focus upon how the area can best position itself to provide the best environment for attracting strong economic growth within a number of employment sectors.
- Should aim for the area to become a centre for green technology and innovation, such as gigafactories, retrofitting, building construction,

renewable energy generation supported by new educational and training opportunities for upskilling

- Needs to clarify how much growth is required
- Consideration is needed for what jobs are needed in the countryside
- Should focus on creating new investment opportunities to generate good quality sustainable jobs with an emphasis on localism

## Responses to Town Centres Objective 5

- Town Centres should be a high priority and the Plan should develop a robust long-term framework that is regularly reviewed
- Need to focus on repurposing Town Centres into mixed-use areas which will bring employment in and reverse the trend of empty retail space to enable them to become vibrant places to live, with local independent leisure and retail sustained by those new town centre residents. This would also improve law and order by having an increased population.
- Encourage the creation of small and micro-business through appropriate land use in our town centres avoiding fragmented initiatives
- Create Town centres which are pleasant to be in and which are not dominated by traffic by investing in their holistic development

## Responses to Infrastructure Objective 6

- It is not the case that new development alone should deliver new infrastructure
- Should make reference to enhancing existing community infrastructure/facilities as well as providing new infrastructure to support economic growth.
- Should include explicit reference to getting development in the right place first time. The Plan should be focused on where it can add real value, such as allocating enough land for development in the right places.
- New development should capitalise on existing strategic and social infrastructure before committing to new infrastructure. This approach is one of the most climate friendly development strategies. It is important that large settlements in the Plan area are utilised for their existing infrastructure, services, amenities and employment opportunities.
- Infrastructure needs to be provided before homes are built

## Responses to Environment and Heritage Objective 7

- The current use of the best and most versatile agricultural land must be retained as a priority, as well as protecting and enhancing our most important historic and environmental assets.
- Concern that the objective only seeks to protect and enhance the most important historic assets. This does not comply with the NPPF which seeks to conserve all heritage assets, both designated and non-designated (para 184)
- Should say more including committing to biodiversity net gain and protecting wildlife reducing the destruction of important habitats.

- The issue of nature recovery/biodiversity merits inclusion as a strategic objective in its own right – this would also be consistent with having ‘improving biodiversity’ as an overarching principle.
- Shouldn’t just relate to the most important environmental assets – local important assets also play a vitally important role so ‘most important’ wording should be removed.
- The national importance of the AONB and its geographical extent covering 8% of the plan area means that it merits explicit reference in the objective.
- Need to consider protection and replacement of trees – e.g. those lost to Dutch elm disease
- Need to protect existing green spaces

## Responses to Net Zero Carbon Objective 8

- A flexible approach is required when establishing the carbon reduction policy requirements for tourism development such as hotels and holiday resorts/parks, acknowledging the locational requirements of most tourist facilities which are usually located in the countryside. It is also necessary to recognise that some older buildings cannot be retrofitted to provide up to date technology in the same way as a new build.
- Tackling the Climate and Biodiversity emergency needs to be given much greater focus. The key objective must be to become carbon neutral and to enhance biodiversity and should influence all the objectives that come after it. We need to use new measures that put reducing carbon emissions, environmental protection and the wellbeing of the population before profit. Business as usual is no longer an option.
- It is not about contributing to net zero carbon, it is about delivering net zero carbon new buildings and net zero carbon-retrofitted buildings.
- There should be reference to minimising the need to travel, locating development in the most sustainable locations, encourage a green economy, prioritising infrastructure to enable active travel modes and sustainable transport
- Advise a precautionary approach given the change in economic circumstances resulting from the pandemic. Need to consider financial viability of residential schemes to meet net zero carbon requirements. The Plan needs to be sufficiently flexible to adapt to rapid change.

## Responses to Health Objective 9

- Suggest that good health and wellbeing is a part of delivering a good quality of life rather than the other way around as drafted
- This objective should be first as the others follow on from this.
- Recommend including ‘reducing health inequalities’ as a priority in ‘improving the health and quality of life of our communities’
- Should reference the need to improve air quality
- Need provision for places of worship – the Plan should fully embrace the varied requirements of the many faiths in the country, in the infrastructure of any development areas. This would address spiritual wellbeing
- There should be reference to crime and public safety

## Responses to Tourism Objective 10

- Given the lack of guest accommodation it is suggested that the objective should evolve to focus on the provision of new and improved accommodation as well as the cultural, heritage and countryside assets that the area has to offer.
- Need to set a positive and supportive framework to ensure the area remains attractive to visitors, both domestic and overseas. A framework that expects and welcomes change/investment is essential.
- The Plan should only be seeking to enhancing tourism if it can be done in a way that does not create carbon emissions. There is a potential conflict with some of the other objectives such as reducing reliance on the private car, reducing carbon emissions and protecting wild spaces
- Should have a bolder vision for tourism centres on climate-friendly, sustainable practices, encouraging education and family-friendly experiences that do not require a car. EG free/discounted entry if arrive by sustainable transport.
- May need to diversify away from tourism and cater more for local people in a resilient, carbon zero economy that has greatly reduced emphasis on long distance travel.
- Tourism needs to be focussed on those tourists who contribute significantly to the local economy and discourage those tourists who cause a nuisance, clog up the streets, create pollution and do not spend much money.
- The Plan should no focus on enriching tourism potential and this should be removed as a strategic objective
- Emphasis on tourism is problematic as it relies on international flights – this is incompatible to achieving net zero emissions within the Plan area. So tourism towns like Stratford need to diversify their economy away from tourism as much as possible – perhaps a greater appreciation of potential economic interrelations of the relatively affluent area of South Warwickshire with the less affluent neighbouring areas is worth considering – eg enabling local short breaks from nearby areas.
- Make more of our historic past EG Civil War and other battlefields, Country Houses, SAMs, Country Parks, footpaths

## Other Comments

- The Plan objectives must be guided by government strategy and not seek to divert from it
- It is unclear how the objectives flow from the vision, there needs to be greater integration, e.g. meeting the housing need should be part of the vision with the strategic objectives setting the context for the spatial strategy and placemaking for developments.
- The objectives need to be holistic and adaptable
- The objectives don't link back to the 4 overarching principles.
- There should be a commitment to delivering a range of growth taking into account the area's rural nature and ensuring the benefits of development are distributed accordingly.
- The Plan must recognise that the objectives are not mutually exclusive. For example the area's outstanding and distinctive historic environment is an

important resource that contributes to the economy and tourism as well as education, culture and community identity. This is important to join elements up and avoid old fashioned silos.

- The promotion of sustainable growth in itself should be an important component of the new Plan. The Plan needs to set a context to facilitate recovery across all market sectors and across the full plan area covering both urban and rural areas. The principle to support and positively promote sustainable growth must apply across the entire plan period to take account of the likelihood that different places and diverse market sectors will respond at various times to policies.
- Clarification is required as to how the Plan and its objectives will impact upon existing Neighbourhood Development Plans.
- Suggestion that these principles do not offer anything new, it is just business as usual
- There is a sense of north-centredness, more attention is needed for the south.
- Need to consider the ordering of the objectives, all objectives should carry equal weighting and the order suggests housing more important than the environment. Attitudes have changed and the plan should recognise this.
- An objective based on people is missing – effectively a social objective that fits all ages
- The outcomes of the Plan need to equitably distribute the potential benefits to communities without generating negative outcomes which impact on our current local natural environments, our wellbeing, and future 'green' employment opportunities.
- The devil will be in the detail, the specifics of the what, where and how much
- The objectives should be repositioned at the beginning of the document so they can act as the main themes upon which the subsequent policies are based.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	6.3%
Developer	35.0%
Elected Member	1.9%
Landowner	4.4%
Lobby	10.6%
Local Authority	1.3%
Parish Council	10.0%
Public Sector	5.0%
Resident	25.6%



## Q42. How do you think we should best address the affordability of housing?

There were 191 respondents to this question.

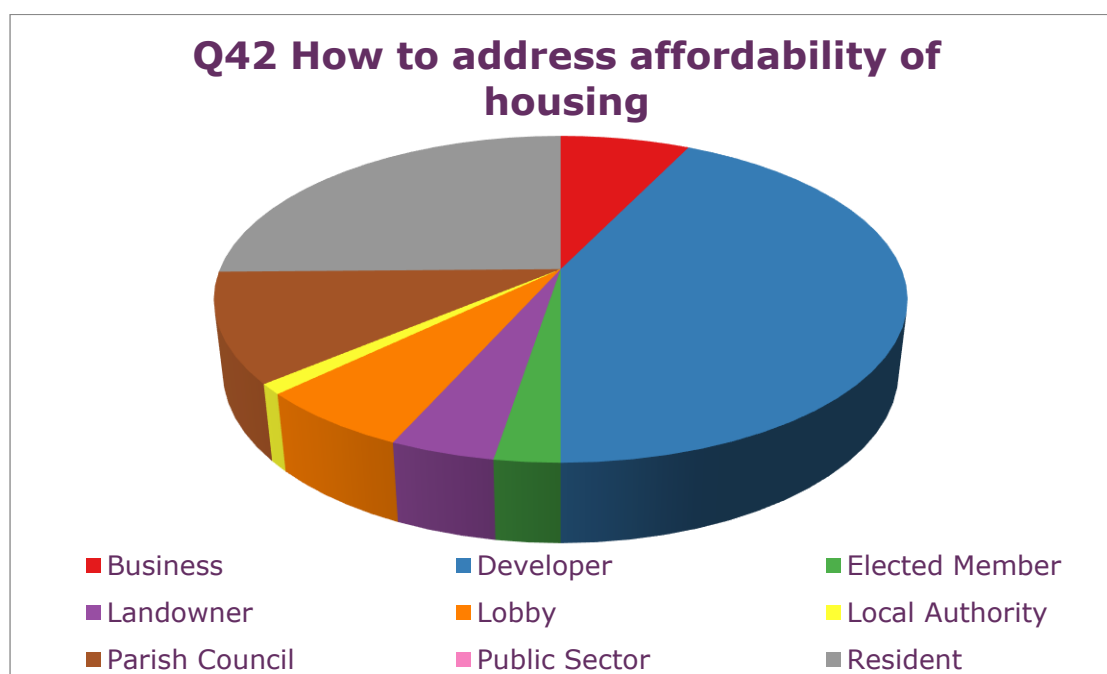
Key themes	Number of respondents
<p><b>Social/Council Housing</b></p> <p>Responses suggested it would be preferable for the Council to build more social housing to address the affordability need. So specific points were raised below:</p> <ul style="list-style-type: none"> <li>• Seek a higher percentage of affordable on new development/and enforce this effectively.</li> <li>• The council should itself become the builder of the Affordable housing stock and now sell on. – This point was raised separately in responses as well without the mention of social housing.</li> <li>• Look at passivhause council housing projects- (links to climate change)</li> <li>• Always need social housing and good quality rented so increased social housing would contribute.</li> </ul> <p>It should be noted that in regards to the first point one further respondent felt the affordability percentage should be reduced to assist developers.</p>	18
<p><b>Mix of housing</b></p> <p>Many points were brought up and overall it was felt that it was important to achieve the right mix of size and tenure of homes, to address affordability.</p> <ul style="list-style-type: none"> <li>• Planning the right size homes can help address affordability and planning for specialist homes such as older people housing can have a knock-on effect freeing up much needed family homes</li> <li>• Any tenure/mix requirements set out in the local plan should ensure sufficient flexibility to meet changing market needs over the plan period</li> <li>• Plan for mixed and balanced placed so that both new and established communities have access to services and open green space</li> <li>• Providing a great mix of housing in the rural settlements so that there are opportunities or local people to stay within the same settlement.</li> </ul>	26

Key themes	Number of respondents
<p><b>Rural communities</b></p> <p>Points raised here were around affordable homes in rural communities often not being available and how to negate this.</p> <ul style="list-style-type: none"> <li>• National policy encourages planning authorities to support more specific types of affordable housing, such as rural exception sites that provide affordable housing to enhance and maintain the vitality of rural communities</li> <li>• Access to housing is a problem within the rural areas, particularly within SDC.</li> <li>• In the rural area where affordability problems and higher due to less new homes. This is affecting viability and vitality of these communities. Making specific site allocations in these areas as well as delivering market housing to provide greater choice will bring forward specific affordable housing provision in line with prevailing policy</li> <li>• affordable housing across SW, particularly in rural areas where the needs have been identified and housing costs are high</li> <li>• Important to acknowledge the role and contribution of rural/community- led housing schemes to overall housing supply and the sustainability of smaller rural places.</li> </ul>	16
<p><b>Affordability issues</b></p> <p>Acknowledge that bod SDC and WDC have an affordability issues. Stratford has the second highest affordability ratio in the West Midlands only behind Malvern hills and Warwick 6th overall.</p>	Nearly all responses to some degree
<p><b>Empty homes/second homes</b></p> <p>Some points/suggestions in responses were –</p> <ul style="list-style-type: none"> <li>• Build flats to replace empty shops. Take empty houses and second homes and make these affordable housing. No more new development.</li> <li>• Uk has 5 times more empty properties than people needing housing/tackle empty homes</li> </ul>	7

Key themes	Number of respondents
<p><b>Housing Requirement</b></p> <p>Discussion around the minimum requirement and seeking to provide about this number:</p> <p>Several response served to remind the council that the minimum requirement should be considered a starting point.</p> <ul style="list-style-type: none"> <li>• Standard method includes- an affordability uplift however NPPF is clear that this is a minimum figure</li> <li>• As such, a housing requirement above the minimum LHN should be considered in order to increase the supply of affordable housing to be delivered.</li> <li>• If this approach is not taken by the councils robust evidence should be provided as to why this is the case.</li> </ul>	29
<p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Planning permission has already been granted for larger numbers of homes which have not yet been built. Building more, which may not be requires would be detrimental to the environment and have a negative impact on out carbon footprint. Should be avoided unless proven essential</li> </ul>	4

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	7.2%
Developer	42.8%
Elected Member	2.6%
Landowner	4.1%
Lobby	6.2%
Local Authority	1.0%
Parish Council	10.8%
Public Sector	0.0%
Resident	25.3%



## Q43. If we are required to meet housing shortfalls from elsewhere, how best should we accommodate such shortfalls?

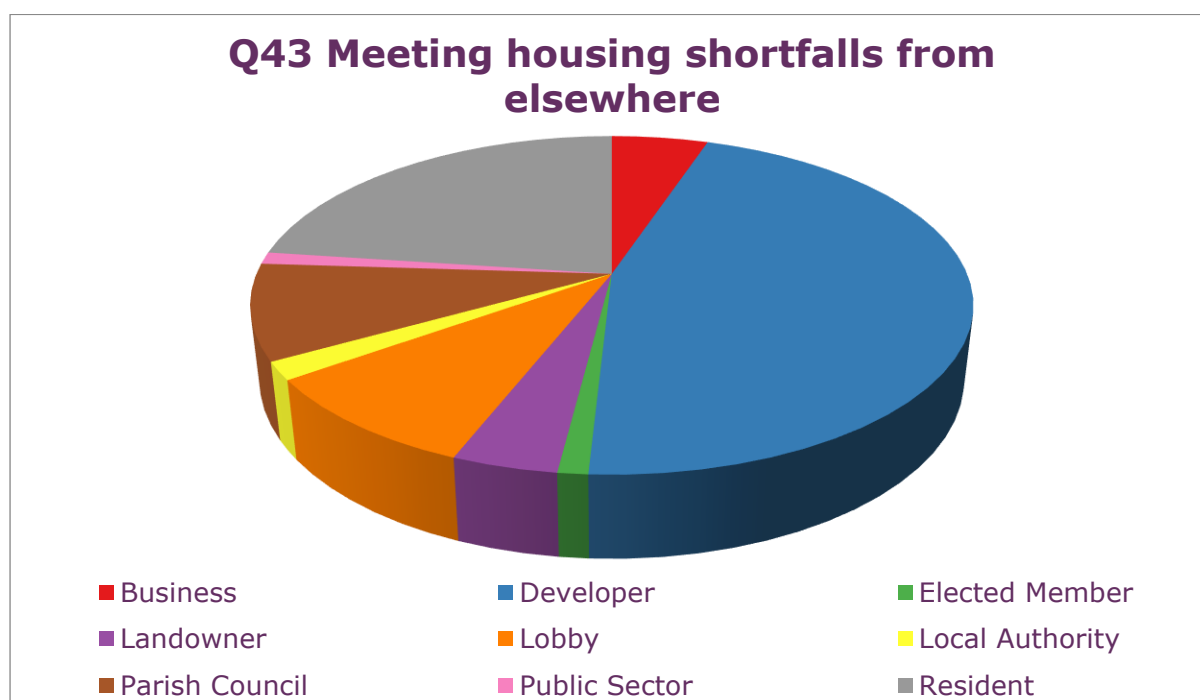
There were 159 respondents to this question.

Key themes	Number of Responses
<b>Green belt</b> These comments were on various topics around the green belt in terms of concern for its future, to suggesting a green belt review. <ul style="list-style-type: none"> <li>• Mention of Warwick already removing green belt land to assist Coventry</li> <li>• Implications for the green belt but growth as such locations would reflect the approach identified in the National Planning Policy Guidance. In regards to positioning of housing near the shortfall area.</li> <li>• will require Green Belt release for development to come forward in the most sustainable locations</li> <li>• General concerns for the green belt.</li> </ul>	27
<b>Brownfield</b> <ul style="list-style-type: none"> <li>• Great deal of brownfield sites which are not being developed.</li> <li>• Brownfield is under utilised.</li> </ul>	13
<b>Duty to Co-operate</b> The authorities engaging in this strategic housing shortfall should then seek to fully engage in the duty to cooperate process to establish what percentage of the identified shortfall each should be responsible for.	14
<b>Sustainability</b> Covered many topics but overall it seems the respondents felt that locations needed to be sustainable for example: <ul style="list-style-type: none"> <li>• If the known housing shortfall is from Birmingham and Coventry market area then additional sites, which are appropriate and sustainable, should be provided in suitable locations in close proximity to where people want to live.</li> <li>• Any housing needs that cannot be met within neighbouring areas must be met as close as possible to those areas, or within areas where sustainable transport connections can easily be made to those areas</li> <li>• Will require Green Belt release for development to come forward in the most sustainable locations</li> <li>• Locating new development at train stations could be one response to meeting the future housing needs of Birmingham in sustainable locations.</li> </ul>	28

Key themes	Number of Responses
<p><b>Infrastructure</b>                      general topic raised in relation to how to deal with and where to position shortfalls:</p> <ul style="list-style-type: none"> <li>• Will be a need to plan for large-scale strategic sites than can serve to meet housing growth and associated infrastructure requirements</li> <li>• Concerns on the scale of development on infrastructure.</li> <li>• Sensible and pragmatic approach should be taken to utilising existing infrastructure and access to schools, services and facilities regardless of administrative boundary delineations.</li> </ul>	13
<p><b>Accuracy of evidence</b>                      Nuneaton and Bedworth Council no longer recognises Coventry's unmet housing. This ties in with another key theme and that is of the housing figures from Coventry and their accuracy. As well as Mention of Warwick already removing green belt land to assist Coventry when it is felt wasn't necessarily required due to the numbers of the shortfall and the accuracy.</p>	10
<p><b>The Government's 35% uplift</b></p> <ul style="list-style-type: none"> <li>• Several respondents felt this should be acknowledged as will only increase shortfalls.</li> </ul>	13
<p><b>Object</b>                      Various reasons given for example:</p> <ul style="list-style-type: none"> <li>• We should not be required to do this.</li> <li>• Revise your estimates of what Coventry City needs most experts now say the figures are wrong</li> <li>• This should not be considered. Each area should meet its own government set targets, as previously set for the period</li> <li>• This is illogical and should be fought. Most of the commentary has been about reducing transport and improving sustainability which is contrary to putting shortfalls from other places here.</li> </ul>	7

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.1%
Developer	45.7%
Elected Member	1.1%
Landowner	4.0%
Lobby	9.1%
Local Authority	1.7%
Parish Council	9.1%
Public Sector	1.1%
Resident	22.9%



**Q44. Do you agree with prioritising jobs by increasing employment opportunities and therefore potentially increasing the minimum housing requirement for South Warwickshire? If not, what alternative do you suggest?**

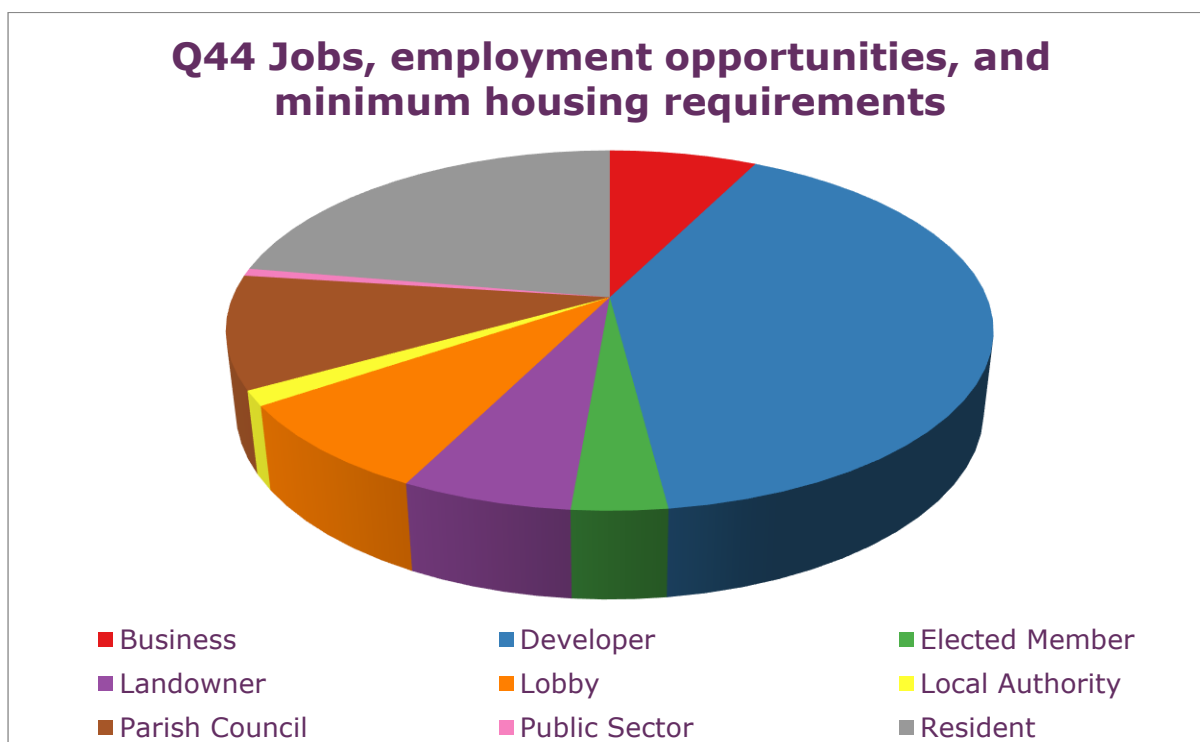
There were 120 respondents to this question.

Key Themes	Number of responses
<b>Exceptional circumstances with regards to housing requirement</b> Several response raise the point that - NPPF allows local authorities to deviate from the standard methodology when exception circumstances, such as pursuing an economic-led housing requirement are justified	7
<b>Yes/support with no or little further comment</b>	5
<b>Object with no or little further comment</b>	8
<b>Rural Character</b> More growth would not be in keeping with the rural nature of the Area. 'South Warwickshire is rural and should be kept as such'.	4
<b>Established employment base within Local Plan area</b> <ul style="list-style-type: none"> <li>• Number of opportunities to pursue a jobs growth/economic lead strategy that seeks to build on the established employment base already present.</li> <li>• the local plan should look to take advantage of this by encouraging employment opportunities within the area and assisting to create the conditions in which businesses can invest, expand and adapt.</li> </ul>	12
<b>Positive effects on commuting and climate change</b> <ul style="list-style-type: none"> <li>• Increasing employment opportunities within South Warwickshire should be matched by reduced commuting out of the District.</li> <li>• To encourage people to move into the SW area closer to their place of work would help to reduce commuting levels, thus having wider benefits in terms of offering people wider choice of travel mode and reductions in fuel consumption.</li> </ul>	11

<p><b>Green Economy</b> Would allow movement towards a green economy-suggestions such as gigafactories for economic growth.</p>	5
<p><b>Housing affordability</b></p> <ul style="list-style-type: none"> <li>• SW has an aging population coupled with the unaffordability of the area, this could pose future challenges in terms of labour supply. However, by increasing employment opportunities and subsequently the housing land supply for SW will ensure it will retain and attract significant amount of young/working age people.</li> <li>• If the housing needs of potential works needed for economic growth aren't met there will be an adverse impact on economy, climate change and potentially housing affordability.</li> <li>• Helping to tackle the wider unaffordability of housing generally across the SW area.</li> <li>• A figure above the minimum local housing need would assist with supporting economic growth and with affordability of housing as well as delivery of affordable.</li> </ul>	19
<p><b>Positioning of the district</b> Respondents raised the district having excellent transport links as a positive t helping achieve economic growth and should be considered moving forward. Particularly its links to the M1/M42/M6. It was also mentioned that there was no need to encourage growth as it would naturally occur due to the Plan areas positioning.</p>	10
<p><b>Effects of economic prosperity</b> Reduces poverty, health inequalities, crime and impacts on local services and facilities.New Housing growth at the right level will deliver market and affordable housing to contribute to economic prosperity of the area.</p>	5

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	7.4%
Developer	40.5%
Elected Member	3.4%
Landowner	6.1%
Lobby	8.1%
Local Authority	1.4%
Parish Council	10.1%
Public Sector	0.7%
Resident	22.3%



## Q45. Are there any locations in South Warwickshire where you have specific infrastructure concerns? Please specify.

There were 122 respondents to this question.

In total, there are 96 comments that identify locations in South Warwickshire with specific infrastructure concerns, fifteen general comments, and eleven comments that state that there are either no areas of concern, or that any such issues can be mitigated or overcome. The most common concerns related to: transport (62 comments), utilities (19 comments), education (19 comments), green infrastructure (14 comments) and medical infrastructure (12 comments).

The most common theme in the responses is concern about infrastructure in relation to transport (62 comments). 58 of these make reference to traffic, parking, road capacity, and/or reliance on car use. Nine comments concern constraints relating to the rail network, six comments mention poor bus services, four suggest a need to improve cycling infrastructure, and four also indicate issues with public footpaths. In terms of specific locations, the most common settlements referred to in relation to specific transport-related concerns are Stratford-upon-Avon (21), Long Marston (11), Leamington (7), Warwick (6) and Tiddington (6). Many of the issues raised by respondents in comments related to Stratford-upon-Avon, Long Marston and Tiddington are interrelated, this is also the case for Leamington and Warwick. For the Stratford-upon-Avon, Long Marston and Tiddington cluster of comments the main concerns were: a limited capacity for development at the Long Marston Airfield garden village, Meon Vale, and to the south west and south east of Stratford more generally, partly as a result of the delays in delivering a South Western Relief Road (six comments); responses highlighting the benefits of restoring of the Stratford-Honeybourne rail line (five comments); and issues of road capacity and congestion on the Clopton Bridge (four comments). The majority of the comments in relation to Leamington and Warwick do not mention specific roads but instead relate generally to transport infrastructure not keeping pace with housing development, leading to gridlock and congestion. Two responses specifically mention Europa Way in Leamington, two cite the M40, two name the A425, and one mentions the A452, while another makes a general comment about river crossings in these settlements (the latter response also mentions the river crossing in Stratford-upon-Avon and so it is also counted above in relation to the Clopton Bridge).

Nineteen comments broadly relate to utilities infrastructure – electricity, communications, sewage, drainage and flood-related infrastructure. Seven responses relate to deficiencies in electricity capacity. One comment suggests this is a problem across the South Warwickshire area, while another suggests that it is an issue that particularly impacts small villages. The Coventry and Warwickshire Local Enterprise Partnership mention this as an issue that has previously led to loss of inward investment particularly in Warwick, Leamington, Coventry and in the areas of Stratford District near the border with Redditch. This response also highlights electricity capacity as a key matter that will need to be addressed in

relation to proposals for a West Midlands 'gigafactory'. Communications infrastructure (broadband and availability of phone signal) is mentioned as a concern by seven respondents. Four of these comments mention smaller villages in general as having issues with communications infrastructure, other individual respondents raised Wellesbourne, Lapworth, and Radford Semele as problem areas. Five comments relate to issues with drainage, flooding, and sewage infrastructure. Severn Trent highlight that there is likely to be a need for capacity upgrades at a number of Waste Water Treatment Works and advise further liaison as part of the Water Cycle Study for further detailed assessment. In particular, they suggest that further development within the Itchen bank catchment serving Southam, Long Itchington and Bishops Itchington should not be pursued until ongoing infrastructure works to address flooding and pollution are completed. Other problem areas raised by single respondents were Leamington and Warwick, Wellesbourne, and Lapworth (the latter two were raised by the respective Parish Councils, the first two by a resident).

Nineteen comments relate to educational provision. Eleven mention primary schools, two refer early years provision, and one comment references higher education and skills. Tiddington was the most common specific area of concern mentioned in these responses (6 comments), while single responses referred to Ilmington, Lapworth, Leamington, Shipston-on-Stour, and Stratford-upon-Avon. Six comments made reference to a wide-ranging constraint on capacity (generally in relation to primary schools) in rural villages and in settlements in the lower tiers in the settlement hierarchy of Stratford-on-Avon District's and Warwick District's current Plans.

The next most common theme in the responses relates to issues around green infrastructure (14 comments). These comments generally bring together a number of interrelated concerns in terms of the protection or expansion of the provision of green spaces for community usages or environmental purposes, and the benefits of these spaces for both physical and mental health. Six of these comments relate to Tiddington, with particular reference to a local shortage of unrestricted open amenity space and the need to preserve the south of Tiddington Fields as community orchard, woodland and green space as previously allocated in the local Neighbourhood Development Plan. Single responses relating to Barford, Bubbenhall, Lapworth and Sherbourne emphasise the importance of local landscapes, natural habitats, and biodiversity in their respective areas as reasons to not direct substantial development to these locations. Three comments refer to the importance of preserving the green belt, one of these making specific reference to the "squeezing" of the green belt in Leamington and Warwick due to HS2, recent housebuilding, and the planned expansion of Rugby. One comment also relates to blue infrastructure and suggests that the River Avon should be opened up for navigation and improved services provide along the Warwick-Stratford-Lapworth-Warwick ring, with improved marina facilities at Bidford-on-Avon and Welford-on-Avon also a priority.

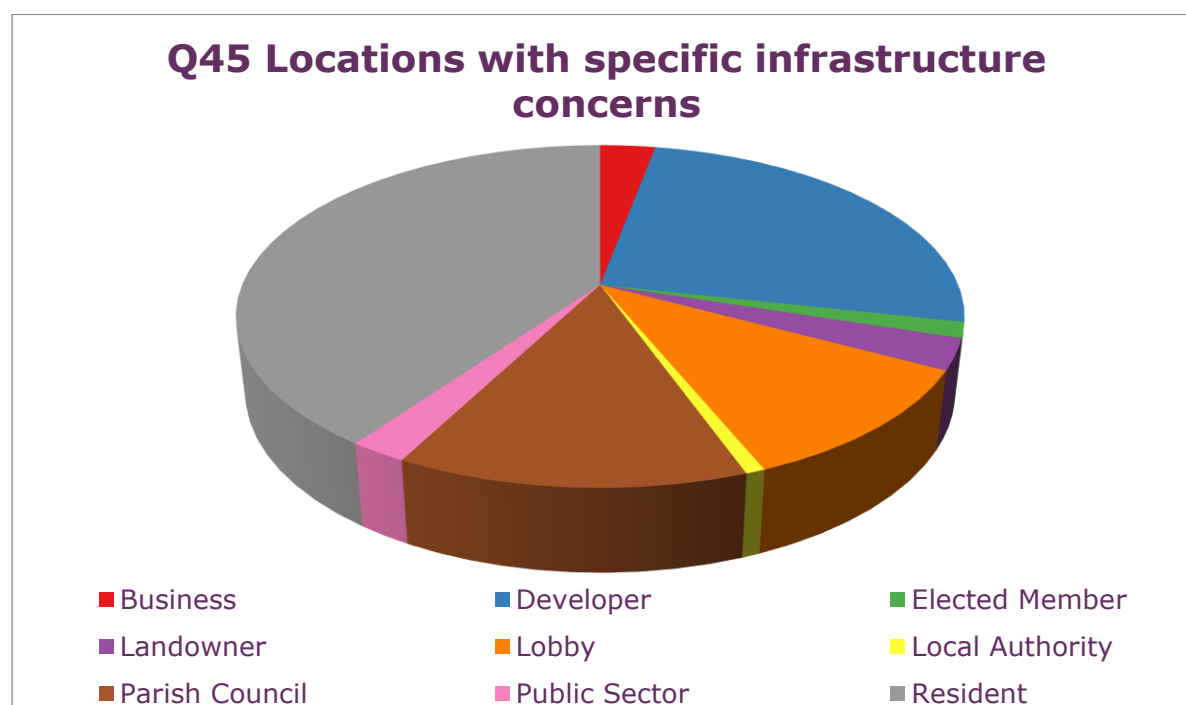
The last of the main themes in relation to infrastructure concern is medical infrastructure (12 comments). Five of these comments specifically mention shortages of GP surgeries, two relate to a lack of hospital provision, one to social

care, one to dentistry, and one to mental health. Five of the comments relate to Tiddington as an area of concern, three to Stratford-upon-Avon, one to Leamington and Warwick (although this is primarily in respect to a difficulty in access arising from public transport deficiencies), one to Shipston-on-Stour, one to the western edge of South Warwickshire (in terms of A&E provision), and two comments referring generally to difficulties of access in small and rural villages.

While the above comments highlight specific topics and areas of infrastructure concerns, there were a number of responses from developers and landowners emphasising the potential for issues to be mitigated, as well as the need for the South Warwickshire Plan to plan positively and seek to overcome infrastructure concerns where development would otherwise bring benefits. Three comments stated that there were no areas of concern in South Warwickshire. Four stated that there are no areas where the concerns are significant enough in scale that mitigation would not be possible. Seven comments emphasise the need for the South Warwickshire Local Plan to plan positively to overcome constraints. Six of these make reference to road planning. One of these comments suggests that the proposals for an A46 link road recently consulted on by Warwickshire County Council will be more attractive in securing funding streams if it can be linked to a proposal for jobs and homes, and if allocated it could also secure contributions from developers as part of planning approvals. A further response suggests proactive engagement with Highways England and other stakeholders to find solutions to capacity issues. Another comment suggests that the South Warwickshire Local Plan is an opportunity to revisit the Long Marston strategic site and both deliver the South Western Relief Road and facilitate/unlock further development south of Stratford-upon-Avon. This comment and two others make the argument that provision of infrastructure can itself be a catalyst for further demand for housing and other uses not considered in previous Plans. Lastly, the Defence Infrastructure Organisation raise the need for policy text to highlight the existence of Explosive Safeguarding Zones if sites are to be identified in the proximity of Defence Munitions Kineton.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.9%
Developer	25.5%
Elected Member	1.5%
Landowner	2.9%
Lobby	10.9%
Local Authority	0.7%
Parish Council	13.1%
Public Sector	2.2%
Resident	40.1%



## Q46. Do you agree with the initial findings of the high-level Sustainability Assessment of the Growth Options? If not, why not?

There were 124 respondents to this question.

A few individuals agreed with the initial findings of the high-level sustainability assessment without further comment (12), however the majority raised points concerning certain aspects of the appraisal and many raised their concerns.

Many raised concerns about the high level assessment, with some stating that it is not a robust means by which to identify key differences between growth options (3), others stated the assessment appears to be superficial and does not provide sufficient evidence to effectively test and rule out any option (4), some stated that it is too high level to comment on (4) and the remaining stated that the assessment is too simplistic (4), lacks suitable analysis (1) and does not consider likely trends over the period being considered (1). It was also raised that a high-level assessment is unlikely to take into account interventions arising from policy and investment decisions (1).

There were also concerns over the approach and breadth of the high-level assessment. Some noted that the assessment is not particularly helpful as it is limited by the type of spatial options put forward, which are presented as mutually exclusive themes. It was recommended that it would have been much more helpful to have set spatial strategies informed by evidence about the role and function of places, rather than focusing on generic themes. It was also commented on that as a qualitative assessment, there is limited information on how the scoring has been applied, and also that the scope of each category is unclear. There were also concerns that the sustainability appraisal excludes the impact of any potential green belt development and does not consider heritage/historic environment, nor biodiversity as distinctive themes. It was also noted that there was no reference to the transport connections located just outside of the South Warwickshire border, despite these facilities being used by residents within the plan area.

For those that supported the high-level approach, the majority understood that it was a brief, high level assessment and would be followed by a full Sustainability Appraisal/ Strategic Environmental Assessment (13). Many welcomed the opportunity to comment on these when they emerge, and others acknowledged how further work would be required as the plan progresses (11). Some respondents specifically requested a workshop where stakeholders could engage in the process of growth option assessment (4).

The following breakdown identifies, where possible, the comments that were made on the specific themes of the sustainability appraisal in relation to each growth option. One particular theme that came up relates to housing provision. It was questioned why housing achieves a negative in all bar 2 of the growth options. If housing isn't delivered, this would amount to a negative scoring, and therefore in the alternative, the delivery of housing should as a starting point be seen as a positive, receiving a negative score only where impacts are incapable of being

mitigated (6). It is also worth mentioning at this point that a number of respondents believed that a mix of growth options are likely necessary to meet the housing requirements (13).

## Rail corridors

### People

- This growth option is assessed as 'minor negative' in terms of people because it is said that development is likely to be in a linear form, which may limit community cohesion and the viability for local facilities. This seems an odd finding, given that the growth locations identified under the Rail Corridors include main towns and many sustainable villages, which are not linear and where there are good community facilities.
- Locating growth at these settlements would enhance community cohesion and support the viability of local facilities

### Health

- Minor positive impact on health is identified. Whilst it is recognised that proximity to public transport options encourages people not to use the car the sustainability appraisal suggests that noise pollution may be a constraint. Noise need not be a constraint to development as it can be easily mitigated through setting development back from noise sources and the use of attenuation featured

### Water

- The SA suggests that the rail corridor option may have flood risk impacts. It is not clear why this conclusion has been reached. Train stations are not located in areas of flood risk.

### Economy

- The SA suggests that the effects of the rail corridor growth option are 'unknown' and that it may compromise the vitality and viability of existing centres. The rail corridor options will boost the vitality and viability of existing centres by providing sustainable and simple access to existing centres

### Transport

- Scoring seems low as there could be more significant transport benefits
- Further analysis should be undertaken to consider whether the journey times and destinations offered by rail vs bus corridors are likely to lead to sustainable travel choices
- This growth option focuses development in the main centres which share the same travel benefits as growth in urban areas, however this growth option has the added benefit that the main focus is sustainable travel
- Should consider Tile Hill and other transport links just outside of the South Warwickshire boundary
- A disadvantage is stated as being 'access to rail facilities may still require use of private cars'. Assuming people are using the train to travel some distance, any car journey to the station is part of a net reduction in car use. How is this a disadvantage?

- Disagree that rail service is judged as less desirable than access to bus service when rail is much more popular for commuting, is more reliable and often cheaper
- Cannot be the case that the rail corridors option has only a minor positive effect on transport when the bus corridors option has a 'significant positive'. Bus patronage is declining while rail patronage is increasing. Rail connectivity is equally sustainable, if not more so, than bus connectivity.
- No indication that either Network Rail or the train operating companies would contemplate the provision of additional railway stations

## Housing

- Rail corridors growth option is identified as having a 'minor negative' impact on housing on the basis that it may not deliver affordable housing in areas that most need it. Developments associated with rail corridors can provide affordable housing in the same way that any other development can. Train stations are not completely isolated from existing services and facilities.

## Bus corridors

## Culture

- Cultural impacts are more 'negative' than suggested as they will affect the heritage assets rural setting

## Health

- This would put new housing close to busy roads with significant particulate pollution issues

## Land

- Do not believe that the impact would be less than the options that focus more on housing development in already built up areas, but in any case, the impact on land is negative rather than positive

## Economy

- Although bus routes seem viable on paper, they are not suitable for work travel, especially for commuters who then need to switch to another form of transport

## Transport

- Further analysis should be undertaken to consider whether the journey times and destinations offered by rail vs bus corridors are likely to lead to sustainable travel choices
- Bus services are unlikely to be delivered at the frequency required to attract significant shift from cars, and will not link direct or quickly to key destinations such as London or Birmingham
- Does not fully acknowledge the flexibility inherent within the existing services to increase services and consequently enhance sustainability

## Housing

- Questions why it scores negatively in relation to housing and no advantages are listed

## General

- Cost of providing a decent service would be exorbitant

## Main Road corridors

### Health

- Noise is listed as a disadvantage under rail corridors, but not road. Most road noise is from the tyre/road surface interface which is bound to increase noise levels

### Climate

- Object that main road corridors will have a 'neutral effect' on the climate

### Transport

- Dispute that development on main road corridors would necessarily 'encourage use of the private car for all forms of travel'. Where large scale development is brought forward in close proximity to the existing network and higher order settlements, there are opportunities to secure new or improved access to public transport to enable and encourage non-car journeys as part of the new development
- The SA currently assumes all settlements in the main road corridors do not have public transport, which is not correct
- Development on or near main road corridors that also relate well to main bus corridors have the potential for improving access and usage of the public transport network

### Design

- Object that main road corridors will have a 'minor positive' on design

## General

- Many roads are of poor quality, are relatively narrow and are poorly maintained

## Enterprise Hubs

### People

- Analysis makes reference to the lack of supporting community facilities at enterprise hubs which may limit the amount of cohesion. However, for large scale employment development it is routinely now the case that appropriate amenities are provided for workers and visitors. The potential disadvantage is easily avoided.
- Given a minor positive score because it is seen as providing opportunities to develop mixed use areas which may enhance community cohesion. Many of the enterprise hubs are at motorway junctions - is it really seen as realistic to develop cohesive new communities in these locations?
- Postulated benefits of people living close to their jobs will not in fact arise to any noticeable extent, because (a) people change jobs, and (b) people live in households with more than 1 worker.

## Health

- A significant impact on health is identified. The assessment indicates that health may be affected by poor air quality, reduced access to green infrastructure, a lack of services and facilities and a lack of public transport options. Significant new green infrastructure and open space can be provided, as can adequate facilities and transport options

## Water

- It is suggested that there will be a neutral impact on water. The Sustainability Appraisal suggests that the economic hub option may have flood risk impacts. It is not clear why this conclusion has been reached. A site specific FRA can be undertaken and used to direct development away from any areas at risk of flooding

## Resources

- Analysis identifies the only disadvantage in this regard being that decontamination may be required if relating to previously developed land. In fact, the remediation of contaminated land should be seen as a benefit. Wrong to suggest there would be a likely 'Significant negative' effect.

## Utilities

- The SA notes that such an option will increase the demand for the provision of utilities but acknowledges that there may be existing infrastructure at existing employment hubs that could be used. We concur with this point and note that it would be preferable to create additional capacity at an existing facility rather than having to create everything new

## Economy

- This option provides the opportunity to deliver precisely the sort of development sought by businesses and the development industry, including a type and scale not possible through other options. Offers the potential for 'significant positive' effects, and this should be recognised

## Transport

- Could reduce the need for travel if employees have and want to take the opportunity to live close to where they work

## Housing

- Questions why it scores negatively in relation to housing and no advantages are listed. Some of the enterprise areas are in close proximity to where a significant proportion of housing need is generated

## General

- Could result in a better balance of homes and jobs than under other options.
- Would place jobs in a few locations - fine in town, but of little use in the countryside and would lead to more commuting
- Unduly pessimistic

## Main Urban Areas

### Culture

- Focusing development in urban centres would increase the population near cultural facilities, increasing patronage for the arts

### Transport

- The size of Main Urban areas and the potential for development to be on the periphery is likely to increase commuting into the centre at distances which could eliminate active travel, therefore this would be expected to be minor positive only.

### Housing

- Wrong to suggest that only options relating to main urban areas can deliver new affordable housing and more rural locations cannot. This seems to suggest that affordable housing needs within rural areas is less important than the needs of households within Urban Areas
- The SA assumes that the main urban areas will have a positive relationship with the 'housing principle'. However this should be negative and positive, as whilst the housing requirements of those in urban areas will be addressed, rural housing needs will not be addressed and this has not been reflected accurately in the appraisal

### General

- Underplays the positive impact of concentrating new developments in existing urban areas, as increasing the density of development in existing settlements would have a positive impact on landscape due to reducing the need to develop on greenfield land
- Fails to reflect governments clear support for development in town and villages, as per Paragraph 78 of the NPPF
- Assessment excludes other settlements that would also provide sustainable development

## Dispersed

### People

- Consider the impacts of commensurate growth throughout the spatial hierarchy positive. Without such growth rural communities will age and decline, having a significant impact on the vitality and viability of rural services.
- In order for rural communities to not only survive but thrive, these locations must also accommodate some growth and remain accessible to varied employment opportunities

### Culture

- Disagree that there are no cultural advantages. Developments outside Main Urban Areas may bring some individuals closer to sites of cultural interest
- Whilst the proforma explains that cultural and heritage assets within existing settlements may be negatively impacted, the planning process can

mediate and mitigate against such risks. If cultural damage can be caused through the dispersed growth option, then it can equally be caused through any growth option

## Health

- Do not agree that 'reduced access to services may increase isolation and loneliness' as there may not necessarily be reduced access to services as a result of this option and/or new facilities delivered as part of new developments.
- The rise of online shopping means many services can be accessed remotely.
- Pandemic has demonstrated that it is possible to live in a rural/remote areas whilst still maintaining regular virtual contact with friends/family/colleagues

## Water

- The likelihood of flooding is not necessarily greater outside main urban areas

## Climate

- Think this would be significant negative due to car usage

## Land

- Dispersed growth strategy may not necessarily have a significant impact on landscape, and such impacts can often be mitigated. Development adjacent to any settlements may have a significant impact on the setting or landscape depending on the circumstance and it is not true to say larger settlements do not have sensitive areas which would be inappropriate for development.

## Resources

- Cannot be assumed all developments coming forward for option G will be on greenfield land as numerous brownfield sites may exist within rural areas, and this option, by its nature, will still include many sites in urban areas
- Cannot be assumed that greenfield sites will not be contaminated and/or be otherwise suitable for agricultural use

## Utilities

- Smaller villages have poor utility infrastructure
- Cannot be assumed that all sites outside of Main Urban Areas have inadequate access to Utilities and/or that this could not be delivered as part of any new development.
- Delivery of new utilities infrastructure would also represent a major benefit to some areas
- Utilities assessment looks to be underestimating the effect. There is the potential for significant negative impact. By dispersing growth to lots of smaller catchments, which often discharge treated effluent into smaller watercourses with lower flows, this could have a significant negative impact on a larger number of receiving watercourses. It is likely that a large number of locations would need capacity upgrades to be able to treat additional flows and in some locations this may be hindered by the

environmental capacity of the receiving watercourses to take more flows due to technical inabilities to meet very tight water quality permits.

## Economy

- Do not agree that option G would not provide 'easy access for employees without access to a private car' as it would arguably bring employment opportunities closer to many SW residents who might otherwise need to commute to main urban areas.
- Provided new employment development is of an appropriate scale to the settlement concerned we also do not agree it would compromise the vitality and viability of existing main centres

## Transport

- Do not agree that this option would lead to rural isolation, and that it encourages the use of the private car for all forms of travel, as walking/cycling can often be a more popular means of transport for undertaking short journeys outside of main urban areas.
- Locating some development within smaller settlements and the associated infrastructure improvements this may bring may also improve access, thereby helping minimise car use in such areas
- A negative score is given based on the fact that development under this option encourages the use of private car for all forms of travel. However, this ignores the fact that some settlements are also located, either on, or in close proximity to, a main bus corridor and are more sustainably located than other less accessible settlements. Development in rural locations that also relates well to main bus corridors has the potential to improve access and usage of the public transport network

## Design

- Do not agree that 'the need to respect existing urban built form may limit the scope to create attractive new places'. National policies require good design, which takes account of its contexts regardless of whether that context is urban or rural

## Housing

- Do not agree that this option may not 'deliver affordable housing in areas that most need it' as there is a well-documented need for affordable housing in rural areas where house prices generally tend to be higher.
- Disagree that this option 'may not create sustainable development with access to a range of services and facilities' as it is possible to live outside main urban areas and still have good access to services and facilities, which may be further expanded/improved through new development
- Do not agree that more rural areas do not need new development. Rural areas often see new delivery constrained, raising house prices and contributing to the aging of settlements with no opportunities for people to downsize
- Wrong to suggest that only options relating to main urban areas can deliver new affordable housing and more rural locations cannot. This seems to suggest that affordable housing needs within rural areas is less important than the needs of households within Urban Areas

- Focusing on affordable housing need in such broad terms ignores the fact that affordability and affordable housing are issues that face rural areas too

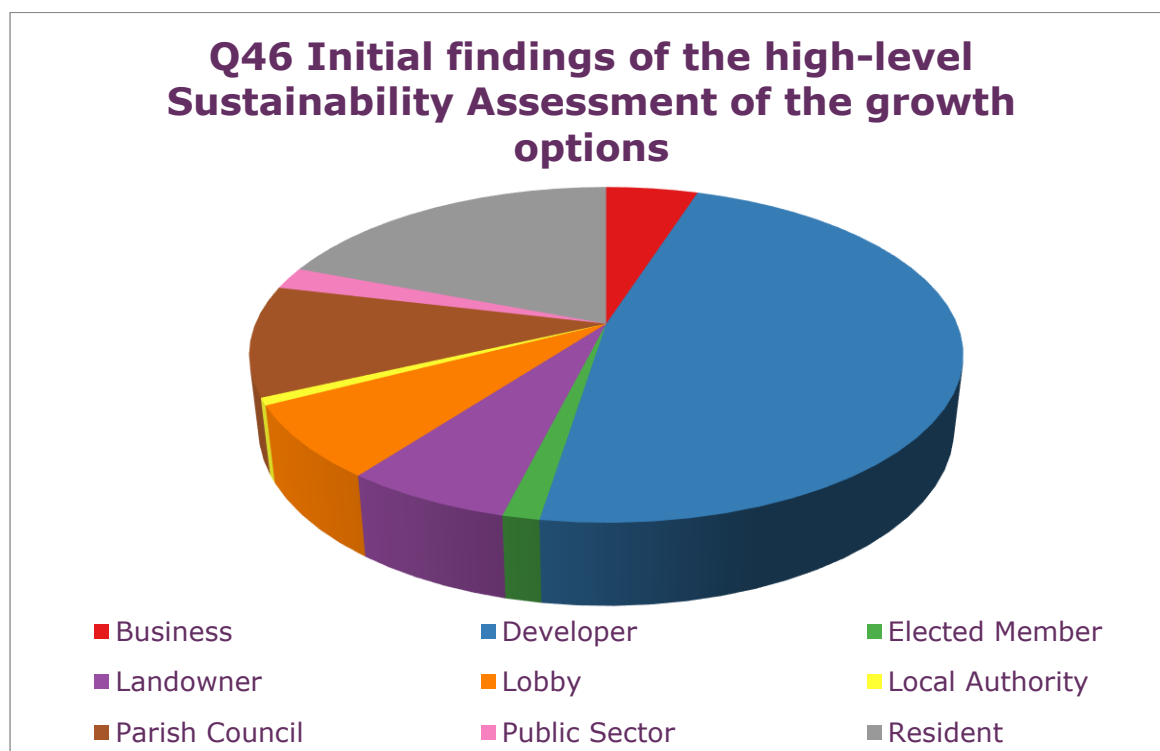
## General

- Approach used in the Core Strategy that is now based on out of date evidence
- Do not consider that the findings have correctly weighted the benefits of such a pattern of growth and have similarly misjudged the perceived disadvantages of this approach.
- Should include all settlements that would contribute to strategic housing and economic provision within the County and not just the word 'dispersed'.

Overall it is clear that respondents are keen to see further Sustainability Appraisals that go into more detail.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.0%
Developer	47.5%
Elected Member	1.4%
Landowner	6.4%
Lobby	7.1%
Local Authority	0.7%
Parish Council	10.6%
Public Sector	2.1%
Resident	19.1%



## Q47. Do you agree with the initial findings of the climate change analysis of the Growth Options? If not, why not?

There were 71 respondents to this question.

A significant number of responses (26 respondents) agreed with the initial findings. However, some concern was raised about the limited level of detail, the robustness of the assessment and the methodology applied for some of the growth options.

### General Comments

- The analysis is at too high a level for detailed comment. Does not provide sufficient evidence to effectively test and rule out any option. The options should consider how the required level of growth might be accommodated and the assessments more precisely related to those options. As it stands, there is a reasonable likelihood that some options might be prematurely discounted.
- More work is needed, part of which should be weightings for the different factors. Would be better adopted on a micro rather than a macro basis with clear criteria for assessing applications and supporting the sustainable and climate responsive delivery of the Preferred Option scenario.
- A robust evidence base would assist in tackling the key factors – e.g. update of zero/low public and private transport options – need to dynamically assess the changes to come over the plan period and establish whether excluding Growth Options based on 2020 base data reflects the accurate CO2 position in 2030, 2040 and 2050.
- Based on very limited empirical evidence from the SCATTER carbon emissions tool, with no information for Stratford District at all.
- Question the relevance of the MET office diagram and UK weather patterns to the climate change assessment for each of the growth options.
- Do not agree with many of the findings which appear to be anecdotal with no grounding in scientific fact.
- Does not offer any useable conclusions on what to do and there should be when tackling climate change is first on the list of overarching principles.
- Looking ahead to 2050 presents a genuine opportunity to address the current situation and future changes likely to affect the area through proper strategic planning. So using data based on a 2017 baseline the analysis simply looks at what the situation is now rather than taking a strategic view. Without looking into the future it is not clear what the best actions would be to address climate change in the longer-term.
- Support the recognition that larger-scale development cannot only address housing needs, it can also result in increased potential for low carbon energy production and distribution such as hydrogen, district heating schemes and off grid renewable energy with benefits for carbon reduction.
- Disagree with sweeping statements such as “the further sites are from town centres and facilities, the more reliance on private cars and unsustainable

lifestyles.” This is an over simplification of the issue which has not been evidenced in the analysis. Ignores the fact that larger-scale development has the potential to improve access to different travel modes including public transport.

- Based on current traditional thought processes and fail to recognise the change to society and economic activity which are occurring and have been accelerated by the pandemic. EG changes to working patterns, how people shop, use of delivery service, provision of education, move to electric vehicles.
- The requirement to plan for climate change mitigation and adaptation is one of the many planning considerations for the Plan– so a balanced approach is required that the needs of all communities, both rural and urban, are addressed whilst also responding to the climate change agenda. This is especially important given the intention to adopt a flexible framework for the plan up to 2050 and the need to ensure the new strategy is soundly based.
- Measures appear reasonable but how this relates to growth is perhaps less certain.
- Important to recognise that while new development may result in increased traffic, a proportion will be trips that have been shifted from other parts of the transport network. Consideration should be given to how some emissions will have cross boundary impacts.
- Seems to promote the merits of electrification of public transport but not consider the same for private vehicles. Seems not to consider increased remote working and a possible reluctance to return to public transport.
- The ongoing impacts of COVID may also be relevant to the analysis.
- The data and conclusions should be verified by an independent expert analysis.
- Not clear what role this has in the plan making process – the SA/SEA process is capable of capturing matters relating to climate change and is the legal process by which the Plan will be tested and assessed. A separate climate change analysis can’t supplant the SA/SEA and would cause confusion, especially in the event of conflicting assessment in the climate change work and SA/SEA.
- Would be helpful to understand the rationale for providing a standalone further assessment on climate change when climate is a topic listed as one of the 12 plan objectives.
- The scale of development opportunities i.e. potential for strategic sites/new settlements needs to be better reflected within the impact assessments.
- Agree with a focus on developing in highly sustainable locations, especially those with public transport hubs/access to wider public transport opportunities to address these key issues.
- It is noted that, other than for densification, each option is likely to involve a significant quantum of development on greenfield land which can have impacts on land for local food and carbon capture.
- Suggest an approach of focussing development on the following, with an examination of releasing land in the Green Belt, particularly where that land is sustainably located.

A – Existing rail halts/stations

D – At Enterprise Hubs

F – in and at the edge of main centres

- Provides a good starting point for qualifying the potential impact of development. Will need to be adapted to include:
  - Future Homes Standard and Future Buildings Standards will reduce carbon emissions from new development
  - The phasing out of fossil fuel vehicles and funding to support EV take up
  - The requirement for EV charging in homes, non-residential and public spaces
- Suggest a workshop type approach where key stakeholders can engage and influence the process outside of the formal consultation stages.

## Rail Corridors Option (A) Analysis

- Rail Corridors given a 2/3 score because of lack of frequency or locations of stations which may result in journeys by car and thereby limit the potential carbon benefits of focusing development around stations. It is said for some of the more rural stations there is likely to be continued reliance on the car to access rail services. However, choices can be made in the Plan to locate development where it is accessible to railway stations and this will limit the use of the private car. Assessment can be made of the frequency of services at each station in order to guide development to the locations where sustainable travel choices are more likely. The rail corridor option could achieve the greatest modal shift away from car use as it would provide residents with a choice of travel modes. As such the rail corridors growth option should be raised to a score of 2.
- Rail Corridors are a better options, with a possible parkway station on the Fosse.
- While motor vehicles are being decarbonised, the rail service in South Warwickshire is diesel based which is not recognised in the assessments.

## Main Road Corridors Option (C) Analysis

- Now more people can work from home so the use of main road corridors could be greatly reduced.

## Enterprise Hubs Option (D) Analysis

- Enterprise Hubs given a score of 2 as suggests that by focusing development close to existing employment hubs, this has the potential to reduce commuting and to provide alternatives to the car for commuting journeys. However, not all employment hubs have the full range of infrastructure and services. These locations could therefore result in additional journeys for schools, retail and other functions. Therefore the score for Enterprise Hubs should be downgraded to 2/3.
- Difficult to understand why Enterprise Hubs are classed as reducing carbon emissions given that they would inevitably encourage more vehicle journeys.

## Main Urban Areas Option (F) Analysis

- The claim that this option has the potential to deliver development and lifestyles that are net zero carbon or close to it is a very strong claim and needs to be supported by analysis.
- Not all sites outside of Main Urban Areas will result in the loss of greenfield and/or BMV agricultural land. Many sites may be of poor quality with little/no visual/landscape impact for example, or impacts that can be appropriately mitigated. It is also unlikely all the SW's development needs can be met within the envelope of Main Urban Areas/brownfield land.

## Dispersed Option (G) Analysis

- The dispersed options impact could be improved if development is directed to those settlements with good quality services and facilities, such as shops and schools. As a consequence the need to travel is reduced along with the impacts on climate change.
- If the dispersed option is accompanied by local jobs it has the potential to reduce carbon emissions.
- Question the statements that it often means smaller sites which makes it harder to fund and deliver concentrated infrastructure improvements and services to support new development. This is not necessarily the case and has limited relevance to climate change.
- Dispersal approach has the potential to bring forward employment opportunities to rural areas where a large proportion of the South Warwickshire population reside, thereby minimising car use.
- Do not agree with mitigation rating of 4 - significant further work is required.
- Assessment for Dispersal Option reinforces the view that this options is both less sustainable and less able to respond to the challenges posed by climate change than the others. As such this option should be largely discounted.
- Lack of sensitivity especially for Option G dispersed – there are different degrees of dispersal e.g. G-A spreading growth across all towns and villages whereas G-B could be limiting the dispersal of growth to towns and larger villages with a primary school.
- While option F (Main Urban Areas) refers to concentrating development in a smaller number of large scale development, no consideration has been given to focusing development in defined rural settlements under G. As such the analysis of urban and rural locations in relation to options F and G have not been fairly and consistently applied and represent a flaw in the published evidence.

## Densification

There is confusion in densification options mitigation item C:

- Low carbon sources are diffuse in nature and can't be made more concentrated by grouping homes or industries closer together. So densified development does not of itself create greater potential for low carbon energy sources. However, densified development leaves available other land which might otherwise be used for housing so there is a possible gain.

- Hydrogen is not low carbon unless produced from renewable electricity or with full carbon capture and storage if produced from natural gas. Even if 100% carbon capture becomes possible, there will still be leakage of methane from natural gas production and supply so fossil derived hydrogen will never be zero carbon.
- Distribution of hydrogen and/or District Heating will only acquire minor carbon reductions by densification. Essentially this amounts to the carbon footprint of the length of pipe that is saved and for district heating, a small efficiency gain due to reduced heat leakage from the pipes.
- Off grid renewable electricity production appears irrelevant to discussion of benefits of densification because almost all properties are grid connected. The key requirement is to maximise production of renewable electricity and minimise demand which reduce demand for fossil derived electricity.
- Other than densification each option is suggested likely to involve a significant quantum of development on greenfield land. The loss of greenfield land should not be seen as an overriding issue at the expense of allocating sites in sustainable locations close to services and facilities.

## Adaptation Methodology

- Would be helpful to understand the rationale for providing a standalone further assessment on climate change when climate is a topic listed as one of the 12 plan objectives.
- The adaptation scale is redundant as all options are considered the same – i.e. no impact on adaptation.
- Need to consider legislation and guidance such as the England Biodiversity Guide which are also relevant.
- Adaptation is unlikely to be the same across all options.

## Mitigation Methodology:

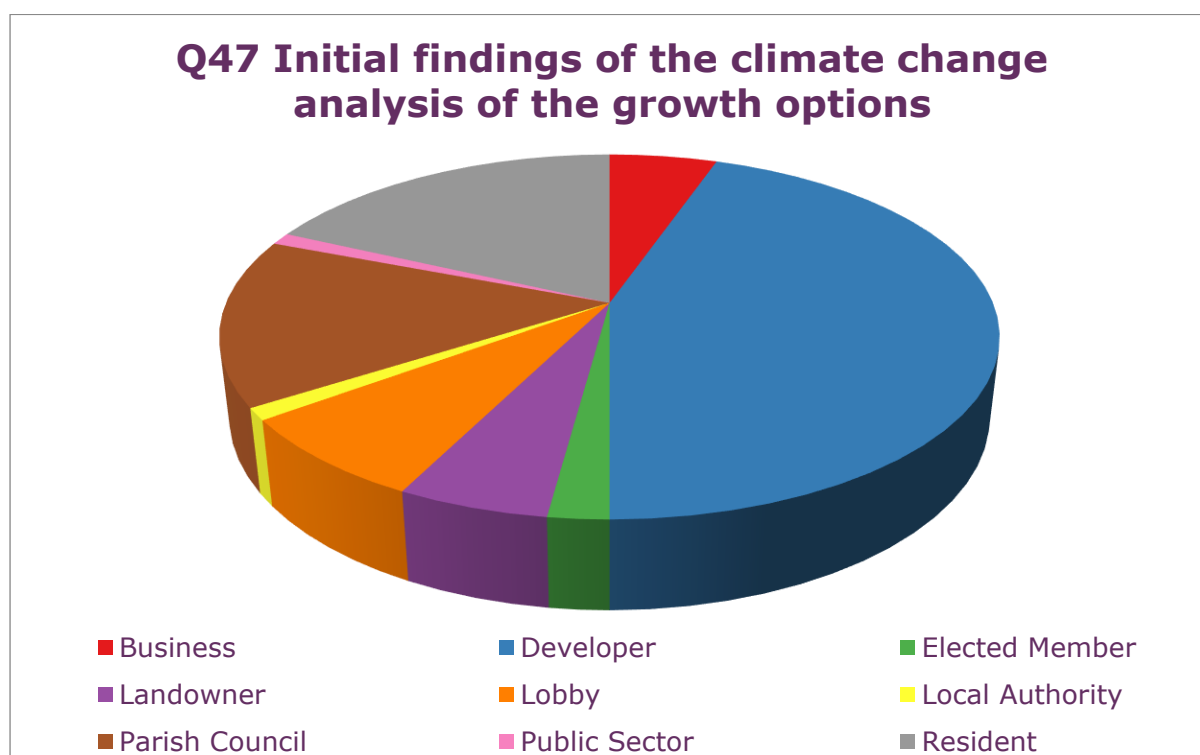
- The methodology for mitigation needs further thought and refinement – as the banding is so narrow it can have a profound effect on the scoring outcome. A wider banding range would assist and build in the variations in growth options which inevitably arise.
- Mitigations measures go from 2-4 with 4 being the highest and yet on the climate table in the initial SA assessment it is identified as minor positive or neutral. This can't be correct.

## Causes of Climate Change Section:

- Query the meaning of points iii) and iv) which are confusing and appear to include errors. Suggest that reference to commercial actually be institutional in iii) and residential be commercial in iv)

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.3%
Developer	44.7%
Elected Member	2.1%
Landowner	5.3%
Lobby	7.4%
Local Authority	1.1%
Parish Council	14.9%
Public Sector	1.1%
Resident	18.1%



## Q48. What is your favourite Growth Option and what do you particularly like about this option?

There were 275 respondents to this question, a couple of whom stated that they did not have a Preferred Option or felt there was not enough information and evidence available at this stage to decide on a Preferred Option. Further, there were a couple of comments that stated that none of the Options were effective at addressing Climate Change and therefore should not be pursued.

Over 90 of the respondents stated that a mixture or a combination of all of the Growth Options would be the Preferred Option moving forward and even when specific Growth Options were put forward these were in combination with at least one other Option. For example, Option A – Rail Corridors and Option B – Bus Corridors, together both of these Options would be stronger.

It is important to note that in some instances where Consultants have been used to represent Developers, the responses in relation to this question differ depending on the site (s) being promoted. Therefore, there are instances where the same Developer has stated very different Growth Options as being Preferred Options for the South Warwickshire Local Plan.

It is evident from the responses that there are two clear themes to take into account when looking at what the preferred Development Strategy will be moving forward. Climate Change is one and the needs and requirements of residents following the Covid pandemic another. Climate Change and Sustainability should be at the heart of the Development Strategy and this is felt very strongly amongst respondents. There was also a very strong view that moving forward people will want to live, work and socialise in the same place and that this in turn will contribute towards much more sustainable travel patterns.

A number of responses stated that Local Service Villages are seen as being sustainable locations for development (as identified in existing Local Plans/Core Strategies) and therefore they are suitable to take an amount of growth as well as the Main Urban Areas. This would allow opportunities for improvements to infrastructure and facilities such as bus services and would ensure that there was a balanced approach to growth across the South Warwickshire Area.

In conclusion, there did not appear to be a clear overall Preferred Option but that it could or should be a combination of all Options with Climate Change and Sustainability at the heart.

### Approximate headline figures

Growth Option	Total
A – Rail Corridors	16
B – Main Bus Corridors	7
C – Main Road Corridors	0
D – Enterprise Hubs	19
E – Socio Economic	9

F – Main Urban Areas	16
G - Dispersed	40
Mix of Growth Options	115
Other	76
Total	298

A large number of respondents who specified their preferred option as 'mix of Growth Options' did not specify any specific options within this and in a number of cases stated that for the best option to work it would be a combination of all of the 7 options.

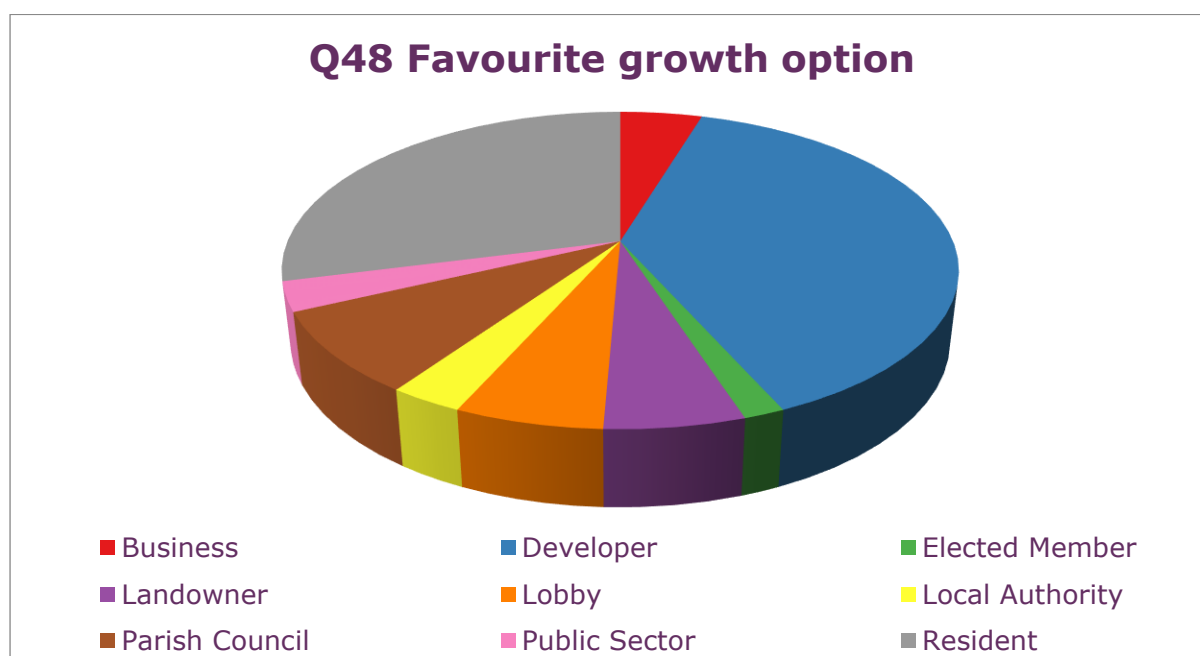
Having looked into the responses where a preference of the options were given, it would appear that the three most popular options were A, B and D. These were the three options that were favoured when combined with the other ones. A rough estimate of these numbers is shown in the table below:

Option	Number
A	26
B	23
C	12
D	20
E	16
F	13
G	16

Sustainability was predominantly the key theme throughout any of the Growth Option preferences, for example where Option G was chosen as the Preferred Option, it was suggested that this Option would be strengthened by focussing development in sustainable locations.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.7%
Developer	38.7%
Elected Member	1.7%
Landowner	5.7%
Lobby	6.0%
Local Authority	3.0%
Parish Council	8.3%
Public Sector	3.0%
Resident	29.0%



Below is a brief overview of the Preferred Growth Option for each of the categories.

### Business

There was not one definitive preferred Option, however more than one respondent expressed the Mix of Growth Options as their preferred Option.

### Local Authority

The majority of responses stated that there was not a preference, however again a Mix of Growth Options appeared to be the most popular.

### Resident

The preferred Options here were Mix of Growth Options and Option A. In some cases where respondents expressed Option A as their preferred Option they also said that this should be combined with one of the other Options to ensure maximum benefit.

### Developer

Option G – Dispersed and Mix of Growth Options was the preferred Option amongst Developers.

### Parish

Option E – Socio Economic and Option F – Main Urban Areas were the two preferred Options amongst respondents.

### SDC member

Growth Option A was the preferred Option.

### Landowner

A mixed approach to the Growth Options was most popular.

### Parish Neighbouring

There was only one respondent and the two Options put forward as preferred were Option E – Socio Economic and Option F – Main Urban Areas.

### Staff

The response here was an observation with no specific Option specified.

### Lobby

Mixed approach to the Options was the preferred approach.

### Public Sector

The main response was no preference to any of the Options, however there were several in favour of a mixed approach.

### WDC Member

Option D – Enterprise Hubs and density were the preferred approaches.

## Q49. What is your least favourite Growth Option and what do you particularly not like about this option?

There were 205 respondents to this question. In terms of the split of respondents by type, 102 (50%) were residents; 43 (21%) were developers; 22 (11%) were Parish Councils; 13 (6%) were lobby groups; 7 (3%) were businesses; 5 (2%) were landowners; 5 (2%) were public sector organisations; 3 (2%) were local authorities; 4 (2%) were elected members; and 1 (1%) was a Stratford-on-Avon District Council officer.

Many respondents identified more than one specific Growth Option as their least favourite. Of the 205 responses, 55 (27%) identified two or more options as their least favourite. This analysis has recorded each selection of a Growth Option individually, rather than counting combinations of options as a single instance. The table below shows the amount/percentage of times a Growth Option was selected by respondents as a least favourite option:

Growth Option/Response	Times Selected	Percentage of Times Selected (%)	Percentage of Respondents Selecting this Option/Response (%)
A – Rail Corridors	14	4.4	6.8
B – Main Bus Corridors	40	12.6	19.5
C – Main Road Corridors	21	6.6	10.2
D – Enterprise Hubs	19	6	9.3
E – Socio Economic	39	12.3	19
F – Main Urban Areas	34	10.7	16.6
G - Dispersed	92	29	44.9
Specific location	19	6	9.3
Not enough information	10	3.2	4.9
Do not have a least favourite	11	3.5	5.4
Do not want one option in isolation	3	1	1.5
Do not like any options	4	1.3	2
Other comment	9	2.8	4.4
Object to question but no comment given	2	0.6	1
Total	317	100	-

As can be seen from this table, **Growth Option G (dispersed) was the least favourite option of respondents**, being chosen by 45% of respondents either on its own or in combination with other options.

In terms of instances where a specific Growth Option was not selected as a least favourite option, 19 respondents instead identified a specific location where they did not want growth to be located. The majority of these responses (13) were in relation to Bishop's Tachbrook. 10 respondents indicated that they did not have sufficient information to indicate their least favourite Growth Option at this stage. 11 respondents stated they did not have any least favourite option. 3 respondents stated that they did not have a least favourite option, except for the use of one option in isolation (as opposed to utilising a combination of Growth Options). 4 respondents indicated they did not like any of the given options.

In terms of which options were the most commonly chosen 'least favourite option' per respondent type, the following observations are made:

### Businesses

Out of the 7 business respondents, Options C (Main Road Corridors), D (Enterprise Hubs) and G (Dispersed) were each selected two times.

### Local Authorities

There was no consensus amongst the three Local Authorities who responded as to their least favourite growth option. Two of the three Local Authorities had general comments on the options rather than selecting a particular least favourite.

### Residents

The dispersed option (Option G) was the least favourite option of residents by a significant margin, followed by Option B (Main Bus Corridors) and Option E (Socio-economic).

### Developers

Option F (Main Urban Areas) followed by Option E (Socio-economic) were the least favourite options of developers.

### Parish Councils

Option G (Dispersed) was the least favourite option of Parish Councils by a significant margin.

### SDC members

Option G (Dispersed) was the least favoured option of the SDC Members who responded.

### Landowners

There was no overall consensus of the least favourite option of landowners, with Option C (Main Road Corridors) being selected twice, and Option F (Main Urban Areas) and Option G (Dispersed) being selected once each.

### Neighbouring Parish Councils

There was only one neighbouring parish council respondent, who identified Options D (Growth Hubs) and G (Dispersed) as their least favourite option.

### Staff

The response here was an observation with no specific Option specified.

## Lobby

Main Bus Corridors (Option B) and Dispersed (Option G) were the most selected options, being selected four times each.

## Public Sector

Option G (Dispersed) was the least preferred option.

## WDC Member

The WDC Member who responded identified Option G (Dispersed) as their least favourite growth option.

## Key Themes from Responses

**In terms of Growth Option G (dispersed),** many respondents who chose this option considered that it would be difficult to provide sufficient infrastructure across a dispersed range of settlements. The potential barriers to accessing services, employment and amenities was also mentioned by many. The climate change implications of pursuing this strategy was also a common concern raised; it was considered that it would result in an increase in car use. Concerns about the impact on the character of smaller settlements and the countryside were also raised.

**Comments in relation to Growth Option B (main bus corridors)** included concerns that bus services were too impractical/infrequent for many people such as commuters to rely on, and that bus routes and provision were too changeable to rely on. Some respondents considered that buses would be unlikely to replace the private car and that there was not enough usage of buses to justify pursuing this strategy. Many objections to pursuing Option B specifically concerned Bishops Tachbrook.

**In respect of Growth Option E (socio-economic),** some respondents cautioned against focussing a greater share of affordable housing in rural settlements, where it was considered that rural housing need is less than larger settlements. It was also suggested that this option in isolation would be unlikely to achieve the economic potential of the Plan area, but could be pursued as an element of the overall strategy. Option E was also selected by many respondents as a least favourite option specifically in relation to Bishop's Tachbrook.

**In terms of Growth Option F (main urban areas),** many respondents selecting this option commented on the growth restraints of the main settlements, particularly the Green Belt. It was considered that a Green Belt review would be necessary before identifying this as a potential option. Some also considered that this option failed to consider the employment and housing needs of the rest of South Warwickshire. It was also raised by some that the existing main settlements risked coalescing and lacked the infrastructure to absorb more development.

**In respect of Growth Option C (main road corridors),** the sustainability of this option was questioned by many who chose this as a least favourite option. In particular, it was raised that it could increase pollution and congestion, affect road safety, reduce use of public transport, and threaten the Council's climate change

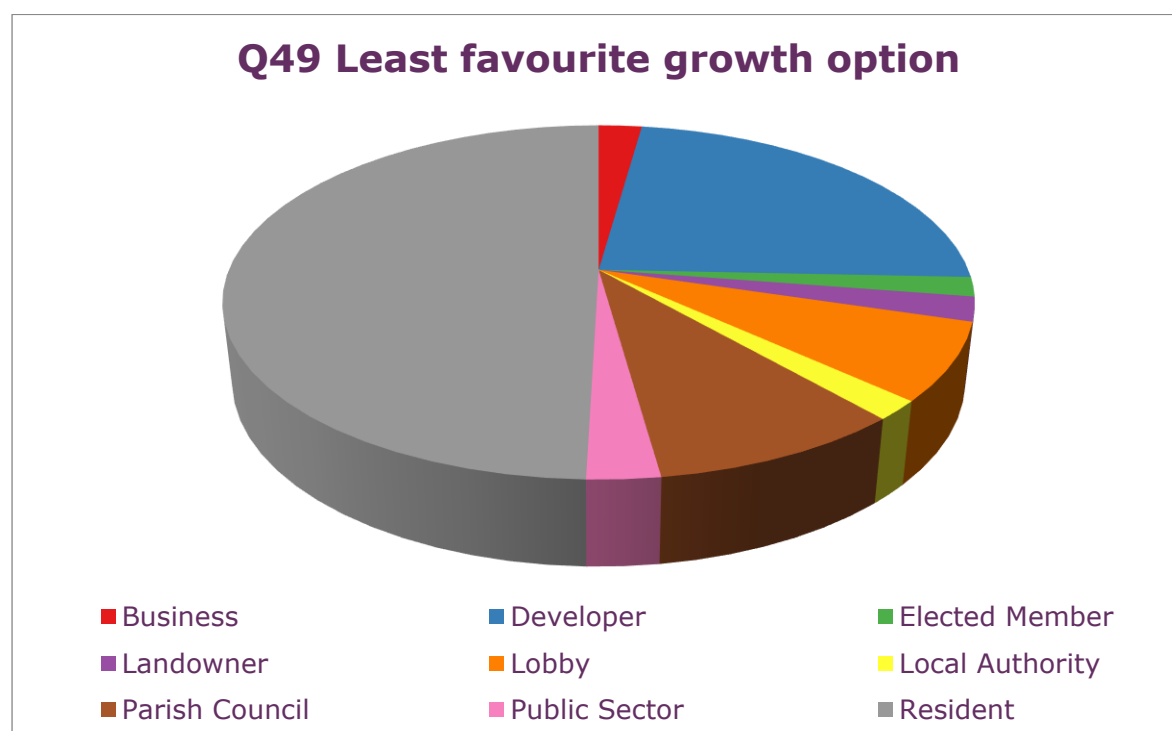
goals. Another concern was the potential for development to be divorced from areas of employment.

**In terms of Growth Option D (enterprise hubs),** some of the concerns raised included that it reflects current ways of working rather than future trends. It was also raised it would result in significant housing growth in areas that do not necessarily have the infrastructure and amenities to support this, e.g. near industrial estates and motorways. It was also questioned whether Highways England would permit development near motorway junctions. Concern was raised over a potential lack of community cohesion, and increased car trips. It was also considered by some that over-reliance on growth hubs could risk the delivery of the Plan's strategy.

**Regarding Growth Option A (rail corridors),** the concerns raised with this option included that it would concentrate growth in the north of the Plan area and mostly around the major urban areas. It was raised that this could restrict the ability to meet the local growth needs of rural centres and villages elsewhere in the Plan area. It was also raised that this would likely require significant allocations in the Green Belt and would be dependent on the capacity of the rail network.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	2.2%
Developer	23.5%
Elected Member	1.8%
Landowner	2.2%
Lobby	7.1%
Local Authority	1.8%
Parish Council	9.3%
Public Sector	2.7%
Resident	49.6%



## Q50. Do you agree that we should be considering densification as part of our Growth Option? If so, where in South Warwickshire should they be located?

### General overview

There were 106 respondents to this question. The recurring themes have been summarised below and where other issues were raised these have been included under a general heading. In general there was support for densification as it supports the reuse of brownfield land and is strongly encouraged by the NPPF. It also provides a number of benefits such as tackling climate change, reducing travel and conversely promotes active travel. However, only a small number of representations felt it should be an Option in its own right with most stating that it should be considered as part of a range of options.

### Densification in isolation

Whilst a large number of respondents felt that densification is an important consideration it was clear that respondents felt it shouldn't be considered in isolation. This was due to a number of reasons including that there would not necessarily be sufficient land available to meet the projected housing targets, the impact that densification can have on the environment and historic setting of towns and villages and that it may not be suitable in rural areas whereby it would be more so in more urban areas. Further, another respondent also suggested that a blanket approach in policy should be avoided as it is more suitable to build to a higher rate of density in urban areas than in the countryside especially given South Warwickshire is rural. It should be in tandem with a policy approach that supports Greenfield and Green Belt sites to deliver homes where there is an identified need.

There should be a recognition that density should be considered on a site by site basis which is influenced by location and the prevailing character of the area.

There was a concern that by going down a high density only approach that this would not take into consideration or provide for a range of housing types such as bungalows, affordable homes etc. Bungalows are an important component in creating balanced overall housing stock and are not necessarily conducive to high density developments.

Density should be considered in the context of other considerations such as an identified need for different types of housing, local market conditions and viability and the availability of infrastructure and services. Densification should not simply be driven by housing numbers.

One of the respondents suggested that reference should be made to 'quality densification' rather than 'densification' as there can be too much densification.

## Transport and Infrastructure

A number of responses highlighted the importance of transport and infrastructure. Higher density developments support more sustainable travel patterns and are in line with the Government's objectives of making the most effective use of land. There was a very strong message again from a number of respondents that any high density developments should reflect good place making principles such as design which incorporates accessibility and connectivity. One respondent stated that higher density developments would only be supported if they were located in well-connected places such as urban areas along main public transport corridors. They should have excellent active travel, public transport infrastructure and digital connectivity and ensure this is provided for from the onset to serve all new residents. Developments should also be mixed use.

One of the responses suggested that small scale changes to development such as in-fill can result in an increased strain on existing infrastructure and is something that should be taken into consideration.

## Design

A number of responses made reference to the importance of design of high density developments in order to maintain the existing character of an area but also to ensure high quality development. One response recommended a design led approach when establishing strategies on density and the importance of ensuring that care is taken when looking at high density development in Conservation Areas and also in the setting of Listed Buildings.

One respondent suggested that homes need sufficient space for a minimum of 2 cars and with access to electric car charging points as well as areas for outdoor activity and therefore, did not agree with the high density approach. Another felt that high density developments provide an opportunity and have benefits for Surface Water Discharge rates by incorporating SUDS into developments. Another key point that was raised was in relation to gardens and green space and the fact that this has become an important part of people's health and well-being particularly since Covid. Therefore, higher density developments should not be at the expense of losing valuable green space, however in response to this point another response suggested that green space could be provided in alternative ways such as through community orchards, parks, gardens and allotments.

## Policy

Policies that encourage the delivery of specialist accommodation for the elderly will facilitate building at higher densities in sustainable locations accordingly.

A number of responses suggested that higher density development should only be used when considering the following and not for large new developments:

- Using vacant sites
- Underused employment land
- More homes in town centres
- Brownfield Land

Policies should optimise the use of land in an area and meet as much of the housing need as possible. They should seek an uplift in the average density of residential development within Town Centres and other locations served by Public Transport unless there are other reasons to do so.

There should be minimum density standards for other parts of the Plan area and there may need to be a range of densities to reflect individual areas. Applications should be refused if they fail to consider the efficient use of land.

## Other

A number of other issues were raised in relation to this topic area and these are summarised below.

One respondent suggested that although school playing fields are necessary not all of them are being optimised. Therefore, is there an opportunity for building housing for rent through crowd funding schemes which would provide housing and revenue for the school.

Another suggested that there is plenty of underused Greenfield land available which is not being used as productively for agriculture.

A couple of responses touched on climate change and the benefit of higher density development in providing opportunities for low carbon energy production and distribution and also the potential to deliver developments that are net zero carbon or close to it.

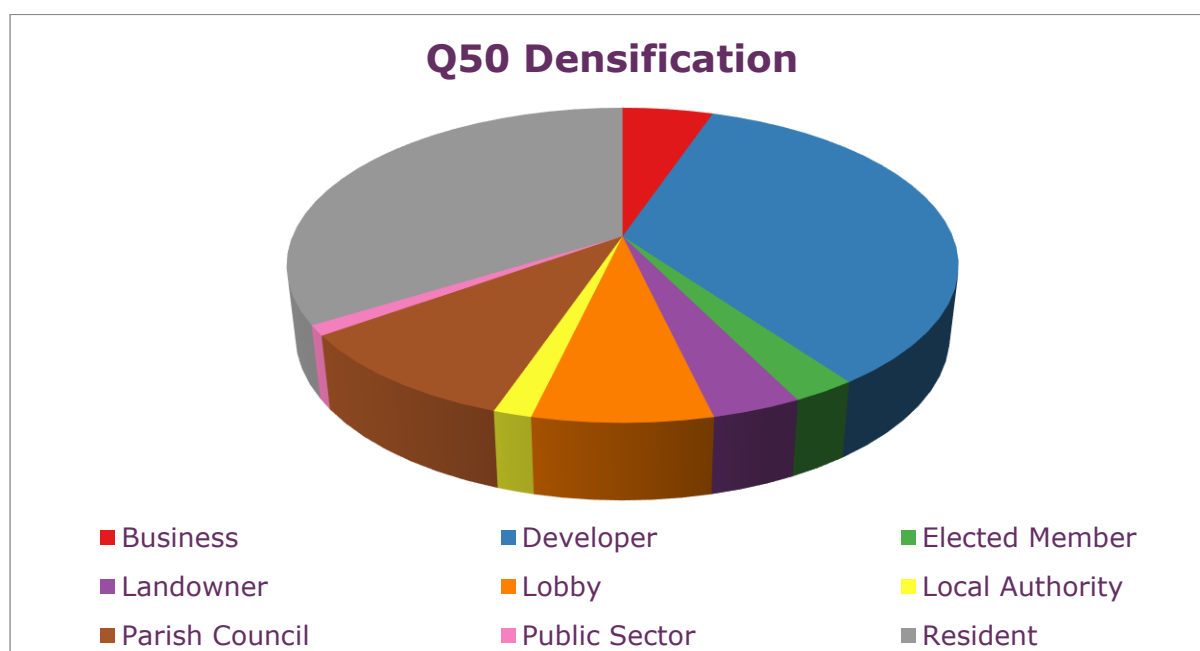
If densification is to be explored as an option, consideration should be given to the practicalities of the requirement being achieved, e.g. fractured land ownership and the feasibility in terms of viability due to the additional challenges associated with urban sites such as remediation. However, this could also have a negligible impact on reducing land required to accommodate the future housing needs of both districts.

The SWLP should identify land able to meet target of homes without the use of windfall sites or densification policy enforcing density standards should be avoided as it would not take into account site specific detail.

There should be a balance of biodiversity within new developments and one respondent felt that high density development should be a policy in its own right.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.2%
Developer	34.9%
Elected Member	2.6%
Landowner	3.6%
Lobby	7.3%
Local Authority	1.6%
Parish Council	9.9%
Public Sector	1.0%
Resident	33.9%



## Q51. Do you agree that we should be considering new settlements as part of our Growth Option? If so, where in South Warwickshire should they be located?

There were 147 respondents to this question, with an additional 19 that appear to be duplicates. The duplicates have been removed for the purpose of this summary. In total, there were 54 comments in support of new settlements, 39 comments against new settlements, and 54 did not provide conclusive answers either way.

The two main themes in arguments in support of new settlements were that these offer better opportunities to ensure that the required infrastructure is provided to support development, and that such a strategy will help to protect existing settlements from excessive development. Eight responses suggest that it will be easier to ensure that transport, educational and/or medical infrastructure are provided at adequate levels in a new settlement. Turning to the second main theme, eight responses expressed hope that an approach incorporating new settlements may provide an opportunity to protect existing settlements from excessive development. Three of these comments related to concerns about infrastructure constraints in existing settlements. Comments also relate more generally to harm caused by development to the well-being of residents (3 responses), to the character of settlements (3 comments) and damage to the local economy by making the area less attractive for tourism (1 response).

Locating a new settlement around existing transport infrastructure was a key principle in a number of the responses. Twelve respondents supported locating new settlements near to existing main roads. Ten expressed a preference for locations adjacent to a railway station or easily connectable to rail. Four respondents suggested locating new settlements near to existing bus networks so that they can easily be connected to this. Two comments also highlighted a need to design new settlements in ways that encourage cycling. Other important principles mentioned by respondents included locating new settlements near existing sources of employment and enterprise hubs (7 comments) and a preference for brownfield land (6 comments). Two comments argued for either zero or minimal encroachment onto green belt, however two other respondents specifically highlighted green belt land for release, and another comment argued for a general release of green belt land on the edge of existing settlements. A list of sites and locations suggested by respondents follows this summary.

The first main theme of responses that are opposed to new settlements, or which caution against an overreliance on new settlements, is that these may be slow and/or unreliable in delivery due to such issues as infrastructure costs, availability of funding streams, and difficulty in assembling land ownerships. While 36 comments fit this broad theme, only eight of these state definitively that new settlements should not be considered at all. The remaining 28 responses highlight the importance of identifying a variety of small and medium sites to complement any new settlements and other large allocations. These smaller sites could come

forward more quickly and help to ensure that any delays in delivering new settlements do not endanger the maintenance of a Five Year Housing Land Supply. Five comments also emphasise the need to ensure that a robust evidence base is identified to justify the choice of a new settlement and demonstrate its viability in order to avoid the risk of the Plan being judged as unsound at Examination on this basis. In terms of infrastructure viability, Severn Trent raise the issue of potential costs in connecting a new settlement to an existing Wastewater Treatment Works or building a new treatment works.

The second main theme of responses that are opposed to/sceptical of new settlements is that incorporating these into the Growth Option could harm the sustainability of existing settlements by constraining development. Fourteen responses relate to this broad theme. Ten of these comments argue that development in and around existing settlements is important to meet housing needs locally to where they arise. Three mention the potential for new development to help fund improvements to local infrastructure, and two comments make specific reference to benefits to the rural economy.

A third theme is notable particularly among respondents who were reluctant to provide a firm answer for or against new settlements. Ten comments express reluctance to commit to supporting or opposing the general principle until specific location(s) have been identified. The need for more information on the intended attributes and purposes of sites was mentioned by five of these comments, and three respondents mentioned the need for site-specific assessments of sustainability and/or environmental impact before they could assess whether a new settlement should be part of the Growth Option.

Finally, four comments highlight general concerns relating to the difficulty of building character, community and a sense of place in new settlements. Three responses raise issues of environmental sustainability in terms of road-building and car-dependency. Two comments make reference to historic “New Towns” having suffered from these issues.

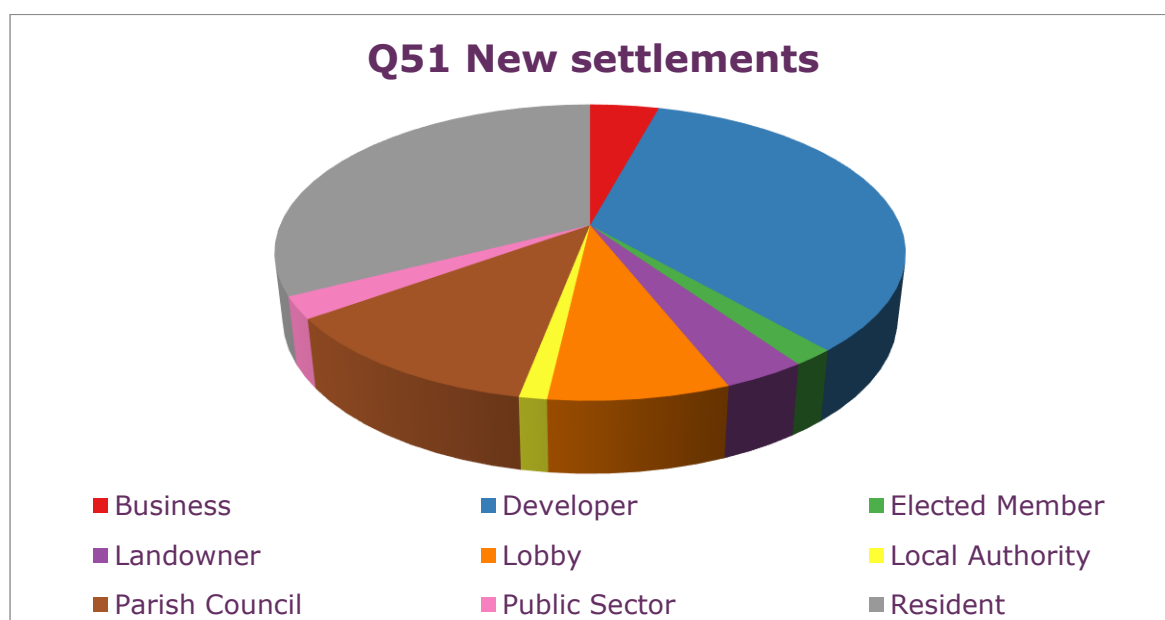
## Specific sites and areas identified by respondents

- Intensification/expansion of Long Marston Airfield allocation (3 comments)
- Intensification/expansion of Gaydon/Lighthorne Heath allocation (3 comments)
- East of Stratford close to A46 and J15 M40 (2 comments)
- South of new District (2 comments)
- North of the new district
- Intensification/expansion of Kings Hill allocation
- North-west of the region near to the M40
- Land between M40 and A3400
- M40 corridor
- Near Chiltern Line
- Triangle south of Warwick by A46 Marroway Turn on Stratford Road/Black Hill and Snitterfield Road
- Fosse Way near Kineton/Wellesbourne junction
- Near Coventry airport investment hub
- Hatton

- Southam Cement Works
- Rumbush Lane, Earlswood
- Rail corridor around Earlswood
- Rail corridor around Warwick Parkway

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	4.2%
Developer	34.3%
Elected Member	1.8%
Landowner	3.6%
Lobby	7.8%
Local Authority	1.2%
Parish Council	12.0%
Public Sector	2.4%
Resident	32.5%



**Q52. Notwithstanding your preferred Growth Option, do you agree that we should explore growth opportunities in Green Belt locations? If not, why not?**

There were 225 respondents to this question.

### Summary of main reasons supporting 54% (121)

1	Opportunity for provision of Affordable Housing
2	Enables consideration of removing existing settlements that are 'washed over' by Green Belt
3	Enables growth to have adequate provision of supporting infrastructure
4	Demand from growth in the economy and population
5	Opportunity to focus on development of sites which do not harm the purposes of the Green Belt
6	Opportunity to consider replacement/addition of land to the Green Belt
7	Opportunity to create sustainable patterns of development
8	Extent and tightness of existing Green Belt boundaries
9	Length of time since Green Belt was established
10	Suggested by the Greater Birmingham & Black Country HMA Strategic Growth Study 2018
11	Opportunity to consider possible creation of new settlement(s)
12	Varied ecological and landscape value of some areas of Green Belt
13	Need a blended approach to new growth
14	Opportunity to focus new growth adjacent to existing settlements in the Green Belt
15	Plan needs to be underpinned by comprehensive Green Belt review in line with NPPF
16	Enables a focussed assessment of the Green Belt on the Green Belt purposes

### Summary of main reasons for not supporting – 31% of responses (70)

1	Setting a precedent
2	Protect it for future generations
3	Does not constitute sustainable development
4	The Green Belt contributes towards biodiversity and climate change aims
5	The role of the Green Belt has not changed since originally designated
6	Focus should be on brownfield and urban development first
7	Contradicts the 4 overarching principles of the SWLP
8	Should be increasing Green Belt instead
9	Would damage the character of the area
10	Impact of HS2 on the Green Belt
11	Impact of Covid pandemic – role in people's health and wellbeing

12	Future potential for National Park designation
13	Loss of Green Belt in neighbouring areas
14	Green Belt helps to maintain density levels in non-Green Belt areas
15	Available land outside of the Green Belt
16	Plan should not be developer led
17	Should not just apply the easy option to addressing development needs
18	Non-Green Belt sites in sustainable locations should be prioritised

## Summary of main other comments – 15% of responses (34)

1	Need to examine all reasonable options before concluding that exceptional circumstances exist to consider releasing Green Belt areas
2	Need to wait until development needs are known
3	Should be limited to infill, brownfield land development and revision of village boundaries where necessary
4	Green Belt concept not working as originally perceived
5	Site Specific Comments
6	Focus on low grade sites
7	Will be determined by land availability as much as strategic objectives

## Main reasons supporting 54% (121)

Issue Number	Summary of Issue
1	<p><b>Opportunity for provision of Affordable Housing</b></p> <p>There should only be some small developments (no more than a dozen homes on each) in villages located in the Green Belt if they were affordable to local people.</p>
2	<p><b>Consider removing existing settlements that are 'washed over' by the Green Belt</b></p> <p>Possible option could be to remove existing settlements currently washed over by the Green Belt from the Green Belt.</p>
3	<p><b>Needs adequate provision of supporting infrastructure</b></p> <p>Should green Belt be used, there must be adequate provision in place for green space, such as large open park areas in the development and to complement the existing residential areas.</p> <p>GB development should be considered where its practical to do so, i.e. where there's a rail station inside the GB and no housing developments.</p> <p>The Plan should consider growth opportunities in the Green Belt where they would offer sustainable development (for example railway connections).</p>

Issue Number	Summary of Issue
	<p>Priority should be given to urban extensions and large-scale development in areas currently supported by strong infrastructure, in particular rail routes.</p> <p>Agree but only if it can be shown that to do so adds net value to communities, current and future. This could be particularly relevant when access to rail networks falls within greenbelt for example.</p> <p>The station sites are a particular example of those that offer the best opportunities for new sustainable developments and are all within the Green Belt.</p> <p>Only in sites close to existing main infrastructure/large road networks/rail stations. North Stratford is a good example but there will be others. Land to the immediate north of Stratford-upon-Avon is located well for the primary road network (A46/M40) inc. bus routes, the rail station at Stratford Parkway and the Park and Ride facility adjacent to the station looks optimum but there may be others to the NE of Stratford, or on the edge of Warwick, Leamington, Kenilworth, Studley, Alcester and Henley in Arden etc. All greenfield sites should have sufficient greenspaces so as to offset carbon emissions.</p>
4	<p><b>Demand from growth in the economy and population</b></p> <p>Given the continued demand for growth in the economy and population it may be inevitable that a single large planned development may inevitable.</p> <p>Due to the quantum of growth required exceptional circumstances now exist to justify altering the boundary of the Green Belt.</p> <p>Given the current unmet need for the South Warwickshire Plan area coupled with that generated by Birmingham and Coventry and the lack of suitable brownfield land, it is likely that GB release will be required.</p> <p>The acuteness of the unmet housing needs within the C&amp;W and GBBC HMAs might reasonably be considered an exceptional circumstance. It is entirely reasonable, and indeed necessary, for a review of the Green Belt to establish whether parcels of land could be released to assist in meeting the SW housing needs and unmet housing needs of others. It is also entirely consistent with the approach required by the NPPF.</p> <p>Piecemeal solutions provide for planning blight on multiple locations and often take years to resolve and are more damaging overall to the existing population. Strong, well-planned options can provide for co-ordinated residential, industrial and transportation solutions over a lasting period.</p>

Issue Number	Summary of Issue
	<p>The demand for housing within the plan area is so great the GB land release will be inevitable.</p> <p>Due to the scale of growth required, all growth options should be explored including locations within the Green Belt. It would seem illogical to proceed with strategic growth recommendations without the core evidence of a Green Belt review for the whole plan area.</p> <p>In order to provide the number of new homes required the Plan will have little choice than to consider sites in the Green Belt.</p> <p>Given the current unmet need for the South Warwickshire Plan area coupled with that generated by Birmingham and Coventry and the lack of suitable brownfield land, it is inevitable that additional land will need to be released from the GB in order to accommodate the required growth.</p> <p>Due to the scale of growth required over the plan period all growth options should be explored - including locations within the Green Belt.</p> <p>The Respondent considers that the unmet housing needs of both the C&amp;W and GBGB HMA might reasonably be considered an exceptional circumstance.</p> <p>NPPF Para 11a states that plans should be sufficiently flexible to adapt to rapid change. It is therefore prudent to identify as early as possible GB land that could potentially be released to accommodate housing/employment land should the position change in the future. It is noted that there may be a requirement to accommodate growth from Coventry and Birmingham, which are located immediately north of the GB.</p> <p>Due to the scale of growth required all growth options should be explored including locations within the Green Belt. It is considered that exceptional circumstances now exist to justify altering the boundary of the Green Belt.</p>
5	<p><b>Opportunity to focus on development of sites which do not harm the purposes of the Green Belt</b></p> <p>Sites which currently lie in the GB could be developed without harming the fundamental principles of retaining the same and each should be assessed on its own merits.</p>

Issue Number	Summary of Issue
6	<p><b>Opportunity to consider replacement/addition of land to the Green Belt</b></p> <p>Should review the relevance of Green Belt land but if proceed to develop on it and the measure has widespread public support then the Plan must reallocate Green Belt status to a piece of land equal to or greater that the land you are taking. Green Belt exists to check development and they work, don't ignore what is a very useful scheme.</p> <p>The Respondent also references the opportunity for the SWLP evidence base to review the replacement or inclusion of more GB land as part of the review if such land when assessed would benefit from its inclusion.</p>
7	<p><b>Opportunity to create sustainable patterns of development</b></p> <p>There is a need to review the Green Belt and to consider potential development sites within it as it has the potential to offer a much more sustainable form of development than in some non-Green Belt locations.</p> <p>It is inevitable that to deliver growth at sustainable and accessible locations there will be a need to explore growth opportunities in the GB, especially related to the rail corridors, at towns and larger villages with a range of facilities/services and on the periphery of Coventry and Redditch.</p> <p>If this is not undertaken development will need to jump the GB which would result in an isolated pattern of rural development.</p> <p>It should not be the starting point that the redrawing of the Green Belt is a last resort. The Plan should not ignore the potential for the release of land from the Green Belt which can overall achieve better performance to the sustainability objectives. Such a situation may occur where a Green Belt has been tightly drawn around settlements large and small preventing the accommodation of growth to meet identified need - which spatially can be accommodated in locations that provide high levels of connectivity to existing facilities and services.</p> <p>There is a need for the Green Belt to be released to promote sustainable patterns of development. Whilst development could be provided elsewhere, there is a concern that the blanket exclusion on development in the GB would be counterproductive to the economic and social wellbeing of those areas within the Green Belt.</p> <p>All growth options which are demonstrably sustainable and meet needs close to where they arise should be explored - including locations within the Green Belt.</p>

Issue Number	Summary of Issue
	<p>In reviewing Green Belt locations sustainable patterns of development should be taken into account.</p> <p>It is inevitable that the Green Belt will feature some of the most sustainable locations for development adjacent to the main towns and more sustainable villages and to choose not to explore these options would lead to unsustainable outcomes. A Green Belt review would result in more sustainable development than jumping the Green Belt to areas beyond.</p> <p>Due to the need to ensure new housing growth is focused in the most sustainable and accessible location, exceptional circumstances now exist to justify altering the boundary of the Green Belt.</p> <p>It is entirely possible for Green Belt land, despite other sources of greenfield land potentially being available, to provide a more sustainable location for development.</p> <p>Essential in order to provide for sustainable development, address climate change and meet ambitions for zero carbon. Many locations within the GB will be the most sustainable in the Plan area. If not then more development will be directed to less sustainable settlements and locations.</p> <p>This will promote sustainable patterns of development where principle settlements are constrained by the designation. National policy specifically states that when drawing up green belt boundaries the need to promote sustainable patterns of development should be taken into account. Directing too much development beyond the most sustainable locations such as the principle settlements could result in unsustainable patterns of development and commuting. It is therefore recommended that a comprehensive GB review around the principle settlements is undertaken to facilitate housing delivery via Sustainable Urban Extensions (SUEs), such an approach will enable South Warwickshire to capitalise on the locational sustainability and benefits of large development.</p> <p>Essential that a GB review is undertaken and it is necessary to help promote development in sustainable locations, whereby development would not impact adversely on openness of the GB and purposes of including land within it. In doing so it would help remove the stifling nature that GB has had on those sustainable settlements throughout the SW area of development on settlements such as Henley historically, making them more viable and sustainable settlements overall.</p> <p>There is a need for the Green Belt to be released to promote sustainable patterns of development. Whilst development could be</p>

Issue Number	Summary of Issue
	<p>provided elsewhere, there is a concern that the blanket exclusion on development in the Green Belt would be counterproductive to the economic and social wellbeing of those areas within the Green Belt.</p> <p>The objectives of GB in the NPPF are still valid however the overriding driver of this plan must be policies that meet the climate change emergency. The key question must be 'Where is the most sustainable place to locate new development?' If the answer is a location or locations in the GB then this provides the overriding justification for amending the GB.</p> <p>It is possible for Green Belt land, despite other sources of greenfield land potentially being available, to provide a more sustainable location for development.</p> <p>In terms of housing numbers, particularly unmet need for Coventry, GB boundaries need to be reviewed to accommodate growth. There are 3 possible scenarios for meeting the future housing needs in Coventry City – 1) Protect the GB 2) Building within the boundary 3) Sustainable Growth. Options 1 and 2 are unrealistic in that the future housing needs of Coventry will not be met. The Respondent supports a sustainable growth strategy which would be in line with the NPPF. Coventry City will need to rely on GB land to the south west of Coventry, within WDC to meet part of their housing needs. The proposed strategy for SW should recognise that land currently in the GB can represent the most sustainable option to accommodate future housing needs.</p> <p>Sites where there is the potential for major investment to deliver significant benefits should be considered, balancing that against the contribution they make to the GB, the extent to which this would be reduced, and also the compensatory improvements that might be offered to the environmental quality and accessibility of remaining GB land. The Respondent cites Coventry Airport as an example, which is a remnant finger of GB surrounded on three sides by existing, proposed and ongoing development. The Airport includes an array of buildings, the runway and other areas of hardstanding; it is of low environmental quality and makes a limited contribution to the GB. Plan in progressing in relation to the delivery of a gigafactory here, which would deliver very considerable benefits including in terms of jobs, investment, support for the automotive industry and a boost to the wider manufacturing sector. It is a very obvious opportunity for growth, sustainably located immediately on the edge of Coventry.</p> <p>Agree that the GB has to be used rather than squeezing more and more houses into a town or village until it becomes unpleasant to live in. Ideally there should be separation between towns and villages to avoid urban sprawl, but there is plenty of GB land that</p>

Issue Number	Summary of Issue
	<p>could be used whilst maintaining district areas. People's quality of life is more important than hanging on to a sacred cow for no good reason.</p> <p>The GB should be made to provide its fair share of extra housing. It is not there for its beauty, although it is a delight. It is capable of taking a large part of the extra homes required without any substantial environmental or landscape damage. And it is far closer to the conurbation and will reduce the impact of commuting to work there.</p> <p>It is important to take the opportunity of the SWLP to re-examine the current GB boundaries and test these against the need to accommodate growth close to where it occurs. For example, the Plan area contains part of the urban fringes of Coventry and indeed the growing Warwick University campus. In addition, the proposed new gigafactory development at Coventry airport is in the Local Plan area and has selected a site in the Breen Belt. Enabling expansion and transport infrastructure to connect into the University of Warwick will be very important to the future success of the university and create growth options within the sub region. If the full benefit of the gigafactory is to be achieved, it seems likely that additional land around the proposed gigafactory will need to be identified to make full use of the economic benefits of this nationally significant investment. This will include supply chain opportunities within the local area which will need space to take advantage of, and make a success of the gigafactory within the bordering authorities (including South Warwickshire). More work needs to be done to recognise the potential supply chain implications of the gigafactory.</p> <p>The main urban areas are generally located in the northern part of the plan area in designated GB or on the edge of the GB such that part of the settlement edge is GB. In addition, to achieve socio-economic aspirations and dispersed growth will require development in the northern areas also in GB. Changes to GB boundaries will be required in order to achieve a sustainable pattern of development and the needs of the area. There has been a decline in recent years in some settlements due to the lack of growth, such as loss of services, and aging population as younger residents move away for higher quality jobs or lower price housing. Some of the small towns and villages in the GB, such as Alcester and Henley, are highly sustainable and have a good level of services and facilities and it will bring opportunities for provision of new services. Many villages have primary schools that need sustaining through development. Furthermore, the areas in the northern parts of the area are well connected by public transport to the larger centres and there are three rail corridors through the area with stations at a number of locations that would provide a focus with growth. It is</p>

Issue Number	Summary of Issue
	<p>necessary to consider a number of spatial distribution options before concluding GB land is needed to provide the optimum strategy and exceptional circumstances exist. Such work is part of this process of plan preparation where strategies are explored and it is essential to find the optimum strategy without being constrained by GB. The current Local Plans focused on areas outside of GB and have used many of the available opportunities for allocations outside of the GB. Further development in the south will extend the settlements away from their core centres leading to an imbalance of growth and extending travel distance back to the centre. Other edges of the settlements should now be considered and this will mean exploring opportunities in GB to achieve the most sustainable pattern of development.</p>
8	<p><b>Extent and tightness of existing Green Belt boundaries</b>  This should be considered because of the tight Green Belt boundary for both districts.</p> <p>The extent of the GB is such that it is reasonable to explore whether there are options for development within it without compromising the essential purpose of the GB.</p>
9	<p><b>Length of time since Green Belt was established</b>  Given the long period of time since the Green Belt was established it is important that the Growth options should distribute growth neutral of their current designation. To do otherwise would distort the growth options any subsequent analysis.</p> <p>It is time to look at redrawing the GB, it cannot stay as it is forever. The options to remove a large part of the GB to accommodate large scale development, with railway line, is probably the best, least disruptive option for growth in the Plan.</p>

Issue Number	Summary of Issue
10	<p><b>Suggested by the Greater Birmingham and Black Country HMA Strategic Growth Study 2018</b></p> <p>A commitment to tackling future shortfalls from its neighbours should be expressly stated in the emerging SWLP, even if elements of those shortfalls are not currently determined. The 2018 Greater Birmingham and Black Country HMA Strategic Growth Study concluded (para. 10.21) that the solution to meeting the housing need shortfall will require a multi-faceted response, including not just maximising urban supply and accelerating the delivery of this, but the identification of further development land and the progression of local Green Belt reviews.</p> <p>Exceptional circumstances exist to justify a review of the GB given the inter-relationship between HMAs across Greater Birmingham and Coventry and Warwickshire. The SGS 2018 assessed the potential for releasing GB around the edges of the WM conurbation and the major towns located within the GBBC HMA area, including land lying on the edge of Redditch but within Stratford-on-Avon District. The study found that land around the eastern edge of Redditch only performed a supporting and not a principal contribution to the GB in this location. The SGS identified 24 areas of search for strategic development, inc. area 18 south east of Redditch, Stratford-on-Avon District, for an urban extension. A GB review is appropriate and should be undertaken at an early stage in the SWLP process. On the basis of available information, GB release is clearly a reasonable option that should be explored as part of the wider strategy based on enabling both local needs and the wider needs from outside the SW area to be addressed in a comprehensive manner.</p>
11	<p><b>Opportunity to consider possible creation of new settlement(s)</b></p> <p>GB must not be nibbled to accommodate peripheral sprawl. That defeats the main purpose of GB. However a large free-standing block might be development as an integrated and sustainable new settlement.</p> <p>Look to create new small towns with associated facilities and if some GB land is included then so be it. Far better than cramming yet more sites into towns and villages there the infrastructure for them simply does not exist.</p> <p>The one exception could be a new town settlement so long as the location and design meets the good practise described in this local Plan</p>
12	<p><b>Varied ecological and landscape value of some areas of Green Belt</b></p> <p>The GB needs a major overhaul. A better consideration would be protection based on ecological value and ecological potential.</p>

Issue Number	Summary of Issue
	<p>It would be OK to relax GB rules if stringent studies show that the area being considered is not ecologically useful and important.</p> <p>It is a common misconception that GB designation is an indication of landscape quality. It is not often land within the GB can be somewhat featureless but its continued protection can divert new development to more intrusive and visually harmful areas. New housing within GB can be amongst the most sustainable locations. If new housing is located outside of the GB then it can promote long-distance commuting.</p> <p>It should be recognised that the GB is of varying environmental quality and there are very significant variations within it in terms of the contributions different parcels make to advancing GB purposes.</p>
13	<p><b>Need a blended approach to new growth</b></p> <p>Adopting an appropriate blend of approaches would ensure that SW meets its housing targets. without releasing significant amounts of GB land for development, SW will likely fail to meet its target housing need of 35,000 homes by 2050.</p> <p>Avoiding the Green Belt entirely is unlikely to be practical or lead to a balanced pattern of development.</p>
14	<p><b>Opportunity to focus new growth adjacent to existing settlements in the Green Belt</b></p> <p>Where Green Belt land is considered to be released, these locations should be suitably sized adjacent to existing settlement boundaries or within strategic locations.</p> <p>The locational benefit in the provision of housing close to Coventry City boundary in order to achieve a sustainable pattern of development justifies a release of land from the Green Belt adjoining existing settlements.</p> <p>Should be reserved for locations adjacent to metropolitan boundaries (e.g. Coventry) where the planning process demonstrates that the over-spill has nowhere else to go.</p> <p>Only those around main town centres of Stratford, Warwick and Leamington</p> <p>Opportunities for redevelopment of the Green Belt may be appropriate, particularly on sites which are outside the settlement boundary but are still within walking distance of a good range of shops, services and amenities.</p> <p>The sustainable GB settlements of Alcester, Henley, Studley and Wooten Wawen should be prioritised within Stratford District for GB release.</p>

Issue Number	Summary of Issue
	<p>Land immediately adjacent to existing settlements should be considered for future growth</p> <p>The SWLP should be actively seeking growth opportunities in sustainable locations and prioritise those that are located within or close to either main towns like Stratford upon Avon or small towns/large villages such as Shipston on Stour.</p> <p>Consideration should be given to whether some growth could be accommodated to the North and West of Warwick and Leamington rather than the countryside to the South and East of the two towns as well as the development of brownfield sites within GB areas.</p> <p>Land immediately adjacent to existing settlements should be considered for future growth</p> <p>Development on the edge of Green Belt inset villages should be explored to help deliver more sustainable communities and reduce the need to travel.</p>
15	<p><b>The Plan needs to be underpinned by a comprehensive Green Belt review in line with the NPPF</b></p> <p>The SWLP should be underpinned by a comprehensive Green Belt review.</p> <p>Required in order to ensure that the Plan is sound</p> <p>Given the existing policy hook of DS20 of the WDC Local Plan, it would be appropriate to commission a focussed GB review within the area defined by Policy DS20.</p> <p>A Green Belt review should be included in the list of evidence for the Plan. Given the scale of growth required it would not be appropriate to proceed with strategic growth recommendations without the evidence of a Green Belt review.</p> <p>Undertaking a GB review is not a short term exercise and is in line with the NPPF. The SWLP intention to plan longer term to 2050 aligns with para 136 that GB reviews should support the long term development requirements. It also emphasises the importance of planning correctly over the long term to remove GB constraints where the tests in the NPPF apply.</p> <p>Agree that growth options in the Green Belt should be explored. In doing so, this may rule out potential locations in the Green Belt that are not suitable for development because of the impact on the Green Belt. This would then reinforce the need to look at suitable alternative locations for development outside of the Green Belt.</p> <p>Given the 26 year plan period for the new Plan it is right that potential for Green Belt development should be explored on this</p>

Issue Number	Summary of Issue
	<p>basis. It is necessary to carry out or update a review of the Green Belt in order to support the exploration of Green Belt locations.</p> <p>Both authorities need to commit to a Green Belt review to ensure that difficult choices are confronted and, where location in the Green Belt are the right option to accommodate some of the growth needed, we are confident that exceptional circumstances will again be shown to justify further Green Belt release.</p> <p>A Green Belt boundary review is required to ensure that a strategic growth option can be found sound, based on an up to date evidence base which has considered all alternative option.</p> <p>To ensure that Councils are able to pursue a sound spatial development strategy a review of the Green Belt must be undertaken.</p> <p>The NPPF requires exceptional circumstances to be demonstrated and this should include evidence of the examination of all other reasonable options for meeting an identified need for development. Use of pdl and density will be key considerations</p> <p>To do otherwise would be to prematurely and unreasonably close off significant and sustainable growth option or options, resulting in a significant risk that the Plan has not been through detailed and robust SA.</p> <p>Whilst housing and economic need are exceptional circumstances, it is necessary to consider a number of spatial distribution options before concluding GB land is needed to provide the optimum strategy and exceptional circumstances exist. Such work is part of this process of plan preparation where strategies are explored and it is essential to find the optimum strategy without being constrained by Green Belt. The current Local Plans focused on areas outside of GB and have used up many of the available opportunities for allocation outside GB. Other edges of the settlements should now be considered and this will mean exploring opportunities in the GB to achieve the most sustainable pattern of development.</p> <p>Given that the GB is tightly drawn around existing settlements and washes over others a GB boundary review is necessary, to ensure that Councils are able to pursue a sound spatial development strategy a review of the Green Belt must be undertaken.</p> <p>Growth opportunities within the GB should be explored where fully evidence and justified in line with the NPPF.</p> <p>Growth opportunities within the Green Belt can be explored but only within the parameters for exceptions to protection as listed in the NPPF</p>

Issue Number	Summary of Issue
	<p>Exploration is completely valid as there shouldn't be any sacred cows, but it shouldn't just be the lazy option.</p> <p>To achieve sustainable development, a policy-off approach will be required for the assessment of the growth options to be supplemented by a GB review to identify suitable sites which should be considered. This will be an important part of the evidence base for the Local Plan to demonstrate that all alternative options have been considered.</p>
17	<p><b>Enables a focussed assessment of the Green Belt on the Green Belt purposes</b></p> <p>The evidence base should consider which parts of the GB can be released while incurring the least harm to GB purposes, including the avoidance of coalescence.</p> <p>Growth opportunities in the GB could be explored without compromising the purpose of the GB.</p> <p>The SWLP will have to be satisfied that in releasing land the land which is released does not compromise the 5 purposes of including land in the GB.</p> <p>The GB is valuable in preventing Birmingham from absorbing its neighbouring towns. However, its effect on constraining growth in Warwick District in particular is pernicious. It can have no effect on Birmingham or Coventry whether Leamington and Warwick expand to the north or to the south. Nor need other thoughtful areas of development in the SW part of the GB reduces its ability to achieve its intended purposes. Support development in the GB which does not threaten its purpose.</p> <p>Sites where there is the potential for major investment to deliver significant benefits should be considered, balancing that against the contribution they make to the GB, the extent to which this would be reduced, and also the compensatory improvements that might be offered to the environmental quality and accessibility of the remaining GB.</p>

## Main reasons for not supporting – 31% of responses (70)

Issue Number	Summary of Issue
1	<p><b>Setting a precedent</b>  Once the Green Belt boundaries start to be changed it would create a precedent which would then become the norm and would gradually erode its effectiveness. If we allow some development now it will be harder to refuse it in the future.</p> <p>The Green Belt should be protected at all costs and is sacrosanct. The SWLP must send out an unequivocal message to this effect.</p>
2	<p><b>Protect it for future generations</b>  What we do now will affect future generations and they should be able to enjoy the beautiful countryside, flourishing nature, clean air and inherit viable plans to avert climate disaster.</p> <p>If we simply degrade the Green Belt and open countryside decade on decade, then there will come a time when much of lowland England will have been urbanised. Once the Green Belt is built on it is lost forever.</p>
3	<p><b>Does not constitute sustainable development</b>  Building further and further out of towns creates traffic by increased car use, pollution, decreases safety, consumes land that is better put to food products (rather than buying in from abroad or shifting vast quantities of food around the country by road.) Do not consider agricultural land that is graded 1, 2 and 3.</p> <p>It will lead to more traffic, more people and less public open space.</p> <p>The Plan should not reduce the access to the countryside for those living in urban situations.</p> <p>Unrelenting expansion of our towns into the surrounding countryside causes the loss of nearby green space for recreation.</p> <p>Development of the Green Belt should have no place in any sustainable plan and the focus must be on regenerating and increasing the efficiency of previously developed land. The current approach to development, being wholly reliant on constructing new buildings is completely unsustainable.</p> <p>There will be a risk of ruining rural locations by over development. No more countryside should be consumed for housing. There are other options.</p> <p>The limits to a town's size that a Green Belt provides must be respected and when these limits are reached new developments considered. It is a key part of ensuring that urban sprawl does not happen within South Warwickshire.</p>

Issue Number	Summary of Issue
4	<p><b>The Green Belt contributes towards biodiversity and climate change aims</b></p> <p>Green Belt land often includes significant local biodiversity and historical sites, but it also captures carbon and provides space for water to prevent flooding.</p> <p>Not only is it our duty but also scientific evidence is clear that the safeguarding of the natural environment and the balancing of the ecosystems is one of the most important challenges for society to embrace.</p> <p>Green Belt provides the natural barriers needed between communities and for nature to continue to thrive. Green Belts provide buffers between green spaces and the built form for biodiversity and important wildlife in the area. Further degrading the Green Belt would cause biodiversity loss and impact protected species and important habitats across South Warwickshire.</p> <p>One of the values of green land is as a sink for carbon and a positive contributor in tackling the climate emergency. To build on environmentally valuable land, in light of the climate emergency will contribute to the problem not address it. Even carbon offsetting is unlikely to justify such development once the true carbon cost of new buildings and their carbon footprint over their lifetime.</p> <p>There are too many uncertainties going forward when it comes to the use of our natural resources, future development should seek to adopt new ways to meet the needs of supply and demand in the local area without undermining current efforts to conserve and protect the limited natural environment remaining with the Green Belt.</p> <p>Too much emphasis in the Plan to growth and development and too little on adaptation, conservation and lower consumption of both energy and goods. Do we really need so much development that we have to invade the Green Belt?</p> <p>The only exception should be temporary permissions for renewable energy such as solar farms.</p>
5	<p><b>The role of the Green Belt has not changed since originally designated</b></p> <p>The reasons why the Green Belt was put in place originally have not changed and should not be ignored or circumvented. The original objectives were right and clear and it is more urgent to stick to them than ever. It has served us well for decades, it is there for a very good reason and must not be disturbed.</p>

Issue Number	Summary of Issue
	<p>Re-designating them would fundamentally undermine why they were created in the first place and their purpose.</p> <p>The importance of green Belt is where the land is strategically – and not whether it is green enough.</p> <p>The Green Belt policy has been extremely effective and beneficial since it was introduced. All five of its aims are vital to maintaining the character of rural communities and country towns and ensuring a well-planned, attractive environment that promotes the wellbeing of its residents.</p> <p>It is not responsible to give up Green Belt for future development as it was established for the specific purpose of stopping built up conurbations from merging into large urban areas without any countryside or green spaces that residents can use for recreational and educational purposes.</p> <p>The green belt area south of Coventry should not be disturbed because of its important function.</p>
6	<p><b>Focus should be on brownfield and urban development first</b>  It should be the very last option pursued after brownfield and urban sites. We should look to areas of brownfield sites instead, whether within town centres or in industrial areas, for regeneration.  We should be looking to repurpose empty abandoned properties as a priority, with the exploration of brownfield sites both with Warwickshire and in adjacent counties as an absolute priority.</p> <p>It will lead to the neglect of other areas outside of the Green Belt that need redevelopment.</p> <p>What is needed is urban regeneration and making these areas decent places to live.</p>
7	<p><b>Contradicts the 4 overarching principles of the SWLP</b>  Building in the Green Belt would break all four stated principles of the SWLP – tackling climate change, promoting wellbeing, improving connectivity and increasing biodiversity</p>
8	<p><b>Should be increasing Green Belt instead</b>  We should be doing the opposite and adding to the Green Belt if practicable. There is not enough Green Belt in South Warwickshire.</p> <p>The area 'S1' in the WDC Local Plan should be returned to the GB (Area to the southwest of Westwood Heath Road). The area between Westwood Heath Road and the HS2 track line should be retained as GB.</p>

Issue Number	Summary of Issue
9	<p><b>Would damage the character of the area</b>  Warwickshire is in part defined by its green and open spaces and we risk irreparable damage and a permanent change to the feel and appeal of our county if the Green Belt is not protected.</p> <p>The character of the area should remain essentially rural – an environment more attractive to tourists and essential to increasing both food production and leisure facilities.</p> <p>The Green Belt is a recognition of the rural nature of much of Warwickshire.</p> <p>Separation of town and villages is critical in keeping the identity of Warwickshire.</p> <p>The Green Belt is one of Warwickshire’s most significant assets and the Plan needs to place much more importance on how valuable an asset the Green Belt is. It should be a source of considerable pride that the SWLP should be responsible for ensuring that it will have a crucial role in preventing the creation of an even larger West Midlands conurbation.</p> <p>The SWLP should step up to the role of custodians and protectors of all that is still wonderful about South Warwickshire. Conserve, protect, defend, resist.</p>
10	<p><b>Impact of HS2 on the Green Belt</b>  Significant amounts of Green belt land is already being lost to HS2, including a lot of biodiversity value. The presence of this line should not be used as an excuse for further creeping loss of Green Belt in this area.</p> <p>Because of HS2, certain areas in the gap between Coventry and Kenilworth have become very narrow and special consideration should be directed to all the infrastructure proposals (WCC A452 Phase 2) and development pressures to decide how to proceed.</p>
11	<p><b>Impact of Covid pandemic – role in people’s health and wellbeing</b>  During the pandemic the Green Belt has been used for people to enjoy whilst walking.</p> <p>The pandemic has shown us that it is more obvious and important to keep the Green Belt areas – for nature, and the benefits to people’s mental and physical health by being able to go for a walk in an open space.</p> <p>Threatening this land at the present time seems somewhat out of touch.</p>

Issue Number	Summary of Issue
	The Green Belt is important for the wellbeing of residents, it provides an area for breathing. It has a demonstrable value in enhancing people’s health and wellbeing.
12	<p><b>Future potential for National Park designation</b></p> <p>The Government is looking to create at least one more National Park in England and this could be the Cotswolds. More of South Warwickshire’s land could be included within that.</p>
13	<p><b>Loss of Green Belt in neighbouring areas</b></p> <p>SDC has already ceded part of its Green Belt to Bromsgrove and Redditch and Solihull has destroyed almost all of its Green Belt by building on it. This only leaves a small and very pressurised area in Warwickshire that is already being used by those from the larger conurbations for these recreational and educational purposes.</p> <p>With neighbouring authorities like Redditch and Solihull happy to build on their green Belt it is all the more important that South Warwickshire preserves and defends the crucial areas it hopes to inherit.</p> <p>Adjoining authorities along the northern border of Stratford District like Redditch and Solihull are eating into the Green Belt in their Local Plans. This means that if the Green Belt is to be maintained then there is no scope for relaxation in south Warwickshire. It is all the more important that South Warwickshire preserves and defends the crucial areas it hopes to inherit.</p> <p>The Plan needs to place much more importance on what can be done to avoid encroachment by Redditch, Birmingham, Solihull and Coventry.</p>
14	<p><b>Green Belt helps to maintain density levels in non-Green Belt areas</b></p> <p>The Green Belt is one of the key restrictions that has maintained density levels, and prevented the level of car-dependent urban sprawl afflicting countries like the US and Australia. Undermining it seems to contradict the interest in maintaining or improving existing densities.</p> <p>Denser settlements should be built instead.</p>
15	<p><b>Available land outside of the Green Belt</b></p> <p>There are plenty of opportunities for housing and commercial development in areas to the south of the Green Belt so there is no need to consider building on the Green Belt up to 2050.</p>
16	<p><b>Plan should not be developer led</b></p> <p>Both residents and the government want to retain the Green Belt, it is developers who wish to see it gone.</p>

Issue Number	Summary of Issue
17	<p><b>Should not just apply the easy option to addressing development needs</b></p> <p>We should not relax the controls simply because it makes it easier for us to address the housing challenge.</p> <p>Should have a shift towards multi-generational use of houses by families instead</p> <p>Lots of housing is being built already which the infrastructure cannot support.</p> <p>Homes built in rural areas does not bring long term or local jobs.</p> <p>Major growth in employment and new or refurbished/replaced housing should be directed to areas desperately needing them, many in northern parts of England.</p> <p>We must avoid continued urban sprawl which leads to poor building practices, areas devoid of character and ill-defined boundaries between areas of character. Such development leads to poor air quality and impeded views and appreciation of the natural environment.</p> <p>Where there has already been urban creep into the Green Belt, or where new infrastructure has already or is proposed to be built on virgin land of Green Belt, then this should not be permitted within the time horizons of the Plan.</p> <p>Removing villages from the Green Belt may lead to further inappropriate development (large extensions etc) that has previously been constrained by Green Belt rules and practices.</p> <p>Conflating the Green Belt with 'areas inset from the Green Belt' or 'washed over' by it i.e. with towns, confuses the issue. Considerations against building on the Green Belt should not apply in the same way to building within existing urban perimeters.</p>
18	<p><b>Non-Green Belt sites in sustainable locations should be prioritised</b></p> <p>Growth options in the Green Belt should be explored but non-Green Belt sites in sustainable locations should be prioritised, in accordance with advice contained in the NPPF.</p> <p>In order to address the shortfall of strategic employment sites in particular, the release of Green Belt will be inevitable, because of the location of the motorway and A road network.</p>

Issue Number	Summary of Issue
	<p>There are sustainable settlements outside of the Green Belt which should be first considered for growth prior to the release of any GB land.</p> <p>Non-GB sites in sustainable locations should be prioritised in accordance with advice in the NPPF.</p> <p>Suitable and sustainable non-GB sites should be preferred for allocation before GB land. The NPPF advises that before concluding that exceptional circumstances exist to justify changes to GB boundary, it needs to be demonstrated that it has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it is necessary to demonstrate that all other reasonable options for meeting identified development needs have been fully examined.</p>

## Main other comments 15% (34)

Issue Number	Summary of Issue
1	<p><b>Need to examine all reasonable options before concluding that exceptional circumstances exist to consider releasing Green Belt areas</b></p> <p>The approach should be in line with the NPPF in terms of seeking to examine all other reasonable options to meet needs before concluding that exceptional circumstances exist. The ability of non-Green Belt growth options to deliver sustainable growth should be fully explored before Green Belt site options are considered. This needs to be demonstrated by the supported evidence base to the Plan.</p> <p>Ensure the Plan approach is in line with the NPPF and fully explores all non Green Belt options before green belt sites are considered.</p> <p>Brownfield sites within the green belt should be explored. Otherwise the Green Belt should only be built on where all other options have been exhausted and the development is absolutely necessary.</p> <p>If such options are to be considered the Plan will need to demonstrate that exceptional circumstances exist and consider alternative options when allocating land to meet their housing need.</p> <p>No objection to undertaking a Green Belt release, however all reasonable non-Green Belt sites should be first considered. It is</p>

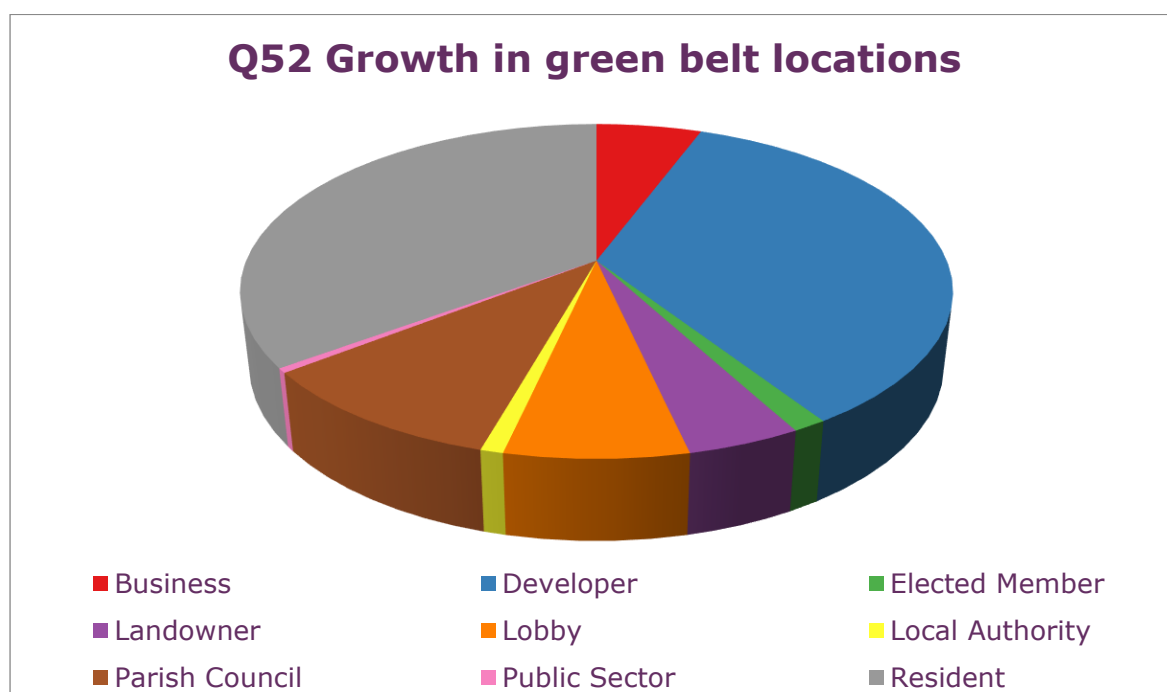
Issue Number	Summary of Issue
	<p>recommended that the development of non-Green Belt sites are considered for their inclusion as a potential allocation before considering any release of land from the Green Belt.</p> <p>There are a number of sustainable settlements throughout the district which are outside of the Green Belt. Growth to areas outside of the Green Belt should be prioritised before considering release of land from the Green Belt to ensure that all other reasonable options have been explored.</p> <p>Exceptional circumstances will need to be demonstrated by the supporting evidence base to the draft plan. Whilst it is recognised that exceptional circumstances for GB release can be justified in the context of securing the most sustainable development options the ability of non-GB growth options to deliver sustainable growth should be fully explored before GB site options are considered.</p> <p>Given the need to demonstrate that exceptional circumstances exist, it is not possible at this stage to conclude that the SWLP should explore growth opportunities in the GB. The only exception is land south of Coventry which is subject to Policy DS20 of the Warwick District Plan. Given this existing policy hook it would be appropriate to commission a focussed GB review within the area defined by policy DS20 from the outset of the SWLP process.</p> <p>Whilst some GB release may be justifiable, it will be incumbent upon the Councils to demonstrate that comparable non-GB sites have been exhausted. It would also be necessary for the Council to demonstrate exceptional circumstances as to justify the release of GB land. As a rule, GB sites must be viewed as less preferable for development as non-GB sites and the Council would need very particular justification for releasing GB when suitable non-GB sites exist.</p> <p>Should only be considered in exceptional circumstances to accommodate a large scale new development for example next to a railway line for a new settlement away from existing towns. The GB is an important buffer between towns and as has been seen during the last year it is important that people can readily access large areas of green space within walking distance of their home for their health and mental wellbeing.</p>
2	<p><b>Need to wait until development needs are known</b> Once the development quantum is known the NPPF requirements should be considered.</p>
3	<p><b>Should be limited to infill, brownfield land development and revision of village boundaries where necessary</b></p>

Issue Number	Summary of Issue
	<p>Growth options in the Green Belt should be limited to the development of infill sites and the revision of village boundaries to take account of the existing built environment.</p> <p>Would prefer brownfield sites to be used in these areas, a very delicate balance which needs to be assessed individually and taking in the views of local residents and the impact on them is a priority. Any loss needs to be replaced.</p>
4	<p><b>Green Belt concept not working as originally perceived</b></p> <p>The concept of the greenbelt to constrain the sprawl of urban development introduced early in the life of the planning system is a concept that is now not operating as originally perceived. Development has to skip over the green belt doughnut so the urban sprawl is occurring in another pattern. South Warwickshire is a doubtful recipient of this demand.</p>
5	<p><b>Site Specific Comments</b></p> <p>Land east of Bockendon Road towards the university has been removed from the GB and safeguarded for potential development of a further 725 homes in the next plan period. It is Burton Green Parish Council's view that this safeguarded land should now be returned to the GB. Inclusion of sites either side of Bockendon Road south of Westwood Heath Road in the WDC Local Plan, with the land take required by the HS2 project, has also reduced very significantly the area of designated GB between Coventry and Burton Green. And Warwick University's proposed southward expansion, including a football stadium, plus the possibility of the A46 strategic link road would leave precious little GB at all to the east of Burton Green.</p> <p>GB was removed from Coventry - Westwood Heath and King's Hill to incorporate the housing needs for Coventry. These housing forecasts have now proved to be inflated. Whilst Coventry is refusing to review their Local Plan, investigations not being undertaken by ONS will inevitably show the housing numbers to be grossly inflated. Take time to review the statistics to not make the mistakes Coventry City Council are forcing upon their near neighbours.</p> <p>Request that the piece of land south of the university (southern parts of land parcel C19) be returned to the GB, and that the two parcels of land near Cromwell Road be returned to the GB. The GB in the area between Coventry and Kenilworth has been severely eroded by HS2, and it is imperative that some balance be maintained by taking out some of the proposed developments otherwise Coventry and Kenilworth will become joined.</p> <p>Land at Kings Hill and Westwood Heath, taken out of the GB in the 2017 Local Plan, is now not needed for housing, and those areas of</p>

Issue Number	Summary of Issue
	<p>former GB on which no permissions have been granted should be returned to the Green Belt.</p> <p>The GB in Milverton and Blackdown Parish area constitutes good quality agricultural land which it would be wasteful if used for other purposes and it is most important to maintain the separation of towns, villages and hamlets rather than to allow them to be joined up to form a conurbation, thus destroying a valuable 'green lung' for the residents of northern Leamington Spa, which has lately proved invaluable especially during the covid lockdown.</p> <p>The GB to the north of Leamington Spa is of great benefit to residents.</p> <p>Under Policy DS10 of the WDC Local Plan, land has been removed from the GB, allocated and safeguarded to meet future development needs. This area has also been impacted by HS2 and by the proposed alignment of the A46 Strategic Link Road. The Respondent is committed to supporting sustainable growth in this location and, whilst it is not proposing any change to the GB boundary, will work collaboratively with the local authorities and other partners to plan more strategically for the area.</p> <p>Some areas of Green Belt are already under great threat from HS2 and southerly extension of Coventry into King's Hill, the University and Coventry Gateway. Low grade rural sites which are already desecrated by earlier development should be considered.</p>
6	<p><b>Focus on low grade sites</b></p> <p>Consider low grade rural sites which are already desecrated by earlier development.</p>
7	<p><b>Will be determined by land availability as much as strategic objectives</b></p> <p>Wary of the potential of widespread encroachment into the GB. Whilst this may have to be considered on a case by case basis, wherever there are alternatives these should be prioritised. Development on this scale will be determined by land availability at least as much as by strategic objectives and therefore minor encroachment into GB may be preferable to dispersed development as a least worst option.</p> <p>The results of the Call for Sites will demonstrate whether the Councils will need to look at GB locations to accommodate growth. One of the key criterion upon which sites should be assessed is their impact on the Green Belt. Those which do not impact on the Green Belt should be considered favourably when measured against those which do.</p>

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	5.7%
Developer	35.1%
Elected Member	1.3%
Landowner	4.4%
Lobby	7.0%
Local Authority	0.9%
Parish Council	10.1%
Public Sector	0.4%
Resident	35.1%



## Q53. Are there any other options or approaches for meeting our development needs within South Warwickshire that we should consider? Please give details.

### General overview

There were 93 respondents to this question. Overall it was a fairly mixed response with a range of alternative options suggested and a number of responses suggesting that a one Option approach is not the way to go and that there should be a combination of options in order to meet the requirements for South Warwickshire over the plan period. Where there were a number of responses to a particular common theme these have been identified below and where there were individual points raised they have been noted as bullet points under a more general heading.

### Variety of Options

A number of responses stated that a combination of options was required in order for the needs of South Warwickshire to be met rather than one standalone option. There should be a focus on the social, economic and natural environment as well as the built environment recognising that one option won't address all of these. Further, another respondent suggested a mix of growth options looking at the integration of housing, transport and employment across the wider region should be considered. The range of options should also at the outset look at zero net population growth. A couple of responses made specific reference to a combination of Option A, D and C and also raised the importance of proposed sites being close to the rail network. There was one respondent who felt that if the existing options were to be carefully constructed against anticipated levels of growth that other options would not then be necessary.

One of the responses raised a concern that the current options do not fully reflect the range of alternative links available such as walking and cycling and that consideration should be given to options that align with these existing routes and have the potential to enhance existing or new walking/cycling connections.

### Vacant properties and existing sites and land

A number of comments touched on the need to be more proactive in looking at opportunities for utilising vacant properties and developments. For example, military facilities at Kineton may not be used and qualify as brownfield land. It was suggested that the best areas for development are brownfield sites, areas of old housing that are neglected, sub-standard and too expensive to improve, abandoned shops, garages, industrial land. Another respondent suggested that there should be a need to look at the redevelopment of Town Centres and the High Street perhaps by converting them to villages.

Sustainable Travel was raised in a number of responses and that there should be a focus on large towns that link to sustainable transport options including the use

of very light rail. This also was raised in another response in terms of looking at public transport opportunities and infrastructure currently in place, for example, the branch line to MOD Kineton which could present an opportunity for connecting the likes of the new Gaydon/Lighthorne Heath new town to destinations.

A flexible and balanced approach to planning policy is required with areas of land which is located on the edge of existing rural settlement boundaries and would form sustainable sites for housing.

## Other

A number of other suggestions were put forward but mainly by individuals. These are summarised below as bullet points.

- Growth to outside of the Green Belt should be prioritised before consideration is given to the release of land from the Green Belt to ensure that all other reasonable options have been considered.
- New Towns/villages are not a good thing except in locations such as the Long Marston Airfield/Military sites.
- Gypsy and Traveller Accommodation has not been addressed within the document and should be.
- Should protect what we have rather than create new homes.
- Should avoid modern housing development.
- Should encourage high rise in town centres.
- Revert back to planning models from the 1960s and 1970s.
- More provision for affordable homes in rural locations.
- Canals and towpaths should be considered as networks and development opportunities particularly in terms of carbon neutral travel.
- There should be a stakeholder session specifically on this topic.
- There shouldn't be any development in the Green Belt at all.
- Consideration of New Towns in the East and South of Stratford should be considered.
- Residents' gardens should not be classed as Green Belt.
- Consideration should be given to neighbouring Development Plans in the Cotswolds and Wychavon Districts.
- The results of the HEDNA may change the current situation.
- Need to lead the way in South Warwickshire and find ways to avert the climate emergency.
- Allocations made for older people accommodation should be a specific policy related to the provision of specialist housing for older people, this should provide detailed targets as well as site specific criteria upon which proposals to meet older person's needs will be supported by the council.
- Need to look at the Covid 19 Recovery Plan due to the change in nature of the business since the pandemic.
- Should look at dispersal – sites that abut existing or allocated sites in adjoining authorities that can come forward. Expanding existing settlements that don't fall solely within the Plan Area as cross-boundary developments.

## Further Analysis: Respondent Type Split

Respondent Type	Percentage
Business	1.0%
Developer	24.7%
Elected Member	2.1%
Landowner	4.1%
Lobby	12.4%
Local Authority	2.1%
Parish Council	15.5%
Public Sector	1.0%
Resident	37.1%

