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FAO Mr Dave Barber

27th June 2014

Dear Mr Barber,

RE: Warwick District Council, Draft Local Plan Consultation

I refer to your Draft Local Plan Consultation, which closes on today's date.

As you are no doubt aware the County Council has made a number of responses regarding the emerging Local Plan over a long period of time. I thought it would be useful to pull together some of the major responses, particularly those which will require major supporting infrastructure, to cater for the developments coming forward.

Included in the text of this letter are comments relating to Highways, Waste, Libraries, Planning Policy, Archeology and Ecology.

Attached to this letter are response forms relating to Paragraph 1.42 of the Draft Local Plan, Policy DS12 and Policy TR5.

Also please find attached the response of Public Health which is in the form of the Health Impact Assessment carried out for the Draft Plan.

Highways

Warwickshire County Council (WCC) and Warwick District Council (WDC) have worked together over a number of years to undertake testing of the proposed Warwick Core Strategy (CS) allocations. The final submission, April 2014, was the Strategic Transport Assessment Phase 4.

This report outlines the impacts of a revised approach to the allocation of growth, referred to as the 'WDC Revised Development Approach' (WDC RDA), on the Warwick and Leamington area road network.

The objectives of this fourth phase of work were as follows:

- To assess the potential impacts of the RDA on the Warwick and Leamington area road network.
- To refine the proposed Local Plan transport scheme assumptions in light of the impacts of the RDA and identify, where appropriate, areas of change compared to the previously proposed phase 3 mitigation strategy.
- To undertake a focussed assessment within the Kenilworth and Stoneleigh Wide Area PARAMICS model to assess whether the RDA is likely to trigger further mitigation within that area.
- To assess the potential impacts of adopting alternative layouts for some of the originally proposed schemes within the area of Warwick Town Centre.

The first stage of the assessment was undertaken within the Warwick and Leamington Area Wide model (WLWA). Once the RDA demands had been assigned, and the mitigation measures refined, the following conclusions were drawn:

- Inclusion of the Revised Allocation strategy demands will likely result in an increase in the average network journey times and a reduction in average speeds that vehicles are able to achieve within the 2028 Revised Allocation network in comparison to the 2028 Reference Case conditions. These impacts occur in spite of the adoption of a proposed mitigation strategy.
- Similar impacts are observed within the 2028 WLWA RDA + Revised Town Centre Approach (RTC) scenario albeit there is a further increase in the journey times experienced on the network as a result of these proposals.
- Analysis of the queuing outputs indicates that the 2028 WLWA + RDA network suffers less overall increases in queue lengths than the 2028 WLWA RDA + RTC network.
- The 2028 WLWA RDA model network still suffers a number of instances of queuing levels increasing by 30 to 50 vehicles indicating that the network would benefit from further optimisation of mitigation measures and, potentially, additional schemes being included.
- Queue impacts identified within the 2028 WLWA RDA + RTC network indicates that there may be strategic impacts incurred in areas which provide alternative routes to the routes through the town centre, such as the A46 towards Longbridge Island, A452 between M40 and Leamington and Emscote Road Corridor.
- Analysis of the impacts on journey times reveals that within the AM there are some areas that experience reductions in delay and others which experience increases but those areas where the most severe increases occur appear to be in regions where there is the potential to further optimise the proposed mitigation measures to overcome the issues.

- There are further impacts accrued within the AM network as a result of the allocation of the RTC measures. This indicates that further refinement of the proposed measures is likely to be required before an optimum solution can be identified. The impacts within the PM both with and without the RTC measures appear to indicate little difference in performance of the two networks.

The second stage of the assessment was undertaken within the KSWA model. Once the RDA demands had been assigned, and the mitigation measures incorporated, the following conclusions were drawn:

- Inclusion of the RDA demands will likely result in a relatively small increase in the average network journey times and a reduction in average speeds that vehicles are able to achieve in comparison to the 2028 Reference Case conditions
- Analysis of the trip completion ratio within both Reference Case and RDA scenarios indicates that, the network is able to accommodate the assigned demands. The mitigation measures simply act to minimise the impacts rather than enabling more trips to be completed, there is no trip suppression caused by congestion preventing traffic entering the network.
- The Do Something scenario is better able to cope with the increased demands on the network compared to the Do nothing scenario as reflected in the improved network conditions
- Without mitigation, adoption of the RDA strategy will potentially lead to a worsening of traffic conditions within the Kenilworth and Stoneleigh town areas however the proposed mitigation measures have the potential to deliver improved conditions for road users in the form of reduced queuing and, in some cases improved journey times.

Overall, the findings of this Report indicate that the potential impacts of the proposed RDA strategy will be, in part, mitigated by the proposed transport strategy but some residual impacts will still occur. Such impacts may occur through the allocation of natural growth within the network although, without the mitigation measures, the impacts may reach comparable levels at an earlier point in time.

The Report considers the impacts likely to occur at the end of the plan period based on robust trip generation assumptions and including schemes which should be considered as being relatively high level in terms of design and feasibility. Detailed work on measures which may reduce the car based trip generation, through alternative, sustainable, modes, as well as further refinement of the proposed measures, would likely reduce the impacts that have been documented within the report.

The following outlines a series of recommendations that should be considered during any additional stages of the Strategic Transport assessment.

- Further work on calculating the costs of delivering the Highways Agency network safety and capacity improvements (for the purposes of this study have been assumed to take the form of Smart Motorways) and identifying an acceptable level of developer contribution toward the overall mitigation strategy is recommended to be undertaken at the earliest opportunity.
- That, once the preferred allocation strategy has been determined, consideration should be given to undertaking an assessment to confirm that the proposed mitigation will still operate within acceptable levels.
- That the potential impacts of any strategic reserve sites that come forward as part of the preferred allocation strategy are not likely to fundamentally change the nature of the mitigation that is proposed
- More detailed work is undertaken on sustainable transport requirements and the assumptions on mode share and mode shift are based on the outcome of these studies. Once the preferred allocation

The mitigation measures identified to date are shown in the tables below:

Infrastructure	Lead Delivery	Other Partners	Timescale	Cost (£)	Funding	Critical to Delivery
Pedestrian and Cycling improvements, existing and linking sites, bus infrastructure and Smart Choices	WCC	WDC/ Sustrans	All Phases	2,000,000	CIL/S106	Essential
Site Related Bus Services	WCC	Bus Operator	Phase 2	TBC	S106	Essential
Existing Bus Services South Warwick and Leamington	WCC	Bus Operator	Phase 1&2	1,700,000	S106	Essential
Nuckle 2 Kenilworth Station and Infrastructure Improvements	WCC	DfT/ Network Rail	Phase 1	11,300,000	DfT, Major Schemes Fund &WCC	Essential
Park and Ride South of Warwick	WDC	WCC / Bus Operator	Phase 1	2,000,000	CIL and Businesses	TBC
Park and Ride North of Leamington	WDC	WCC / Bus Operator	Phase 2 or 3	2,000,000	CIL and Businesses	TBC
Bus Priority; Southern Park and Ride	WCC		Phase 1	TBC	CIL and Businesses	TBC
Bus Priority' Southern Park and Ride to Warwick	WCC		Phase 1	TBC	CIL and Businesses	TBC

Table 1

Infrastructure	Lead Delivery	Other Partners	Timescale	Cost (£)	Funding	Critical to Delivery
Thickthorne Roundabout Signalised	WCC	HA	Phase 1	1,250,000	Local Growth Fund CIL/S106	Essential
A452 Kenilworth Gyrotory improvement	WCC		Phase 2	300,000	Cil / S106	Essential
A452 Bericote Roundabout Signalisation	WCC		Phase 2	1,250,000	Local Growth Fund CIL/S106	Essential
A453/B4113 Blackdown Roundabout Signalisation	WCC		Phase 2	650,000	Cil / S106	Essential
A452 Spinney Hill Roundabout Improvement	WCC		TBC	450,000	Cil / S106	Desirable
Emscote Road / Greville Road Signalisation	WCC		Phase 1	750,000	Cil / S106	Essential
Princess Drive / Warwick New Road Improvements	WCC		Phase 1	350,000	Cil / S106	Essential
Bath Street / High Street	WCC		Phase 2	500,000	Cil / S106	Essential
Adelaid Road / Avenue Road Signalisation	WCC		Phase 3	350,000	Cil / S106	Desirable
Dormer Place / Adelaid Road	WCC		Phase 3	300,000	Cil / S106	Desirable

Table 2

Infrastructure	Lead	Other	Timescale	Cost (£)	Funding	Critical to
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Delivery Partners			Delivery			
Myton Road / Banbury Road Roundabout	WCC		Phase 1	450,000	CIL/S106	Essential
Priory Road / Smith Street / St Nicholas Church Street	WCC		Phase 1	300,000	CIL/S106	Essential
Castle Hill / St Nicholas Street / Banbury Road	WCC		Phase 1	650,000	CIL/S106	Essential
A452 europa Way / Myton Road Roundabout Signalisation	WCC		Phase 2	1,600,000	CIL/S106	Essential
A452 Shires Retail Park Roundabout Signalisation	WCC		Phase 1	1,250,000	SEP CIL/S106	Essential
A452 heathcote Roundabout Signalisation	WCC		Phase 1	900,000	SEP CIL/S106	Essential
Greys Mallory Roundabout Signalisation	WCC		Phase 3	500,000	SEP CIL/S106	Desirable
A46/A425/A417 Signalisation	WCC	HA	Phase 1	1,400,000	SEP CIL/S106	Essential
Bericote Road / Stoneleigh Road	WCC		Phase 3	500,000	CIL/S106	Desirable
Kenilworth Road / Westhill Road	WCC		Phase 3	500,000	CIL/S106	Desirable

Table 3

Infrastructure	Lead Delivery	Other Partners	Timescale	Cost (£)	Funding	Critical to Delivery
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Europa Way Corridor Improvement Part 1	WCC		Phase 1&2	5,500,000	SEP CIL/S106	Essential
Europa Way Corridor Improvement Part 2	WCC		Phase 1&2	2,950,000	SEP CIL/S106	Essential
Warwick Technology Park Roundabout Improvements	WCC		Phase 1	600,000	CIL/S106	Desirable
Banbury Road Warwick Improvements	WCC		Phase 1	300,000	CIL/S106	Desirable
"Smart Motorways Project J14 to J15	HA	WCC, WDC, SDC	Phase 3	10,000,000	SEP CIL/S106	Essential
Infrastructure Provided by Coventry and Warwickshire Gateway Site	HA / CCC	WCC	Phase 1	TBC	S106 / S278	Essential

Table 4

Total Transport infrastructure requested, to date, £ 52,550,000.

Waste

Most of our Household Waste and Recycling Centres (HWRC) are strategically well placed around the county and within Warwick District we have two sites, Prince Drive and Cherry Orchard.

With the proposal 12,300 extra properties, it will be necessary to redesign both of the sites facilities to accommodate the increase vehicle movements, but also greatly increase the opening hours of the sites to accommodate the expected 1,419 vehicle movements per week which equates to approximately 73,800 vehicle movements per year. Each household deposits on average 236kgs of waste per year at each HWRC.

To cater for this increase we will need to extend Cherry Orchard HWRC onto the old landfill site to accommodate the increased skip provision, costs will be in the region of £241,500. This has been based on 1,500 new households. The baseline used for capital investment is as follows. For the Capital formula we have used the present size of Cherry Orchard HWRC (5,184 m² divided by 10,460 households in Kenilworth = 0.495 m² per household), so the formula used to work out associated costs:

New extension build = 5,184m² divided by 10,468 households in Kenilworth
= 0.495 m² per household.

Spon's Building price per m² (2012 price, plus 1.5% inflation per m² = £324.8)
Which includes split level sites.

Therefore:

1500 households * 0.495m² = 743 m² * £324.80 = £241,326

Prince Drive HWRC will require the provision of an extra waste compactor being installed at £235,000 to accommodate the extra demand of waste. We have just installed a new compactor at Princess Drive at this cost; therefore this is a true cost for the equipment in 2013 prices. The design of the bays will mean further redesign of the skip bays to address the demand of increased recycling estimated to be in the region of £100,000. The same formula would apply, but as we are introducing a compactor, we believe we only need to redesign the skip bays by 310 m² so would be just above the £100,000 at £324.80 per m².

Total Waste infrastructure requested, to date £576,326.

Libraries

The County Council has a statutory duty to provide a 'comprehensive and efficient' library service for the people of Warwickshire. This is laid down in the Local Government Act 1964.

The Library and information Service is directly affected by the numbers and characteristics of the populations we serve. The majority of any population uses library services. The Household Library User Survey shows that over 70% of all households are library members.

The more people there are in an area, the more pressure there is on Library services. Books, audio visual materials, computers, library buildings and vehicles are in effect the infrastructure of the service. Books and other items are borrowed more often, and computers are used more frequently. Choice and service availability is reduced for both existing and new customers, while wear and tear on stock and equipment increases.

In 2001 the Government introduced Public Library Standards (PLSS) in order to judge how well services are performing. The aim of the standards are stated in the Department for Culture, Media and Sport's (DCMS) statement regarding the PLSS and aims to "help create a clear and widely accepted definition of Library Authority's statutory duty to provide a "comprehensive and efficient service", and set for the first a performance monitoring framework for public libraries." The DCMS also "believe that the standards are reasonable and reflect the minimum standard of service that local people are entitled to expect."

The full list of standards (revised as the Public Library Service Standards in 2004) is shown below. Some of these standards relate directly to the size and distribution of the local population, as such changes to the size and distribution of the local population served by branch libraries will have an impact on these standards. These are:

- The distance people live from the nearest library (PLSS 1)
- The aggregate scheduled opening hours per 1000 population (PLSS 2)
- The number of Internet pcs available per head (PLSS 4)
- The number of library visits per 1000 population (PLSS 6)
- The number of new stock items added each year per head (PLSS 9)
- The rate at which the whole library stock is replenished (PLSS 10)

New housing development increases the number of residents within the area. Even if some residents move from elsewhere within the vicinity ultimately new people will occupy the previous accommodation. Thus there is a net gain in population.

The increase in Council Tax received by the Library and Information Service arising from additional dwellings is small – in 2003 / 04 this was calculated at £15 per Band D dwelling. This is insufficient for the Library and Information Service to meet the costs of the additional infrastructure required resulting from new developments. Service standards are therefore in danger of being diluted as a result of new housing developments.

Requests for Library Service improvements are both CIL and NPPF compliant. There is a statutory duty to provide library services, standards are set by the Government, which the County Council are required to meet, the residents of new developments would use County libraries would put additional pressure on the service.

The formulas used to calculate library contributions are all based on the additional population increase only. Therefore it would only be used to mitigate against the additional usage caused by the development, and as such would be at an appropriate and reasonable scale. In addition contributions are allocated specifically to the library affected and as such there is a clear link to directly related to the proposed developments.

The PLSS provide six Standards which are directly related to the size and dispersal of the population. Of these, PLSS 1, 4, 9 and 10 are infrastructure-related, while 2 and 6 are not. Therefore the formula for contributions is based on PLSS 1, 4, 9, and 10, as shown in the table below.

These are calculated from the actual costs of providing the service, which are reviewed annually. The cost per dwelling is based on the average household occupancy for Warwickshire.

Monies secured from the developments would be targeted towards supporting the libraries most impacted. More book stock and other media would be bought to increase the volume of books and other items available and to replenish stock worn out by increased usage. Equipment would be bought to extend the facilities available to accommodate the needs of a larger population. Promotional material would be distributed to the new development to promote the services available through Warwickshire Direct & Libraries to ensure the new population were aware of the range of services to support their health, welfare and wellbeing as well as their educational and leisure needs from the very young onwards.

DCMS Ref.	Standard	Measure	Formula	Current Costings (April 2005)	Calculation	Population increase
PLSS1	The library building network should be within 2 miles of 85% of population. Those living outside this range should be within close reach of the Mobile library service.	85% of population by district living within 2 miles of a library.	Additional population who will live more than 2 miles from a library x £75, based on current building cost of community library of £300,000 / population catchment threshold of 4000 people, or investment in additional mobile services	Figure based on actual cost of Stockingford Library	£0	12984
PLSS 4	Minimum of 6 on-line public computers per 10,000 population.	1 new on-line workstation with support costs per 1,667 additional population, and its cost of first replacement after 4 years. After that the responsibility for replacement passes to the department.	Terminal, furniture, installation and technical support cost @ £2,000 unit cost plus £3,104 sustainability costs over 4 years, x additional population / 1667;	Terminal, furniture and installation cost = £2,000. Support costs include maintenance, upgrades, support, line rental, replacement after 4 years = £776 pa x 4 = £3,104. Therefore unit cost per 1667 additional population = £5,104	£50,923	
PLSS 9	Annual items added to stock per 1000 population. Includes books, films and CDs - target 216	Relative numbers of new books, films, CDs added per year per 1000 population	Average book, films, CDs cost in proportion of spend per 1000 pop, x population increase / 1000	Current average book cost based on adult hard back figure of £17 Video / DVD cost based on current average £20 CD av. cost now £10	£42,629	
PLSS 10	Time taken to replenish lending stock - target 6.7 years	Number of new items added each year as proportion of total lending stock	Cost of additional new stock attributable to the development, to be replaced over 6.7 years. After that the responsibility for replacement passes to the department.	As PLSS 9.		
			Total requirement		£93,553	

Note that average dwelling size is 2.4 (based on a 3 bed dwelling), use this when no breakdown is provided.

Table 5

Total Libraries infrastructure requested, to date, £ 93,553.

Planning Policy

The role of the County Council is twofold; firstly as a principal partner of the Coventry and Warwickshire LEP and secondly, as a major service provider for communities and a statutory consultee including as the Highway Authority, Public Health, libraries, skills and learning.

We have endorsed the Coventry and Warwickshire Strategic Economic Plan as a strategy for growth in the sub region. The ultimate aim of the Strategic Economic Plan

is to improve the economic competitiveness of the Coventry and Warwickshire economy.

Consequently, our strategic response is from the perspective of supporting these services and the necessary infrastructure. The County Council has also aligned our services under an overarching “One Organisation Plan”. The vision supports strategic planning policies that develop and sustain a society that looks after its most vulnerable members, delivers, and seeks opportunities for economic growth and innovation.

The new Local Plan will shape the future pattern of strategic growth up to 2029, in the form of new housing, jobs, growth, and increased economic activity. In land use terms this can be reflected into the Local Plan strategic and development policies that support;

- Communities and individuals are safe and protected from harm and are able to remain independent for longer.
- To bring the best possible outcomes for vulnerable children and adults who need our help.
- That the health & wellbeing of all in Warwickshire are protected.
- Resources and services are targeted effectively and efficiently whether they are delivered by the local authority directly, commissioned or in partnership.
- Ensure our economy is vibrant and thriving so residents will have access to jobs, training and skills development to secure economic growth.
- The proper and effective provision of schools.
- Transport networks and communication networks that meet the needs of business and growth.

The above objectives can be incorporated and reflected positively into statutory planning policies. These priorities form the background to our response.

Response to the Development Strategy of the Local Plan.

Housing and employment balance.

Further explanation should be provided on how the District has arrived at striking the balance between meeting the Warwick District wide housing and employment requirement to enable District communities to be more sustainable.

It is essential that the District Council fully considers the housing / employment balance. If the number of jobs in Warwick District significantly exceeded the resident workforce, this will result in considerable levels of commuting into the District. This could also create recruitment difficulties for employers, further adding to housing pressures in the District including affordable rents.

The Coventry and Warwickshire SHMA has considered population dynamics, economic growth trends and potential, housing market dynamics and affordable housing needs in each area. These are brought together to provide an assessment of housing need for each local authority.

The SHMA concludes that provision of between 3,335 – 4,100 homes per annum would be appropriate. The mid-point of this range for 3,750 homes per annum would represent a reasonable level of provision across the HMA.

The SHMA is intended to provide a consistent assessment of need across the HMA. However, it is a strategic-level assessment and through the development of individual authorities' development plans there may be wider evidence which forms part of the evidence base regarding more local dynamics and issues, including in regard to local economic growth potential, which may provide a basis for refining needs estimates. In interpreting the conclusions herein, greater weight should be attached to the HMA-wide findings. Unless, there is significant other evidence that we are not aware of, the County Council supports the conclusions of the Joint SHMA as robust strategic evidence and therefore fundamental in shaping development strategies and strategic policies.

Comments on the housing mix for the District.

The County Council takes the view that getting the housing mix right in Local Plans is fundamental in supporting families and preventing dependency as a consequence of the aging population. Hence our aim is:

To support an increase in the supply of the right types of housing so that current and future residents including older people are able to;

- live independently at home;
- reduce their need for care and support;
- Preventing dependency.
- Encouraging independence and an active, healthy lifestyle in later life.

The Joint SHMA has considered and drawn together these factors to provide guidance on the future mix of market and affordable housing.

The evidence suggests that the focus of market housing will be for two and three-bed properties over the period to 2031. Table 2 of the Joint SHMA provides specific guidance. Continued demand for family housing can be expected from newly forming households and those trading up or down in the market. There may also be some demand for medium-sized properties (2 and 3 beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay.

We support the guidance on Market Housing Mix and Table 3 of the Joint SHMA on Affordable Housing Mix for Warwick District. The guidance on housing mix identified in the table is intended to inform strategic planning policies and guide supply.

Vulnerable communities - meeting specific needs

The SHMA has considered the needs of various groups within the community which might have specific housing needs. In particular it identifies the need to plan for an ageing population over the period to 2031 in the HMA.

The evidence suggests as people get older, some may require support including adaptations to their properties to meet their changing needs, and provision of floating support. It forecasts a growth of 80% in people with dementia and 65% in people with mobility problems over the period to 2031 (linked in particular to improvements in life expectancy). Therefore, housing need should also accommodate these requirements in the evidence base and the policies that reflect these matters.

Homes can also be designed in accordance with the Lifetimes Homes Standard to enable adaptations to be made to people's changing needs.

Housing need and demand to meet the ageing population.

A proportion of the growing older population will have more specialist needs. The SHMA provides an indicative assessment of a need for 630 units of specialist housing for older people (sheltered and extra care) per annum in the HMA linked principally to the ageing of the population. The SHMA also estimates that households which include people with a disability can be expected to increase by a third over the period to 2031. This would provide a rationale for policies seeking or supporting provision of housing for older people within development schemes, and a potential need to provide support for adaptations to existing stock.

For many older people, traditional residential care does not meet their needs. We need to find alternative solutions, such as building additional Extra Care Housing across the County that will offer independent living with added security of health and assistance on hand when required. Please attached appendix to this note regarding the current supply and gaps in supply. The current challenge of an increasing ageing population is the prominence of Alzheimer's and Dementia. Consequently, the County Council is in the process of developing a strategy on "Accommodation with support" and a consultation will be carried out later in the year.

Archaeology

HISTORIC ENVIRONMENT COMMENT

Proposed Development Sites

As highlighted in our previous consultations throughout the development of this Local Plan, we are concerned that the choice of proposed allocation sites has not been informed by a detailed assessment of the potential impacts on the historic environment.

Whilst the studies previously undertaken have identified statutorily protected sites within and in the vicinity of the proposed housing site, there are a number of known un-

designated heritage assets which have not been identified. Whilst these sites are as-yet undesignated, these could include heritage assets of national significance which are worthy of conservation. The assessment has also not taken into account the historic landscape character of these areas and the impact that the development of the proposed allocation sites could have upon the settings of heritage assets (including Scheduled Monuments) within or in the wider vicinity of the development areas.

The primary source of information for the historic environment, the Warwickshire Historic Environment Record (HER) , was not consulted. Consultation of the HER would have demonstrated that there are several known heritage assets of as yet unknown significance within several of the proposed strategic sites.

In addition, as noted in our previous consultation responses during the development of this local plan, there will also be archaeological sites as yet undiscovered which will not be recorded on the HER, and even in areas where no archaeology has been recorded, evaluation may be required to confirm the presence/absence of remains. Consultation on a site by site basis will remain the best means of identifying archaeologically sensitive areas on the basis of current knowledge, as well as areas where archaeological potential will need to be assessed through more detailed work.

Since the individual allocations will need to take account of the impact upon historic environment we recommend that further work (in the form of a historic environment assessment) be undertaken to identify the issues in respect of the historic environment.

Whilst we are concerned in principle to the selection criteria, since they do not allow for a proper consideration of Historic Environment, we do not object in principle to the majority of sites selected providing that proper appraisal is undertaken and allowance made where necessary for preservation of sites of national Importance (in the sense of the 1979 Ancient Monuments and Archaeological Areas Act and the National Planning Policy Framework).

We would be happy to meet your strategic planning team in person to discuss our comments and recommendations whilst the Local Plan is prepared, and to contribute to any supplementary planning documents in respect of the historic environment.

We also have a number of minor comments that do not relate to the overall soundness of this document which we will provide under separate cover.

Ecology and Geology

The council supports the references to biodiversity throughout the Local Plan and particularly supports the Natural Environment Policies NE1 to NE7. We would only suggest that 'Warwickshire Biological Record Centre (WBRC)' is added to the Evidence list under 1.38 (possibly below the Habitat Biodiversity Audit bullet). This would support the inclusion that the WBRC should be consulted under paragraph 5.191.

We would also suggest that with the wording "15 Sites for Nature Conservation" (paragraph 1.16) is reviewed at the time of submission as the number is more than 15

and that these sites are now reference to as Local Wildlife Sites, as you have done throughout the remainder of the Local Plan.

Yours sincerely

Monica Fogarty
Strategic Director for Communities