Issues and Options Consultation - Questions

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|  | If you wish to comment using the online consultation portal, please visit [www.southwarwickshire.org.uk/swlp/issuesandoptions](http://www.southwarwickshire.org.uk/swlp/issuesandoptions)or scan the QR code: |

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| **Chapter 3** |  |
| **Q-V3. 1** | **Do you agree that the Vision and Strategic Objectives are appropriate?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-V3.2:** | **If no, please indicate why:** |
| **Chapter 4** |  |
| **Q-I1:** | **Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.** |
| **Q-I2:** | **Please select the option which is most appropriate for South Warwickshire****Option I2a: Set out infrastructure requirements for all scales, types and location of development***If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.***Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy***In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts.* |
|  | The County Council favours Option 12a. We believe that this gives greater clarity over requirements at the earliest stage. It will support potential developers to understand the implications of growth within a specific area and help avoid conflict with infrastructure providers.  |
| **Q-I3:** | **Please select the option which is most appropriate for South Warwickshire****Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan***A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.***Option I3b: Each District Council to produce its own Levy***Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances* |
|  | The ability to charge differing rates across the individual District Council areas is already dealt with in the two existing separate CIL strategies. WCC considers that a single CIL would bring considerable benefits and as such would support such an approach. However, WCC also recognises some of the challenges of this approach and will seek to work with both Districts whatever the outcome. Currently the District Council’s CIL approaches differ and as a minimum we would suggest that the application and monitoring processes should align. This would require a clearly agreed timetable and a shared set of paperwork. As a key Infrastructure provider and an organisation who actively bids for CIL funding the key issue is consistency of approach for determining funding allocation, monitoring spend etc. We also feel that there must be a mechanism whereby funds can be made available across the Local Plan area to help support the delivery of key infrastructure required because of cumulative impact.  |
| **Q-I4.1:** | **Should we include a policy to safeguard specific infrastructure schemes within the SWLP?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | If proposed growth can only come forward with the provision of key infrastructure which will require land, it would seem appropriate for this to be safeguarded within the Local Plan. We would expect areas required safeguarding to become apparent at the next stage of consultation when we will consider in more detail specific potential development locations and growth size.  |
| **Q-I4.2:** | **Please add any comments you wish to make about these specific safeguarding provisions** |
|  | With reference to Emerging Site Allocations Plan and the A46 Safeguarding we ask if the Marraway junction should also be included or have National Highways confirmed that no improvement at this location would require land to be safeguarded?Although we recognise that the Plan is still at a relatively early stage of development, we would like to note that there may be a number of future transport schemes which would benefit from safeguarding within the Local Plan to ensure these opportunities are not lost as a result of growth. Examples include the potential for a new rail station/interchange/park and ride to serve the University of Warwick (also known as ‘Coventry South’), the preferred route of the A46 Link Road and the Stoneleigh Business Park Strategic Access Improvements. We understand that Midlands Connect will be making a similar submission regarding the future doubling of the Leamington Spa to Coventry rail line, which we also strongly support. |
| **Q-I5:** | **Please add any comments you wish to make about infrastructure, viability and deliverability.** |
|  | Under Infrastructure Delivery (Chapter 4, 4.1, Issues I2) a list of 3 ways for infrastructure to support new development is provided along with supporting/explanatory text. No. 3 states *‘off-site through the provision of financial developer contributions to pay for the provision of infrastructure to be provided elsewhere – e.g. education, health facilities, biodiversity restoration’*. We have concerns that this suggests that this is the only way that off-site infrastructure can be delivered. We believe that this point and the explanatory text should be amended to also make reference to the delivery of transport and highway improvements via a section 278 highway agreement.For many large off-site transport improvements, the delivery generally relies on either s106 contributions or s278 highway agreements or a combination. This is often because the infrastructure costs are too large to be borne by a single development parcel and would have implications for the viability of development. This means that infrastructure delivery is reliant on developers submitting planning applications for the allocated sites in a timely and coordinated manner, all of the s106 contributions need to be received (often from different development sites or phased parcels within those sites), or s278 applications made, in order for the infrastructure to be designed, technically approved and constructed on-site to dovetail with the identified development occupancy trigger(s). If infrastructure is to be delivered at the right time, then the infrastructure delivery mechanisms/processes need to reflect the overall programme for the delivery of the infrastructure and require the design work, which is often complex, to be carried out sufficiently early so that the on-site construction period dovetails with the build out/occupancy rates of development.Recommend that for this strategic objective and particularly for large scale infrastructure delivery, there should be a mechanism to plan and monitor the overall programme for delivery, including design and construction stages, and to identify risks.The further assessment as part of the Housing and Economic Land Availability Assessment (HELAA), Infrastructure Delivery Strategy and viability assessments will be important to determine the deliverability of infrastructure. However, there are many elements for transport and highways schemes that are unknowns until the detailed design stage and these can make a scheme undeliverable, e.g. costs associated with diversion/protection works for statutory undertakers’ equipment, requirement for structures, ground conditions etc., by which time development and even occupation has started. Either more information should be provided by land promoters as part of the viability assessment work during the Local Plan review, or robust contingencies should be incorporated into the assessments.  |
| **Q-S1:** | **Please select the option which is most appropriate for South Warwickshire****Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced***Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy.***Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy***Instead of identifying Green and Blue Corridors within the South Warwickshire Local Plan, this option will rely on the production of the Local Nature Recovery Strategy. The production of a Local Nature Recovery Strategy will likely come after the SWLP Spatial Growth Strategy has been determined, therefore it is likely that there will be a reduced synergy.* |
|  | The County Council Favours Option S1a.  |
| **Q-S2:** | **Please select all options which are appropriate for South Warwickshire****Option S2a: Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.***Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood.***Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes***In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles*.**Option S2c: Do not have a policy which encourages intensification***This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under-utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be**lower.* |
|  | It would seem appropraite to consider intensification, but this will be limited to those areas where adequate mitigation can be provided. Option S2a seems the most appropriate approach. |
| **Q-S3.1:** | **Please add any comments you wish to make about the Urban Capacity****Study** |
|  | No comments at this stage but the County Council will be happy to support discussions going forward. |
| **Q-S3.2:** | **Please select the option which is most appropriate for South Warwickshire****Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.***Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.***Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location***This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.***Option S3.2c: None of these** |
|  | The County Council favours Option 3.2a.  |
| **Q-S4.1:** | **Do you think that growth of some of our existing settlements should be part of the overall strategy?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | Growth of existing settlements should form part of the identification of sustainable and deliverable growth but a general policy on supporting growth of existing settlements could be problematic. It is recognised that growth in some areas could prove beneficial if it brings improvements to services. However growing existing settlements should only be considered where impact can be adequately mitigated. Growth in some smaller villages could help with the delivery of affordable homes encouraging younger families to move to the area. However, these small villages are often without education or health provision and public transport can be patchy. Large scale growth within one location can provide an opportunity to deliver new social infrastructure such as schools, health provision, green space etc. and active travel options can be planned in. Although this can be challenging, especially in those situations where the proposed growth area is made up of a variety of land parcels under separate ownership, we do believe there are examples of good practice within Warwickshire that could help inform the South Warwickshire Local Plan.  |
| **Q-S4.2:** | **Please add any comments you wish to make about the settlement analysis,****indicating clearly which element of the assessment and which settlement(s) you are commenting on.** |
|  | No additional comments at this point.  |
| **Q-S5.1:** | **Please provide any comments you have on the emissions estimation****modelling for the seven potential new settlement options** |
| **Q-S5.2:** | **Do you think new settlements should be part of the overall strategy?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | We believe that the delivery of new settlements will provide an opportunity to develop sustainable neighbourhoods. The settlements to be of sufficient size that they will deliver social infrastructure such as education and health facilities as well as available green space and employment provision.  |
| **Q-S5.3:** | **In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | This seems to be a sensible approach to delivery of growth. Growth to focus close to existing rail stations or in areas that already have regular bus connectivity to the station.  |
| **Q-S5.4:** | **If not, what approach would you take?** |
| **Q-S7.1:** | **Please provide any comments you have on the emissions estimation****modelling for the five growth options** |
| **Q-S7.2:** | **For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire::****Option 1: Rail Corridors****Appropriate strategy** ~~|~~ **~~Neutral~~** ~~|~~ **~~Inappropriate strategy~~**Further commentsGrowth focussed on existing lines and existing stations should be a priority. The view of Network Rail and likelihood of new stations being opened on existing lines to be undertaken before growth focused in areas where stations aren’t currently in existence. The notion of re-opening disused lines seems risky and growth in these areas should not be considered until a detailed feasibility exercise has taken place and the views of Network Rail known. Without assurances that lines will reopen will result in development being reliant on car usage. **Option 2: Sustainable Travel****Appropriate strategy** | **~~Neutral~~** ~~|~~ **~~Inappropriate strategy~~**Further commentsSensible to look at both rail and bus travel corridors as locations for growth particularly in the more rural parts of South Warwickshire. However, lack of control of bus service routes needs to be factored in and growth to contribute to bus provision whenever possible. **Option 3: Economy****Appropriate strategy** | **Neutral** ~~|~~ **~~Inappropriate strategy~~**Further commentsThis approach does not support growth in areas with the opportunity to travel through sustainable means. **Option 4: Sustainable Travel and Economy** **Appropriate strategy** | **~~Neutral~~** ~~|~~ **~~Inappropriate strategy~~** Further commentsThis option seems sensible but we do have concerns over the possibility of car reliance. **Option 5: Dispersed****~~Appropriate strategy~~** ~~|~~ **~~Neutral~~** | **Inappropriate strategy**Further commentsDevelopment unlikely to be of sufficient size to provide key infrastructure improvements. The County Council does not support an overall dispersal strategy.  |
| **Q-S8.1:** | **For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward?****~~Yes~~** ~~|~~ **~~No~~** | **Don’t Know** |
|  | Although on the face of it this could be a sensible way forward, this would need to be carefully considered and monitored to ensure this didn’t simply become a mechanism for generic dispersed growth and the difficulties this can cause. Thresholds would need to be agreed by the Local Community and reflected in the corresponding Neighbourhood Development Plans.  |
| **Q-S8.2:** | **For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?****Limit of 10 dwellings per site A higher limit is appropriate A lower limit is appropriate** |
|  | The threshold size and how this will be delivered could be different for each community, but it should align with the corresponding neighbourhood plan.  |
| **Q-S9:** | **Please select the option which is most appropriate for South Warwickshire****Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.***Any revisions to existing boundaries, and consideration of which settlements have boundaries, would be saved for Part 2 plans and NDPs. The advantage of this approach is that waiting until Part 2 is likely to mean more detailed information is available – for example non-strategic allocations will likely not be made until Part 2, so waiting for these to come forward means any boundary revisions can accurately reflect new allocations. The disadvantages are that inconsistencies of approach between Stratford-on-Avon and Warwick Districts would not be addressed in the short term; and it results in a longer time period to address any out-of-date boundaries.***Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.***The aim would be to achieve a consistent approach across Stratford-on-Avon and Warwick Districts regarding the type or size of settlement that has a defined boundary. The main impact is on where limited infill development is permitted, and where ‘open countryside’ policies apply. The disadvantage is that some non- strategic land allocations will likely not be made until Part 2 plans come forward. In such cases, it becomes difficult to make appropriate revisions to boundaries in advance of these non-strategic allocations.* |
|  | It would seem appropriate to reconsider this at the next stage of consultation.  |
| **Q-S10:** | **Please add any comments you wish to make about the development****distribution strategy for South Warwickshire** |
|  | Nothing to add at this stage.  |
| **Chapter 5** |  |
| **Q-E1.1:** | **Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-E1.2:** | **If your answer to E-1.1 is No, what would be a more appropriate approach****to calculating future employment needs for this Local Plan?** |
| **Q-E2:** | **Please select all options which are appropriate for South Warwickshire****Option E2a: Include a policy which encourages businesses to be low carbon** *This could be in terms of their use of materials, promotion of active travel initiatives for employees and the use of clean technologies in construction and in infrastructure delivery, their buildings, transport arrangements, supporting development of clean technology clusters close to innovation areas and identifying sites suitable for material reuse hubs to support a circular economy. The policy could also include prioritisation for businesses looking to use low carbon infrastructure such as renewable energy. This would be a new policy in response to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this.***Option E2b: Do not include a policy encouraging businesses to be low carbon***It is acknowledged that it could be difficult and costly for some businesses to become greener especially if it involves retrofitting. As there is still a strong emphasis on maintaining a thriving economy, it is important not to discourage businesses to the area.***Option E2c: Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy.***This would help to brand South Warwickshire as a place where green businesses may wish to locate to. It would be a new policy in response to the need to address climate change.* |
|  | Options E2a and E2c are preferred. Option E2a would build upon Warwickshire County Council's ambitions for addressing/mitigating climate change.Option E2c seems an innovative approach to encourage 'green businesses' to South Warwickshire.There is some concern that perhaps the term encouragement is on the weak side and perhaps we should be requiring businesses to be low carbon wherever possible. However we do appreciate the need to balance strong targets against a possible negative impact on inward investment.  |
| **Q-E3:** | **Please select all options which are appropriate for South Warwickshire****Option E3a: Include a policy expanding on SDC’s current existing policy..** *This sets out the principles for economic activity within South Warwickshire and would also include setting out how much employment provision would need to be provided..***Option E3b: Have separate policies for individual sectors***These would set out criteria for economic activity including how much employment provision should be provided for each sector and may need to be adapted depending on whether the area is urban or rural.***Option E3c: Include a policy that secures employment strategies through S106.***This would look at a strategy which would indicate how developers would promote employment and skills at certain stages of the development process for local people. For example, it could be a percentage of jobs are advertised to local people only. It would help to retain local skills and provide jobs for local people.***Option E3d: None of these** |
|  | It would seem appropriate for the Local Plan to link to the emerging South Warwickshire Economic Strategy.  |
| **Q-E4.1:** | **Please select the option which is most appropriate for South Warwickshire****Option E4.1a: Include a policy supporting diversification***This would set out criteria of how rural businesses and agricultural diversification will be supported. The policy could expand one existing policies and be a combination of what is currently in Stratford’s Core Strategy and Warwick’s Local Plan.***Option E4.1b: Do not include a specific policy on diversification.***This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.***Q-E4.2: Please select the option which is most appropriate for South Warwickshire****Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas***This would encourage small businesses to be to grow in more rural areas of South Warwickshire which in turn would help to contribute and sustain the local economy.***Option E4.2b: Do not include a policy supporting small-scale employment opportunities in rural areas***This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.* |
|  | Option E4.1a and E4.2a |
| **Q-E5:** | **Please select the option which is most appropriate for South Warwickshire****Option E5a: Include a policy which supports a range of business units.** *This policy would encourage business units of differing sizes including smaller units for those businesses looking to start up. It is often difficult for small businesses to find affordable and available premises. This would be a new approach as currently there aren’t any specific existing policies in relation to this in either the Core Strategy or Local Plan.***Option E5b: Do not include a policy in Part 1.***This level of detail may be considered beyond the scope of the Part 1 plan. Existing detailed policies may be ‘saved’ and subsequently incorporated into a Part 2 plan and/or other policy documents as appropriate.* |
|  | Although this would be a new approach Option E5a would support the provision of units to support new small businesses as well as though businesses looking to expand.  |
| **Q-E6:** | **Please select the option which is most appropriate for South Warwickshire****Option E6a: Include a policy which protects South Warwickshire’s economic****assets.***As these assets are a major contributor to the economy, it may be appropriate to protect their current use to support them and ensure that the right investment is made in these areas. However, such a policy might hinder alternative uses if the current needs change.***Option E6b: Do not include a policy protecting all these economic assets.** *This could mean that there would be a loss to the economy if some of these assets are not protected and are lost to other uses. It may be that some of these assets would be covered under alternative policies, or the view may be taken that specific protection is not needed. Alternatively, protecting these assets could be seen as beyond the scope of part one of the plan, and instead be considered in part two of the Plan.*  |
|  | Option E6a to be prioritised.  |
| **Q-E7.1:** | **Please select the option which is most appropriate for South Warwickshire****Option E7.1a: Include a policy directing employment to the Core Opportunity Area.***This policy would look to direct employment growth to the Core Opportunity Area with areas outside of this, providing opportunities for more local investment.***Option E7.1b: Do not include a policy directing employment to the Core Opportunity Area.***This could mean that South Warwickshire fails to capitalise on employment opportunities or that new investment is focused outside of the Core Opportunity Area and fails to capitalise on the connectivity that the core opportunity area brings.* |
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| **Q-E7.2** | **Please select the option which is most appropriate for South Warwickshire****Option E7.2a: Include a policy relating to additional economic growth at the major investment sites.***This policy would seek to allocate additional land for specific employment uses at the major sites, including a list of development principles in order to create the right environment to secure major inward investment into South Warwickshire.***Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites.***This could mean that South Warwickshire fails to capitalise on employment opportunities. It could also undermine the presence of existing businesses as they find themselves unable to grow in the long-term. This could put existing jobs at risk.* |
|  | Option E7.2a |
| **Q-E8.1:** | **Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | This approach will provide investment certainty and ensure that we can continue to grow the local economy. If existing allocations are not included, we will need to find alternative sites across South Warwickshire to meet our employment needs.  |
| **Q-E8.2:** | **If, no please list the sites that should be excluded and give reasons.** |
| **Q-E8.3:** | **Do you agree that proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-E8.4:** | **Pease specify what you consider to be appropriate tests** |
| **Q-E9:** | **Please select the option which is most appropriate for South Warwickshire****Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan.***In order for the hierarchical approach to be implemented effectively it may be useful to identify retail areas within each of the Town Centres as well as Town Centre boundaries. This would follow the current Warwick District Local Plan approach whereas currently Stratford does not currently identify these. It would allow consistency across South Warwickshire.***Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2.***This may not be considered a strategic matter for Part 1 to address. However, saving existing boundaries would result in an inconsistent approach across the two Districts* |
|  | Option E9a would be preferred but we do need to be aware of ease of change of use.  |
| **Q-E10:** | **Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~***Whilst Tourism is essential to the vitality of South Warwickshire, there are few aspects of tourism that have an effect on the spatial planning of an area. It is therefore proposed that tourism is addressed fully, within Part 2 of the South Warwickshire Local Plan.* |
| **Q-E11:** | **Please add any comments you wish to make about delivering South****Warwickshire’s economic needs** |
| **Chapter 6** |  |
| **Q-H1-1:** | **The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | Although the HEDNA provides a good basis for older people housing with care projections of future demand, we feel it is limited in its reliance on POPPI projections. We don’t believe any interaction with the county council took place to input into the HEDNA in terms of need for working age adults and specialised accommodation. To identify the future need of those with physical disabilities, learning disabilities, autism and sensory issues we suggest that this also considers WCC information on demand or need from the operational social work teams. For this local plan it would be positive to see partnership work between the district/borough housing authorities and the county council for future planning and projecting need for housing with care across the south. The county council do have opportunity to provide data and oversight of the demand being seen from operational social work teams regarding gaps in provision and where the demand sits across the south of the county. It is important to ensure that housing need and commissioning messages about housing with care are being aligned in local housing plans and county council commissioning strategies. WCC would also welcome a revised approach to the S.106 local connection criteria. This heavily prioritises a local connection, and while WCC recognises the importance of this for many of the people it supports, it is contrary to the wider reciprocal arrangement approach to housing across England to support those experiencing Domestic Abuse. WCC would welcome further engagement on this criterion to find a solution which both protects local housing for local needs, but also recognises the absolute need for reciprocal housing arrangements for those experiencing Domestic Abuse. |
| **Q-H1-2:** | **If your answer to H1-1 is No, what would be a more appropriate approach****to calculating future housing needs for this Local Plan?** |
| **Q-H2-1:** | **What is the best way to significantly increase the supply of affordable****housing across South Warwickshire?** |
|  | South Warwickshire Local Plan should seek to meet the local requirements for affordable homes (ideally between 30-40%). This should be done in partnerships with Housing Teams to ensure key local needs are met. Affordable homes should be included on a mixed site with privately owned homes, as this reduces exclusion and encourages integration within the community. In addition, there is a need for developing more 1-bedroom accommodations and bungalow provision to meet housing needs. Currently, Warwickshire County Council Energy Efficiency Rating is similar to the England average. The Warwickshire Director of Public Health Annual Report 2022 has made several recommendations to improve health and wellbeing and reduce health inequalities in Warwickshire. The recommendations are framed around the themes of housing, food, and transport to address the causes of poor health and wellbeing. Warwickshire Public Health request consideration into the development of new affordable homes as highlighted in the DPH 2022 report: “R.2 I recommend that housing, planning and health leads work together to prevent ill health caused by poor housing and living conditions. This should include a commitment to preventing new homes from being built with an Energy Performance Certificate (EPC) rating of less than C and working with private and public landlords to ensure existing homes have an EPC of C or above and are mould free.”Implementation of the recommendations will rely upon the concerted efforts of key partners across health and care and the wider determinants of health.  Warwickshire’s County Council Promoting Health and Wellbeing through Spatial Planning reports that “Marmot’s recommendations also remind us of the need to reduce health inequalities and mitigation of climate change and this is achievable through the improved energy efficiency of housing across the social gradient. This should result in a reduction in fuel poverty in deprived areas and a decrease in energy related emissions, which should help tackle climate change”. <https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf> In summary, homes that are energy efficient and well insulated will have a positive impact on overall living conditions and the health and wellbeing of individuals whilst being kinder to the environment. |
| **Q-H2-2:** | **Please select the option which is most appropriate for South Warwickshire:****Option H2-2a: A single South Warwickshire wide affordable housing requirement***A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts. This results in the most certainty – for developers, greater certainty in anticipating their costs; and for Councils, greater certainty in anticipating delivery of affordable homes. However, this approach would not reflect variations in value, or variations in affordable housing demand, in different areas of the Districts. This could result in a greater level of challenge on viability grounds in areas with lower house prices, and missed potential for affordable housing delivery in areas with higher house prices.***Option H2-2b: Separate affordable housing requirements for Stratford-on- Avon and Warwick Districts***Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations. It would provide a reasonable level of certainty for developers and Councils. However, the District boundaries are unlikely to be the most accurate way of reflecting of variations in value, or variations in affordable housing demand, in different areas of South Warwickshire.***Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire***A more localised approach could reflect with greater accuracy the variations of value, or variations in affordable housing demand, in different areas of the Districts. This may mean fewer challenges on viability grounds. However, having different requirements in different localities adds a level of uncertainty – it makes it harder for developers to anticipate their costs, and it makes it harder for Councils to anticipate delivery of affordable homes. There could also be unintended consequences if it makes certain areas more attractive to developers than others, with the potential that this makes it more challenging to deliver the chosen spatial**growth strategy.* |
|  | Option H2-2a or Option H2-2c. It would not seem useful to have different policies for the two LPA areas when this is a combined Local Plan.  |
| **Q-H2-3:** | **How should South Warwickshire best address the specialist needs for older****people?** |
|  | **Public Health Warwickshire encourage well** designed places that are easy to navigate by foot (and for cycle). In addition, Warwickshire Public Health encourage the use of measured miles signage to encourage people to actively travel. Warwickshire County Council Promoting Health and Wellbeing Through Spatial Planning highlights that “poorly designed places that lack connections can stop many vulnerable people from leaving the home for example, due to fear of crime in public spaces, or fear of traffic and may be a barrier preventing elderly people from reaching services and community groups (Allen, 2008)”. <https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf> Promoting safe access for pedestrian and sustainable transport provision for older residents is encouraged and supported. The Warwickshire Count Council Spatial Planning reports that pedestrians are one of the most vulnerable residents (and the largest) in terms of both real and perceived threats to their safety and personal security; and the quality of the local environment is of importance to pedestrians, and most particularly to children and older people, especially those with a health condition or specialist needs.**Access to key services**Design and layout can facilitate direct, convenient, and safe walking routes to town centres, green spaces, local neighbourhoods, health centres, hospitals, libraries, local shops, services and public transport facilities. Warwickshire Public Health encourage accessibility for people living with a disability and consider the Department of Health’s Dementia Friendly design principles. Warwickshire County Council Promoting Health and Wellbeing Through Spatial Planning highlights that, although people are living longer, they are spending much of their additional time in poor health. Opportunities to develop social networks and participation in communities can act as protective factors against cognitive decline and dementia for those over 65 (Fabrigoule, 1995). Those who are social isolated are between two and five times more likely to die prematurely when compared to those with strong social ties (Marmot, 2011)Consideration is encouraged given the ageing population of South Warwickshire that is set to continue and that **a** wide range of specialist types of housing is provided across South Warwickshire to accommodate older people that have a disability and / or a specialist needs**.**   |
| **Q-H3:** | **Please select all options which are appropriate for South Warwickshire****Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.***It may not be considered strategically important, across the entirety of South Warwickshire. In this case, minimum space standards could be considered in a Part 2 plan.***Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.***This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.***Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.***This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.***Option H3d: None of these** |
|  | Option H3c: We feel that consultation with the population is essential to the development of plans. The County Council is currently carrying out a Joint Strategic Needs Assessment (JSNA) of the care and accommodation needs of older people. For awareness the JSNA is not a consultation document. We suggest that the findings are considered in planning for South Warwickshire. As part of this, we would want the plan to be informed by trends in the uptake of different kinds of support (e.g., Domiciliary Care at home; ECH; Care Homes etc) and in the unmet need and service gaps.Partnership working across district and county council is critical to success. We recommend that we continue to develop and maintain strong working relationships and strategic alignment to explore housing with care needs and the future planning needs. This would ensure housing with care developments are in line with other developments and plans for the local area. Housing with care covers both specialised supported housing and extra care, we note that in the consultation documents there is little reference to specialised supported housing and to people with disabilities. We recommend this is looked at in the remit of housing with care within the local plan and this should also be extended to include, for example but not limited to, those with mental health issues as this is an area of growing demand. Housing with care schemes for people with disabilities would clearly have the majority of spaces built to Building Regulations M4(2)/M4(3) standards.WCC has noted that the HEDNA does not specify details regarding the housing needs for other people with support needs e.g., Safe Accommodation, Learning disabilities, Autism, Mental Health, care leavers etc. WCC would therefore be happy to be involved in the later stages of the consultation to influence representation of these areas.There is strong evidence to suggest that poor space standards in housing can have an adverse impact on health and wellbeing. Therefore, a proportionate baseline would be that all new homes should be built to Nationally Described Space Standards, and a reasonable proportion M4(2 and 3). Again, WCC would welcome engagement on this at a later date as to what would be an appropriate proportion. Broadly aiming for both H3b and H3c would be a sensible ambition. E.g., H3c as a target, and H3b as the fallback position if developer viability demonstrates that only a proportion/ no M4(2 and 3) homes can be delivered. |
| **Q-H4-1:** | **Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford- on-Avon District?****~~Yes~~** ~~|~~ **~~No~~** | **Don’t Know** |
|  | WCC would like to better understand if any requirement to meet the Birmingham and Black country HMA (housing market assessment) shortfall would apply to specialist supported housing needs, and if so, then request an opportunity to engage further on this and related questions.  |
| **Q-H4-2:** | **Please add any comments you wish to make about the scale of the shortfall****from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan** |
|  | No comments at this stage.  |
| **Q-H4-3:** | **If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?***You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question* |
|  | Any additional housing requirement should form part of the overall housing number. Growth to be located as close as possible to the overspill area.  |
| **Q-H5:** | **Please select all options which are appropriate for South Warwickshire****Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.***This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not be appropriate.***Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.** *This would provide more certainty of delivery as it would be a requirement of the**larger development sites across the area and could provide a wider spread of this**type of home across South Warwickshire. However, some people looking for self and custom build homes may not wish to live or on the edge of a large housing site. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.***Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.***This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for self and custom build homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of self and custom build home are made available* |
|  | Option H5b seems to be the most deliverable.  |
| **Q-H6:** | **Please select all options which are appropriate for South Warwickshire****Option H6a: Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes.***This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not likely be appropriate.***Option H6b: Require large developments of over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site.***This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. Whilst this option has the potential to build positive relationships between the settled and travelling communities and enable both communities to benefit from sustainable infrastructure that is provided as part of a large development, measures would likely need to be put in place to manage and foster these relationships. This approach may not be suitable for Travelling Showpeople yards which are typically larger in order to accommodate circus and fairground equipment. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.***Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability.***This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for Gypsy and Traveller and Travelling Showpeople homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of these type of homes are made available; in the past this approach by itself has not delivered sufficient new provision to meet the need.* |
|  | Options H6a and H6c seem to be the most deliverable.  |
| **Q-H7:** | **Please add any comments you wish to make about delivering homes in****South Warwickshire** |
|  | No additional comments at this stage.  |
| **Chapter 7** |  |
| **Q-C1.1:** | **Please select the option which is most appropriate for South Warwickshire****Option C1.1a: Identify and allocate land that is considered suitable for wind or solar energy generation schemes***Allocating suitable land would set the groundwork for future renewable energy proposals. The details of any such proposal would be further assessed through planning applications. Allocating land would also help prevent schemes coming forward in less suitable locations.***Option C1.1b: Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location.***Choosing not to allocate land for renewable energy generation would in effect rule out onshore wind projects, unless land was allocated for this purpose in a Neighbourhood Development Plan. Solar developments are not bound by the same restrictions as onshore wind, so these could still come forward without land having been allocated. This type of policy would show general support but would not identify specific locations. Proposals would therefore be considered on a site- by-site basis at planning application stage rather than a more planned-for approach. The policy could encourage this use on certain grades of agricultural land.***Option C1.1c: None of these** |
|  |  |
| **Q-C1.2:** | **Are there any other criteria which should be considered when assessing****proposals for large scale renewable energy developments?** |
|  |  |
| **Q-C2** | **Please select the option which is most appropriate for South Warwickshire****Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable** *Decentralised energy schemes are typically only viable for developments of a significant size – for example in the region of 2,500 or more dwellings, or 10 hectares or more of employment land. In order see a benefit from this option, much of the planned growth would need to be concentrated into a smaller number of larger developments.***Option C2b: Have a policy encouraging the consideration of decentralised energy systems***Option 2 allows for greater flexibility, but is a weaker policy that may result in opportunities being missed.***Option C2c: None of these** |
|  |  |
| **Q-C3.1:** | **Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-C3.2:** | **Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to****secure emissions removals or reductions?** |
|  |  |
| **Q-C3.3:** | **Please add any comments you wish to make about renewable energy****generation or carbon sequestration in South Warwickshire** |
|  |  |
| **Q-C4.1:** | **Please select all options which are appropriate for South Warwickshire****Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time.***Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.***Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.***This would require all new development to achieve net zero carbon from adoption of the plan, expected in 2025. However, it would be at a cost as the development industry may not be ready to viably deliver this and as a consequence we may see less affordable housing built and maybe fewer other social and community benefit from development to offset the cost of achieving net zero carbon. Viability work would be needed to establish the impact of this approach.***Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards.***This would require all new development to achieve net zero carbon from a future date and this would be set out in the plan. It could allow time for the development industry to adjust to the higher standards, give time for the cost of achieving these standards to come down, and may mean that we can secure more affordable housing and community benefits from development. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan.***Option C4d: None of these** |
|  |  |
| **Q-C4.2:** | **What scale of development should the requirements apply to?****Option C4.2a: All new development***Including for example residential extensions***Option C4.2b: Development over a certain size***For example all developments of 1 dwelling or more, or 100+ square metres?* |
|  |  |
| **Q-C5:** | **Please select all options which are appropriate for South Warwickshire****Option C5a: Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications***Achieving net zero carbon requirements on existing buildings that are converted or change use is a great way to be able to retrofit climate change adaptation and mitigation measures into South Warwickshire’s existing building stock. However, the ability to make changes to existing buildings can be more restrictive and expensive than on new builds and may result in some developments becoming unviable.***Option C5b: Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas***A policy that proactively encourages the retrofitting of climate change measures into existing buildings, within certain parameters, can make it easier and provide more certainty for property owners to be able to tackle climate change. In sensitive locations this approach may be more challenging and if taken forward it will be important for solutions to be sought to minimise any adverse impact on local surroundings.***Option C5c: None of these** |
|  |  |
| **Q-C6.1:** | **Please select the option which is most appropriate for South Warwickshire****Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a ‘business-as-usual’ approach to construction***A policy requiring reductions in embodied emissions of 100% would have a significantly positive effect on reducing carbon emissions from new development. There are challenges that would need to be overcome in terms of validating and assessing emissions data to ensure its robustness. There may be implications for the viability of some developments following such a policy and this would need to be tested.***Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.***A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area’s development needs.***Option C6.1c: None of these** |
|  |  |
| **Q-C6.2:** | **If a phased approach is used, what dates and thresholds should be used?***For example, achieve 80% reduction by 2030 and 100% reduction by 2040.* |
|  |  |
| **Q-C6.3:** | **Please add any comments you wish to make about Net Zero Carbon****buildings in South Warwickshire** |
|  | The County Council is keen to work with the Local Plan Team to consider the impact of Climate Change and how we can head towards Net Zero Carbon. |
| **Q-C7:** | **Please select the option which is most appropriate for South Warwickshire****Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures?***This would include the application of the cooling hierarchy, the use of cool materials and provision of green infrastructure to create cooling.***Option C7b: Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures***Not having a policy requiring developments to adapt to higher temperatures would result in new building stock not being designed to deal with this effect of climate change.***Option C7c: None of these** |
|  | The Plan should be ambitious in its thinking; hence we should look for Option C7a. |
| **Q-C8:** | **Please select the option which is most appropriate for South Warwickshire****Option C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events***This would include SuDS and water efficiency requirements***Option C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events***Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.* **Option C7c: None of these** |
|  | The Plan should be ambitious in its thinking; hence we should look for Option C8a.  |
| **Q-C9.1:** | **Please select the option which is most appropriate for South Warwickshire****Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity***This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.***Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity***Opportunities for biodiversity enhancement may be lost without a policy in the plan requiring biodiversity measures to be incorporated into development.***Option C9.1c: None of these** |
|  | Option C9.1a is our preference.  |
| **Q-C9.2** | **Please add any comments you wish to make about climate responsive****development design in South Warwickshire** |
|  | No additional comments at this stage.  |
| **Q-C10.1:** | **Please select all options which are appropriate for South Warwickshire****Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This could this be in line with RCP 8.5 in order to maximise the level of interventions incorporated?***RCP 8.5 is a ‘business-as-usual’ scenario in which emissions continue to rise throughout the 21st century and climate change continues unabated. This scenario is suggested as a baseline as if new developments assess risks related to this scenario a more comprehensive approach to incorporating adaptation and resilience interventions can be achieved than applying a lower RCP scenario.***Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated?***Once an assessment has been undertaken, checklists are a useful way in enabling developers to identify which interventions they will incorporate into a new proposal. Stratford-on-Avon District Council’s Development Requirements SPD Part V on Climate Change Adaptation and Mitigation is a way in which checklists can be applied in this way. Alternatively, there may be other tools or guidance that could be developed.***Option C10.1c: None of these** |
|  | The Plan should be ambitious in its thinking. As a minimum we should look for Option C10a but ideally, we should aim for C10b.  |
| **Q-C10.2** | **Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire** |
| **Q-C11:** | **Please select the option which is most appropriate for South Warwickshire****Option C11a: Do not include a policy on water quality in the SWLP Part 1** *‘Save’ existing policy content in this regard from existing plans and take forward through subsequent policy documents as appropriate. The spatial strategy should take account of the impact of strategic growth on relevant watercourses.***Option C11b: Include policy along similar lines to the existing policies, where supported by up-to-date evidence***Prioritise water quality as a strategic issue, and develop a new policy based upon up-to date evidence.***Option C11c: None of these** |
|  | The Plan should be ambitious in its thinking. As a minimum we should look for Option C11a but ideally, we should aim for C11b.  |
| **Q-C12:** | **Please add any comments you wish to make about water management or****flood risk in South Warwickshire** |
|  | Assessments will be made of potential sites at the next round of consultation.  |
| **Chapter 8** |  |
| **Q-D1.1:** | **Do you agree that this is an appropriate range of topics for a strategic design policy?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-D1.2:** | **If no, please indicate why** |
| **Q-D2:** | **Please select all options which are appropriate for South Warwickshire****Option D2a: Develop a South Warwickshire Design Guide***A single reference document. However, given the large geographical area this would cover, it would be challenging to tailor to the specifics of individual settlements or places, or guide significant change. This would need to be led by the Local Planning Authorities.***Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an ‘area’ in the case of a new settlement) where the spatial strategy identifies significant change.***This option could take a more comprehensive view of areas of change identified in the SWLP, rather than focussing on a development site or sites (which it could do in addition), with a view to guiding all development proposals. These would expand upon the place-based principles approach in the Stratford-on-Avon District Core Strategy and would be led by the Local Planning Authority (or both authorities if relevant), in collaboration with local communities. There may also be potential for some or all of this work to come forward through Neighbourhood Development Plans***.****Option D2c: Develop design guides/codes for strategic development sites/locations.***Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.***Option D2d: None of these** |
|  | The inclusion of broader design guides for planning and general needs housing may be a good opportunity too also incorporate design guides for extra care and supported housing to ensure the housing stock delivered for these specific areas is fit for purpose and aligned to commissioning needs. WCC would welcome further opportunities to engage in relation to this.  |
| **Q-D3:** | **Please select all options which are appropriate for South Warwickshire****Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.***This would be similar to the current approach in Stratford-on-Avon. It may facilitate a more locally tailored approach to density, though there may be a risk that in some locations that the efficiency of the land use may not be as high. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.***Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h.***This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.***Option D3c: Identify appropriate density ranges for different locations****/areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.***This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis)***Chapter 8 – A well-designed and beautiful south Warwickshire South Warwickshire Local Plan 142***and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.***Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.***This approach would be different to recent local policy approaches, where the emphasis would be on accessibility to infrastructure including transport infrastructure. This approach would align with the suggestion in Paragraph 125**(e) of the NPPF. If a growth strategy focussed around sustainable travel were to be taken forward, there would be a clear synergy with this option. This option could also have a greater role in examining opportunities for densification in appropriate locations, and in determining the approach to any potential new settlements. The challenge of this approach is that it may result in a different density range in some places across South Warwickshire compared with the conventional approach.***Option D3e: None of these** |
|  | The appropriate density of development is likley to differ across the Local Plan area with greater densities being more acceptable in urban areas than would be appropriate in more rural areas.  |
| **Q-D4.1:** | **Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-D4.2:** | **If no, please indicate why** |
| **Q-D5:** | **Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~***Heritage assets are undoubtedly important to the character of South Warwickshire and should be considered at a strategic level within Part 1 of the South Warwickshire Local Plan, helping inform the strategic growth strategy. Detailed heritage policies are will be deferred to part 2.* |
| **Q-D6:** | **Please add any comments you wish to make about a well-designed and****beautiful South Warwickshire** |
|  | Thought to be given to the inclusion of reference to supporting local distinctiveness which lead to a sense of place. Consideration of key non-designated heritage assets to also be considered.  |
| **Chapter 9** |  |
| **Q-W1:** | **Should the Part 1 plan include a policy on pollution? Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~***This policy would cover all pollution and would ensure that any development that would result in a significant impact on the health and wellbeing of people in an area as a result of pollution will not be permitted unless effective mitigation can be achieved. This policy should also look to protect those areas which are within Air Quality Management Areas by requiring air quality assessments and where necessary a mitigation plan to demonstrate practical and effective measures have been taken to avoid any adverse impacts.* |
|  | Warwickshire County Council support an overall policy on Pollution. The following supports our decision:Pollution is vast covering land, sea and water. An overarching approach should provide a co-produced systematic plan in addressing the issue in line with the latest evidence base. This approach maybe progressive given time to change behaviours and implement new ways of working and to allow time required for transformation change in uniting all sectors and partners.Supports Warwickshire County Council’s declared climate emergency. *Warwickshire County Council - Council Plan 2020-2025.*Poor air quality is the largest environmental risk to public health in the UK. Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. (Health Matters: air Pollution, GOV.UK)People living in the most deprived areas are more likely to suffer from multiple long-term conditions which can be exacerbated by poor air quality. Warwickshire County Council’s Promoting Health and Wellbeing through Spatial Planning reports: Transport related air pollution impacts most on the disadvantaged which results in increased risk of respiratory diseases and other illness. People in the 10 per cent most deprived areas in England experience worst air quality, suffering for example 41 per cent higher concentrations of nitrogen dioxide than the average (Walker, 2003). Lower socioeconomic groups are more likely to be housed close to airports, highways and busy roads, meaning that these groups are likely to experience more nuisance from noise and pollution than other groups. <https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf> Given people living in the most deprived areas in England experience worst air quality and suffer from multiple long-term conditions which can be exacerbated by pollution, there should also be a focus on making health inequalities a priority to improve the likelihood of positive outcomes, especially within identified Air Quality Management Areas.Given the scale of Pollution, Warwickshire Public Health look forward to hearing more about this approach as the South Warwickshire Local Plan develops |
| **Q-W2:** | **Please select the option which is most appropriate for South Warwickshire****Option W2a: Include a policy on Health Impact Assessments.***Developers would be required to submit a Health Impact Assessment/Screening report for all major developments. This would ensure that health impacts have been adequately considered and if required mitigation measures are in place and would align with current national government guidance. A threshold of what constitutes a major development would need to be agreed.***Option W2b: Do not include a policy on Health Impact Assessments.** *Although any major health impacts such as noise and pollution are likely to be picked up at the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural communities.* |
|  | Option W2a: Include a policy on Health Impact Assessments. Warwickshire Public Health support a Health Impact Assessment approach. Warwickshire Public Health are pleased to see that “As well as a HIA of the policies at Preferred Options stage, consideration should be given to major planning proposals and whether applications for these should require a Health Impact Assessment to be submitted”. As outlined in the Issues and Option 2023 document and supported in the Consultation Statement 2022 the National Planning Policy Guidance (NPPF) refers to Health Impact Assessment's as a useful planning tool in addressing any major development proposals and considers the impact they may have on the health and wellbeing of a population. Additionally, this is supported by national government guidance <https://www.gov.uk/government/publications/spatial-planning-for-health-evidence-review> and the National Government Association.Health Impact Assessment is a method Warwickshire County Council recommend using to systematically examine the effect that a development may have on a population. The Warwickshire Director of Public Health Annual Report 2022 has made several recommendations to improve health and wellbeing and reduce health inequalities in Warwickshire. The recommendations are framed around the themes of housing, food, and transport to address the causes of poor health and wellbeing. Implementation of the recommendations will rely upon the concerted efforts of key partners across health and care and the wider determinants of health. One of the four recommendations highlights that “that key anchor organisations, including local authorities focus expertise and capacity on building an inclusive, healthy and sustainable Warwickshire. To do this, all partners should focus on: “Policy: adopting, and sharing learning from, a Health in All Policies approach (<https://www.warwickshire.gov.uk/health-policies-1/health-policies>) and using Health Equity Assessment Tool (HEAT) to reduce inequalities in health”. The HEAT was produced by Public Health England (PHE) to enable professionals to systematically identify and address health inequalities and equity in their work programmes or services. The Director of Public Health Annual Report 2022 can be accessed here: <https://api.warwickshire.gov.uk/documents/WCCC-1350011118-3085> Departments across Warwickshire County Council over the last 18 months have successfully completed HEAT used to judge the potential health effects of new developments, policy, programmes and / or projects on a population, particularly on vulnerable or disadvantaged groups. HEAT across the Council have proven to be a success providing impactful opportunities to influence policy so that any potential negative health impacts can be considered, reduced or avoided and opportunities for positive impacts can be enhanced and improved further. In addition to HEAT, Warwickshire County Council recommend that developers use the Wales HIA Support Unit (WHIASU) tool <https://phwwhocc.co.uk/whiasu/> or the London Healthy Urban Development Unit <https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2019/10/HUDU-Rapid-HIA-Tool-October-2019.pdf> Warwickshire County Council Public Health team recommend the Health Equity Assessment / HEAT should be started at the beginning of the policy development process, with adequate time and resources available to support it. The consequences for health of the development can then be fully considered, and the HIA/HEAT can have a genuine influence on the development. The HIA/HEAT will need to be revisited with each iteration of the proposed development, to ensure that significant changes have been assessed. Public Health Warwickshire support working in conjunction with South Warwickshire on the Health Impact Assessment.  |
| **Q-W3:** | **Please select the option which is most appropriate for South Warwickshire****Option W3a: Include an overall policy on health.***This policy would aim to address all aspects of health and assist in creating communities which are safe, healthy, and inclusive for everyone across South Warwickshire as a whole. This would build on the existing health policies in both the Warwick District Local Plan and the Stratford Core Strategy.***Option W3b: Do not include a policy on health.***This would mean that health is not picked up at a strategic level within part 1 of the plan and there could be a missed opportunity to make communities as safe, healthy and inclusive as possible. It could be included within part 2 where more detailed specific health policies would be developed.* |
|  | Option W3a: Include an overall policy on health**:**Public Health Warwickshire support an overall health policy approach. A Health Policy developed at Stage 1 will provide an overarching framework in creating communities which are safe, healthy, and inclusive for everyone across South Warwickshire. The Policy, developed at a strategic level should be co-produced with local infrastructure providers at the earliest possible stage to understand requirements and take account of key strategies and that duplication is avoided. Regular review and evaluation of the Policy would ensure the Policy is informed, updated with strategy priorities, latest evidence base and emerging needs of communities. There should also be a focus on making health inequalities a priority to improve the likelihood of positive outcomes. |
| **Q-W4:** | **Please add any comments you wish to make about a healthy, safe and****inclusive South Warwickshire.** |
|  | Warwickshire County Council where pleased to see that “There is a lot of evidence which suggests that the places in which people live and work can have a profound influence over their physical and mental health. A paper written by Public Health England '[Getting research into practice A resource for local authorities on planning healthier places](http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951310/GRIP2_PHE_national_resources_151220_for_Gateway_2.pdf)' suggests that poor health and illness is influenced by the environment in which people live.”Ensuring places are well connected to green spaces provides opportunities for people to exercise outside and walk and/or cycle to key services and facilities is key. Regular green space visits are associated with improvements in mental wellbeing and exercising outside. Please see the WCC Public Health developed Promoting Health and Wellbeing Through Spatial Planning document for more information: <https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf>.Warwickshire Public Health value the South Warwickshire consultation with professionals and the public to understand what is important to them in line with local health and wellbeing needs. Targeted community engagement with the public will help in addressing barriers to healthy behaviours, For example, if the community are travelling children to school in the car and live in a built up urban area with high traffic congestion the motivation to engage in active travel is lower and that changes, awareness and education is required. How do we encourage various modes of active travel where uptake is low? Are barriers fully understood? How can appropriate active travel materials and resources help with individuals’ behaviours?Behaviour change models can be a helpful guide when identifying intervention components and addressing barriers to healthy behaviours. The COM-B behaviour change model is used extensively in behaviour change interventions in the scientific literature. COM-B (‘capability’, ‘opportunity’, ‘motivation’ and ‘behaviour’) model. This model recognises that behaviour is part of an interacting system involving all these components.Community engagement is essential to ensure interventions are appropriate, targeted for communities and their needs are highlighted to have the most positive impact. We recommend an emphasis on co-production to improve the likelihood of positive behaviour change. Community champions have been shown as a positive intervention to engage with communities and develop local solutions. Adopting this approach may influence communities to increase knowledge and confidence in being able to cycle to school. Green open Spaces are known to be linked to significant benefits for people's health and wellbeing, as well as additional environmental and economic benefits. Can Warwickshire Public Health ask if green gyms have been considered, especially as the rising cost of living is likely to exacerbate some of the health inequalities which already exist across the county?Finally, Warwickshire Public Health ask that consideration is in place for regulating the growth and proliferation of hot food takeaway, highlighting the links to obesity, especially within the most deprived areas across Warwickshire. Warwickshire Public Health encourage all new hot food takeaway establishments to undertake a Health Impact Assessment prior to planning approval. <https://www.gov.uk/government/case-studies/planning-document-to-limit-the-proliferation-of-takeaways> Evidence supporting this consideration is the following for Warwickshire:* Adults classified as overweight or obese has increased from 63.3% (2019/2020) to 65.6% (2020/21)
* Year 6 children classified as obese and severely obese has increased from 19.8% (2019/20) to 21.6% in 2021/22)
* Reception age children classified as obese and severely obese has also increased from 8.7% in 2019/20 to 8.9% in 2021/22.

Access to further healthy lifestyle health data when assessing developments and populations can be found here:<https://fingertips.phe.org.uk/search/Road%20traffic%20accidents#page/1/gid/1/pat/6/ati/402/are/E10000031/iid/90804/age/169/sex/4/cat/-1/ctp/-1/yrr/3/cid/4/tbm/1><https://www.warwickshire.gov.uk/joint-strategic-needs-assessments-1> |
| **Chapter 10** |  |
| **Q-T1:** | **Please select all options which are appropriate for South Warwickshire****Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.***It might be considered more appropriate to consider such matters in the context of specific locations and places, but in this scenario it would not apply consistently across South Warwickshire within the Part 1 SWLP.***Option T1b: Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy.***This would recognise its relevance to the overarching principles of the SWLP, but suggest it doesn’t warrant a bespoke policy. Alternatives may also be offered. This would raise the profile but not guarantee that a single approach would be consistently adopted across South Warwickshire*.**Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.***This would set out very clear the vision and expectations for new developments and places, to ensure early design incorporation.* |
|  | Option T1cWarwickshire County Council Public Health support a bespoke policy requiring the principles of 20-minute neighbourhoods to be included in development proposals.Warwickshire County Council were pleased to see that the principles of the 20-minute neighbourhood “have underpinned the development of the '[settlement design analysis](https://www.southwarwickshire.org.uk/doc/211519/name/Settlement%20Design%20Analysis.pdf)' across South Warwickshire with a view to this informing the evolution of spatial strategy options in making the case that this might form the basis of a policy within the SWLP”. It is critical that the environment in which people live does not promote sedentary behaviour. Structure and design can influence whether communities will walk or cycle. Simply, by having key facilities within a reasonable walking distance can encourage active travel. Having facilities and services available near developments are particularly imperative for community resilience, happiness and especially important for people that are elderly, socially isolated, those living with health conditions and those living with a disability. As reported within Warwickshire’s County Council Spatial Planning document <https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf> residents of highly walkable neighbourhoods have lower body weights than their counterparts in less walkable neighbourhoods (Foresight report, 2007). Waltham Forest Council have reported to have successfully pioneered 20-minute neighbourhoods, giving every resident easy access to everything they need to live well. <https://www.walthamforest.gov.uk/council-and-elections/about-us/waltham-forest-public-service-strategy/priority-3-our-15-minute-neighbourhood> We would encourage best practice dialogue with other local authorities across the countryin implementing the 20-minute neighbourhoods’ principles and that the Policy is reviewed regularly in line with the most up to date evidence base. |
| **Q-T2:** | **Please select the option which is most appropriate for South Warwickshire****Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.***This would be based on those living in rural areas, urban areas etc. It could include making changes to car parking standards and lowering them in areas where there are good active/public transport links in place such as in main urban centres. The policy would explore opportunities to use existing green and blue infrastructure as potential active travel options. The policy should also ensure that proposals are in line with the priorities as set out in the Local Transport Plan such as promoting and looking at alternative options for sustainable travel, e.g. car club initiatives, e scooters etc.***Option T2b: Do not include a policy which takes a hierarchical approach.** *There could be a general policy on sustainable transport which requires the necessary infrastructure and services (including the use of existing green and blue infrastructure) in place to allow both existing and new communities to become more sustainable and to have much easier access to key services and facilities. This would be regardless of whether residents live in rural or urban areas and could be an expansion of Policy CS.26 in the Core Strategy. This could also include a section on ensuring that proposals are in line with the priorities as set out in the Local Transport Plan. If a hierarchical approach is not taken it may still lead to those residents who have good access to public transport still continuing to use their cars for everyday use as there would be little incentive to change travel habits.* |
|  | Warwickshire County Council Public Health support T2a - a policy which takes a hierarchical approach to prioritising transport infrastructure. The Warwickshire Director of Public Health Annual Report 2022 has made several recommendations to improve health and wellbeing and reduce health inequalities in Warwickshire. The recommendations are framed around the themes of housing, food, and transport in order to address the causes of poor health and wellbeing. Implementation of the recommendations will rely upon the concerted efforts of key partners across health and care and the wider determinants of health. One of the four recommendations highlights that “that transport planners and health partners work together to improve transport links for those living in areas with more rural isolation, deprivation and where rates of long-term conditions and access to transport links are poor”. Public Transport plays a key role, particularly for vulnerable groups, in providing access to a range of services and opportunities, including health care, employment, shops and recreational activities. When combined with walking and cycling use of public transport can also bring health, wellbeing, and environmental benefits. Warwickshire County Council Public Health are pleased to see that considerations such as making changes to car parking standards and lowering them in areas where there are good active/public transport links such as in main urban centres. The Warwickshire County Council Director Public Health Annual Report 2022 reports that certain groups are impacted by this more than others. Nationally, those living in the most deprived areas are 3 times more likely to rely on public transport for essential travel and less likely to be able to work from home, compared to those in the least deprived areas (<https://www.ucl.ac.uk/news/2021/jan/people-deprived-areas-3-times-more-likely-use-public-transport-essential-travel>). In 2017/18, 33% of the lowest income households nationally did not have access to a car (thereby making them more reliant on public transport), compared to just 5% of the highest income households (<https://www.health.org.uk/publications/long-reads/how-transport-offers-a-route-to-better-health>) Women may also be disproportionately affected. In 2018, women across England made over a third more journeys by bus then men. (<https://wbg.org.uk/analysis/uk-policy-briefings/2019-wbg-briefing-public-transport-and-gender/>) Community engagement is essential to ensure interventions are appropriate (especially within the most deprived areas), targeted for communities and their needs are highlighted to have the most positive impact. We recommend an emphasis on co-production to improve the likelihood of these positive behaviour changes. It was also pleasing to see that proposals should support the priorities outlined in Warwickshire’s Local Transport Plan. Warwickshire County Council Public Health recognise the complexities surrounding this plan; however, possible interventions are clear and key to supporting active travel choices by 2026.  |
| **Q-T3:** | **Please select the option which is most appropriate for South Warwickshire****Option T3a: Include a policy encouraging more sustainable road-based transport for businesses.***It is acknowledged that employment and businesses will still need to operate using roads as their predominant form of transport particularly for the distribution of goods. This policy would encourage businesses to become more sustainable such as by using electric vehicles, introducing low emission zones, workplace levies, looking at the possibility of ‘last mile’ freight journeys (the very final stage of delivery) or driverless delivery pods whereby battery powered autonomous vehicles will be used to deliver goods. This could also include measures required in order to mitigate against any unacceptable impacts that road-based travel from business/employment may have on the environment such as poor air quality. This will help in meeting the climate change aspirations of the plan.***Option T3b: – Do not include a policy encouraging more sustainable road- based transport for business.***This may be beyond the scope of the Part 1 plan as it could be picked up under a more general sustainable transport policy rather than specifically for business and employment. If it is not considered to be a strategic issue for Part 1, a detailed policy could be developed as Part 2 of the plan.* |
|  | Whilst this correctly identifies the issues faced by existing residents and businesses, particularly in the rural areas, the current delivery mechanisms for improvements are subject to CIL legislation, viability considerations and the commercial realities for public transport providers. Consideration could therefore be given to identifying sites for future development that could have a cumulative benefit on the existing population for an area.Warwickshire County Council Public Health support a policy encouraging more sustainable road-based transport for businesses. Warwickshire County Council has declared a climate emergency, therefore, Warwickshire County Council Public Health are pleased to see that ‘sustainable road-based transport for businesses’ is being considered. *(Warwickshire County Council - Council Plan 2020-2025)*Options outlined in the Plan such as low emissions zones, workplace levies etc is positive. Other methods of encouraging the uptake of electric and low emission vehicles could be explored further such as public incentives but consideration given to larger scale businesses, especially those organisations whose predominant form of travel is road-based. Evidence suggests that a package of well-designed financial incentives plus non-financial incentives (and possibly also investment in public charging) may be the most effective means of increasing uptake.<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/464763/uptake-of-ulev-uk.pdf> Whilst it is recognised that detailed standards will be developed in due course, an over-arching policy could be helpful for residential and employment sites, and potentially retail and education uses. Until revised standards are in place, the existing standards will be applied, and these may be contrary to the general presumption intended for sites (depending on the strategy chosen), and it is likely that planning applications will be made ahead of the Local Plan adoption and any subsequent Development Briefs or SPD’s. |
| **Q-T4:** | **Please provide suggestions for how smart cities technologies could be****supported in South Warwickshire** |
|  | It is positive to see that Smart Cities technologies are being considered given the social, economic, and environmental benefits to communities. Public Health Warwickshire seek further clarity with this question? ‘Support’ in terms of financial or ‘support’ from infrastructure providers and /or other suggestions?Although Smart Cities technology presents many disadvantages such as privacy and security risks and substantial investment capital there are many beneficial advantages to the health and wellbeing of communities. Data and digital technology combined can help with individual making more informed choices and decisions, thereby improving their quality of life. Smart Cities technologies assist in keeping our communities safer. Research has shown that people are concerned about their safety on public transport such as violent crime (e.g., sexual offenses, knife attacks, terrorism, thefts), non-violent crime (e.g., anti-social behaviour, vandalism, drug use, trespassing, drunkenness) <https://www.researchgate.net/publication/340987221_Public_Transport_Quality_Safety_and_Perceived_Accessibility>. As highlighted in Warwickshire County Council Spatial Planning Document <https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf> Smart Cities technologies could assist in the reduction of crime and improve public safety. Smart cities technologies allow behaviour change to be understood in further detail such as people’s patterns, changes in behaviour and demands of people and in turn technology can respond with more efficient and lower cost improvements. Smart Cities technologies will bring vast improvements to the environment including the reduction of carbon footprint, reduced emissions which could help in keeping many people safe from adverse health conditions such as Asthma and COPD. 'Live' timetable information at bus stops is likely to provide reliable confidence for more people to use public transport, therefore, reducing car dependency. Warwickshire Public Health look forward to hearing more about the Smart Cities technologies approach as the South Warwickshire Local Plan develops. |
| **Q-T5:** | **Please add any comments you wish to make about a well-connected South****Warwickshire** |
|  | Public Health Warwickshire are pleased to see a good range of sustainable travel choices. Public Health Warwickshire are pleased to see that the principles of a 20-minute neighbourhood are being considered given the significant health benefits and connectively this will provide to communities. Public Health Warwickshire are pleased to see the South Warwickshire Local Plan should look to align with the Local Transport Plan priorities. Key amenities should be within a reasonable distance for travelling or walking to and provide the opportunity to choose a healthy lifestyle. This includes adequate access to green spaces, education and health facilities, reasonably priced healthy food choices and limitations on unhealthy lifestyle outlets. Local amenities, such as community/health centres, schools, and food stores should be within a 5-minute walkable distance, reducing the need for car use, promote physical activity and integrate facilities and services into the heart of the community where they can be well used by all. Having facilities within a reasonable distance to travel to will help to reduce loneliness and social isolation of residents in the neighbourhood. Has consideration been given to new developments and how they will integrate into existing buildings and connection? Will people be able to travel from new to existing facilities and services?Warwickshire County Council Public Health in line with national evidence base encourage the design of places with a good mix of housing to enable people to integrate and connect into their community no matter what their living arrangements where.The “Determinants of and Barriers to Active Travel in Coventry and Warwickshire” report published in June 2021 (taken from the Warwickshire County Council Director of Public Health Annual Report 2022 <https://api.warwickshire.gov.uk/documents/WCCC-1350011118-3190>) identified that: * For commuting, concern about lack of cycle routes and road safety were the biggest barriers
* For educational trips, distance was the biggest barrier
* For shopping trips, carrying a heavy load was the biggest barrier
* Health is identified both as a driver and barrier (due to specific conditions) for Active Travel
* Those living in buildings where some safety features are present are more likely to use their bike, evidencing that safe storage is a contributory factor
* Individuals were worried about their safety in separate bike lanes as they were worried cars can pass into them
* Individuals said they would respond to positive incentives (such as safe lanes or group active travel) as opposed to negative incentives (removing or charging for work parking)

*(Sen S, Patel R. Determinants of and barriers to active travel in Coventry and Warwickshire. 2021 Jun 1.)*  |
| **Chapter 11** |  |
| **Q-B1:** | **Please select the option which is most appropriate for South Warwickshire****Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District***Maintaining Areas of Restraint as a strategic policy approach will help protect parcels of land that help preserve the structure and character of settlements within the plan area. As part of identifying areas in Warwick Stratford designations would be reviewed*.**Option B1b: Remove Areas of Restraint designations***Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.***Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District.***This option sees a continuation of the current approach. Stratford-on-Avon would maintain its Areas of Restraint and Warwick District continues without this designation. This would result in a disjointed approach.* |
|  | Option B1a seems the sensible approach for a Plan covering the geographic area of the two LPAs.  |
| **Q-B2:** | **Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~***The Vale of Evesham Control Zone relies upon collaboration between local authorities and HGV Haulers to work effectively. If neighbouring authorities removed the policy designation then there would be little merit in South Warwickshire continuing with it in isolation. Do you agree that if Wychavon and Cotswold District Councils remove the Vale of Evesham Control Zone, that South Warwickshire should follow suit?* |
| **Q-B3:** | **Please select the option which is most appropriate for South Warwickshire****Option B3a: Introduce Special Landscape Areas across all of South Warwickshire***Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA’s refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA’s within Stratford remain relevant and where any SLA’s within Warwick should be located, an updated study would need to be undertaken.***Option B3b: Maintain Special landscape Areas within Stratford-on-Avon****District but don’t introduce them within Warwick District***Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.***Option B3c: Discard Special Landscape Areas and bolster general landscape policy***Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.* |
|  | Option B3a seems the sensible approach for a Plan covering the geographic area of the two LPAs.  |
| **Q-B4:** | **Please select the option which is most appropriate for South Warwickshire****Option B4a: Maintain the current policy approach, without the use of a buffer***Maintaining the current policy approach in line with National Planning Policy Framework would result in little to no change in the level of protection afforded to the Cotswold AONB.***Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape***Creating a buffer zone around the Cotswold AONB would help ensure regard is given to the potential impacts of development outside of the National Landscape, on the natural beauty of the National Landscape. It is possible that a distance based buffer is used around the entirety of the special landscape area (e.g. 3km), or alternatively a sinuous buffer based on landscape sensitivity in different areas is created in consultation with the Cotswold Conservation Board. This would mean that the buffer is thicker in some areas than others, and could be identified as a special landscape area. Details of the buffer would be considered as the plan progresses should this option be preferred. However, it is worth noting that the level of protection afforded to the Cotswold AONB would not change. Such an approach may simply help officers when determining planning applications.* |
|  | Option B4b preferred approach.  |
| **Q-B5:** | **Please select the option which is most appropriate for South Warwickshire** **Option B5a: Explore and pursue an integrated Environmental Net Gain Policy***To consider Environmental net gain as a new and pioneering approach to support natures recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice. However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a minimum 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.***Option B5b: Explore environmental net gain through separate policies***A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate polies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.***Option B5c: None of these** |
|  | Option B5a would seem to be the best approach for providing clarity. |
| **Q-B6:** | **Should the South Warwickshire Local Plan introduce Wildbelt designations? Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t~~ Know***Designate areas of Wildbelt across the Local Plan Area to support nature’s recovery and the Wildlife Trust’s goal to have 30% of our land and sea managed for nature by 2030.* |
| **Q-B7:** | **Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~***Where possible, the SWLP will seek to signpost to relevant policies in other documents, rather than duplicating or paraphrasing these policies. It is not within the scope of the SWLP to produce its own distinct policy regarding minerals. This approach also avoids difficulties of varying plan periods for different plans.* |
| **Q-B8.1:** | **Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?****Yes** ~~|~~ **~~No~~** ~~|~~ **~~Don’t Know~~***Agricultural land is graded 1-5 according to its quality and versatility for producing a range of crops. The ‘best and most versatile’ land (grades 1, 2 and 3a) is that which is most flexible, productive and efficient.* |
| **Q-B8.2:** | **When considering climate change, biodiversity and economic wellbeing,****are there any rural land uses or locations that should be prioritised over others?** |
|  |  |
| **Q-B9:** | **Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites.****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~***Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non- designated biodiversity or geodiversity assets, and there are variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.* |
|  |  |
| **Q-B10:** | **Please add any comments you wish to make about a biodiverse and****environmentally resilient South Warwickshire** |
| **Chapter 12** |  |
| **Q-P1.1:** | **Do you agree with the proposed broad content of the Part 1 plan?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
| **Q-P1.2:** | **If no, please indicate why.** |
| **Q-P1.3:** | **Do you agree with the selection of policies to be addressed in the Part 1 plan?****Yes** | **~~No~~** ~~|~~ **~~Don’t Know~~** |
|  | All existing adopted policies are to be retained or updated (except for those policies regarding retail changes of use - which are to be deleted for consistency with updated legislation). |
| **Q-P1.4:** | **If not, please indicate why** |
| **Q-P2.1:** | **Are there any areas where equality and inclusivity in planning needs further attention?****~~Yes~~** ~~|~~ **~~No~~** | **Don’t Know** |
| **Q-P2.2:** | **If yes, please give further details** |