**Chapt. 3**

**QV3.1:**   NO

**QV3.2:**  Objectives do not give enough weight to the gravity of climate change; there is an over projection of housing needs and developments, and the wrong areas are identified for development. Infrastructure is inadequately assessed with insufficient priority given to green options. There is no real vision of how our world will look in 20 years time,  so current strategies outlined will be be 20 years out of detate, assuming their time scale has not fallen behind or costings become excessive. HS2 serves as an example of what can go wrong with misdirected and poorly evidenced strategy and vision.

The Green Infrastructure Study in use is already 10 years out of date.

**Q-13**   'B' = preferred option

**Q.14.1**  Don't know

**Q.15**  I am concerned that all significant projects exceed budgets and over-run time scales, and this is not allowed for in strategic planning; the result will be a hit for future local residents and their community charges.

**Q-S1**  Option S1'a'.

**Q-S2**  Option S2'a'.

**QS3.1**  Brownfield sites must always be developed before using greenfield and greenbelt land. If some brownfield sites cannot be developed appropriately then they should be transformed into green spaces.

**Q-S3.2**  S32'b' is the best option.

**Q-S4.1** Don't know.

**Q-S4.2**  Kenilworth cannot sustain any more housing growth. The infrastructure will not sustain it. The town centre cannot serve it, the health facilities are not adequate; there will be a risk of flooding from inadequate drainage, green spaces will be swamped or have housing built on them; allotments will be lost; the greenbelts will be damaged and narrowed. The housing will serve jobs in neighbouring towns not Kenilworth, and so will not be good for climate.

**Q-S5.1**  No weight given to the impact of wood burner emissions, or how these will be prevented in future developments. Councils could make their own property much greener and more able to catch emissions - eg trees and shrubs around and within car parks.

**Q-S5.2**  Yes.

**Q-S5.3**  This is not a simple yes/no question,

**Q-S5.4**  Assess each potential location and its transport infrastructure on its individual green and low emissions merits.

**Q-S7.2**  Option 2 is appropriate.  Option 3 is not.

**Q-S8.1**  No

**Q-S9**  S9.a

**Chapt.5**

**Q-E1.1** No

**Q-E1.2**  Use more accurate  and tested population projections. including future mobility and dispersals of populations.

**Q-E2:**  E2a;  E2c.

**Q-E3:**  E3c.

**Q-E4.1**  1a;  2a.

**Q-E5**   E.5b.

**Q-E6**  E.6a

**Q-E7**  E7.1b

**Q-E8.1**  Don't know

**Chapt.6**

**Q-H1-1**  No

**Q-H1-2**  You should take more note of 'Windfalls' looking at their average over the past decade or so - this indicates there is no need to appropriate more land for housing. WINDFALLS

• The SWLP allows for land for 220 dwellings per annum (DPA) from windfalls.  
• Actual annual average windfall numbers since 2011 have been 901.  
• 69% of Stratford’s housing site needs since 2011 have been met from Windfalls;  
44% of Warwick’s.  
• If instead of 220 DPA’s (as in plan) the SWLP assumed only half the annual average,  
(450 homes) the housing land shortfall drops from 23,000 to 1510 in 2040; 5,410 in  
2045 and 9310 in 2050.  
• If the actual average since 2011 – 901 - is used, the plan is in surplus:  
5,255 excess house spaces in 2040; 3610 excess in 2045. 1965 in 2050.  
• In addition to a severe underestimate of overall numbers, the Local Planning  
guidance only includes within the 220, those spaces for fewer than 9 dwellings. So  
places like the Ford Foundry site, the King’s High School sites, land adjacent to  
Leamington Spa Station, and others for more than 9 homes would not be included.  
• We believe that this also seriously distorts likely available land, based on figures  
since 2011.  
2. AFFORDABILITY UPLIFTS  
• Under a formula devised in 2004, housing numbers are automatically increased in  
more expensive areas, on the assertion that building more houses will bring down  
prices.  
• This has nothing whatsoever to do with actual housing need.  
• ONS numbers from the base year used (2014) assessed the SWLP area need at 874  
homes. The Affordability formula increases this to 1,239. These are the numbers  
used in the SWLP.  
• This is an increase of 42% over need.  
  
2. IN-MIGRATION  
  
• Housing numbers like Coventry’s encourage net in-migration to local areas. They are  
not a response to endogenous growth.  
• 76% of Warwick’s estimated population growth for 2018-2028 comes from net in-  
migration.  
• 118% of Stratford’s is from the same source. (ie. Just on birth rate, without in-  
migration, the population would decline).  
• This therefore risks becoming a self-replicating cycle. (“We’ve filled more houses,  
therefore we need more houses, therefore…”)

**Q-H2-1**  Most affordable housing is not affordable. You need to build more social housing, and also hold developers to the proportions of affordable housing they originally agree to - these commitments are often reduced for spurious reasons.

**Q-H2-2**  : 2c.

**Q-H2-3** :  Invest much more in care and social services for older people, including in their own homes.

**Q-H3** : H3c.

**Q-H5:**  Resist such requirements.

**Q-H5:**   H5c

**Q-H6:**   H6a

**Q-H7:**   Use only brownfield sites; re-examine the projections on which housing needs are based;  more social housing, and less building/re-developing of large homes with multiple living rooms in the £500,000+ bracket, meet modern standards of sustainability and energy saving. Promote green corridors and spaces within developments; develop country parks within reach of all significant settlements; protect historic and wildlife sites.

**Chapter 7**

**Q-C1.1:**  C1.1b

**Q-C1.2** :  Visual impact on landscapes over a wide area;  visual impact on historic landscapes;   noise impact over adjoining areas;  mental health impact of overlooking constantly turning blades;  impact on wildlife, for example bird-kills.

**Q-C2:**  C2c

**Q-C3.1:**   Don't know; carbon off-setting is increasingly viewed as an easy way out for developments, and largely ineffective; e.g. it takes 40 years for a sapling to become an effective carbon-reducing tree.

**Q-C3.2:**  Pay for widespread publicity on how households and businesses can reduce emissions,  starting with the elimination of woodburning stoves.

**Q-C3.3:**   Building regulations should compel developers of new housing, factories, warehouses etc to have solar panels added; Install solar panels on council properties; keep solar panels of prime agricultural land.

**Q-C4.1:**   1b.

**Q-C4.2:**  2a.

**Q-C.5:**   C5c.

**Q-C61:**   1a.

**Q-C6.2:**   90% by 2030;  100% by 2035.

**Q-C7:**   C7a

**Q-C8:**  C8a

**Q-C9.1:**    1a.

**Q-C9.2:**    Ensure developers adhere to original agreements; don't give in to their excuses not to; prevent developers doing unnecessary green space covering, or tree cover or spinney clearances.

**Q-C10.1:**   c.

**Q-C.11:**     C11b

**Q-C.12:**   Do not build on flood meadows.  Control paved areas in new developments; proactive interventions to improve quality of local streams and rivers. Control use of chemicals and fertilisers on council land.   Assess whether existing drainage and sewer systems can cope with a new development, without discharge into streams and rivers; ensure developers pay for required improvements to drainage and sewer systems. Involve Severn Trent in development flood and drainage assessments.

**Chapter 8**

**Q-D1.1:**Don't know.

**Q-D.2:**    d.

**Q-D3:**   d.

**Q-D4.1:**     don't know

**Q-D5:**    yes.

**Q-D6:**   Beautiful Warwickshire depends on protecting landscapes and views from eyesores - i.e where can this development be seen from? E.G. views from a castle, not just of it. 'Beautiful' depends on protecting important green areas, woodlands, hedgerows, footpaths, green corridors and spaces within villages, towns, settlements; environmental diversity and richness should be a priority; waterways should be clean, litter removed from along main roads; historic buildings should be preserved inside and out - not just their frontages; quiet places and dark skies should be part of the county. Where developers build hundreds of new houses new parks should be added so existing ones do not get worn out by footfall.

**Chapter 9**

**Q.W1:**  Yes

**Q-W2:**   2a.

**Q-W3:**   3a

**Q-T1:**   a

**Q-T2:**    a

**Q-T3:**   a

**Q-T5:**    Invest much more in rural and urban bus services. Work on improving rail services from and to Kenilworth, maximising use of its station.

**Q-B1:**    B1a

**Q-B2:**    Don't know

**Q-B3:**    B3a

**Q-B4:**    B4b

**Q-B5:**   5b

**Q-B6:**     Yes

**Q-B7:**   Don't know

**Q-B8:**   Yes

**Q-B8.2:**  Setting aside land for green spaces, parks, nature reserves, Local Nature Reserves, returning to nature; protecting community playing fields.

**Q-B9:**  Yes

**Q-B10:**   There should be a 20% biodiversity net gain through new development; at present the plan only includes one of 10%. This shows a lack of ambition.   The Green Infrastructure Study needs updating and reviewing if it is to inform growth options.   At present there is a lack of detailed assessment of local biodiversity, wildlife and river habitats; especially where growth and new settlement locations are indicated biodiversity assessments should be detailed and local, if a number of of 'Potential Local Wildlife Sites' are not to be lost - for example along the Avon corridor.  More detail is needed around the Council's plans for dealing with the acknowledged  climate emergency. These plans should have a practical basis, not generalised. Biodiversity can have a very localised significance - for example the number of species dependent on a single mature oak, or a long established hedgerow, or pond. The micro environment is as important as the macro, and at risk from smaller scale plans.

**Chapter 10**

Don't know