

**To: The Chairman and Members of the Local Development Framework Sub-Committee**

**(Councillors Reilly, Chambers, T Clews, Hancocks, Osborne and Simpson)**

**For the information of the other Members of the Council**

**For general enquiries please contact Democratic Services on 01827 719237 or via e-mail: [democraticservices@northwarks.gov.uk](mailto:democraticservices@northwarks.gov.uk)**

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## **LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE**

**20 FEBRUARY 2023**

The Local Development Framework Sub-Committee will meet on Monday, 20 February 2023 at 6.30pm in the Council Chamber at The Council House, South Street, Atherstone, Warwickshire.

The meeting can also be viewed on the Council's YouTube channel at [NorthWarks - YouTube](#).

### **AGENDA**

- 1 Evacuation Procedure.**
- 2 Apologies for Absence/ Members away on official Council business.**
- 3 Disclosable Pecuniary and Non-Pecuniary Interests.**
- 4 Minutes of the meeting of the Local Development Framework Sub-Committee held on 4 January 2023 - copy herewith, to be approved as a correct record and signed by the Chairman.**

# ITEMS FOR DISCUSSION AND DECISION

## (WHITE PAPERS)

- 5 **The South Warwickshire Local Plan, Issues and Options Consultation (2023)**– Report of the Chief Executive

### **Summary**

This report informs Members of the consultation on The South Warwickshire Local Plan, Issues and Options (2023) which incorporates issues identified in the South Warwickshire Local Plan 2021 Scoping and Call for Sites consultation. The Board report includes comments on the issues and options consultation and seeks any further comments by Members.

The Contact Officer for this report is Mike Dittman (719499).

STEVE MAXEY  
Chief Executive

## NORTH WARWICKSHIRE BOROUGH COUNCIL

### MINUTES OF THE LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

4 January 2023

Present: Councillor Reilly in the Chair.

Councillors Hancocks, Osbourne and Simpson

Apologies for absence were received from T Clews

Councillor D Humphreys was also in attendance and, with the consent of the Chairman, spoke on Minute No 21 (Provision of Waste and Bin Storage Facilities for New Developments), Minute No 22 (Supplementary Planning Document (SPD) "Planning Obligations for Open Space, Sport and Recreation" and Associated Calculator Documents), Minute No 23 (Future Work)

#### 19 **Disclosable Pecuniary and Non-Pecuniary Interests**

There were none declared at the meeting.

#### 20 **Minutes of the meeting of the Local Development Framework Sub-Committee held on 28 November 2022**

The minutes of the meeting of the Local Development Framework Sub-Committee held on 28 November 2022, copies having been previously circulated, were approved as a correct record and signed by the Chairman.

#### 21 **Provision of Waste and Bin Storage Facilities for New Developments**

The Chief Executive reported on the updates to the Design Guide for Bin Storage and sought any comments prior to the document going to Planning and Development Board recommending it be adopted as a Supplementary Planning Document to inform planning decisions.

##### **Resolved:**

- a That the report; be noted; and**
- b That comments made by Members be reported to the 9 January 2023 meeting of the Planning and Development Board.**

**22 Supplementary Planning Document (SPD) “Planning Obligations for Open Space, Sport and Recreation” and Associated Calculator Documents**

The Chief Executive Informed Members of the consultation and proposed changes to the Draft Planning Obligations for Open Space, Sport and Recreation SPD and associated Calculator Documents. Members’ comments from the LDF Sub-Committee would be presented to the Planning and Development Board when it would be recommended to adopt the Supplementary Planning Document and it be used to inform planning decisions.

**Resolved:**

- a That the report be noted; and**
- b That comments made by Members will be reported to the 9 January 2023 meeting of the Planning and Development Board.**

**23 Future Work**

The Chief Executive reported on a summary of work and issues for Members to note. Further detailed reports would be brought to the Board in due course.

**Recommended:**

**That Members acknowledge the information in the report but request further information on each item:**

- (i) An Invitation to the authors of the HEDNA, Icenl, to present on their methodology and findings;**
- (ii) An update on the Strategic Employment study; and**
- (iii) Members to Invite Birmingham City Council to meet with North Warwickshire Borough Council to present on their housing and employment land need calculations.**

D Reilly  
Chairman

## Agenda Item No 5

### Local Development Framework Sub Committee

20 February 2023

#### Report of the Chief Executive

#### The South Warwickshire Local Plan, Issues and Options Consultation (2023)

## 1 Summary

- 1.1 This report informs Members of the consultation on The South Warwickshire Local Plan, Issues and Options (2023) which incorporates issues identified in the South Warwickshire Local Plan 2021 Scoping and Call for Sites consultation. The Board report includes comments on the issues and options consultation and seeks any further comments by Members.

### Recommendation to Board

- a That Members note The South Warwickshire Local Plan, Issues and Options Consultation (2023); and
- b To support the suggested responses in Appendix 1 to this report and to raise any further comments regarding the Issues and Options identified to be included in the formal response to the consultation.

## 2 Consultation

- 2.1 Stratford-on-Avon District Council and Warwick District Council are working together to prepare a new Local Plan for South Warwickshire. The Plan is expected to replace the strategic policies of the existing Stratford-on-Avon Core Strategy which runs until 2031 and Warwick Local Plan until 2029. The Issues and Options consultation is the second stage in preparing the South Warwickshire Local Plan – a new Plan for Stratford-on-Avon and Warwick Districts. The South Warwickshire Local Plan will set out a long-term spatial strategy for housing, jobs, infrastructure and climate change for both Districts to 2050. Following the consultation held in May 2021 on the Scoping and Call for Sites document the two councils have now issued an Issues and Options document for consultation.
- 2.2 The South Warwickshire Local Plan, Issues and Options Consultation (2023) runs from Monday 9 January to 6 March 2023. Although North Warwickshire

does not immediately border either Warwick District or Stratford on Avon District the Borough Council have previously supported the two authorities, in relation to the legal Duty to Co-operate requirements, as part of the Coventry and Warwickshire sub-region involved in undertaking joint planning and evidence base work. Members may recall the Borough's response to the Scoping and Call for Sites consultation was considered at Executive Board on the 21 July 2021, where the Borough Council made comments on whether there were strategic cross boundary issues that need to be addressed.

2.3 The feedback from the earlier Scoping and Call for Sites consultation feedback has been used to inform the content of this consultation. This second stage consultation seeks views on the Issues identified and the Options proposed as possible solutions to plan for the future of South Warwickshire to 2050. Chapters 1 and 2 deal primarily with local plan process and the current National and Local policy context so no comments or views are noted/proposed. The main chapters relevant to joint planning and the Duty to Cooperate are:

- Chapter 3 sets out the vision and strategic objectives centred around five overarching principles that will underpin the Plan and sit at its heart: These include:
  - A climate resilient and net zero carbon South Warwickshire
  - A well-designed and beautiful South Warwickshire
  - A healthy, safe and inclusive South Warwickshire
  - A well-connected South Warwickshire
  - A biodiverse and environmentally resilient South Warwickshire
- Chapter 4 provides the options for how South Warwickshire's development needs can be met sustainably including a range of potential spatial growth options and identified locations for possible new settlements.
- Chapters 5 and chapter 6 set out the policy options for delivering the area's economic and housing needs, followed by chapters 7-11 which set out the remaining policy options under the 5 overarching principles.

2.4 Alongside the consultation on the Issues and Options document, a second Call for Sites is also underway, which will provide landowners with the opportunity to submit land/sites for consideration in the plan-making process.

### **3 Observations**

3.1 The Planning and Compulsory Purchase Act 2004 places a legal duty on public bodies to engage constructively, actively and on an ongoing basis with each other to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters. Its aim is to encourage positive and continual partnership on planning matters that go beyond the boundaries of a single local planning authority's (LPA) administrative area. As part of the two Councils legal responsibilities towards the local planning Duty to Cooperate requirements the Borough Council's views are sought in the Issues raised and the Options proposed as possible solutions for inclusion in the South Warwickshire Local Plan (SWLP).

- ...
- 3.2 The consultation seeks responses and views to a series of questions raised throughout the various Chapters noted above. These are provided online and not all questions are considered relevant to, or require a response from, the Borough Council. The full list of questions is attached as Appendix 1 to this report and includes 'no comment' responses were considered appropriate or not necessary.
- 3.3 The recent local plan examination and work leading up to the adoption of the North Warwickshire Local Plan has informed officers initial response to the issues and options consultation questions. Members views and comments on these responses are sought and any additional comments or amendments to the responses listed in Appendix 1 will be added to the Borough Council's response to the joint South Warwickshire Local Plan consultation.
- 3.4 In broad terms the responses are focussed on issues relating to the relevant and appropriate cross-boundary matters previously noted in the earlier 2021 consultation. There is broad support and agreement around the various issues and options highlighted within the document and/or raised in the questions. Nevertheless, there is one issue the Council considers should be highlighted and raised in relation to addressing the need/demand for strategic employment sites, including potential logistics.
- 3.5 In Chapter 5 the supporting text to Issue E1 highlights the HEDNA's consideration of employment land requirements across Coventry and Warwickshire to 2050, noting that "*In addition, a proportion of the 709 hectares of strategic B8 employment land (i.e. warehousing and distribution) identified for the wider Coventry and Warwickshire sub-region will also be required*". It however goes on to say, "*Whilst new employment land allocations along the strategic road network do lend themselves well to logistics - and no doubt there would be interest from occupiers – such activities would fail to maximise the economic potential of South Warwickshire and fail to capitalise on the strengths of the existing sectors and skills of the workforce.*" The approach taken to the following Issue E7: Core Opportunity Area and Major Investment Sites and the proposed approach to the Plan's identified Core Opportunity Area and Major Investment Sites, with specific reference to the Gaydon M40 J12 area's constraint on potential Logistics/B8 uses continues this theme of not supporting logistic uses, , as highlighted in E1 supporting text.. Will the South Warwickshire Local Plan address this issue directly, either through consideration/accommodation of the potential for B8 on appropriate Core Opportunity Area and Major Investment Sites or consider the potential for including a criteria-based policy to address potential general strategic site needs, for both logistics, single site uses (e.g. large scale battery manufacturing) or major employment needs.
- 3.6 It is noted that the Issues and Options document question E7.2 seeks views on the need for a policy relating to additional economic growth at the major investment sites. This approach is broadly supported, however the supporting text for the Gaydon Area / M40 Junction 12 Major Investment Site seeks to exclude or avoid the site from accommodating strategic logistic uses (i.e. Use Class B8). The reasons for this constraining approach on this site are not clearly defined, the use simply being considered inappropriate for the site.

- 3.7 In light of the North Warwickshire Local Plan's Inspector's requirement to provide for a local plan policy that addressed regional employment needs including logistics, the current pressures and demands for strategic employment and logistics sites (as evidenced by both recent appeals and applications in or adjoining the North Warwickshire Borough area, including Junctions 10, 11 of M42 and junctions 1 and 2 of M69, the recommendations noted recent West Midlands Strategic Employment Sites Study and further related studies underway across the region and in adjoining regions) the need for a general plan policy to address this issue would appear appropriate/necessary.
- 3.8 The Borough Council's response to question Q-E7.2 options also includes a note relating to this issue and the Gaydon M40 J12 Major Investment Site, stating "The site also has clear cross linkage and economic supply relationships between logistic uses and the adjoining automotive hub manufacturing and development activities at this location. Such uses should not be seen as 'mutually exclusive' in policy or locational terms in these strategic locations". The interrelated nature strategic logistics are likely to have with the automotive industries located there, the locations suitability for logistics sited on a major motorway junction with central location accessible to the wider motorway network, would appear to indicate that the site could be appropriate and potentially suitable location for logistics uses. In light of experience from the North Warwickshire Local Plan Examination, relevant planning appeals, recommendations from regional employment sites studies and further ongoing work around this issue, the site should at least be considered and assessed in terms of its potential for strategic logistics.
- 3.9 Nevertheless, beyond this main issue of concern the Borough Council is generally supportive of the Joint Plan approach taken by the two District Councils and hope the responses and option preferences indicated in Appendix 1 are considered helpful and informative.

## 4 In Summary

- 4.1 This Council is in general support of:
1. the Joint Plan approach taken by the two District Councils;
  2. the issues and options identified in the South Warwickshire Local Plan, Issues and Options (2023) consultation are generally supported except where specific concerns relating to logistics are raised; and,
  3. the continued wider cross-boundary work on the issues identified, for the progress towards wider joint planning opportunities for the sub-region.
- 4.2 To note the concerns raised in relation to the exclusion of strategic logistic needs and potential across the districts and, in particular, at the Gaydon M40 J12 Major Investment Site.

4.3 To note any further comments and observations Members may make on the issues and options raised in the South Warwickshire Local Plan, Issues and Options (2023) consultation.

## 5 Report Implications

### 5.1 Environment and Sustainability Implications

5.1.1 The South Warwickshire Local Plan, Issues and Options (2023) consultation has a separate sustainability appraisal, climate change, health and equalities impacts assessment and technical reports included as part of the consultation process.

### 5.2 Legal Implications

5.2.1 As indicated above, the Planning and Compulsory Purchase Act 2004 imposes a duty to consult in relation to certain strategic cross-boundary matters. As also indicated, whilst their areas do not border the Borough Council's area, Warwick and Stratford are consulting the Borough Council due to the wider potential sub-regional impact of their plans. Any responses from the Board will contribute to this Council's duty to respond to such consultation.

The Contact Officer for this report is Mike Dittman (719499).

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

<b>Background Paper No</b>	<b>Author</b>	<b>Nature of Background Paper</b>	<b>Date</b>

## North Warwickshire Borough Council

### Responses to questions raised in The South Warwickshire Local Plan, Issues and Options (2023) consultation.

Chapters 3 to 12 only

#### Chapter 3 Vision and Strategic Objectives

##### Q-V3.1: Do you agree that the Vision and Strategic Objectives are appropriate?

###### Vision

The vision is to meet South Warwickshire's sustainable development needs to 2050, while responding to the climate emergency. Where appropriate and agreed, this could include unmet need from neighbouring authorities. The plan will provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this development is delivered:

- A climate resilient and Net Zero Carbon South Warwickshire – adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development
- A well-designed and beautiful South Warwickshire – creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area
- A healthy, safe and inclusive South Warwickshire – enabling everyone to enjoy safe and healthy lifestyles with a good quality of life
- A well-connected South Warwickshire – ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel
- A biodiverse and environmentally resilient South Warwickshire – strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire

###### Strategic Objectives - Meeting South Warwickshire's Sustainable Development Needs

- Supporting vibrant and distinct centres
  - Responding to the changing roles of town centres given the growth in internet shopping, and in the context of emerging from the COVID pandemic.
- Providing infrastructure in the right place at the right time
  - Ensuring that the infrastructure needed to support the growth in new homes and jobs is secured through new development, and is provided when people need it
- Developing opportunities for jobs
  - Accommodating the growth in employment opportunities that build upon our strong and diverse economy, including innovative industries and technologies, embracing the potential of the green economy.
- Delivering homes that meet the needs of all our communities
  - Allowing for the growth in new homes that meet the diverse needs of all our residents, including affordable, student, specialist and self and custom build housing, along with the accommodation needs of our gypsy and traveller and travelling showpeople communities.
  - A resilient and Net Zero Carbon South Warwickshire
- Contributing towards Net Zero Carbon targets
  - Ensuring that new development does not cause a net increase in carbon emissions, that new developments are resilient to a changing climate, and that every opportunity is taken to reduce existing carbon emissions and mitigate against climate harms.
  - A well-designed and beautiful South Warwickshire
- Creating attractive places
  - Focusing on the design of new development to create great places, spaces and buildings that are of a high quality and cater for the needs of all users and which respect the setting of our many settlements.

**NWBC Response** – Agreed as appropriate

**Q-V3.2: If no, please indicate why**

No further comment.

## **Chapter 4 Meeting South Warwickshire's Sustainable Development Needs**

### **4.1 South Warwickshire's Development Requirements**

#### **Issue I1: Sustainability Appraisal**

**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.**

**NWBC Response** – No comments

#### **Issue I2: Infrastructure Requirements and delivery**

**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.

**NWBC Response** – Recommend Option I2a: Set out infrastructure requirements for all scales, types and location of development - Although strategic sites do require specific focus/addressing in infrastructure terms, the wider impact of multiple smaller developments must not be ignored and can and will ultimately have similar scale infrastructure and service impacts to the specific large strategic proposals.

**NWBC Response** – Agree that all identified options need to be used to address infrastructure requirements and delivery including;

1. On-site directly by the infrastructure provider as a requirement of an individual planning permission – e.g. digital communications, energy, water, roads, cycleways, access to public transport
2. On-site incorporated into the design of the development by the developer – e.g. renewable and low carbon energy, green infrastructure, affordable housing, design quality
3. 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

#### **Issue I3: Community Infrastructure Levy (CIL)**

**Q-I3: Please select the option which is most appropriate for South Warwickshire**

**NWBC Response** – No comment. North Warwickshire Borough do not currently apply the CiL approach, only the use of S106 Obligations. The new 'Infrastructure Levy' proposed in the Levelling Up and Regeneration Bill may need to be reflected by the emerging joint Plan.

**Issue I4: Infrastructure Safeguarding****Q-I4.1: Should we include a policy to safeguard specific infrastructure schemes within the SWLP?**

**NWBC Response** – Agreed as appropriate.

**Q-I4.2: Please add any comments you wish to make about these specific safeguarding provisions**

North Warwickshire have in certain circumstances in the Local Plan Policy proposals indicated the need for, or requirement for safeguarding for Infrastructure requirements or potential schemes, where they are essential to help support and deliver the development proposed in the Plan.

**Issue I5: Viability and Deliverability****Q-I5: Please add any comments you wish to make about infrastructure, viability and deliverability**

**NWBC Response** – No further comment.

**4.2 Development distribution strategy for South Warwickshire****Issue S1: Green & Blue Corridors**

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

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

**NWBC Response** – Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced will address and avoid potential loss/development impacts on these corridors and avoid any delays in delivery of Local Nature Recovery Strategy.

**Issue S2: Intensification (density)****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.

Option S2b: Have a policy with 'in principle' support for intensification development, applicable across South Warwickshire; and develop design codes

Option S2c: Do not have a policy which encourages intensification

**NWBC Response** –South Warwickshire Plan should reflect National Guidance as amended by local preferences and determinations. 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*, appears most relevant/appropriate. No further comment.

**Issue S3: Using Brownfield Land for development****Q-S3.1: Please add any comments you wish to make about the Urban Capacity Study**

**NWBC Response** – No further comment.

Questions for Issue S3: Using Brownfield Land for development

**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.

Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location

Option S3.2c: None of these

**NWBC Response** – Option S32a considered most appropriate. No further comment.

#### **Issue S4: Growth of existing settlements**

**Q-S4.1: Do you think that growth of some of our existing settlements should be part of the overall strategy?**

**NWBC Response** – Yes -Agreed, similar approach taken in North 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**

**NWBC Response** – No further comment.

#### **Issue S5: The potential for new settlement(s)**

**Q-S5.1: Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options?**

**NWBC Response** – No further comment.

**Q-S5.2: Do you think new settlements should be part of the overall strategy?**

**NWBC Response** –This is an issue specific to South Warwickshire Plan but should be a consideration as part of the plan process. No further comment.

**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?**

**NWBC Response** – No further comment. See note above

**Q-S5.4: If not, what approach would you take?**

**NWBC Response** – No further comment.

#### **Issue S6: A review of Green Belt boundaries**

**Q-S7.1: Please provide any comments you have on the emissions estimation modelling for the five growth options.**

**NWBC Response** – No comment.

#### **Issue S7: Refined Spatial Growth Options**

**Q-S7.1: Please provide any comments you have on the emissions estimation modelling for the five growth options**

- Option 1: Rail Corridors

- Option 2: Sustainable Travel
- Option 3: Economy
- Option 4: Sustainable Travel and Economy
- Option 5: Dispersed

**NWBC Response** – No comment.

**Q-S7.2: For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:**

**NWBC Response** – These are all options appropriate to consider for the South Warwickshire Plan as part of the plan process and may be applicable in whole or in part to the Plan, not mutually exclusive. No further comment.

**Issue S8: Small scale development outside of the chosen spatial growth option**

**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?**

**NWBC Response** – Don't Know, leave for South Warwickshire to determine. The North Warwickshire Local Plan allows small scale development adjoining but outside of identified development boundaries, that is appropriate to and in proportion the size and scale of the settlement and its position within a strategy or hierarchy. However, for sites wholly outside and in open countryside (in effect) no accommodation or threshold is provided for.

**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?**

**NWBC Response** – As noted above, the North Warwickshire Local Plan allows small scale development adjoining but outside of identified development boundaries, but for smaller settlements in lower category/hierarchy a limit of "usually no more than" 10 dwellings is accommodated.

**Issue S9: Settlement Boundaries and infill development**

**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.

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 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

**NWBC Response** – Consider 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*, as most appropriate as current settlement boundaries and situations should be reviewed as part of the overall Plan process.

**Q-S10: Please add any comments you wish to make about the development distribution strategy for South Warwickshire**

**NWBC Response** – No further comment. Issue for South Warwickshire to determine.

## Chapter 5: Delivering South Warwickshire's Economic Needs

### Issue E1: Growing the South Warwickshire economy

**Q-E1.1: Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?**

**NWBC Response** – Yes, agreed. Note reference in supporting text to *“In addition, a proportion of the 709 hectares of strategic B8 employment land (i.e. warehousing and distribution) identified for the wider Coventry and Warwickshire sub-region will also be required.”* This also needs to through the South Warwickshire Local Plan.

**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?**

**NWBC Response** – No further comment.

### Issue E2: A Low Carbon Economy

**Q-E2: Please select all options which are appropriate for South Warwickshire**

Option E2a: Include a policy which encourages businesses to be low carbon -

**NWBC Response** – Yes, agreed.

Option E2b: Do not include a policy encouraging businesses to be low carbon

**NWBC Response** – No, disagree.

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.

**NWBC Response** – Yes, agreed.

### Issue E3: Diversifying the economy

**Q-E3: Please select all options which are appropriate for South Warwickshire**

Option E3a: Include a policy expanding on SDC's current existing policy.

Option E3b: Have separate policies for individual sectors.

Option E3c: Include a policy that secures employment strategies through S106.

Option E3d: None of these

**NWBC Response** – Consider all Options E3a to E3C can and may be appropriate, but Option E3d is not appropriate as employment provision and needs should be addressed and quantified.

### Issue E4: Sustaining a rural economy

**Q-E4.1: Please select the option which is most appropriate for South Warwickshire**

Option E4.1a: Include a policy supporting diversification

Option E4.1b: Do not include a specific policy on diversification

**NWBC Response** – Agree with Option E4.1a. Need to ensure economic viability, diversity and sustainability of rural areas.

**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

Option E4.2b: Do not include a policy supporting small-scale employment opportunities in rural areas

**NWBC Response** – Agree with Option E4.2a. Need to ensure economic viability, diversity and sustainability of rural areas is supported.

**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

Option E5b: Do not include a policy in Part 1

**NWBC Response** – Agree with Option E5a. see note above.

**Issue E6: Protecting South Warwickshire's economic assets**

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.

Option E6b: Do not include a policy protecting all these economic assets

**NWBC Response** – Agree with Option E6a, a similar approach has been taken in the North Warwickshire Local plan in relation to rural employment assets and identified existing employment estates.

**Issue E7: Core Opportunity Area and Major Investment Sites**

Major investment sites within the Core Opportunity Area include:

- University of Warwick main campus area
- South of Coventry including Coventry Airport, Coventry Gateway and the National Battery Innovation Centre
- Wellesbourne including University of Warwick and Wellesbourne Airfield
- Long Marston area including the Long Marston Rail Innovation Centre
- Stoneleigh area including Stoneleigh Park agricultural science park
- Gaydon M40 J12 area including Jaguar Land Rover and Aston Martin Lagonda

**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

Option E7.1b: Do not include a policy directing employment to the Core Opportunity Area

**NWBC Response** – Agree with Option E7.1a

**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

Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites

**NWBC Response** – Agree with Option E7.2a. Note, however, following comments in relation to Issue E1 and the HEDNA, that identified the need for a proportion of the 709 hectares of strategic B8 employment land (i.e. warehousing and distribution) identified for the wider Coventry and Warwickshire sub-region to be addressed, the subsequent supporting text for the Gaydon M40 J12 Major Investment Area does not address this issue.

NWBC would raise concerns with the SWLP reference to **Gaydon Area/M40 Junction 12** in relation to the comments the Plan makes (page 89) regarding the location and Logistics/B8 potential opportunity. The Issues and Options document/Plan text states as follows; *“This automotive hub is home to the iconic British brands Jaguar Land Rover and Aston Martin Lagonda. In addition to the economic activities on the Gaydon proving ground, circa 105ha of land has been allocated in the Core Strategy for employment purposes. Through the SWLP, there is an opportunity to capitalise on the existing economic base and grow this area with further automotive-related manufacturing (i.e. Use Class B2). Whilst well-located to the M40, we do not see this location as appropriate for strategic logistic uses (i.e. Use Class B8).”*

The Gaydon Area / M40 Junction 12 should not be excluded as a potential opportunity for strategic logistic uses. The main motorway junctions have previously been highlighted within regional strategic employment studies as having clear potential and as appropriate locations for strategic logistic uses. The site also has clear cross linkage and economic supply relationships between logistic uses and the adjoining automotive hub manufacturing and development activities at this location. Such uses should not be seen as “mutually exclusive” in policy or locational terms in these strategic locations.

It is considered that the Gaydon Area / M40 Junction 12 major investment area could potentially address ‘a proportion of the 709 hectares of strategic B8 employment land (i.e. warehousing and distribution) identified for the wider Coventry and Warwickshire sub-region’ as stated in the Issues and Options document/Plan text.

#### **Issue E8: Existing Employment Sites**

**Q-E8.1: Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?**

**NWBC Response – Agree**

**Q-E8.2: If, no please list the sites that should be excluded and give reasons.**

**NWBC Response – No further comment.**

**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?**

**NWBC Response – Agree, but aware that current NPPF guidance and permitted development right changes may make this approach difficult to achieve/implement.**

**Q-E8.4: Please specify what you consider to be appropriate tests**

**NWBC Response – No further comment.**

#### **Issue E9: Supporting our changing town centres**

**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

Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2

**NWBC Response – No preference or comment.**

**Issue E10: Tourism**

**Q-E10: Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?**

**NWBC Response – Agree**

**Q-E11: Please add any comments you wish to make about delivering South Warwickshire's economic needs**

**NWBC Response – No further comment.**

## **Chapter 6: Delivering homes that meet the needs of all our communities**

**Issue H1: Providing the right number of new homes**

**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?**

**NWBC Response – Agree**

**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?**

**NWBC Response – No further comment.**

**Issue H2: Providing the right tenure and type of homes**

**Q-H2-1: What is the best way to significantly increase the supply of affordable housing across South Warwickshire?**

**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

Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts

Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire

**NWBC Response – Agree with Option H2.2a primarily for Plan consistency but consider potential to include elements of H2-2b referenced within a planning policy. This provides for a consistent approach across the Plan area with the policy able to provide reflection of urban and rural settlement situation or circumstances across the two authorities. No further comment.**

**Q-H2-3: How should South Warwickshire best address the specialist needs for older people?**

**NWBC Response – Consider reflecting elderly need within Plan policy either as part of housing type and mix for specific strategic sites/allocations (using identified age profile needs for specific settlements or areas, if available) or include as a %percentage requirement within strategic policy for strategic proposals to address, based on ONS/Census data and age profiles/projections for the South Warwickshire Plan area. No further comment**

**Issue H3: Providing the right size of homes****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.

Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.

Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.

Option H3d: None of these

**NWBC Response** – Agree Options H3b, H3c and/or H3d may be appropriate subject to viability testing, to provide consistent acceptable minimum standards across the Plan area. No further comment.

**Issue H4: Accommodating housing needs arising from outside of South Warwickshire****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?**

**NWBC Response** – Agree. This is an essential area of cross-boundary co-operation and an active element for the Duty to Co-operate.

**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**

**NWBC Response** – Base the accommodation on evidence of travel to work/commuting patterns to provide a true reflection of relationship with GBBCMA. No further comment.

**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?**

**NWBC Response** – Incorporate the shortfalls as an integral part of the Plans overall housing requirement, to be provided within the Plans overall settlement site allocations or similar. Advisable to avoid specific site allocations/identification to address the shortfall to be accommodated. No further comment.

**Issue H5: Providing custom and self-build housing plots****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.

Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.

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.

**NWBC Response** – North Warwickshire Local Plan applies an approach similar to Option H5b to help enable delivery of serviced self-build sites. Options H5a and H5c rely on sites coming forward either through the Call for Sites or similar and may not provide the certainty of site delivery during plan period. Identification or recognition of pdl/brownfield sites (farm prior notices for instance) as self-build/custom build opportunities within a specific policy may also be an opportunity to consider (expected numbers based on past windfall pdl sites coming forward).

**Issue H6: Pitches and Plots for gypsies, travellers and travelling showpeople**

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.

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.

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

**NWBC Response** – Recommend mix of Option H6a and H6b as providing best potential to address Gypsy and Traveller needs but focussing on small family group pitch numbers as a preference. Inclusion of small family group pitches within larger strategic site allocations will need careful management but would provide an element of certainty of delivery. Option H6c is not considered robust enough approach to address needs and requirements with any certainty. Showpeople needs (if identified) may be difficult to include within Option H6b in relation to their larger site requirements for equipment etc.

## Chapter 7 - A climate resilient and Net Zero Carbon South Warwickshire

### 7.1 - Large scale renewable energy generation and battery storage

#### Issue C1: Solar and wind power

##### 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

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

Option C1.1c: None of these

**NWBC Response** – Recommend mix of Option C1.1a (if evidence of site suitability available) and C1.1b. No further comments.

##### Q-C1.2: Are there any other criteria which should be considered when assessing proposals for large scale renewable energy developments?

**NWBC Response** – No further comments.

#### Issue C2: Decentralised energy systems

##### 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

Option C2b: Have a policy encouraging the consideration of decentralised energy systems

Option C2c: None of these

**NWBC Response** – Recommend Option C2a or mix of C2a and C2b.

**Issue C3: Carbon Sequestration**

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?

**NWBC Response – No comment or option selected**

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

**NWBC Response – No comments.**

**7.2 Net Zero carbon Buildings****Issue C4: New Buildings**

Buildings are a major source of emissions for South Warwickshire and so the need to minimise those that are generated from new development is critical in achieving the climate emergency ambitions.

**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.

**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-C4.2: What scale of development should the requirements apply to?**

**NWBC Response – No comments.**

**Issue C5: Existing Buildings**

**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

### **Issue C6: Whole Life-Cycle carbon emission assessments**

#### **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**

**NWBC Response – No comments.**

### **7.3 Climate responsive development design**

#### **Issue C7: Adapting to higher temperatures**

#### **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?

Option C7b: Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures

Option C7c: None of these

**NWBC Response** – Improved building regulations (national) would be a better more proactive approach to addressing the issue and viability may be an issue. Improved insulation may also be a method of addressing the issue and the Plan can ‘encourage’ improvements to design, but to include requirements within Policy will require evidence/justification for an approach specific to South Warwickshire Plan area, until National Building Regs are revised. No further comments.

#### **Issue C8: Adapting to flood and drought events**

##### **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

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

Option C7c: None of these

**NWBC Response** – No comments.

#### **Issue C9: Mitigating Biodiversity loss**

##### **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

Option C9.1c: None of these

**NWBC Response** – Preference towards option C9.1a, but there may be site/development circumstances where it is difficult to have less than 50% of the wider site to consist of paved/hard surfaced areas, particularly in urban or pdl situations. No further comments.

##### **Q-C9.2 Please add any comments you wish to make about climate responsive development design in South Warwickshire**

**NWBC Response** –No further comments.

#### **Issue C10: Climate Change Risk Assessments**

##### **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.

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?

Option C10.1c: None of these

**NWBC Response** – Preference towards option C10.1a. No further comments.

**Q-C10.2 Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire**

**NWBC Response** – No further comments.

#### **7.4 Flooding and water management**

##### **Issue C11: Water Management**

**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*

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

**NWBC Response** – Preference towards option C11b. This allows a review and update of current policy approach to be undertaken and address any increased climate change implications. No further comments.

##### **Issue C12: Flood risk**

**Q-C12: Please add any comments you wish to make about water management or flood risk in South Warwickshire**

**NWBC Response** – No further comments.

### **Chapter 8: A well-designed and beautiful South Warwickshire**

#### **Issue D1: Strategic design principles**

- **Comprehensive development** - ensuring development is designed and delivered in a coordinated way, and avoiding piecemeal schemes.
- **Attractiveness** – creating a pleasant environment to live and work.
- **Sensitive to context** – responds to its surroundings.
- **Distinctiveness** – builds upon the unique characteristics of its surroundings and/or creates a unique sense of place in itself.
- **Connectedness** (also tackles aspects of 'healthy') - weaves into existing networks of different scales
- **Safety** – ensures layout and orientation create spaces and overall environment that feels safe and secure to be in.
- **Environmental sustainability and adapting to climate change** (links to policies in 'A climate resilient and Net Zero Carbon South Warwickshire' section)
- **Mix and amount of development** (links to D3 below) - getting the right range of complimentary uses

**Q-D1.1: Do you agree that this is an appropriate range of topics for a strategic design policy?**

No option selected

Yes

No

Don't know

**NWBC Response** – Agreed these are appropriate range of topics.

**Q-D1.2: If no, please indicate why**

**NWBC Response** – No further comments.

**Issue D2: Design Codes and design guides**

Option D2a: Develop a South Warwickshire Design Guide

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.

Option D2c: Develop design guides/codes for strategic development sites/locations.

Option D2d: None of these

**NWBC Response** – A mix of three main Options D2a to D2c may be most appropriate, with an overall Design Guide that breaks down to (has related Appendices or SPD type guides as a 'framework' of associated documents) more settlement and/or site or development specific design guides or codes. No further comments.

**Issue D3: Designing adaptable, diverse and flexible places**

**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.

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.

Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire and specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.

Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.

Option D3e: None of these

**NWBC Response** – A minimum density expectation should be identified for the plan to ensure efficient use of development land. A mix/combination of Options D3b to D3c may be most appropriate, to ensure appropriate 'minimum' densities are achieved yet provide for flexibility where necessary and appropriate, allowing lower density design in rural landscape or heritage circumstances (if relevant) and including where significantly increased densities could be applied/enabled. The lack of sufficient public transport and sustainable transport links/routes in rural areas may make Option D3d difficult to apply. No further comments.

**Issue D4: Safe and attractive streets and public spaces**

- **Prioritise the needs of those engaged in active travel – i.e. pedestrians and cyclists (links to and supports the underpinning of 20-minute neighbourhoods)**
- **Ensure that streets and spaces are appropriately enclosed by buildings or strong landscaping to clearly define public and private spaces**
- **Ensure streets and public spaces feel overlooked, safe and inclusive**
- **Legible street layout – minimising use of dead-end cul de sacs**
- **Quality of public realm, including adaptation for climate change – e.g. street tree planting**

**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?**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – Agreed these are appropriate range of topics.

**Q-D4.2: If no, please indicate why**

No further comments.

**Issue D5: Protecting and enhancing heritage assets**

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-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?**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – No comments.

**Q-D6: Please add any comments you wish to make about a well-designed and beautiful South Warwickshire**

**NWBC Response** – No further comments.

**Chapter 9: A healthy, safe and inclusive South Warwickshire****Issue W1: Pollution****Q-W1: Should the Part 1 plan include a policy on pollution?**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – Agreed, to discourage potential pollution generators/uses, but care needs to be taken that planning policy doesn't duplicate or encroach into Environmental Health regulations and responsibilities.

**Issue W2: Health Impact Assessments for major development****Q-W2: Please select the option which is most appropriate for South Warwickshire**

Option W2a: Include a policy on Health Impact Assessments

Option W2b: Do not include a policy on Health Impact Assessments

**NWBC Response** – Agreed, but policy should ensure requirements only apply to appropriate major planning applications/developments.

**Issue W3: Ensuring the built environment provides healthy and inclusive communities**

**Q-W3: Please select the option which is most appropriate for South Warwickshire**

Option W3a: Include an overall policy on health

Option W3b: Do not include a policy on health

**NWBC Response** – Include a policy to reflect NPPF Policy on well-being and sustainable development, to “meet needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”

**Issue W4: Public Open Space for leisure and informal recreation**

**Q-W4: Please add any comments you wish to make about a healthy, safe and inclusive South Warwickshire**

**NWBC Response** – No further comments.

**Chapter 10: A well-connected South Warwickshire**

**Issue T1: 20-minute neighbourhoods**

**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.

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.

Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.

**NWBC Response** – Options T1b or c considered most appropriate and applicable. For proposals and policies around rural settlements the availability of and access to services and infrastructure will be critically important. Development opportunities may need to be predicated on infrastructure or service delivery/provision (particularly around transport services and connectivity) as part of proposals, to help address sustainability and viability of settlements based on a ‘20-minute neighbourhood’ approach. No further comments.

**Issue T2: Sustainable transport accessibility across South Warwickshire**

**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 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.

**NWBC Response** – Option T2a considered most appropriate and applicable. No further comments.

### **Issue T3: Road travel, employment, and freight**

#### **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.*

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.*

**NWBC Response** – Option T3a considered most appropriate and applicable. No further comments.

### **Issue T4: Smart Cities**

#### **Q-T4: Please provide suggestions for how smart cities technologies could be supported in South Warwickshire**

**NWBC Response** – No further comments.

#### **Q-T5: Please add any comments you wish to make about a well-connected South Warwickshire**

**NWBC Response** – No further comments.

## **Chapter 11: A biodiverse and environmentally resilient South Warwickshire**

### **Issue B1: Areas of Restraint**

#### **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

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

**NWBC Response** – Option B1a considered most appropriate and applicable in light of opportunity to review designations in the new Local Plan. No further comments.

### **Issue B2: Vale of Evesham Control Zone**

#### **Q-B2: Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward?**

- No option selected

- Yes
- No
- Don't know

**NWBC Response** –No comments.

### **Issue B3: Special landscape areas**

#### **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.*

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.*

**NWBC Response** – Option B3a considered most appropriate and applicable in light of opportunity to review designations in the new Local Plan. No further comments.

### **Issue B4: Protecting the Cotswold Area of Outstanding Natural Beauty (AONB) and its surrounding areas**

#### **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.*

**NWBC Response** – No comment or preference.

### **Issue B5: Environmental Net Gain**

#### **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.*

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. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.*

Option B5c: None of these

**NWBC Response** – Option B5a considered most appropriate and applicable in light of opportunity to review policies in the new Local Plan. No further comments.

#### **Issue B6: Wildbelt designations**

**Q-B6: Should the South Warwickshire Local Plan introduce Wildbelt designations?**

- No option selected
- 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.*

**NWBC Response** – No comment or preference.

#### **Issue B7: Minerals**

**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?**

- No option selected
- 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*

**NWBC Response** – Agreed appropriate to highlight links in the new Local Plan. No further comments.

#### **Issue B8: Agricultural Land**

**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?**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – Agreed appropriate to consider including a policy avoiding development on the best and most versatile agricultural land, given extent of rural agricultural land covered within South Warwickshire Local Plan area and potential future climate change impacts/implications on food supply/soil health and resources. No further comments.

**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?**

#### **Issue B9: Protecting Biodiversity and Geodiversity assets**

**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.**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – Agreed appropriate to consider including 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 in light of opportunity to review policies in the new Local Plan. No further comments.

**Q-B10: Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire**

**NWBC Response** – No further comments.

## Chapter 12. Plan content

**Q-P1.1: Do you agree with the proposed broad content of the Part 1 plan?**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – Agree with broad content.

**Q-P1.2: If no, please indicate why**

**NWBC Response** - No further comments.

**Q-P1.3: Do you agree with the selection of policies to be addressed in the Part 1 plan?**

- No option selected
- Yes
- No
- Don't know

**NWBC Response** – Agree with Pt1 selection of policies .

**Q-P1.4: If not, please indicate why**

**NWBC Response** - No further comments.