

South Warwickshire LOCAL PLAN PART 1



Working *Together*



PREFERRED OPTIONS | REGULATION 18 CONSULTATION
JANUARY 2025

Summary

This Preferred Options consultation is the third stage in preparing the South Warwickshire Local Plan – a new Plan for Stratford-on-Avon and Warwick Districts, following the Scoping and Call for Sites consultation in 2021 and Issues and Options consultation in 2023. The new Local Plan will affect the way we live, work, visit and play in South Warwickshire to 2050. As well as working collaboratively on this Plan, both Councils are also preparing other plans on specific topics relevant to their District. Those plans are entirely separate to this South Warwickshire Local Plan.

It is proposed that this Part 1 of the South Warwickshire Local Plan will set out the overall strategy for the pattern, scale and design quality of places within South Warwickshire, and make sufficient provision for housing, employment, retail, leisure and other commercial development, along with infrastructure, community facilities, conservation and enhancement of the natural, built and historic environment and planning measures to address climate change mitigation and adaptation. Primarily, the Local Plan sets out how we will grow the South Warwickshire economy and create jobs through delivery of the net zero carbon agenda. It will ensure that the necessary infrastructure and the right type and number of homes are delivered to support the level of jobs we want to see across South Warwickshire to 2050.

The adoption of this overarching Part 1 would then enable other 'Part 2' planning policy documents to come forward and set out detailed policies for specific areas, neighbourhoods or types of development. This could include allocating sites and the provision of infrastructure at a local level, establishing design principles and setting out other more detailed planning policies.

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1. Introduction

1.1 The South Warwickshire Local Plan (SWLP)

This emerging Local Plan is being prepared jointly by Stratford-on-Avon and Warwick District Councils and will become a statutory development plan document. Once adopted it will set out the strategic vision, objectives and spatial strategy for the South Warwickshire area as well as the planning policies which will determine the future location, scale, type and design of new development in the SWLP area up to 2050. This new local plan is about where and how new jobs, infrastructure and housing are all delivered in the context of place shaping and addressing climate change. The SWLP will also seek to ensure local development is built in accordance with the principles of sustainable development as set out in the National Planning Policy Framework (NPPF).

The NPPF (paragraph 49) sets out the weight to be attached to an emerging local plan, which is a matter of planning judgement for the decision-maker on each application. At this stage in the plan preparation process, the SWLP team advise the Preferred Options documentation should be given very limited weight.

1.2 South Warwickshire Today

Located to the south of the West Midlands conurbation, South Warwickshire covers 488 square miles of predominately open countryside and is made up of the Stratford-on-Avon and Warwick District Council Areas. With good motorway and rail connections between London and Birmingham, South Warwickshire is the gateway to the West Midlands. South Warwickshire has a varying landscape and includes parts of 5 national landscape character areas, of which the Cotswolds National Landscape is one, with 8% of the total area of South Warwickshire falling into this specific national landscape designation. Nearly a third of South Warwickshire is part of the West Midlands Green Belt, which is designed to prevent the unrestricted sprawl of urban areas.

1.3 Purpose of the Consultation

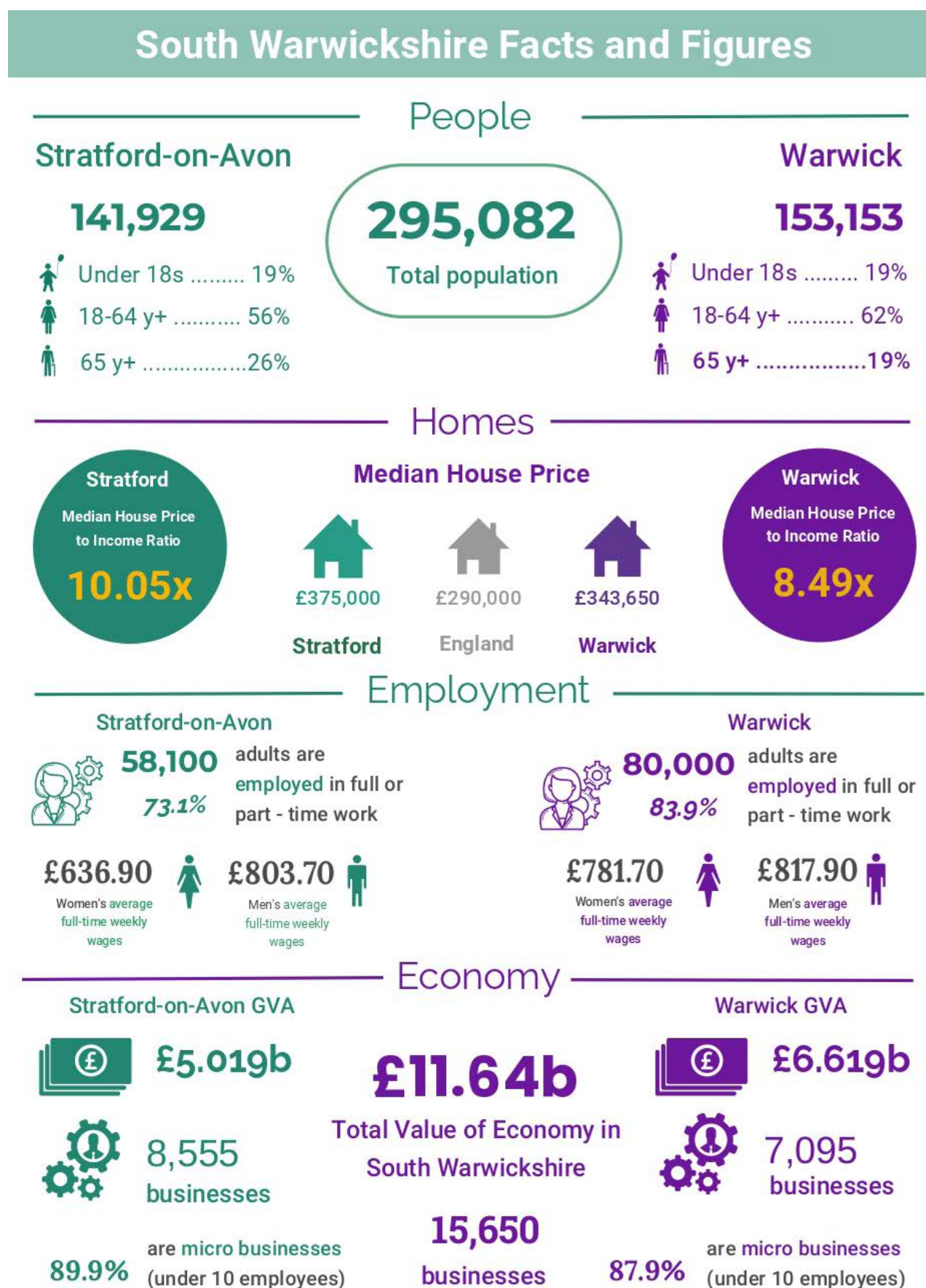
Stratford-on-Avon District and Warwick District Councils are seeking the views of residents, businesses, developers, infrastructure providers, community groups and all other stakeholders on this 'preferred options' document.

We are still at the early stages of the process (stage 3 of 8), and further public consultation will follow. This consultation sets out the "Preferred Options" identified by both Councils following earlier consultations on the Scoping and Call for Sites and Issues and Options documents, as well as further evidenced work. Consultation will be undertaken in accordance with the requirements of the Local Plan Regulations and each Council's Statement of Community Involvement.

Once Part 1 is fully adopted, it will replace the existing strategic policies, and some of the detailed policies contained within the [Stratford-on-Avon District Council Core Strategy and Warwick District Councils Local Plan](#).

Alongside this consultation there is also a focused 'Call for Sites'. This Call for Sites exercise is a targeted exercise and is only looking for sites that fall within the proposed new settlement locations or the adjoining areas, are proposed Gypsy and Traveller Sites, or are suitable for renewable energy generation. More on the call for sites can be found in section 2.3 Call for Sites.

Figure 1: South Warwickshire Facts and Figures



1.4 What is SWLP Part 1?

Rather than have a single comprehensive plan it is envisaged that the plan will be broken down into separate parts as shown in Figure 2. Part 1 of the Plan will provide a policy framework for the delivery of sustainable development across the South Warwickshire area up to 2050. This Part 1 sets out the Spatial Strategy and strategic policies for the area to deliver sustainable development. The Plan will identify the number of new homes and jobs to be provided in the area and makes provision for the retail, leisure and other commercial and employment uses alongside the infrastructure needs to support the development.

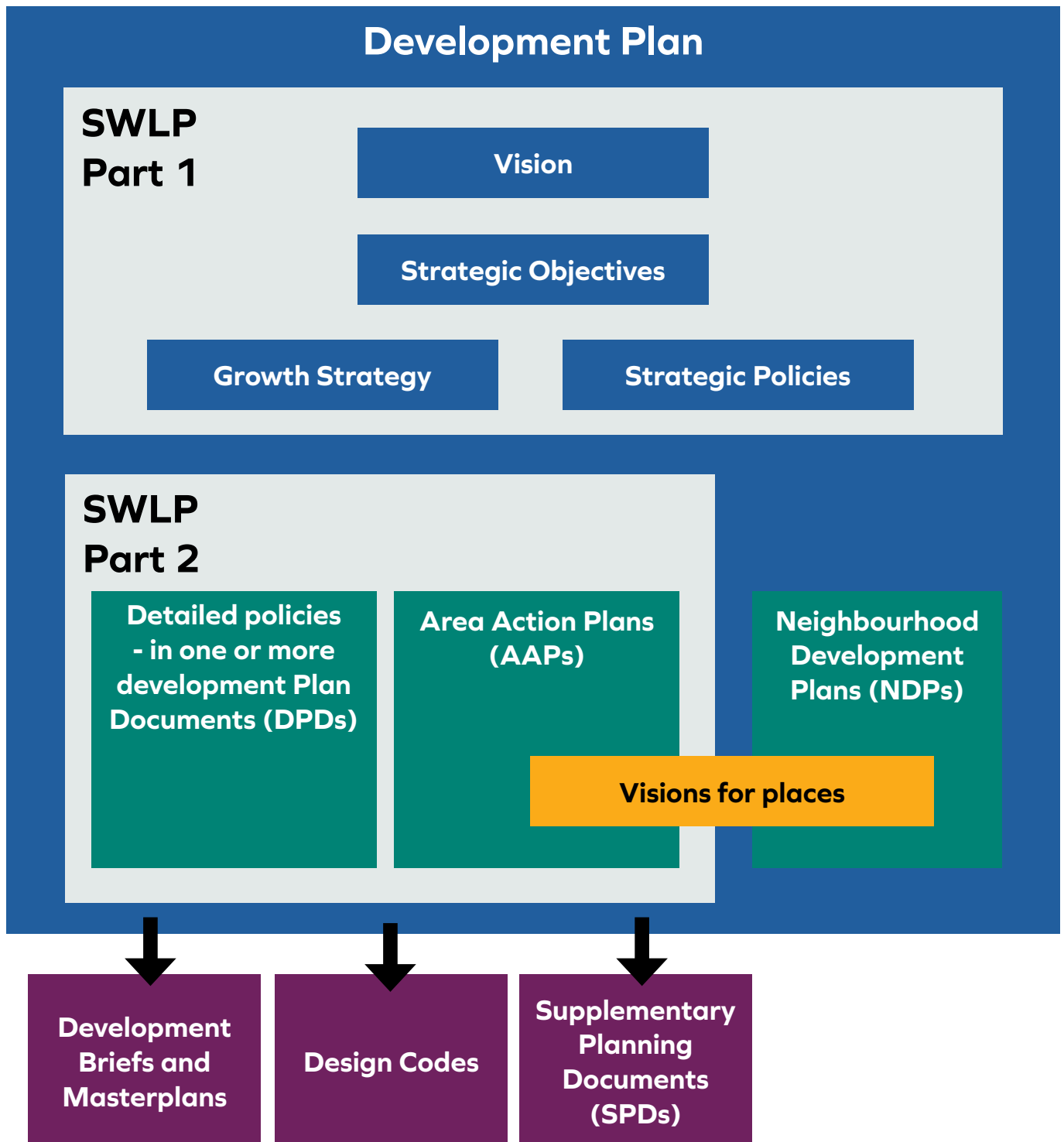
There are however several exceptions to this. Some policy topics that would typically fall within Part 2 of the plan have been transferred to this Part 1. Given priorities within the two Councils it has been deemed necessary to advance the creation of these policies. A list of these expedited policies can be seen below:

- Arts and Culture
- Climate Resilient Design
- Design Codes
- Multi-functional Sustainable Drainage Systems
- Outdoor sports and leisure
- Trees, Hedges and Woodland
- Parks Gardens, food Growing Open Space and local green space
- Providing the Right Tenure and Type of Homes
- Providing the Right Size of Homes
- Protecting Community Facilities
- Water Efficiency
- Whole Life Cycle Carbon Emissions Assessments

As well as strategic policies (and the above expedited policies) Part 1 of the plan will also look to include strategic allocations, which are sites that are critical to the delivery of the plan. Existing policies which are not replaced in Part 1 of the plan could be saved and subsequently incorporated into Part 2 of the plan and/or other policy documents as appropriate. Part 2 of the plan will complement Part 1 plan and will contain the remaining detailed policies or policies that are much more specific to a local area. For example, a particular issue in Royal Leamington Spa, but not necessarily South Warwickshire, is the need to manage purpose-built student accommodation.

Further detail around the proposed contents of the Part 1 plan can be found in Chapter 12 of the Issues and Options Consultation document.

Figure 2: Different Parts of the SWLP



1.5 Allocations in other adopted and draft plans

The adopted Stratford-on-Avon Core Strategy (2016), Warwick District Local Plan (2017), and various made Neighbourhood Development Plans contain allocations for housing, employment land, and other land uses. These allocations remain in place while the SWLP is in preparation. If, at the point of SWLP adoption, any of these allocations have not been delivered, it may in certain cases be appropriate to roll these forward and allocate them in the SWLP; and in other cases, this may not be appropriate.

The SWLP will handle existing adopted allocations as follows:

Document	Status of development	Intention in SWLP	Rationale
SDC Core Strategy / WDC Local Plan	Fully or substantially built-out	Not carried forward into SWLP	There is no benefit in carrying forward allocations where the development has been substantially completed.
SDC Core Strategy / WDC Local Plan	Planning permission on at least part of the site	Re-assessed for SWLP for potential allocation	To ensure continuity of supply it is appropriate to keep existing allocations with permission.
SDC Core Strategy / WDC Local Plan	No planning permission	Re-assessed for SWLP for potential allocation	It is appropriate to consider whether there are underlying reasons for sites not having come forward; and whether these sites align with the strategy and intentions of the SWLP.
Neighbourhood Development Plans (NDPs)	No planning permission	Assessed for possible incorporation into SWLP	It is not the intention to overrule or delete allocations in made NDPs. However, there may in certain cases be opportunities for sites to be allocated for alternative uses within the SWLP.

Stratford-on-Avon District's Site Allocations Plan (SAP) revised preferred options document contains draft allocations for a number of land uses including self and custom housebuilding, reserve housing sites, and other specific site proposals.

The SWLP will handle draft allocations from the Site Allocations Plan as follows:

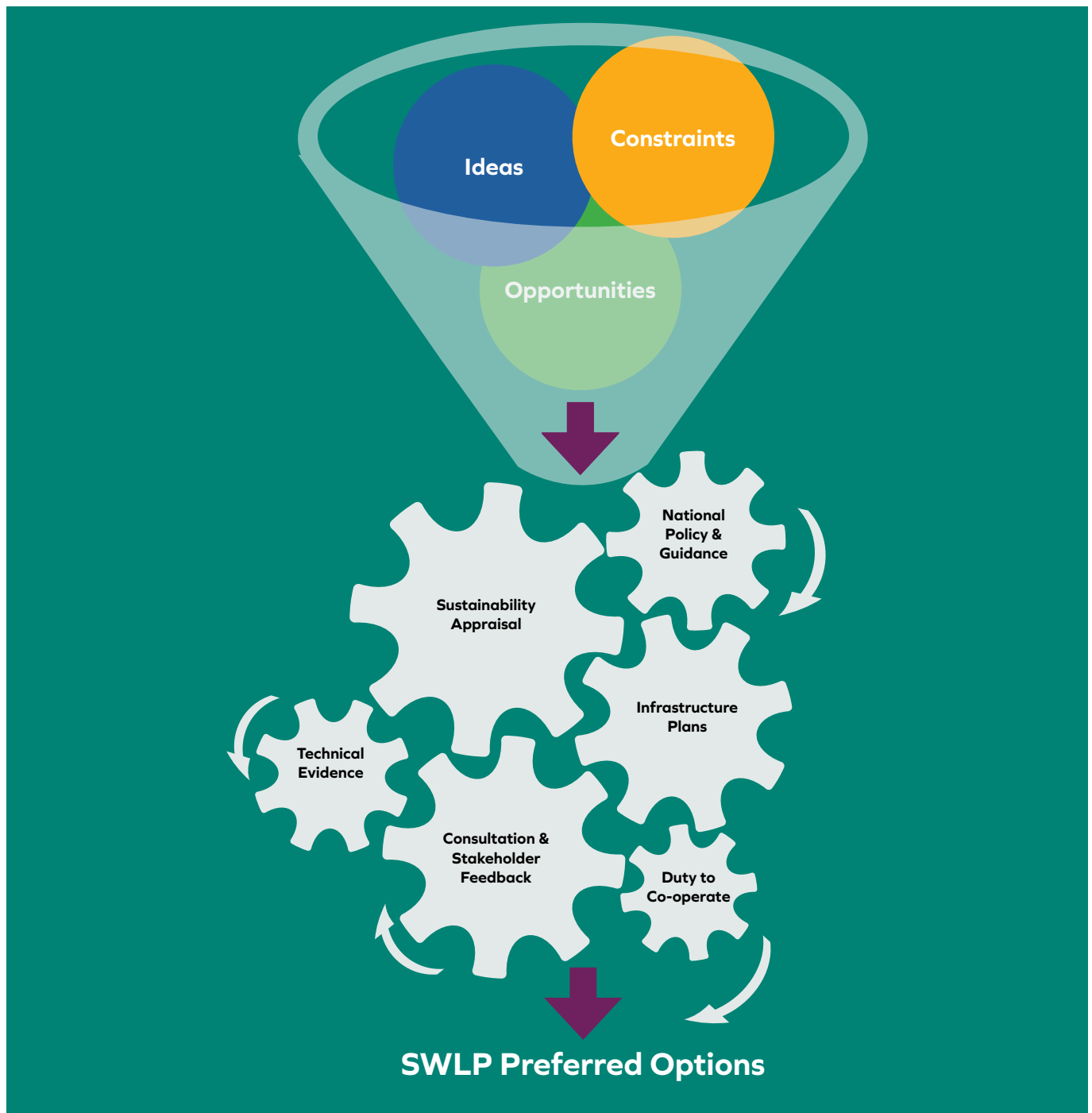
Allocation type	Status of development	Intention in the SWLP	Rationale
All	With planning permission	Not carried forward into SWLP	There is limited benefit in bringing forward draft allocations where permission has already been granted.
Reserve Housing Sites	No planning permission	Re-assessed for potential SWLP allocation	It is appropriate to consider whether any of these sites would be suitable for allocation as general or reserve housing sites.
Self-Build and Custom Housebuilding Sites	No planning permission	Re-assessed for potential SWLP allocation	It is appropriate to consider whether there are underlying reasons for sites not having come forward; and whether these sites align with the strategy and intentions of the SWLP.
Specific Site Proposal	No planning permission	Variable	See relevant sections for rationale.

1.6 How is the SWLP being prepared?

In preparing the SWLP we need to base our proposals on expert technical evidence covering a range of planning topics. We will use the findings of the technical evidence to draft the policies and guidance contained in the SWLP. Our interpretation of this evidence is influenced by the feedback we receive from stakeholders, including the views of residents and businesses. Everything we do is also within the context set by national planning policy and guidance.

Ultimately, the SWLP must contribute to the achievement of sustainable development, and this means balancing the need for more jobs and homes against the impact on the built and natural environment. To help us understand and mitigate those impacts we prepare a Sustainability Appraisal that accompanies this consultation document.

Figure 3: Local Plan Refinement



1.7 What has been done so far?

1.7.1 Scoping and Call for Sites Consultation

Preparing the SWLP is not a single event and there are numerous stages of consultation (see Figure 4). The first consultation was the Scoping and Call for Sites which took place in 2021. There were two aspects to that consultation; firstly, to explore what the broad content of the SWLP should be and secondly to seek suggestions for sites for development through a call for sites request. Officers analysed the responses to the consultation and prepared a [consultation statement](#) that was made available on the SWLP website. The feedback was used to inform the contents of Issues and Options consultation document.

1.7.2 Issues and Options and Call for Sites Consultation

The Issues and Options Consultation along with Second Call for Sites was undertaken between 9th January to 6th March 2023. A total of 1175 respondents engaged with the consultation document providing comments to one or more questions contained within the document. A summary of the consultation responses is available within the [Issues and Options Consultation statement](#). Officers have analysed the responses and used these to inform this Preferred Options document.

1.7.3 Call for Sites 1 & 2

As a result of the two calls for site exercises, 736 sites have been submitted to the councils for inclusion within the plan. All sites submitted through the call for sites process are available to view on the SWLP Website, on the interactive map. These sites have now all been assessed through the Housing and Economic Land Availability Assessment (HELAA) site assessment process. HELAA part A sifted out those sites subject to significant constraints to development, for which mitigation would not be possible or would be very difficult to achieve. Sites which were not sifted out in Part A progressed through to HELAA Part B. This part assessed a wide range of constraints, taking a more holistic view of the relative merits of the site as a whole. All sites assessed in HELAA Part B are still in consideration for inclusion in the plan. More information on the HELAA process can be found in the [methodology and summary](#) of results topic paper.

1.7.4 Stakeholder engagement

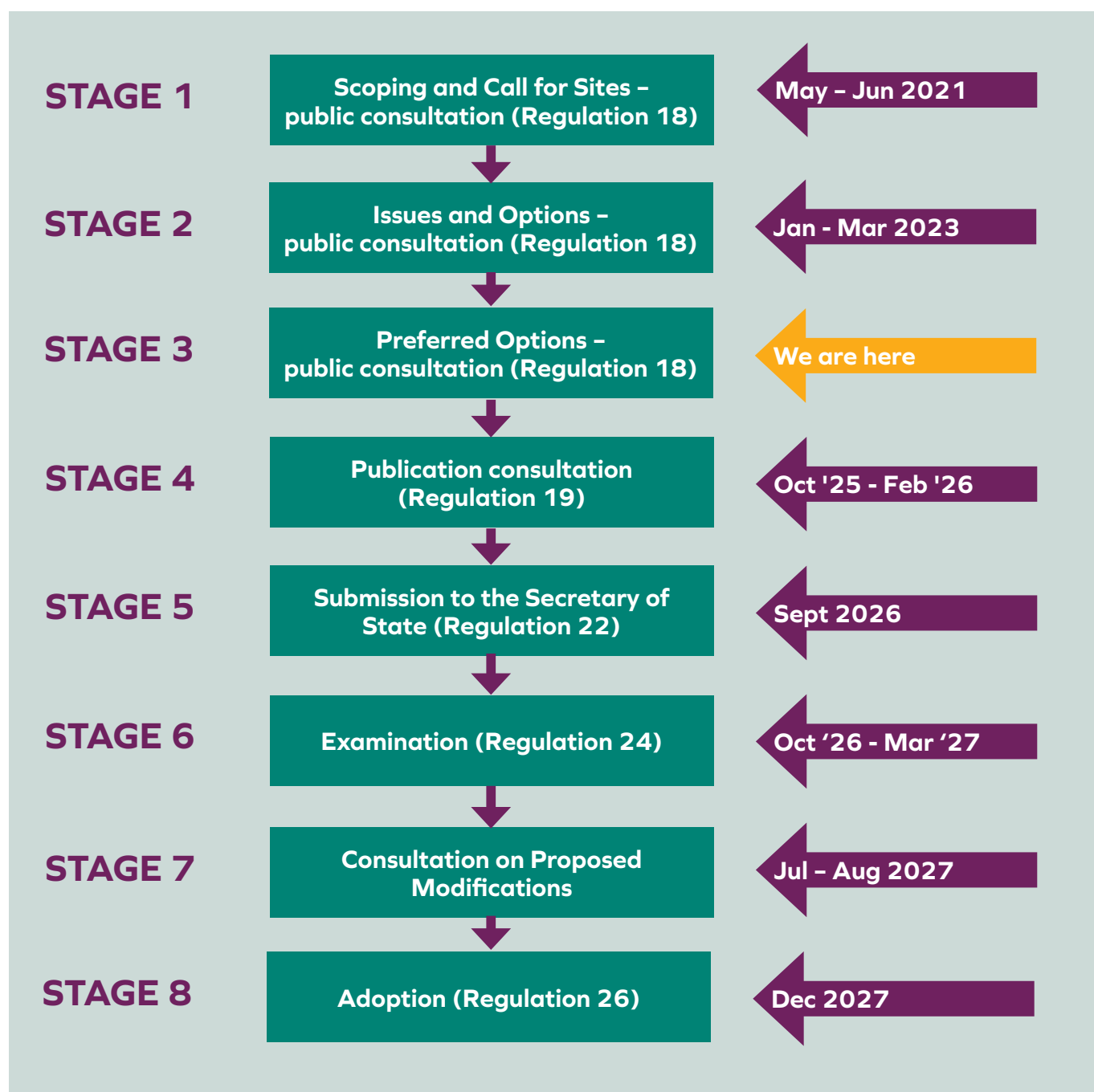
As part of the preparation for the Preferred Options Consultation document we have engaged with various stakeholders, including Parish Councils and key infrastructure organisations, and have conducted interactive stakeholder sessions. These sessions focused on 'Place Analysis' for a number of settlements. This analysis looked at key features within a settlement, areas that are considered problematic by local stakeholders, and ways that these problems could be resolved. Officers have taken feedback from these sessions on board as they have progressed with this Preferred Options Consultation, particularly with regards to selecting potential strategic areas of growth.

1.7.5 Technical Evidence

Officers on the SWLP team have also commissioned various consultants to conduct numerous technical assessments. The Technical Evidence that has been obtained following the Issues and Options Consultation is available online and is as follows:

- [Assessment of Carbon Sequestration and Habitat baseline and opportunities](#)
- [Coventry & Warwickshire HEDNA – WMSESS Alignment Paper](#)
- [Equalities Impact Assessment \(EQIA\) – Preferred Options](#)
- [Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Assessment](#)
- [Habitats Regulations Assessment \(HRA\) – Preferred Options](#)
- [Health Impact Assessment \(HIA\) – Preferred Options](#)
- [HELAA assessment methodology and results](#)
- [High Level Transport Assessment](#)
- [Infrastructure Delivery Plan \(Part One\)](#)
- [Long Marston Airfield Garden Village: Sustainable Transport Viability & Feasibility Assessment](#)
- [Developing the Detail of the Sustainable Transport Vision for Long Marston Airfield Garden Village - The Vision - Part 2 Evidencing the Vision](#)
- [New Settlements Note – Employment](#)
- [New Settlement Assessment \(as at Preferred Options\)](#)
- [Renewables and Decentralised Energy Opportunities](#)
- [Retail and Town Centre Uses Study](#)
- [South Warwickshire Green Belt Review Stage 1](#)
- [South Warwickshire Employment Land Study](#)
- [Spatial Growth Strategy topic paper](#)
- [Vision and Validate - Site based Sustainable Transport Vision - Long Marston Airfield Garden Village - The Vision](#)
- [Water Cycle Study](#)
- [Warwickshire, Coventry & Solihull sub-regional green Infrastructure strategy](#)
- [West Midlands Strategic Employment Sites Study](#)
- [WCC – SWLP Strategic Transport and Education Assessment of New Settlement Options – Oct 2024](#)

Figure 4: Timetable for the SWLP



1.8 Structure of the Preferred Options Consultation

This “Preferred Options” Document follows on from the previous two consultations. It addresses a number of topics, and then presents the preferred approach to addressing them. In this consultation document there are a range of draft policies, and draft policy directions. Table 1 lists all of the policies within the document, and outlines whether it is a draft policy direction, or draft policy.



Draft policies, contain details of the subject matter and clearly set out the requirements of what the policy would like to achieve. The draft policy directions are just an indication of the direction of travel the final policy will take and gives an indication about the content and aspiration of the policy to be drafted at Regulation 19 stage. The level of detail is not as advanced in these policy directions, as will be visible in the draft policies. Throughout the document the draft policies are highlighted in the following colours:

Draft Policy Direction: Numbered 1, 2, 3.....

Draft Policies: Numbered A, B, C....

The consultation document is split into 11 chapters and the glossary which is Chapter 12. Chapters 1-3 provide context to the document, providing a summary, details on what the Local Plan is, the consultation process, and outlines the vision and strategic objectives. Chapter 4 onwards contains the policy topics. At the beginning of chapters 4 onwards there is a short section outlining the issues covered in that chapter. Chapter 12 contains the glossary.

Each policy topic is structured in a uniform way:

- Initially the section starts with a paragraph setting the scene about the topic.
- It is followed by what was said at Issues and Options Consultation. This section is intended to show how responses to the previous consultations have been considered.
- Next, each policy topic will have a box outlining either the draft policy, or draft policy direction. This box will either be  for the draft policies, or  for the draft policy directions.
- Finally, the policy topic will be accompanied by a justification as to why the draft policy/policy direction has been progressed.

Each policy topic therefore shows the preferred approach, and how this approach has been reached. The consultation seeks views on whether residents and stakeholders agree with the proposed approach.

Table 1: List of draft policies and policy directions

Key:

Draft Policy Direction: Numbered 1, 2, 3.....	
Draft Policies: Numbered A, B, C....	

Policy Direction or Policy number	Policy Direction or Policy Title
-----------------------------------	----------------------------------

Chapter 4: Meeting South Warwickshire's Sustainable Development Requirements

Policy Direction - 1	Meeting South Warwickshire's Sustainable Development Requirements
Policy Direction - 2	Potential New Settlements
Policy Direction - 3	Small Scale Development, Settlement Boundaries, and Infill Development
Policy Direction - 4	Accommodating Housing Needs Arising from Outside South Warwickshire
Policy Direction - 5	Infrastructure Requirements and Delivery
Policy Direction - 6	Safeguarding land for transport proposals
Policy Direction - 7	Green Belt
Policy Direction - 8	Density
Policy Direction - 9	Using Brownfield Land for Development

Chapter 5: Delivering Homes that Meet the Needs of all our Communities

Policy Direction - 10	Providing the Right Tenure and Type of Homes
Policy - A	Providing the Right Size of Homes
Policy - B	Providing Custom and Self-Building Housing Plots
Policy Direction - 11	Meeting the Accommodation Needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers

Chapter 6: Delivering South Warwickshire's Economic Needs

Policy Direction - 12	Locations for Employment Growth
Policy Direction - 13	Core Opportunity Area
Policy Direction - 14	Major Investment Sites (MIS)
Policy Direction - 15	Provision of Office Accommodation and Refurbishment of Existing Office Stock
Policy Direction - 16	Airfields
Policy Direction - 17	A Low Carbon Economy
Policy Direction - 18	Supporting Rural Employment and Diversification
Policy Direction - 19	Supporting a Range of Business Units and Affordable Employment Space
Policy - C	Protecting Community Facilities
Policy Direction - 20	Supporting our Changing Town Centres
Policy Direction - 21	Arts and Culture

Chapter 7: Climate Change

Policy - D	Large-Scale Renewable Energy Generation and Storage
Policy - E	Protecting Large Scale Existing Renewable Energy Infrastructure
Policy - F	Decentralised Energy Systems
Policy Direction - 22	Net Zero Carbon Buildings

Policy Direction - 23	Reducing Energy Consumption in Existing Buildings
Policy Direction - 24	Embodied Carbon
Policy - G	Climate Resilient Design
Policy - H	Water Efficiency
Policy - I	Water Supply and Wastewater Infrastructure
Policy - J	Reducing Flood Risk
Policy - K	Multi-functional Sustainable Drainage Systems (SuDS)

Chapter 8: A Well Designed and Beautiful South Warwickshire

Policy Direction - 25	Strategic Design Principles
Policy Direction - 26	Design Codes
Policy Direction - 27	Protecting and Enhancing Heritage Assets/ the Historic Environment
Policy Direction - 28	Waterways

Chapter 9: A Healthy, Safe, and Inclusive South Warwickshire

Policy Direction - 29	Pollution
Policy Direction - 30	Health Impact Assessment for Major Development

Chapter 10: A well connected South Warwickshire

Policy Direction - 31	Sustainable Transport Accessibility
Policy Direction - 32	Electric Vehicle (EV) Infrastructure Strategy
Policy Direction - 33	Road Travel, Employment, and Freight
Policy Direction - 34	Vale of Evesham Control Zone
Policy Direction - 35	Smart Cities

Chapter 11: Natural Environment

Policy Direction - 36	Protection of Sites, Habitats and Species
Policy Direction - 37	Local Nature Recovery Strategy
Policy Direction - 38	Biodiversity Net Gain
Policy Direction - 39	Environmental Net Gain
Policy Direction - 40	Green and Blue Infrastructure
Policy Direction - 41	Carbon Sinks and Sequestration
Policy Direction - 42	Trees, Hedges, and Woodland
Policy Direction - 43	43a - Local Green Spaces 43b - Registered Parks and Gardens 43c - Open Spaces 43d - Urban Parks and Play Areas 43e - Allotments, Orchards and Community Gardens.
Policy Direction - 44	Outdoor Sports and Leisure
Policy Direction - 45	Areas of Restraint
Policy Direction - 46	Protecting the Cotswold National Landscape
Policy Direction - 47	Special Landscape Areas
Policy Direction - 48	Protecting and Enhancing Landscape Character
Policy Direction - 49	Agricultural Land

1.9 Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) and Habitats Regulation Assessment (HRA)

Sustainability Appraisals (SA) are carried out in line with Government guidance to meet the terms of Strategic Environmental Assessment (SEA) which are required under the Environmental Assessment of Plans and Programmes Regulations 2004 (known as the SEA Regulations). A Sustainability Appraisal was carried out to evaluate the social, environmental, and economic effects of reasonable alternatives considered for the South Warwickshire Local Plan at the Regulation 18 Issues & Options stage. Further work has been undertaken on the Sustainability Appraisal to support this Preferred Options consultation to evaluate further reasonable alternatives and proposals relating to the proposed growth strategy, policies and policy directions. The production of a Sustainability Appraisal is an iterative process and further versions of the South Warwickshire Local Plan, including the draft Local Plan, will be assessed as policies and proposals become defined to ensure that the Local Plan is produced in accordance with the Government's definition of sustainable development included in the NPPF (2024).

The Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations) requires the relevant competent authority to carry out a Habitats Regulations Assessment (HRA) to test if a plan or project proposal could significantly harm the designated features of a European site. Both Stratford-on-Avon District Council and Warwick District Council will be required to ensure that such an assessment has been carried out whilst preparing the South Warwickshire Local Plan.

1.10 Duty to Co-operate

The Duty to Co-operate was created in the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively and on ongoing basis with relevant bodies and organisations to address the strategic and cross boundary issues. The SWLP considers the implications of planning policies of the neighbouring authorities. Both Councils have actively engaged with neighbouring authorities through the representation at various Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPo) meetings and having continuous engagement with neighbouring authorities on strategic issues and matters.

1.11 Next Stages

Once the consultation has ended officers will collate and analyse the responses and prepare a consultation statement that will be made available on our SWLP website. These responses, alongside further Technical Evidence, will be used to inform the next iteration of the plan. The next stage will be a statutory consultation on Publication Stage (Regulation 19). This Regulation 19 consultation will be a further enhancement to this Preferred Options consultation, and where policy directions have been consulted on, these will be presented as full policies. The next iteration of the plan will be the plan as proposed prior to it being sent to the Secretary of State (stage 5). After the Regulation 19 consultation, only minor changes are likely to be made.

2. How to Have Your Say

The consultation document contains 11 draft policies, 49 draft policy directions, 24 Strategic Growth Locations (SGL's) and 12 potential new settlement locations. In response to these policy directions, strategic growth locations and potential new settlement locations officers would like to seek your views on the content of the draft policy directions, draft policies and which of the strategic growth locations should be considered for development. We would also like you to identify the most suitable and deliverable locations for potential new settlements. You may respond to as many, or as few of these draft policy directions, draft policies, strategic growth locations, and potential new settlement locations as you wish.

The period for identifying your preferred options and submitting any comments is between Friday 10 January and Friday 7 March 2025. Comments received after the deadline will not be considered.

2.1 How to view the consultation

Online

The consultation content and supporting information is available to view at www.southwarwickshire.org.uk/swlp/preferred-options

Paper copies:

Physical copies of the consultation document are available to view at*:

- Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6HX
- Town Hall, Royal Leamington Spa
- Alcester Library
- Bidford Community Library
- Harbury Community Library
- Henley Community Library
- Kenilworth Library
- Kineton Community Library
- Leamington Spa Library and Information Centre
- Lillington Library and Information Centre
- Shipston-on-Stour Library and Information Centre
- Southam Library and Information Centre
- Stratford-upon-Avon Library and Information Centre
- Studley Community Library
- Warwick Library and Information Centre
- Wellesbourne Library and Information Centre
- Whitnash Library and Information Centre
- Brunswick Healthy Living Centre

*Please check the opening hours of the premises and any restrictions before visiting

If you would like to purchase your own copy of the consultation document, please email SWLP team on swlp@stratford-dc.gov.uk or swlp@warwickdc.gov.uk

2.2 How to Comment

Representations can be made to this consultation by submitting comments using the online consultation portal. We would encourage people to submit their responses using the online consultation portal.

There are a range of questions throughout the document, which can all be answered with either a 'yes', 'no' or 'other' response. Once you select a response to the question you are answering you will be asked to provide a comment. If you do not have further comments to make, you can simply respond 'N/A' in the comment box. Once you have selected your response and provided a comment you can submit your representation.

This document contains a wide range of topics, and you may wish to respond to the topic areas that are of most interest to you. However, there is no limit on how many topic areas/ policy directions you can respond to. Using the online consultation portal is the most effective way to share your views with us. This method also helps ensure that the responses are captured at one single point and officers don't have to input the responses manually into the system. This ensures that officer time is used most efficiently in handling and analysing consultation responses. However, if you are unable to comment using the online form, we will also accept responses by email or post to either:

Stratford-on-Avon District Council

The SWLP Team,
Stratford-on-Avon District Council Elizabeth House,
Church Street, Stratford-upon-Avon, CV37 6HX

Email: swlp@stratford-dc.gov.uk

Or

Warwick District Council

The SWLP Team
Warwick District Council Town Hall, Parade,
Royal Leamington Spa, CV32 4AT

Email: swlp@warwickdc.gov.uk

2.3 Call for Sites

A targeted 'call for sites' is running simultaneously with this consultation. This call for sites is only for sites that meet at least one of the purposes below:

- A site that falls within or adjacent to one of the 12 proposed New Settlement Locations
- A Gypsy and Traveller Site/Travelling Showpeople Site
- A site for commercial or community-led renewable energy generation

We are not accepting any other sites at this time. Sites submitted previously through one of the earlier calls for sites do not need to be submitted again. You only need to tell us if there is a change to the red line boundary or the proposed use, if you wish to withdraw the site, or if you wish to submit further information about the site.

Submissions can be made using the interactive form and the period for submitting Call for Sites is between Friday 10 January and Friday 7 March 2025.

Further Information is available on the SWLP webpage.

3. Vision and Strategic Objectives: South Warwickshire 2050

3.1 Vision

The Issues and Options document put forward a Vision for the South Warwickshire Local Plan. Only 37% of people agreed with the Vision included in the Issues and Options document, whereas 60% of the people did not agree with the vision, and the remaining 3% were undecided.

Some of the key issues raised with respect to the Vision were:

- More clarity around the current housing and employment needs;
- Unmet housing need from other authorities should be given greater priority;
- Definitions of “strategic growth” and “Warwickshire’s sustainable development needs” should be provided.

We do not consider that we need to fundamentally change the Vision in response to the comments received as clarity on the current housing and employment needs will be included as the document progresses in the corresponding chapter. In terms of unmet needs from other authorities we do not consider that it needs to be given greater priority as we will be working with neighbouring authorities under our Duty to Cooperate duty to ascertain how much unmet need, they will need us to accommodate.

The Vision has been written in context of the national and local policy frameworks including the Councils own Corporate Plan Visions.

[Warwick Corporate Strategy 2030](#) Vision is as follows:

“To make Warwick District a great place to live, work and visit by improving lives and our environment.”

[Stratford-on-Avon Council Plan’s](#) Vision reads as follows:

“We are an ambitious, fair, inclusive, and responsible organisation which will put our communities at the heart of everything we do”.

The SWLP will help make sure our area, our environment and our people all thrive together. People and the natural environment are intrinsically linked and care is given to each to enable a high quality of life as the area develops. Social, environmental and economic aspects are considered together to achieve sustainable development. Within the Vision we have proposed five overarching principles. Taken together, the five principles represent what we consider to be sustainable future for the SWLP area.

By 2050 South Warwickshire will be a flourishing, healthy and vibrant place where people will want to live, work and visit. The Vision is to meet South Warwickshire’s sustainable development needs and strengthen local communities, while responding to the climate emergency. 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 and drive towards net zero carbon

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 and addressing health inequalities

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. It was agreed at Issues and Options stage that this document will not include Vision for Place as it was considered that Vision for Places will be included in Area Action Plans and Neighbourhood Plans.

3.2 Strategic Objectives

To enable the vision to be delivered, the following Spatial Objectives are proposed, reflecting the themes of both Council's corporate plans and representing the social, environmental and economic issues of the area. These objectives will complement the policy directions and policies that are included in this document.

At Issues and Options stage various respondents felt that the objectives did not contain enough detail and explanation of how they would be achieved. There was a suggestion to include targets to measure the objectives. Concern was raised especially on how people may interpret 'beauty' and if it is to be included needs to be well defined.

Strategic Objective 1: Providing sustainable levels of growth in the area (related to overarching principle - *A well designed and beautiful South Warwickshire*)

Supporting an appropriate level of growth which is proportionate in scale and is located in the most sustainable locations especially with good transport connections and where people are able to access affordable homes, jobs, services, health, education, social and community facilities.

Strategic Objective 2: Delivering homes that meet the needs of all our communities (related to overarching principle - *A well designed and beautiful South Warwickshire*)

Meeting South Warwickshire's current and future housing need. Allowing growth in new homes that meet the diverse needs of 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.

Strategic Objective 3: Providing infrastructure in the right place at the right time (related to overarching principle - *A well connected South Warwickshire*)

Ensuring development is supported by the infrastructure needed to support the growth in new homes and jobs. This includes (but is not limited to):

- Roads and active travel routes
- Sustainable modes of travel through enhancing greener networks for walking and cycling
- Schools
- Sport and Recreation
- Health care facilities
- Digital Infrastructure and Utilities
- Waste management
- Water supply and wastewater management
- Flood risk
- Blue and Green infrastructure

Strategic Objective 4: Developing opportunities for jobs (related to overarching principle - *A well connected South Warwickshire*)

Accommodating the growth in employment opportunities that build upon our strong and diverse economy, including innovative industries and technologies, embracing the potential of a green economy.

Strategic Objective 5: Making effective use of land and natural resources (related to overarching principle - *A climate resilient and Net Zero Carbon South Warwickshire*)

Encouraging the effective use of previously developed land and natural resources including:

- Re-use and refurbishment of unused existing buildings
- Making most efficient use of land and buildings
- Using sustainable construction techniques
- Encouraging a circular economy
- Efficient use of water resources whilst protecting water quality and flood management

Strategic Objective 6: Contributing towards Net Zero Carbon targets (related to overarching principle- *A resilient and Net Zero Carbon South Warwickshire*)

Ensuring that new development does not cause a net increase in carbon emissions and taking positive action to achieve net zero. Ensuring that new developments are resilient to climate change and that every opportunity is taken to reduce exiting carbon emissions and mitigating and adapting to reduce the impact of climate change and reduce risk to people, communities, the environment and the economy. This will be achieved through (Please note this is not an exhaustive list):

- Design of the new development
- Minimising energy use in both new and existing buildings
- Promoting low carbon and renewable energy generation in the right locations
- Reducing dependency on fossil fuels and reducing greenhouse gas emissions

- Increasing biodiversity, nature recovery and exploring the role of carbon capture, whole life carbon and carbon sequestration
- Improving water sustainability and efficiency measures
- Using nature-based solutions to climate change
- Reducing and managing risk of flooding from all sources
- Protecting and enhancing the water resources and improving water quality
- Supporting low carbon transport initiatives

Strategic Objective 7: Creating attractive places (related to *A well-designed and beautiful Warwickshire*)

Focusing and promoting a high standard of design in new developments that are innovative, adaptable, low carbon, climate resilient, locally distinctive and respect the local character and setting of the existing settlements.

Strategic Objective 8: Protecting and enhancing our heritage and cultural assets (related to overarching principle- *A well-designed and beautiful Warwickshire*)

Protecting and enhancing the wealth of heritage and cultural assets in South Warwickshire, and where possible enhancing access and understanding of these assets.

Strategic Objective 9: Enriching the tourism potential (related to overarching principle- *A well-designed and beautiful Warwickshire*)

Enriching the quality of the visitor experience through the wealth of cultural, heritage and countryside assets that the area has to offer.

Strategic Objective 10: Improving the health, safety and quality of life of our communities (related to overarching principle- *A healthy, safe and inclusive South Warwickshire*)

Promoting health and wellbeing for people of all ages and reducing health inequalities by: creating developments that contribute to physical and mental wellbeing, combat loneliness and isolation, lower levels of pollution, and are free of crime and the fear of crime.

Strategic Objective 11: Connecting people to places (related to overarching principle: *A well-connected South Warwickshire*)

Increasing and improving access to sustainable and active travel options that enhance connectivity between people and places and people and nature and by connecting people to centres, jobs, education, cultural facilities, green spaces and countryside.

Strategic Objective 12: Protecting and enhancing our environmental assets (related to overarching principle - *A biodiverse and environmentally resilient South Warwickshire*)

Protecting what already exists and maximising opportunities for enhancement including improvements to the green space network through tree planting and other biodiversity initiatives.

4. Meeting South Warwickshire's Sustainable Development Requirements

The primary purpose of the South Warwickshire Local Plan is to meet South Warwickshire's sustainable development requirements. This means meeting the needs of the current generation without compromising the ability of future generations to meet their own needs. As well as providing homes and employment land, the SWLP will ensure that infrastructure is provided to support this development. This includes physical items such as transport facilities and schools, as well as the environmental and social infrastructure that are necessary for healthy and happy communities.

Figures 5 and 6 on the following pages show elements of the emerging Spatial Growth Strategy options which are detailed in subsequent sections of this chapter.

Figure 5: South Warwickshire Local Plan-Spatial Growth Strategy Priority Areas

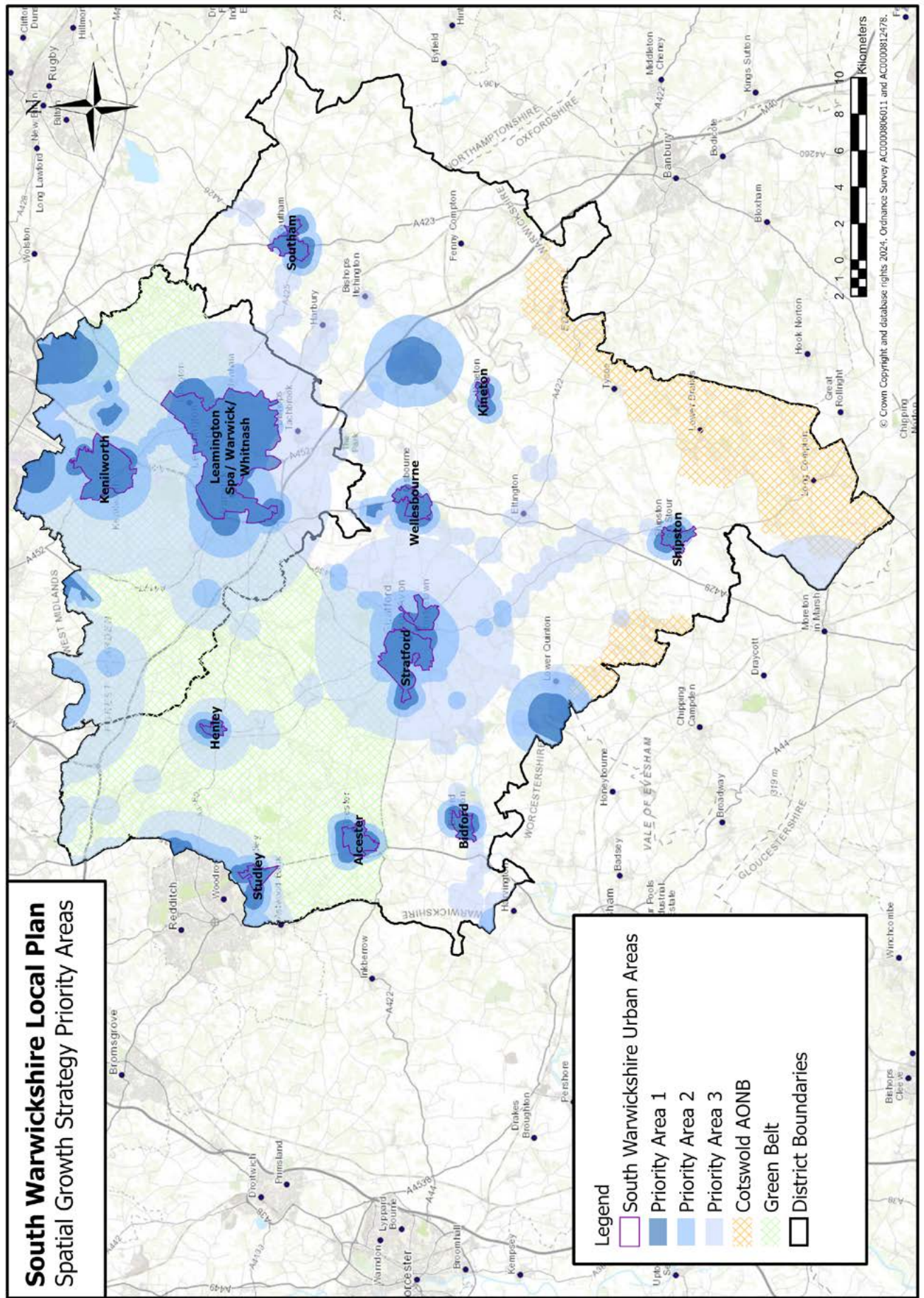
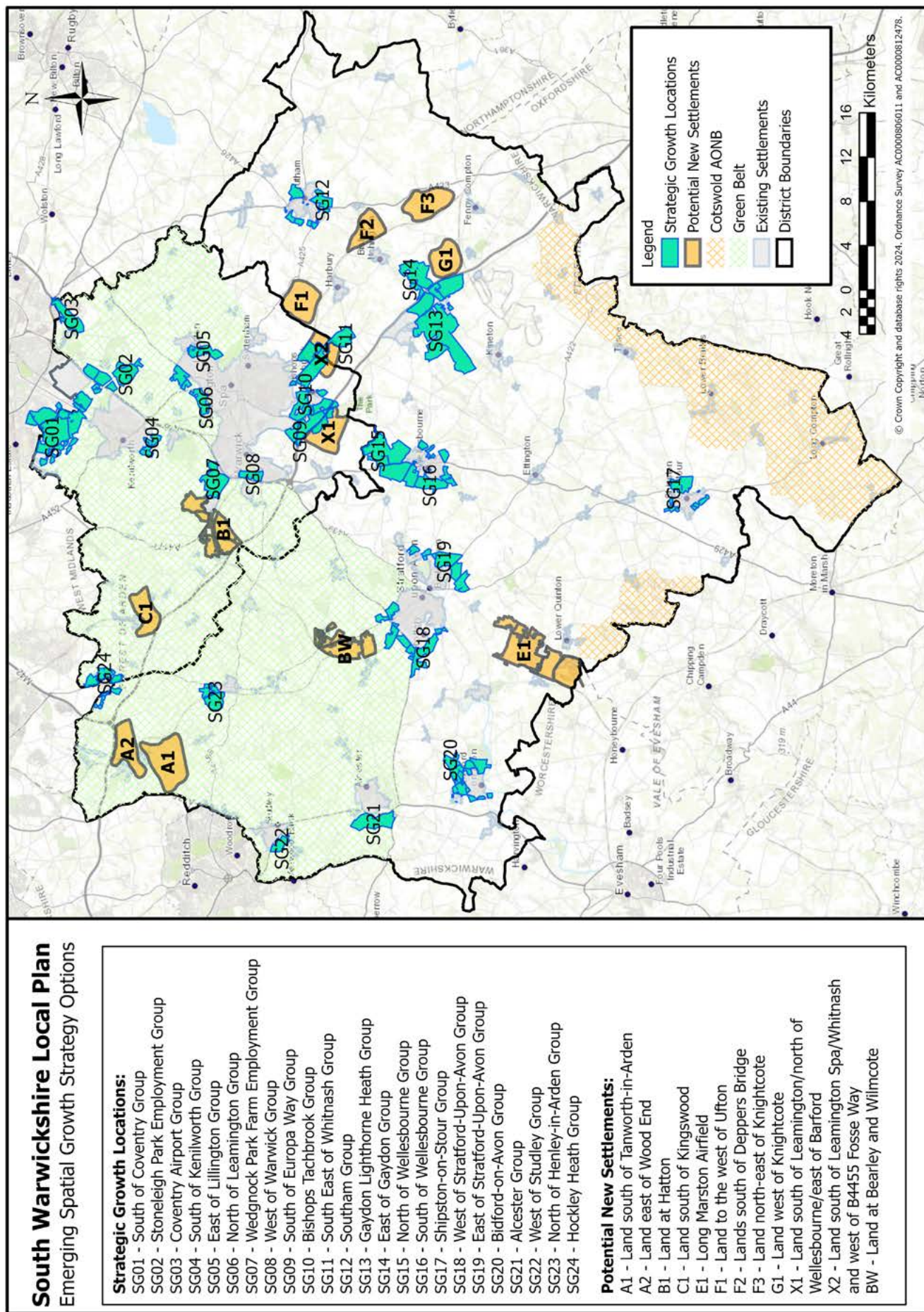


Figure 6: South Warwickshire Local Plan-Emerging Spatial Growth Strategy Options



4.1 Spatial Growth Strategy

A Spatial Growth Strategy sets out in broad terms the locations to which large scale and strategic growth should be directed; and conversely, those areas in which growth should be more controlled. In practical terms, the chosen Spatial Growth Strategy will help deliver the SWLP's five overarching principles, determine where land is allocated for homes and employment uses, and the infrastructure and open space that supports this growth.

The South Warwickshire Local Plan is being prepared in accordance with the principles of achieving sustainable development as set out in national planning policy. To be truly sustainable, it is important that the strategy is evidence-led, rather than being led purely by the sites which have been put forward. In the SWLP, sustainability is achieved by:

- first utilising available urban brownfield land;
- where greenfield development is needed, concentrating this into fewer, larger areas of strategic growth;
- using locations which are within reach of existing facilities, or providing new facilities on site;
- considering the potential for one or more new settlements;
- allowing for small-scale growth outside of strategic areas;
- building at densities that make efficient use of land.

The chosen Spatial Growth Strategy for the SWLP is "Sustainable Travel and Economy". This was presented as Option 4 in the Issues and Options consultation, and is a hybrid option which incorporates the following elements:

- Urban land;
- Sustainable travel – rail stations and bus stops with good travel times to major towns;
- Enterprise hubs – places where people can earn and spend money, including town centres, employment sites, and neighbouring major settlements;
- Socio-economic factors - areas of deprivation where this could be mitigated by new development.

The Spatial Growth Strategy will accommodate South Warwickshire's housing and employment needs for the period to 2050. The The 2022 Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) provides housing figures based on the 2021 Census, which are were considered more robust during the preparation of this Preferred Options document than the 2014-based household growth projections required in the Government's previous "Standard Method" for calculating local housing need. In December 2024, the Government introduced a proposed new Standard Method formula to calculate local housing need via the 2024 NPPF.

As a baseline and given the very recent update to the standard method, the Preferred Options Spatial Growth Strategy accommodates the HEDNA's Census-based housing figures. However the draft policy direction below acknowledges the latest local housing need figures for both authorities and incorporates sufficient flexibility to accommodate these higher figures introduced in the new Standard Method.

South Warwickshire's residual employment need (the net need once the expected employment supply is subtracted from the gross need), is set out in the [South Warwickshire Employment Land Study](#) (SWELS) (2024). This Employment Land Study calculated the residual employment need position through using the demand side findings of the [Coventry & Warwickshire HEDNA 2022, the West Midlands Strategic Sites Study 2024](#) (WMSESS) and the Coventry & Warwickshire HEDNA/WMSESS Alignment Paper 2024. The SWELS also recommends locations for directing future employment growth, which is detailed at Policy Direction 13.

What was said in the I&O

The Spatial Growth Strategy brings together a number of sections from the Issues and Options consultation.

Q-S4.1 asked whether growth of some of our existing settlements should be part of the overall strategy. A majority of respondents agreed.

Q-S5.1 asked whether new settlement should be part of the overall strategy. A majority agreed, although amongst landowners, developers and site promoters, the most common response was "no".

Q-S7.2 asked whether each of the 5 growth options were an appropriate strategy for South Warwickshire:

- Option 1: Rail Corridors
- Option 2: Sustainable Travel
- Option 3: Economy
- Option 4: Sustainable Travel and Economy
- Option 5: Dispersed

Option 5 (Dispersed) was the only option which saw a greater proportion of respondents selecting "inappropriate" than "appropriate". Options 1, 2 and 4 were fairly evenly matched, each attracting support from around 50% of respondents. This similarity is to some extent expected, as some options are hybrids of others in the list. A number of written comments around each Spatial Growth Option were put forward. Commonly occurring themes include the potential impact on the Green Belt of most or all of the proposed options; suggestions for using a hybrid option; infrastructure upgrades needed (for example to rail stations); and difficulties in providing new infrastructure to a dispersed population.

Q-H1.1 asked whether the HEDNA provides a reasonable basis for identifying future levels of housing need. 58.4% said "yes" and 32.0% "no".

In Q-H1.2, further detail was provided, including comments around a potential uplift required to meet needs from outside South Warwickshire; a suggested uplift to provide additional affordable housing; a lack of faith in the figures; a view the figures were too high; and a view that the figures should be seen as a minimum baseline.

Issue E1 of the Issues and Options consultation set out the proposed employment land provision for South Warwickshire based on the findings of the Coventry & Warwickshire HEDNA 2022, which has now been largely superseded by the findings of the [South Warwickshire Employment Land Study \(2024\)](#), the West Midlands Strategic Sites Study 2024 (WMSESS) and the [Coventry & Warwickshire HEDNA/WMSESS Alignment Paper 2024](#).

Issue E1 identified the following employment land needs drawing on the HEDNA (2022) as well as the need to consider strategic warehouse and distribution need across Coventry & Warwickshire.

Q-E1.1 asked whether the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire.

The question had a total of 93 responses. Of the responses, 40.9% (38 responses) were 'Yes', 38.7% (36 responses) were 'No', and 20.4% (19 responses) were 'Don't Know'.

However, we are no longer proposing to use the HEDNA (2022) as the main basis for deciding our employment needs, except for office need. This is as the HEDNA had consistent data only to 2019 due to being prepared during the Covid pandemic period and before the headline results of the 2021 Census were released. Therefore, the responses to question E1.1 are less relevant to this Preferred Options version of the SWLP. However, the findings of the HEDNA have been used to inform the [South Warwickshire Employment Land Study](#) (2024) and the [WMSESS/HEDNA Alignment Paper \(2024\)](#).

Draft Policy Direction 1 - Meeting South Warwickshire’s Sustainable Development

Requirements

The South Warwickshire Local Plan will make provision for the delivery of at least 1,679 dwellings per annum, in line with the HEDNA; with sufficient flexibility to accommodate up to 2,188 dwellings per annum, in line with the 2024 NPPF Standard Method. This equates to at least 41,975 dwellings over a 25-year plan period from 2025-2050, with sufficient flexibility to accommodate up to 54,700 dwellings.

After accounting for existing commitments, and an assumed windfall allowance, there remains a “to find” figure of 15,532 dwellings (HEDNA) or 28,257 dwellings (2024 Standard Method). This to find figure represents the scale of development to be accommodated by the SWLP.

In terms of employment need, the South Warwickshire Local Plan will plan for at least the following (in hectares) over the period 2021-2050. Note that in the table below, residual needs are shown in bold as negative figures; existing surpluses are shown in bold as positive figures:

	Stratford-on-Avon District	Warwick District	South Warwickshire
Residual (net) non-strategic industrial need (2021-50)	-139	-78	-217
Residual (net) office need (2021 – 50)	-3	+14/-6.8	+11/-9.8
Residual (net) strategic industrial site need (2021-45) ²	-	-	-75 to -125

Tables 2 and 3 below illustrate how these figures have been calculated for each housing requirement.

Table 2: Housing calculation using the HEDNA method

HEDNA	Stratford-on-Avon	Warwick	South Warwickshire
Total housing need (per annum)	868	811	1,679
Total housing need (25 year plan period)	21,700	20,275	41,975
Existing commitments	7,962	9,106	17,068
Assumed windfall allowance in SWLP from 2025 (per annum) ³	274	101	375
Assumed windfall allowance in SWLP from 2025 (25 year plan period)	6,850	2,525	9,375
To-Find Figure (i.e. housing need minus commitments and windfalls)	6,888	8,644	15,532

¹It should be noted that while there is a notional supply of 30ha. of office land up to 2050 for Warwick District, resulting in a notional quantitative surplus of office space of 14ha., 20.8ha of this is focussed at Abbey Park. The South Warwickshire Employment Land Study (2024) identifies that Abbey Park has faced deliverability challenges since consent and questions remains around the market attractiveness of the site in terms of its rural locations; and the adequacy of the supply position in the Leamington/Warwick area as the strongest market. If Abbey Park is removed from the supply, there is a shortfall of office employment land in Warwick District of 6.8ha to 2050 and 9.8ha in South Warwickshire.

²There is no total (gross) strategic industrial need available for Stratford-on-Avon and Warwick Districts, as the residual strategic need figure has been taken from the WMSESS (2024) which calculated the gross need across the entire WMSESS study area, rather than the gross need being attributed to the individual authorities.

³Windfall allowances are estimates and may be subject to change.

⁴It should be noted that while there is a notional supply of 30ha. of office land up to 2050 for Warwick District, resulting in a notional quantitative surplus of office space of 14ha., 20.8ha of this is focussed at Abbey Park near Stoneleigh. [The South Warwickshire Employment Land Study \(2024\)](#) identifies that Abbey Park has faced deliverability challenges since consent and questions remains around the market attractiveness of the site in terms of its rural locations; and the adequacy of the supply position in the Leamington/Warwick area as the strongest market. If Abbey Park is removed from the supply, there is a shortfall of office employment land in Warwick District of 6.8ha and 9.8ha in South Warwickshire to 2050.

⁵There is no total (gross) strategic industrial need available for Stratford-on-Avon and Warwick Districts, as the residual strategic need figure has been taken from the WMSESS (2024) which calculated the gross need across the entire WMSESS study area, rather than the gross need being attributed to the individual authorities.

Table 3: Housing calculation 2024 NPPF standard method

2024 NPPF Standard Method	Stratford-on-Avon	Warwick	South Warwickshire
Total housing need (per annum)	1,126	1,062	2,188
Total housing need (25 year plan period)	28,150	26,550	54,700
Existing commitments	7,962	9,106	17,068
Assumed windfall allowance in SWLP from 2025 (per annum)	274	101	375
Assumed windfall allowance in SWLP from 2025 (25 year plan period)	6,850	2,525	9,375
To-Find Figure (i.e. housing need minus commitments and windfalls)	13,338	14,919	28,257

Provision for employment land over the plan period will be made for at least the following (note that in Table 4, residual needs are shown in bold as negative figures; existing surpluses are shown in bold as positive figures).

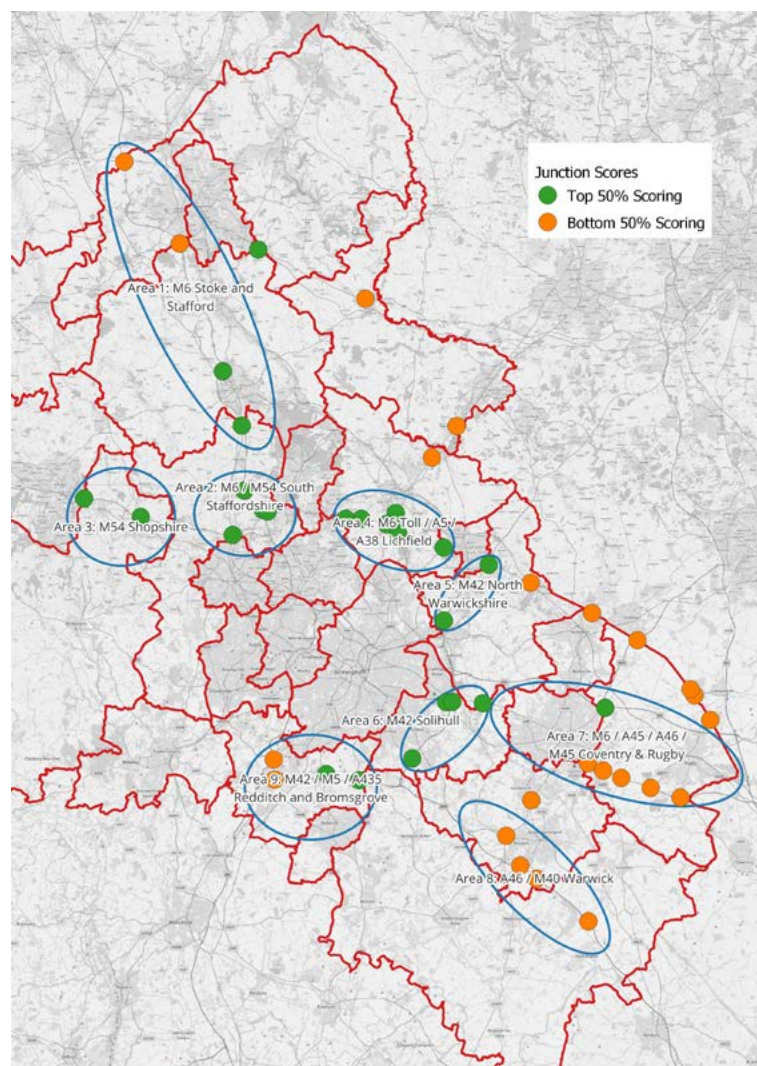
Table 4: Employment land residual needs and existing surpluses

Employment Land (hectares)	Stratford-on-Avon	Warwick	South Warwickshire
Total (gross) non-strategic industrial need (2021-50)	196	113	309
Supply of non-strategic industrial floorspace (2021-50)	57	35	92
Residual (net) non-strategic industrial need (2021-50)	-139	-78	-217
Total (gross) office need (2021-50)	7	16	23
Supply of office floorspace (2021-50) ⁴	4	30/10	34/14
Residual (net) office need (2021 – 50) ⁵	-3	+14/-6.8	+11/-9.8
Residual (net) strategic industrial site need (2021-45)	-	-	-75 to -125

The WMSESS identifies a residual need for 75-125 ha strategic sites up to 2045, to include 1-2 mixed/B8 sites and 0-1 B2 sites within Road Opportunity Area (ROA) 8 along the M40/A46. It is proposed that the upper threshold of 125 ha is used, as recommended within the WMSESS (2024). Strategic sites in this context refer to large scale employment sites typically over 25 ha and largely dedicated to units of over 9,300sqm (100,000sqft). Non-strategic (or local) need refers to industrial (B2/B8 class) uses to meet a local need, generally for units under 9,300sqm (100,000sqft) but also for units over 9,300sqm (100,000sqft) where these are located on non-strategic sites (<25 ha)..

It should be noted that while ROA 7 overlaps the north of Warwick (and includes existing commitments such as the Sub-Regional Employment Site and Coventry Airport), junction opportunities and further land do not fall within Warwick District; whilst ROA 9 overlaps the western edge of Stratford-on-Avon, however, this will likely be Redditch and Bromsgrove facing. As such, ROA 8 is the primary opportunity area wholly within South Warwickshire.

Figure 7: Road Opportunity Area 8, WMSESS (2024)



South Warwickshire’s housing and employment needs will be distributed using the “Sustainable Travel and Economy” Spatial Growth Strategy. Three “priority areas” have been delineated which determine areas of land which fall within this Spatial Growth Strategy, based on proximity to the various elements that form part of the strategy.

South Warwickshire’s existing urban areas fall within Priority 1, and full use will be made of suitable urban brownfield land before development is considered elsewhere.

There is insufficient urban brownfield land to accommodate South Warwickshire’s housing and employment land needs. The majority of the SWLP’s strategic growth needs will be met within priority areas 1-3.

Strategic growth will be accommodated outside of the priority areas only where it is of sufficient scale for significant infrastructure upgrades to be provided on site (for example at the scale of a new settlement).

Small-scale growth to meet identified local needs may be accommodated outside of the priority areas. Neighbourhood Development Plans are considered to be an appropriate vehicle for delivering such sites.

Twenty-four areas have been identified as locations for potential strategic growth. To provide the opportunity to consider reasonable alternatives, the identified strategic growth locations could accommodate well in excess of South Warwickshire's housing and employment needs, and it is not expected that all of the areas will be allocated in the SWLP. Further work will be undertaken, prior to publication of the Regulation 19 Local Plan to identify the sites that are proposed to be allocated. This will include consideration of responses received on the Preferred Options document.

Similarly, the strategic growth locations identified include a mixture of Green Belt and non-Green Belt locations. This will enable a careful assessment of the sustainability of different options, which is necessary to determine whether there are "exceptional circumstances" that would justify releasing land from the Green Belt.

The mix of proposed uses within each strategic growth location is not currently determined.

Table 5: Strategic Growth Locations

Reference	Strategic Growth Location
SG01	South of Coventry Group
SG02	Stoneleigh Park Employment Group
SG03	Coventry Airport Group
SG04	South of Kenilworth Group
SG05	East of Lillington Group
SG06	North of Leamington Group
SG07	Wedgnock Park Farm Employment Group
SG08	West of Warwick Group
SG09	South of Europa Way Group
SG10	Bishops Tachbrook Group
SG11	South East of Whitnash Group
SG12	Southam Group
SG13	Gaydon Lighthorne Heath Group
SG14	East of Gaydon Group
SG15	North of Wellesbourne Group
SG16	South of Wellesbourne Group
SG17	Shipston-on-Stour Group
SG18	West of Stratford-Upon-Avon Group
SG19	East of Stratford-Upon-Avon Group
SG20	Bidford-on-Avon Group
SG21	Alcester Group
SG22	West of Studley Group
SG23	North of Henley-in-Arden Group
SG24	Hockley Heath Group

Note that in addition to the 24 Strategic Growth Locations, potential New Settlement locations may also contribute to South Warwickshire's development needs. See section 4.2 for further details.

The Regulation 19 Local Plan will confirm the development requirements for each proposed allocation, including the required mix of uses, mitigation and enhancement measures and infrastructure (including open space, active travel, education, community facilities, highways, public transport).

Justification

Sustainable development is at the heart of the NPPF. Paragraph 11 sets out the fundamental requirement that plans should promote a sustainable pattern of development, meeting the needs of the area, aligning growth and infrastructure, improving the environment and mitigating climate change.

NPPF paragraph 69 sets out that strategic policy-making authorities should establish a housing requirement figure for their whole area. Paragraph 77 states that new homes can often best be achieved through planning for larger scale development, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Paragraph 124 identifies the need to make effective use of land, including previously developed (brownfield) land.

NPPF Chapter 6 'Building a strong, competitive economy' makes clear at paragraph 85 that the approach taken in local planning policies should allow each area to build on its strengths, going on to recognise that areas with high levels of productivity should be able to capitalise on their performance and potential. Para 86 states that Policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies alongside identifying strategic sites for local and inward investment. Para 87 raises the need to recognise and address the specific locational requirements of different sectors, which includes making provision for clusters or networks for different industries including the knowledge sector and freight and logistics.

Other evidence

The South Warwickshire Local Plan has incorporated a wide range of evidence which has identified South Warwickshire's housing and employment land needs and assisted in determining the most suitable and sustainable locations for growth. A topic paper: [Emerging Spatial Growth Strategy](#) sets out in detail how the Spatial Growth Strategy has evolved to its current state.

The 2022 [Urban Capacity Study](#) identified land in urban areas that may be suitable for re-use. The capacity of such land in South Warwickshire is limited; consequently, there is a need to consider sites in other locations. Two Call for Sites exercises have been conducted, and other potential development sites have been identified including existing and draft allocations from other planning documents where these do not have planning permission.

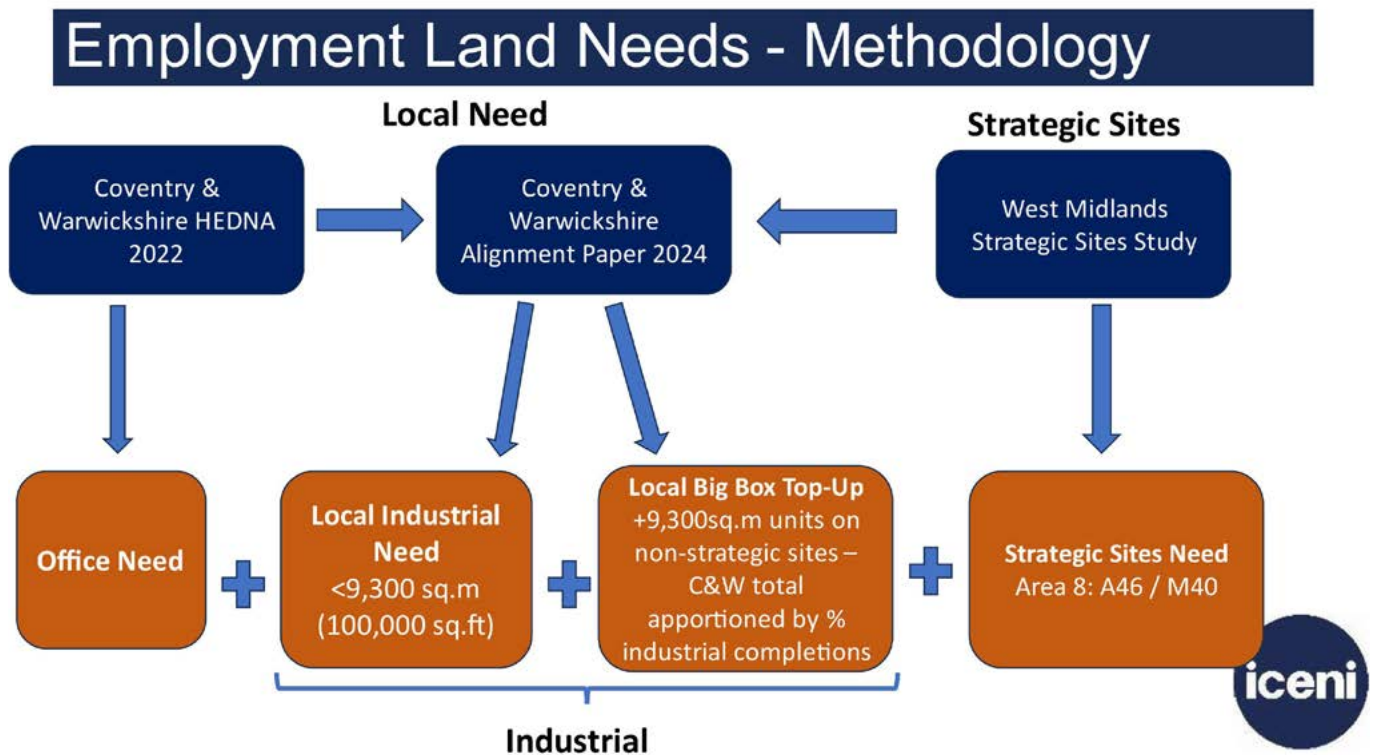
These sites have been assessed using a two-stage [Housing and Economic Land Availability Assessment \(HELAA\)](#). This assessment considered a wide range of evidence from multiple sources, including (but not limited to) flood mapping, heritage, landscape character, Green Belt and transport. HELAA part A ruled out sites subject to severe constraints; part B considered a site's relative merits in the round. The HELAA assessment informed the selection of strategic growth locations.

Comments on specific site submissions, as outlined on the interactive map, and the outcomes of the HELAA Assessment can be made as part of this consultation.

Employment Evidence

There are several different employment evidence documents that fed into the employment strategy in this Preferred Options document. Figure 8 shows the relationship between the below different employment evidence documents that have fed into the South Warwickshire Employment Land Study (2024).

Figure 8: Employment Land Needs Methodology



Ultimately, the results of these evidence documents have then been used within the [South Warwickshire Employment Land Study \(2024\)](#), to calculate and summarise the residual employment need for South Warwickshire.

The Coventry & Warwickshire Housing and Economic Development Needs Assessment (2022)

This provided each local authority with a local industrial and office need for the 2021-41 and 2021-50 periods. In addition, the report also reported a Strategic B8 need to 2050 across the Study region. The HEDNA provided an overall office need for Stratford-on-Avon District of 7.2 ha. to 2050, and for Warwick District of 15.8 ha. to 2050.

West Midlands Strategic Site Study (2024)

Since the publication of the HEDNA, the West Midlands Strategic Sites Study (WMSESS) has identified an overall need for strategic sites across the West Midlands, for B2 and B8 use and identified opportunity areas for strategic sites, assigning them a notional quantum.

In addition to Road Opportunity Areas, where 75-125ha. of strategic employment need is identified in Road Opportunity 8 (located entirely within South Warwickshire), the WMSESS (2024) also identifies a Study-area wide need for 67 ha to 135 ha for rail needs. This indicates a likely need for a new strategic rail freight interchange (SRFI) site within the study period (2022 – 2045).

The WMSESS suggests four broad areas of search for new commercially attractive sites to accommodate an SFRI, namely:

- Stoke / Stafford.
- Lichfield.
- Nuneaton-Coventry; and
- Warwick-Leamington.

However, at this stage the location of this SFRI has not been decided.

Coventry & Warwickshire HEDNA and WMSESS alignment paper

Following the publication of the WMSESS, an [alignment paper](#) has been produced to bring together the WMSESS and the C&W HEDNA, address the overlaps between them, and provide aligned outputs on employment land needs over a consistent set of timescales. The alignment paper identifies a local strategic unit need (for units over 9,300 sqm) not captured by WMSESS. The need for offices is not updated and remains the same as forecasted in the 2022 HEDNA.

South Warwickshire Employment Land Study 2024

The Employment Land Study builds on the findings of the Coventry & Warwickshire HEDNA (2022), the West Midlands Strategic Sites Study (WMSESS) (2024) and the [Coventry & Warwickshire HEDNA / WMSESS alignment paper \(2024\)](#). These studies assessed the employment land needs of the South Warwickshire Study Area. The Employment Land Study carries out a supply side assessment to identify quantitative and qualitative gaps in the Study Area's supply, in order to calculate the residual employment needs for South Warwickshire and identify the most appropriate locations for employment growth.

The residual non-strategic employment needs position has been calculated in the South Warwickshire Employment Land Study by taking the need identified in the three studies listed above and netting off existing allocations, employment commitments and vacant land identified on existing employment sites.

4.2 Potential New Settlements

The aim of a new settlement in planning terms is to deliver a new community that can fulfil most of its day to day needs within the settlement itself, limiting the need to travel.

New settlements can provide access to employment opportunities which in turn can create more internalised trips and opportunities to deliver non-motorised infrastructure to create a sustainable environment. Further sustainable credentials can be met through local level service provision and local centres, helping to create 20-minute neighbourhoods. Ensuring education facilities (primary and secondary schools) are provided and accessible by sustainable modes of transport is an important part of reducing car trips.

By virtue of their larger size, new settlements can take a long time to be delivered. Using a combined approach of new settlement designations, along with other strategic and smaller site allocations, will assist in ensuring that the Local Plan has a sufficiently wide range and mix of sites. This will ensure a steady stream of deliverable sites and maintain a 5-year housing land supply.

What was said in the I&O

The Issues and Options document highlighted new settlements (being a minimum 6,000 dwellings and associated infrastructure) as one of several options being considered to deliver the necessary growth required over the plan period. 7 indicative locations for new settlements were shown, along with a high-level sustainability appraisal of the locations.

On the topic of new settlements, the majority of respondents (59%) thought that new settlements should be part of the overall growth strategy, with most of these also noting there should be expansion of existing settlements in conjunction with new settlements.

Draft Policy Direction 2 - Potential New Settlements

One or more new settlements will be identified and considered for strategic site allocation in the most sustainable location(s) where they can be developed to a suitable minimum size to provide the required infrastructure for substantial internalisation of trips.

12 potential new settlement locations have been identified through the Issues and Options consultation and further evidence gathering, which have been categorised as more or less suitable based on the work undertaken to date. The Sustainability Appraisal undertaken for the Preferred Options includes an assessment and ranking of the potential new settlement locations. The Sustainability Appraisal results, along with further evidence being gathered and responses to this consultation, will inform analysis to further refine site location selection suitability.

Table 6: Potential new settlements and their suitability

Ref	Location	Potential Suitability
A1	Land south of Tanworth-in-Arden*	Less Suitable
A2	Land east of Wood End*	Less Suitable
B1	Land at Hatton**	More Suitable
C1	Land south of Kingswood*	Less Suitable
E1	Long Marston Airfield**	More Suitable
F1	Land to the west of Ufton*	Less Suitable
F2	Lands south of Deppers Bridge*	Less Suitable
F3	Land north-east of Knightcote*	Less Suitable
G1	Land west of Knightcote*	Less Suitable
X1	Land south of Leamington/north of Wellesbourne/east of Barford	Less Suitable
X2	Land south of Leamington Spa/Whitnash and west of B4455 Fosse Way*	More Suitable
BW	Land at Bearley and Wilmcote**	More Suitable

* The Potential New Settlement names have been revised and might differ from the Issues and Options stage document. Whilst their names have been revised, there is no change to their boundaries.

** Site boundaries have been revised to reflect known land promoters' interests.

Justification

The NPPF recognises the role large scale development and new settlements can play in the supply of new homes in an area. Paragraph 77 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Drawing on examples from around the country, a new settlement has the potential to accommodate approximately 6,000-10,000 dwellings (minimum), as a significant proportion of South Warwickshire's growth needs.

The 12 potential new settlement locations identified since the last round of consultation provide a range of options across both Stratford and Warwick districts, broadly aligned to the preferred growth strategy (Sustainable Travel and Economy). [The New Settlement Assessment \(as at Preferred Options\)](#). The New Settlement Assessment (as at Preferred Options) paper sets out the approach to assessing the potential new settlement locations, drawing on a range of sources utilised for the assessment. The categorisation of 4 of the 12 potential new settlement locations as more suitable options, rather than less suitable, is based on holistic planning judgement of the evidence collated to date. A key variable between the potential new settlement locations is the proportion of land being promoted in each proposed new settlement's location. Clearly, the infrastructure requirements for any new settlement location will be significant, and therefore are a key factor for measuring suitability. Further work is required to further refine recommendations on the appropriateness of one or more potential new settlements to accommodate a significant proportion of South Warwickshire's required growth in a sustainable manner.

4.3 Small Scale Development, Settlement Boundaries, and Infill Development

It is important to note the contribution that small scale and windfall development can make to the overall development need for South Warwickshire. Smaller sites often have a valuable role to play in delivering community-led housing and providing opportunities for self-build and custom-build housing. Development of small sites often also provides a boost to the local economy as they tend to be more attractive to small and medium local businesses rather than volume housebuilders.

It is also important to define the boundaries between settlements and the surrounding countryside. This provides a distinction between the various scales of settlements and the open countryside, and in so doing enables the clear, unambiguous and consistent application of policies in the management of development within and outside settlements. This approach encourages the efficient use of land within our towns and villages, including the re-use of previously developed land.

It is not the purpose of settlement boundaries to identify land for development; this will be achieved via the allocation of sites in this Local Plan and Neighbourhood Development Plans. Their purpose is to define the extent of a particular town or village in terms of its built development and therefore, the boundaries are unrelated to the administrative boundaries of a town and parish, which serve this particular function.

What was said in the I&O

At the previous Regulation 18 Issues & Options consultation the following comments were made regarding small scale growth, settlement boundaries and the role of infill development:

- General support to follow a threshold approach to allow more small-scale development to come forward over the plan period.
- Support for a limit of 10 dwellings per site for new individual sites across the plan area. However, a lower limit was also sought by some respondents.
- A strong view that a threshold approach was not appropriate in Green Belt areas.
- A view that a single numerical threshold was inappropriate given the wide variety of settlements that may fall outside of the chosen Spatial Growth Strategy.
- Support by individuals suggesting any amendments/revisions to settlement boundaries should wait until Part 2 of the Plan when further details, such as non-strategic allocations, are available although developers and land promoters stated these revisions should be considered earlier on in the plan period.
- There has been some previous support in relation to growth options in the Green Belt being limited to the development of infill sites and the revision of village boundaries to take account of the existing built environment.

Draft Policy Direction 3 - Small Scale Development, Settlement Boundaries and Infill Development

The SWLP will identify Built Up Area Boundaries (BUABs) for settlements in South Warwickshire. This will include:

- Reviewing, and where appropriate updating, existing adopted boundaries in the current Stratford District Core Strategy, Warwick District Local Plan, and Neighbourhood Development Plans;
- Identifying a suitable size threshold above which settlements should have a BUAB;
- Drafting boundaries for those settlements above the size threshold which do not currently have an adopted or draft BUAB.

The SWLP will review whether a revised settlement hierarchy classification is required to replace the current classifications in the Stratford District Core Strategy and Warwick District Local Plan.

The SWLP will support Neighbourhood Development Plans as an appropriate mechanism for making housing and employment allocations in smaller settlements.

Consideration will be given to the need for the SWLP to identify a number of small sites in order to ensure provision of a 5-year housing land supply and meet the requirement in the NPPF for at least 10% of the housing requirement to be accommodated on sites no larger than one hectare.

Small-scale development on unallocated sites will be supported in the following ways:

- In Green Belt locations:
 - Limited infilling within Built Up Area Boundaries;
 - Limited affordable housing for local community needs, within or adjacent to Built Up Area Boundaries.

- In non-Green Belt locations:
 - Housing, employment and other settlement related development, within or adjacent to Built Up Area Boundaries.
 - Where such sites are adjacent to Built Up Area Boundaries, a threshold site size will be established, below which such developments are likely to be acceptable. The threshold will be determined factoring in:
 - The scale of the settlement;
 - Whether the site falls into Spatial Growth Strategy Priority Areas 1-3 or outside these areas.
 - Where such sites fall within the Cotswold National Landscape, proposals will need to accord with other relevant policies in the SWLP.

Justification

Paragraph 73 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. Planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. Authorities should also seek opportunities to support small sites to come forward for community-led development for housing and self-build and custom-build housing.

4.4 Accommodating Growth Needs Arising from Outside South Warwickshire

Under the Duty to Co-operate, the Council is obliged to engage proactively with certain prescribed bodies to address strategic cross boundary issues. There may be a need to look to accommodate 'unmet need' from the Coventry and Warwickshire Housing Market Area (HMA) and the Greater Birmingham and Black Country HMA. While both Stratford and Warwick districts are located within the Coventry and Warwickshire HMA, only Stratford lies within the Greater Birmingham and Black Country HMA.

It is yet to be established to what extent and what uses (e.g. housing and/or employment) there will be any unmet need from elsewhere within these housing market areas. Some of this need will be met by other constituent Local Planning Authorities within both HMA's; however, through Duty to Co-operate discussions; the Councils will commit to continually consider this need and work with those authorities on how this can be achieved.

What was said in the I&O

The Issues and Options Consultation considered the need to meet housing needs (including unmet need arising from neighbouring authorities) within the vision however, it was felt that this should be given greater emphasis.

- Most respondents (62%) felt that the plan should not be contributing to addressing the unmet needs in the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) until 2031.
- Primarily developers and land promoters considered South Warwickshire should provide for neighbouring housing unmet needs, including beyond the proposed allocations in the Stratford-on-Avon District Council's Site Allocation Plan (SOADC SAP). They considered South Warwickshire has a responsibility to help address the unmet needs through the Duty to Cooperate (DTC). Some mentioned that, given South Warwickshire's size, it is acceptable to accommodate some unmet needs of other Local Authorities within the HMA.

Draft Policy Direction 4 - Accommodating Growth Needs Arising from Outside South Warwickshire

The South Warwickshire Local Plan will be underpinned by a housing need and availability evidence base that considers the Coventry and Warwickshire Housing Market Area as well as the Greater Birmingham and Black Country Housing Market Area. This evidence base will consider a strategic approach that addresses any shortfall of land availability to deliver in full the Housing Market Area's Objectively Assessed Housing Need or other evidenced housing need arising outside South Warwickshire.

If evidence and the duty to co-operate process clearly indicates that there is a housing or employment need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within the South Warwickshire Local Plan, reserve sites will be released for this purpose, or when the relevant authority's 5 year housing land supply calculation falls below the thresholds set out in national planning policy guidance.

Justification

The National Planning Policy Framework (NPPF) provides guidance on the duty to cooperate and meeting cross boundary housing need that cannot be met within neighbouring areas.

The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 identifies likely housing requirements for South Warwickshire in relation to neighbouring authorities, however unmet needs figures (e.g. from Coventry) are not yet known.

For the Greater Birmingham and Black Country HMA, there is evidence of a significant shortfall between housing requirements and land supply, but the overall scale of the shortfall has not been collectively quantified beyond 2031 since the GBBC HMA Strategic Growth Study (2018). A study refresh is required to re-evaluate the housing shortfall considering more recent evidence and policy. Council officers meet regularly with counterparts from other Councils and with various stakeholders in both the Coventry & Warwickshire and Greater Birmingham & Black Country Housing Market Area to discuss cross boundary issues. Until there is greater certainty regarding the quantum of unmet needs from neighbouring housing market areas, it is premature to allocate reserve housing sites. The latest evidence and further discussions with neighbouring authorities will inform the Regulation 19 Submission policies on unmet housing need. If reserve housing sites are needed, the SWLP process will consider suitable sites which may include draft reserve housing allocations in Stratford-on-Avon District Council's Site Allocation Plan (SOADC SAP).

4.5 Infrastructure Requirements and Delivery

Infrastructure is essential to support growth in a sustainable manner. The South Warwickshire Local Plan aims to ensure that there is sufficient and appropriate infrastructure to meet future needs. The Local Plan and supporting evidence base will identify strategic infrastructure that is required to support development in the SWLP area. This section discusses infrastructure requirements and delivery but should be read in conjunction with other parts of this document that relate to specific infrastructure topics, including Section 6.5 on Airfields, Section 6.9 on community facilities, 7.10 and 7.11 in relation to flood risk and sustainable drainage and Section 10 relating to a well-connected South Warwickshire.

The Local Plan will also be supported by an [Infrastructure Delivery Plan \(IDP\)](#). The IDP is being prepared alongside the Local Plan to help identify key infrastructure necessary to deliver the vision of the plan and support its proposed growth and to understand how current and future infrastructure will be planned, funded, and delivered.

The IDP will also have a role in helping to coordinate delivery of infrastructure and reflect the outcomes of discussions on infrastructure needs, including any cross-boundary issues under the Duty to Cooperate.

The IDP will help demonstrate that the objectives of the South Warwickshire Local Plan are realistic, viable, and can be delivered over the Plan period. Informed by the wider evidence base and development requirements identified in the Local Plan, the IDP will identify the priorities, timing, and phasing of infrastructure provision.

Part 1 of the IDP is being published alongside the Preferred Options document. It considers the performance of existing infrastructure, existing planned investment and the infrastructure implication of future growth across a number of topics and themes, including transport, community facilities, green and blue infrastructure and flood risk. It draws on existing plans and strategies, the wider evidence base and responses to the consultation on the Issues and Options Local Plan (January 2023).

The IDP will need to be updated as the Local Plan progresses to submission and other elements of the Local Plan evidence become available, including transport modelling and a Viability Assessment for the Local Plan.

Once finalised, the IDP will include an Infrastructure Delivery Schedule for each district that provides details of specific infrastructure requirements identified in the Local Plan. This IDP remains 'a live document' and the Local Planning Authorities will continue to work with infrastructure providers and other stakeholders to refine its contents up to submission of the Local Plan.

What was said in the I&O

The I&O document asked if the Part 1 Local Plan should set out infrastructure requirements for all scales, types and location of development or if it should just focus on the strategic infrastructure relating specifically to the growth strategy.

- 67% of respondents indicated that the Part 1 Local Plan should set out the infrastructure requirements for all scales, types and locations of development.
- There were a few concerns raised including a point suggesting that the plan is going to be led by infrastructure provision as opposed to infrastructure provision being plan led and stronger wording around 'when needed' as this could be interpreted incorrectly.
- It was also felt that a list of required infrastructure in the plan could help with any uncertainty and that the plan should acknowledge that infrastructure is sometimes the responsibility of other

authorities (County Council, Local Health Authority, Central Gov etc.) which should be identified in the plan.

- There were concerns that a Transport Assessment or Strategy had yet to be concluded in support of the plan with regard to traffic and transport.
- With regards to the delivery, importance was placed on infrastructure requirements and how it should be identified via appropriate evidence as well as identified geographical locations, timescales and funding sources including commitment to providing infrastructure prior to development.
- The source of funding was also addressed with comments stating that infrastructure contributions as part of developments should be proportionately related to the scale of proposals and that developers should not be bearing the burden of overly expensive infrastructure projects.

The I&O document asked if a South Warwickshire Community Infrastructure Levy (CIL) should be established or if each district should produce its own levy.

62% of respondents said that each district should produce its own levy.

Draft Policy Direction 5 - Infrastructure Requirements and Delivery

Development proposals should be consistent with and contribute to the implementation of transport strategies set out in relevant strategies, including the West Midlands Rail Executive's Rail Investment Strategy, The Warwickshire Local Transport Plan, Warwickshire Rail Strategy, Cycling and Walking Infrastructure Plan, Bus Improvement Plan, Stratford-upon-Avon Transport Strategy and updates to these and other policy documents that may be prepared over the course of the lifetime of this Local Plan.

All new development must provide appropriate on- and off-site infrastructure. Development proposals of a strategic nature will need to contribute and help deliver infrastructure that is contained within the Local Plan and IDP.

In addition to strategic infrastructure requirements, the Local Plan will identify development requirements that will apply to each of the allocated sites. This will include requirements relating to e.g. ecology, flood risk, heritage, active travel, highways, education, healthcare, renewables and utilities.

Where new development creates a need for new or improved site-specific infrastructure, provision of such infrastructure or contributions will be sought from developers (through Section 106 and Section 278 legal agreements) to make the development acceptable in planning terms.

The IDP and supporting evidence base will identify how strategic infrastructure requirements to support the spatial growth strategy will be delivered.

Where development creates a requirement for new or improved infrastructure beyond existing provision, including specific development requirements identified in the Local Plan, developers will be expected to provide or contribute towards the additional requirement being provided to an agreed delivery programme.

In certain circumstances where proven necessary and viable, the LPA may require that infrastructure is delivered ahead of the development being occupied.

Detailed specifications of the site-specific contributions required will be included in the site allocation policies.

Development proposals should seek to make provision for all the land required to accommodate any additional infrastructure arising from that development that needs to be accommodated on site.

Planning Legal Agreements (Section 106 of the Town and Country Planning Act, 1990) will be used to provide a range of site-specific mitigation, including any potential cumulative effects, in accordance with the Section 106 tests, which will normally be provided on site but may where appropriate be provided in an off-site location or via an in-lieu financial contribution.

In some cases, separate agreements with utility providers may be required. Where necessary S278 agreements will be used to secure mitigation in connection with existing highways.

The Community Infrastructure Levy (CIL) will continue to be used, with each district maintaining its own CIL charging schedule to secure contributions to help fund the strategic infrastructure needed to support the sustainable growth proposed in South Warwickshire set out in the [Infrastructure Delivery Plan](#) and Infrastructure Funding Statements. CIL rates will be reviewed to reflect the position of Stratford-on-Avon District Council and Warwick District Council and latest changes in development costs and land/floorspace values across the two districts in line with viability evidence.

Infrastructure schemes that are brought forward by service providers will be encouraged and supported, where they are in accordance with other policies in the Local Plan. New residential and commercial development will be supported if sufficient infrastructure capacity is either available or can be provided in time to serve it and proposals are in accordance with other policies in the Local Plan.

In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision and the extent to which new development will impact on these. Development proposals must demonstrate that existing deficiencies have been taken into account when determining the infrastructure requirements for the new development. The provision of infrastructure should be linked directly to the phasing of development to ensure that infrastructure is provided in a timely and comprehensive manner to support new development.

Where an applicant advises that a proposal is unviable in light of the infrastructure requirement(s), open book calculations verified by an independent consultant approved by the Council will need to be provided by the applicant and be submitted to the LPA for its consideration.

The Councils will support enhancements to public transport and opportunities for modal shift, including new park and ride facilities (which will be identified in the Local Plan) and enhancements to the rail network, including improvements to services from Stratford-upon-Avon and services from Coventry to Leamington, including dualling of the railway line and a new rail stop at University of Warwick, where practical and viable. Enhancements to services on the rail corridor from Warwick / Royal Leamington Spa to Nuneaton via Coventry (the Elephant and Bear Line, previously known as NUCKLE), will also be supported.

The Councils will support opportunities for active travel, including the enhancement and extension of existing routes and the restoration of HS2 haul routes for this purpose, where it is appropriate.

Schemes and initiatives that address local issues, such as flood risk attenuation, community transport, road safety, parking, congestion and air quality will be supported subject to assessment.

The Councils will work in partnership with infrastructure providers and other delivery agencies in updating the [Infrastructure Delivery Plan](#) to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained, for example in relation to upgrades to the rail network and upgrades to the A46 corridor and junctions along the M40 and M42.

Justification

In order to be found sound, the South Warwickshire Local Plan will need to demonstrate that there is sufficient infrastructure to meet future needs in accordance with paragraph 20 of the NPPF.

The delivery of infrastructure is dependent on effective collaboration with other stakeholders, including Warwickshire County Council (with responsibilities in relation to schools, public transportation and highways) and the Department for Transport, West Midlands Rail Executive, NHS Coventry and Warwickshire Integrated Care Board and South Warwickshire University NHS Foundation Trust.

In order to identify the required infrastructure an Infrastructure Delivery Plan (IDP) will be produced, building on the Part 1 document that accompanies the Preferred Options document.

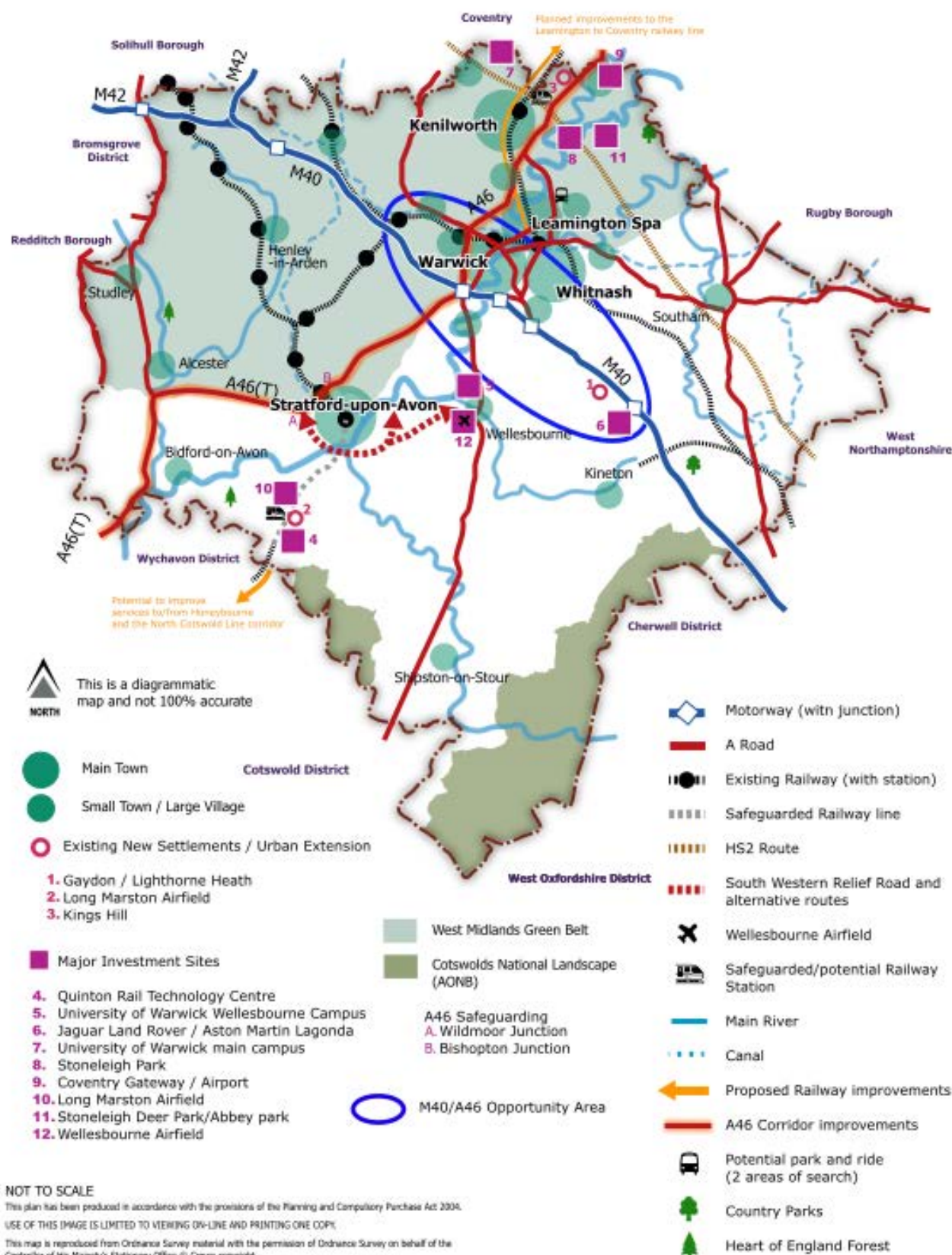
The IDP will include the strategic infrastructure identified in the Local Plan and supporting evidence base that is critical or essential to deliver the growth aspirations and requirements of the Plan to 2050. It will also identify desirable infrastructure requirements which support the sustainability objectives of the Local Plan but can be prioritised according to funding availability and overall net benefit. Standards will be presented in relation to other infrastructure, e.g. in relation to open space provision.

Although the production of the IDP is an iterative process as infrastructure is continually being delivered through the development management process, it is crucial that items of infrastructure are identified as early as possible in the process to better plan for the required growth to be delivered over the Local Plan period.

Figure 9 provides an overview of the transport context for the SWLP area, including existing green and blue infrastructure, the existing road and rail network and airfield. It also shows proposals for enhanced rail services and areas of search for park and ride. Existing new settlements and Major Investment Sites are shown for context. The M42/A46 Opportunity Area is also shown for context as that will have implications for the strategic road network. Wider infrastructure needs associated with the SWLP will be set out in the Regulation 19 Local Plan.

Figure 9: Transport Context

Preferred Options: Transport Context



4.6 Funding for Infrastructure

The [Part 1 IDP](#) identifies a number of different ways infrastructure can be funded and provided for, some of which can be made via a financial contribution, in kind or in lieu, from a developer, through Government capital funds, district or county capital funds and a range of funding streams open to organisations like Homes England, DEFRA, Department for Transport (DfT).

Another avenue of funding is through CIL. Both Stratford-on-Avon District Council and Warwick District Council operate a CIL and have introduced a bespoke charging schedule, and this has been very successful in providing funding to deliver infrastructure in South Warwickshire to date. Both councils support a coordinated approach to the use of CIL that relates to the South Warwickshire Local Plan. It is anticipated that the districts will maintain their own charging schedules but will work together to consider operationally how this will work across the two local authority areas.

Under Section 106 (or s106) of the Town and Country Planning Act 1990, any person interested in land in a local planning authority may, by agreement or unilaterally, enter an obligation (commonly known as a S106 planning obligation). These are another important source of funding.

S106 contributions must be:

- a. Necessary to make the proposed development acceptable in planning terms;
- b. Directly related to the development; and
- c. Fairly and reasonably related in scale and kind to the proposed development.

A Section 278 agreement (or s278) is a section of the Highways Act 1980 that allows developers to enter into a legal agreement with WCC (in its capacity as the Highway Authority) to make permanent alterations or improvements to a public highway, as part of a planning approval, e.g. a new or changed access into a development site or improvements close to the development site.

4.7 Viability and Deliverability

Paragraph 35 of the NPPF states that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

Proposed site allocations will be identified in the Regulation 19 version of the Local Plan, along with a suite of policies. A Viability Assessment will be undertaken of the draft Local Plan, prior to consultation.

Proposed allocations will also be examined to ensure that the contribution they can make to housing and/or employment land supply within the plan period and beyond is understood and reflected in the housing trajectory.

4.8 Safeguarding land for transport proposals

Local plans can use a statutory mechanism to safeguarding land for transport, preventing development from compromising the provision of future infrastructure projects. Safeguarding for transport infrastructure relates to the identification and 'saving' of land required to deliver transport infrastructure that may be required now or in the future. Where new and undecided planning applications either encroach or abut the area of land 'saved' by a safeguarded scheme, the local planning authority and local highway authority are required to consider the implications of the planning application on the future delivery of the safeguarded transport scheme.

An example would be if a proposed development encroaches or abuts a safeguarded transport scheme it will need to either provide a corridor to allow the safeguarded scheme to come forward or deliver (or partly deliver) the safeguarded transport scheme.

The Council or planning inspector can refuse the planning application if they believe that the development would prejudice the possibility of the safeguarded transport scheme coming forward, either through obstructing its route or restricting access for construction and maintenance works of the future infrastructure scheme.

What was said in the I&O

The I&O document asked if the SWLP should include a policy to safeguard specific infrastructure schemes.

80% of respondents supported inclusion of a policy that safeguards infrastructure across the plan area. However, there was a view that Warwick district is being somewhat ignored in the current suggested infrastructure proposal.

Draft Policy Direction 6 - Safeguarding land for transport proposals

At this stage, the Preferred Approach is to carry forward existing safeguarding measures identified in the adopted Local Plans, where they relate to schemes that have not yet been implemented or completed. These may be amended as the evidence base is developed or supplemented by any additional measures that are identified through further work and consideration of reasonable alternatives. A revised policy would be subject to consultation at Regulation 19 stage.

Development within the areas safeguarded for the transport infrastructure highlighted in Figure 9 will not be permitted where it could inhibit the effective delivery of the infrastructure. The list below this policy direction represents an indicative schedule of protected schemes required to assist with the delivery of the overall spatial growth strategy for South Warwickshire, but this will be confirmed through consideration of any reasonable alternatives and transport modelling.

Stratford-on-Avon District

- Road improvements associated with the A46 within Stratford-on-Avon District at:
 - Junction of A46 and A422 Alcester Road (Wildmoor)
 - Junction of A46 and A3400 Birmingham Road (Bishopton)
- M42 Widening – land either side of Junction 3a to help reduce congestion where the M40 joins the M42
- Portabello Crossroads – improvements to this junction between the A429 Fosse Way and the B4035 to the west of Shipston-on-Stour
- Stratford to Honeybourne former railway – safeguarding the route of the former railway south of Stratford-upon-Avon to Honeybourne to facilitate re-opening
- Western Road to Birmingham Road, Stratford-upon-Avon – proposal for new crossing of the canal and creation of a new route between the A3400 Birmingham Road and A422 Alcester Road
- Bridgeway Gyratory Improvements – widening of key town centre route that takes traffic from town centre/A439 onto the Clopton Bridge and south across the River Avon
- West of Shottery Relief Road – currently under construction as part of the West of Shottery development connecting B439 Evesham Road with the A46 at Wildmoor
- Stratford South Western Relief Road – a third crossing of the River Avon to the south-west of Stratford-upon-Avon, connecting A3400 Shipston Road with B439 Evesham Road (alternative routes and options to be investigated).
- Land safeguarded for the possible provision of a railway station at Long Marston Airfield site, adjacent to the former Stratford to Honeybourne line.

The draft Site Allocations Plan also proposes to safeguard land at the Bishopton and Wildmoor junctions to facilitate improvements to the A46 should they be deemed necessary and further consideration will be given to these and any other reasonable alternatives.

Warwick District

- Broad Locations for Park & Ride facilities to serve commuters travelling into Coventry and the Warwick / Leamington / Kenilworth areas including:
 - A Public Transport Interchange to serve Coventry South and the University of Warwick (including provision for Park and Ride and associated bus services, an active travel hub, very light rail and a new heavy rail station); and
 - A Park and Ride facility to serve the north of Leamington Spa (two areas of search are currently allocated on land near Bericote roundabout and Blackdown roundabout).
- Safeguarding of land to deliver transport schemes to alleviate congestion and address deficiencies in sustainable transport provision in specific locations (e.g. potential delivery of a multimodal transport corridor to alleviate local road congestion and deliver modal shift in the south of Coventry area).

A proposed policy direction is to include the safeguarding of land to facilitate widening of rail corridors (e.g. to 'double track' the section of line between Coventry and Leamington).

Both Districts

The Secretary of State for Transport issued revised safeguarding directions in relation to HS2 on 16 August 2016. It is not intended to reflect these on the policies maps but they can be viewed <https://www.gov.uk/government/publications/hs2-phase-2b-safeguarding-maps-warwickshire-staffordshire-leicestershire>.

Further land may be required for safeguarding where this can be justified, for example where latest Infrastructure Delivery Plans provide a more up-to-date list of programmed transport schemes.

Justification

The NPPF (paragraph 111c) states that “Planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.”

Figure 9 shows the existing transport context, including a broad indication of safeguarded areas referred to in the policy direction. Options in relation to future provision of the south western relief road for Stratford-upon-Avon are still under review and will be subject to further technical work, including transport modelling and consideration of reasonable alternative through the Sustainability Appraisal. The emerging evidence base includes work on the Transport Vision ([Part 1](#) and [Part 2](#), January 2023 by Vectos and a [Feasibility & Viability Assessment](#) in May 2024 by Jacobs) and further work will inform the option that is taken forward.

4.9 Green Belt

Parts of South Warwickshire fall within the West Midlands Green Belt, whose fundamental aim is to prevent the sprawl of the West Midlands conurbation, by keeping land permanently open.

Some of South Warwickshire’s most sustainable locations fall within the Green Belt. For example, all of our train stations are either in or close to the Green Belt. This means that to deliver a truly sustainable pattern of growth, the SWLP needs to consider all options, including Green Belt options. A topic paper “[The Green Belt in South Warwickshire](#)” presents an introduction to the purposes of Green Belt, and choosing sustainable locations for growth.

The 24 strategic growth locations and 12 new settlement locations put forward in the SWLP Spatial Growth Strategy (sections 4.1 and 4.2 in this document) include a mixture of Green Belt and non-Green Belt locations. Further work will be carried out to determine which of these areas can be considered the most sustainable; and consequently, whether there is an argument that “exceptional circumstances” exist which would justify releasing some Green Belt land for development.

A key part of the evidence which will inform this argument is a Green Belt Review. This assesses the contribution that different areas of land make to the five purposes of Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

So far, Stage 1 of the SWLP’s [Green Belt Review](#) has been completed, which assesses

parcels of land around settlements which are adjacent to the Green Belt or “inset” within the Green Belt designation; and broad areas of land between these parcels. Stage 2 of the Green Belt Review will assess the performance of specific sites, where these are being considered for development. It will also assess villages which are currently “washed over” by the Green Belt designation to consider whether the built up areas of these villages should be removed from the Green Belt designation. Stage 2 will be available after the Preferred Options consultation.

The recently published 2024 NPPF has made some significant changes to how Green Belt is handled in national policy. One of the most notable changes is the introduction of the concept of “Grey Belt” land, which relates to areas of Green Belt which are previously developed and/or do not strongly contribute to Green Belt purposes a), b), or d) as referred to above. These changes were only introduced prior to the Preferred Options consultation, and so it is not possible to state with certainty how this will affect the SWLP’s consideration of Green Belt.

What was said in the I&O

At the previous Regulation 18 Issues & Options consultation, no specific question was asked around Green Belt. The following comments were made regarding Green Belt:

- Not enough emphasis on Green Belt at the Issues and Options stage of the Local Plan
- General opposition to development within the Green Belt.
- Green Belt is highly valued in the area, providing benefits for both physical and mental health.
- Developers see Green Belt as a significant material consideration, and it is likely that the policy-off approach will need to be revisited during the next stage of plan making.
- Landowner and developer/site promoter responses generally agreed with the necessity of a Green Belt Review in Part 1 (of the Plan).
- Some Parish Councils and individuals argued that the release of Green Belt land would be unjustified and in contradiction to recent government policy.

Draft Policy Direction 7- Green Belt

The SWLP will apply national planning policy to proposals within the Green Belt.

Section 4.1 of this document sets out that after utilising suitable urban brownfield sites, there are 24 identified potential strategic growth locations outside of urban areas. These 24 locations include a mixture of Green Belt and non-Green Belt locations. Similarly, the 12 new settlement locations (section 4.2) include a mixture of Green Belt and non-Green Belt locations.

The SWLP will take a sequential approach to allocating strategic areas of growth and new settlements. Further evidence will be gathered on the relative sustainability of each of these areas. Some of this evidence will come from the Stage 2 Green Belt review, regarding the contribution an area makes to Green Belt purposes, and the impact on the wider Green Belt if an area was to be released. This additional evidence will enable a considered assessment of whether there are sufficient sustainable non-Green Belt locations to accommodate South Warwickshire's housing and employment land needs. If so, then there will be no requirement to release land from the Green Belt. However, if there are clear sustainability benefits to utilising one or more Green Belt locations, then this will form the basis of an argument that "exceptional circumstances" exist to justify releasing that land from the Green Belt.

The SWLP will review those villages which are "washed over" by Green Belt designation and consider whether there is justification for "insetting" any of these villages – i.e. removing the built up area of the village from the Green Belt designation.

The SWLP will also consider whether the Spatial Growth Strategy's patterns of development result in a justification for any new Green Belt. The SWLP will also need to consider whether any areas of safeguarded land should be identified in order to meet longer-term development needs beyond the plan period. Areas of existing safeguarded land such as the land at Westwood Heath designated in the adopted Warwick District Local Plan will also need to be revisited to determine whether they are suitable for development, based on the latest available evidence.

Justification

The National Planning Policy Framework (NPPF) places great importance on the Green Belt which is covered in paragraphs 142 to 160.

Paragraph 144 establishes that new Green Belt should only be designated in exceptional circumstances, where normal planning policies would not be adequate, and when major changes in circumstances make this necessary.

Paragraph 145 allows for Green Belt boundaries to be altered when exceptional circumstances are fully evidenced and justified. Paragraph 147 details the sequential process that must be followed before concluding that exceptional circumstances exist. Paragraph 148 highlights the importance of using previously developed land, then grey belt land prior to other Green Belt locations. Alongside this, the need to promote sustainable development patterns should be used to determine whether a site is appropriate.

Paragraph 149 allows for the identification of areas of safeguarded land between the urban area and the Green Belt to meet longer-term development needs beyond the plan period. Safeguarded land within a Local Plan is not allocated for development at that time, and planning permission should only be granted following an update to a plan. Within the adopted Warwick District Local Plan, there is an area of safeguarded land to the south of Westwood Heath Road. The decision to designate safeguarded land related to transport modelling at the time indicating that the local highway network was unable to accommodate more than the 425 dwellings allocated, based on other proposed developments within Warwick District and Coventry, without significant improvements to transport infrastructure within the area. Key evidence such as the [strategic transport assessment](#), [Green Belt review](#) and [infrastructure delivery plan](#) will inform decision making on designation of safeguarded land.

Paragraph 150 indicates that villages whose open character contributes to the openness of the Green Belt should remain within the designation; but that other villages should be excluded from the Green Belt.

Paragraph 154 establishes that new buildings are considered inappropriate in the Green Belt, with a number of exceptions.

An exploration of Green Belt locations and sustainability is set out in the topic paper "[The Green Belt in South Warwickshire](#)".

A two-stage Green Belt Review is being undertaken that provides an objective, evidence-based and independent assessment of how the Green Belt in South Warwickshire contributes to the five purposes of Green Belt set out in the NPPF. Stage 1 of the [Green Belt Review](#) has been published alongside this Preferred Options consultation. Stage 2 will be published in 2025. The findings of Stage 1 have provided an initial understanding of which areas of land contribute most strongly to the five purposes; Stage 2 will provide greater granular detail about specific sites being considered for development.

4.10 Density

Density refers to how much built development there is in any given area. It is commonly presented as the number of dwellings per hectare (dph). Density considerations are important for determining how a place functions and looks, as well as influencing site, locality, and wider area long-term sustainability.

Densification (sometimes referred to as intensification) is one way of optimising density, by increasing the number of homes within existing urban areas. For example, this could be by infill, mews developments on back streets, or additional storeys on buildings.

Optimising density can provide social, economic, and environmental benefits, and plays a pivotal part in place-making and tackling climate change, as well as supporting vitality and viability and linking to the principle of 20-minute neighbourhoods.

Current policy approaches across Warwick and Stratford-on-Avon differ, with Warwick specifying a minimum density of 30 d.p.h (with opportunities to increase from that minimum), and Stratford-on-Avon having no overarching minimum.

Existing densities vary significantly across South Warwickshire, noting its large proportion of rural areas. When identifying appropriate new densities, these will need to reflect considerations such as existing context, character, setting and densities.

What was said in the I&O:

Density

The Issues and Options consultation asked about the inclusion of a policy on density and density requirements.

The most favourable option overall (31.3% respondents), which included the majority of developer/landowner responses, was to 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. Individuals generally preferred including specific policy for appropriate minimum density ranges and setting out density requirements.

Densification

The Issues and Options also asked a specific question on densification (which was referred to as intensification in that consultation).

Overall responses (61.5%) indicated a preference for identifying areas which are considered particularly suited to intensification development, and to produce a design code for each character area/area type, with a supporting policy for this.

Draft Policy Direction 8 - Density

Appropriate density ranges for different types and locations of development will be indicated in design codes. See section 8.2 for more details.

The SWLP will identify particular areas that would be more suited to higher density development through densification.

A Design Code will be created which will enable high quality densification development that respects and enhances the existing neighbourhood character.

Justification

The “[Guide to existing housing densities in South Warwickshire](#)” illustrates a range of local neighbourhood types, and how different densities look and feel on the street.

Density is one of the design parameters which is considered an essential component of design codes for their effective use. Guidance from the National Model Design Guide, in conjunction with evidence from the SWLP Urban Capacity Study, will be used to agree appropriate density ranges for the different area types across South Warwickshire.

As density itself is not a measure of how appropriate a particular development will be within a given ‘Area Type’, density must be considered amongst other design parameters including building types, building forms, and whether buildings join. This will be used to identify areas which are suited to densification.

An advantage to densification, and optimising density in particular areas, is that more dense developments have a range of services and facilities being provided together. The close-proximity of the services and facilities enables the ‘20-minute neighbourhood’ principles, and the associated benefits of this, to be more easily achieved. Benefits include the promotion and accessibility of active travel, which subsequently reduces private car dependence and associated transport-related emissions, whilst also providing health and wellbeing benefits to individuals, promoting healthy lifestyles.

4.11 Using Brownfield Land for Development

Brownfield land is that which has been previously developed. Reusing vacant or derelict land and buildings reduces the need to build on greenfield land, which is a finite resource and often of higher quality in terms of landscape and biodiversity.

Urban brownfield development is essential for urban regeneration and, if designed to a high standard, brings homes, jobs and services closer together, reduces dependency on the car, and strengthens communities.

As detailed in the Spatial Growth Strategy in section 4.1, the SWLP will utilise urban brownfield land first, before other locations are considered for development. However, not all brownfield land is located within urban areas, so a balance must be struck between the benefits of re-using this land and directing development to the most sustainable locations.

What was said in the I&O

At the previous Regulation 18 Issues & Options consultation, Q-S3.2 asked whether brownfield development should be prioritised irrespective of its location, or only when it is sustainably located. Responses were fairly evenly matched, with a slight preference for prioritising only sustainably located brownfield land.

Other comments about brownfield land include that brownfield land should be used first as per the government pledge; considerations regarding the viability of developing on brownfield land and remediation; and that there should be a policy encouraging the redevelopment and re-use of our town centres to allow them to diversify.

Draft Policy Direction 9 - Using Brownfield Land for Development

The SWLP Spatial Growth Strategy will make full use of suitable urban brownfield land before development is considered in other locations.

Where available brownfield land is located outside of urban areas, decisions on its use will have reference to the sustainability of the location, with regard to the Spatial Growth Strategy priority areas 1-3; and/or whether its use would increase the sustainability of the area as part of a large-scale development such as a new settlement.

Where brownfield land is not considered to be in a sustainable location for residential or employment uses, consideration will be given to other potential beneficial uses. For example, environmental, leisure or agricultural uses.

Justification

The National Planning Policy Framework (NPPF) paragraph 124 emphasises the need to make as much use as possible of previously developed or 'brownfield' land. Paragraph 11 sets out the fundamental requirement that plans promote sustainable patterns of development.

The SWLP Urban Capacity Study identified land in urban areas that may be suitable for re-use. The capacity of such land in South Warwickshire is limited; consequently, there is a need to consider sites in other locations.

5. Delivering Homes that Meet the Needs of all our communities

Chapter 5 sets out various options as to how we might meet the housing challenges facing South Warwickshire to 2050.

The Plan needs to allow for new homes that meet the diverse needs of all our residents, including affordable housing, student accommodation, older persons and specialist housing, self and custom build housing, along with the accommodation needs of gypsy and traveller and travelling showpeople communities. Within Warwick District there is a younger demographic of people due to the proximity of the university and the gaming industry in the area. Some of these are in lower paid jobs and are travelling into the area from places such as Coventry as they can't afford to rent or live in Warwick or Leamington.

Providing new homes is important not only in South Warwickshire but nationally; it not only gives people a place to live but it also supports the local economy creating construction jobs, supporting existing facilities and services so they remain open, making the area more attractive to local employers and promoting additional spending in the local economy. New homes also provide contributions to improve and provide new infrastructure such as schools and open spaces.

5.1 Providing the Right Tenure and Type of Homes

It is important that the new homes delivered over the plan period are provided in sustainable locations, can provide a mix of types and densities that are appropriate to their location, and can help to meet local needs.

Affordable housing is an umbrella term that encompasses lots of different tenures of housing that are provided at a cost below market homes. It is important to understand and plan for what is most needed in South Warwickshire. Similarly, there is an ongoing need for a wide range of specialist types of housing across South Warwickshire, such as that for disabled people, older people, students and single people.

Current policy sets affordable housing requirements and thresholds, according to locally identified needs, as well as requirements in relation to housing tenure and mix.

What was said in the I&O

Consultees noted different approaches to affordable housing:

- A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts.
- Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations.
- 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.

Increasing the overall housing requirement significantly above the identified need was the most popular response for the best way of significantly increasing the supply of affordable housing. Increasing the proportion of affordable housing with each development also received significant support.

There were conflicting views regarding delivering affordable homes in rural/countryside and green belt areas, whilst noting the site costs that can be associated with brownfield development. A more localised approach was favoured for affordable housing requirements for different localities across South Warwickshire.

The definition of 'affordable' housing was queried as well as how this is calculated.

Regarding housing for older people, responses pointed out the benefits of sites solely for older people's housing, as well as the benefits of integrating older people's housing into general mixed use community developments. Requiring the integration of older persons housing into larger scale development allocations was favoured.

There was not a clear housing type preference, however, overall housing choice is needed, as different people want and need different things.

Draft Policy Direction 10 - Providing the Right Tenure and Type of Homes

The councils will have regard to the latest evidence in drafting policies relating to housing tenure and type.

Justification

It is important that policies are based on the latest evidence of housing needs. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA 2022) considers the needs for housing type, tenure and mix across South Warwickshire, including for affordable and specialised housing. The forthcoming Strategic Housing Market Assessment (SHMA) work to be completed in 2025 will provide the latest data for affordable and specialist housing. The Government's revisions to the NPPF also directly impact emerging policy on affordable and specialist housing.

5.2 Providing the Right Size of Homes

It is vital that new homes meet the needs of their occupiers, and future occupiers, in terms of the internal space available in new dwellings. New homes should have adequately sized rooms and efficient room layouts which are functional and fit for purpose to meet the changing needs of occupiers.

There is currently no policy within either the Stratford-on-Avon District Core Strategy, or the Warwick District Local Plan, which specifies local minimum space standards across all new homes. Policy CS.9 of the Stratford-on-Avon Core Strategy does however make a reference to having 'a good standard of space', and CS.19.B requires 1 and 2 bed affordable homes to be built with bedrooms capable of satisfactorily accommodating two occupiers in each room.

The Nationally Described Space Standards (NDSS) were introduced by Government in October 2015 and set out technical internal space standards for new dwellings, being standards for the gross internal (floor) area of new dwellings at a defined level of occupancy as well as floor areas and dimensions. In 2020 they were made mandatory for permitted development. NDSS policy has since been adopted in many local plans across the country to secure accessible levels of internal amenity.

To ensure accessible living, the introduction of enhanced building regulations as policy would recognise the issues faced by our ageing population locally and enable people with disabilities/ poor health to remain in their own home. Planning policy guidance states the local planning authority will determine what standard of accessibility is required for each development.

- Building Regulations Part M4(2) - Accessible and adaptable dwellings - is a higher standard (similar to Lifetime Homes) that requires new dwellings to be more easily accessed and adapted should the need arise in future. Features include wider doorways, bathroom walls suitable for grab rails and stairs that will easily accommodate a stairlift.
- Building Regulations Part M4(3) - Wheelchair user dwellings – is a higher standard that requires new dwellings to be fully wheelchair adaptable or accessible. This includes two sub-categories:
 - M4(3) (a) meets the layout requirements for a wheelchair accessible property
 - M4(3) (b) fully fitted so a wheelchair user can occupy with minimal personalised adaptations.

Across the local authorities with the largest populations in the West Midlands, the M4(2) and M4(3) targets are being advanced through local plan processes.

What was said in the I&O

Both South Warwickshire Councils identified the benefits of having minimum internal space standards and, via a Notice of Motion in Warwick District Council, sought the Nationally Described Space Standard to be applied through a local plan policy. Both Councils also recognised the accessibility needs associated with an aging population, and the potential of the Plans to require enhanced accessibility standards via the Building Regulations.

Most individuals and landowners favoured introducing minimum standards for space and to a lesser extent accessibility, whereas developers and land promoters strongly favoured no new minimum standards unless local need and viability is shown.

Stratford District Council's housing policy specialists advocated for the introduction of NDSS, the enhanced building regulations, as well as the retention of the current SDC policy CS.19 Part B that seeks to ensure that affordable housing bedroom sizes are sufficient to sustain two-person occupancy. Space matters because there is an expectation for affordable homes that two children of the same sex up to age 16 years share a bedroom, and because many people with disabilities live in affordable homes and require adequate space to accommodate their needs.

Draft Policy A - Providing the Right Size of Homes

Amenity Standards

All new residential development, including dwellings created through the subdivision of existing dwellings or conversion, will comply with Nationally Described Space Standards (NDSS), or any subsequent government space standard. [Technical housing standards – nationally described space standard \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

All 1 and 2 bed affordable homes must be built with bedrooms capable of satisfactorily accommodating 2 occupiers in each bedroom (i.e. double or twin bedrooms) unless exceptional justification is advanced as part of a planning application.

Accessible Living Standards

All new residential development, including dwellings created through the subdivision of existing dwellings or conversion, must be designed to be accessible and adaptable in accordance with technical standard M4(2) of the Building Regulations (or as updated).

On new build sites of 10 dwellings or more, at least 10% of market dwellings, and at least 25% of affordable dwellings, should be designed to be wheelchair user friendly dwellings in accordance with technical standard M4(3) of the Building Regulations (or as updated).

Development Management Considerations

Only in circumstances where it can be robustly demonstrated by the applicant that it is not practicable and financially viable to deliver the provisions or where the requirements are clearly incompatible with conserving and enhancing historic character, will new development be exempt from this policy requirement.

Justification

Amenity Standards

National planning policy guidance sets out the approach for implementing the NDSS as policy and states that local planning authorities should consider Need, Viability, and Timing.

In terms of need, the HEDNA 2022 identifies high affordable housing needs in South Warwickshire. Due to the higher cost of housing in the districts, many households are being excluded from the owner-occupied sector. In order to reduce the cost of new market housing within South Warwickshire, there is a risk that the delivery of new homes in the district will be smaller than the 'nationally described space standards' and that an intervention is required to ensure that new homes deliver the appropriate amount of internal floor space and are well designed through a new policy.

The SDC Housing Strategy 2021 evidence log notes that poor space standards on units on developer led sites (for affordable housing) are an issue and that some housing associations are refusing to take on sub-sized properties (i.e. those below NDSS). Current Homes England practice is generally to require NDSS to be met in new grant funded schemes.

Feedback from Council officers highlight the need for NDSS to prevent sub-standard living arrangements, for both new builds and conversion to HMOs. Recent planning appeal decisions at Gaydon Lighthorne Heath and Stratford-on-Avon highlight the issue of room size for amenity, confirming the NDSS act as a good guide or indicator of what comprises acceptable levels of space at a national level and for the assessment of a proposal.

Further assessment is being undertaken on the extent of non-compliance with NDSS and whether this is more prevalent for certain types of residential development.

Further viability testing will be undertaken to ensure the NDSS will not have a material impact on the deliverability of housing schemes, including affordable housing, within the districts.

It is considered the Local Plan preparation process provides sufficient time for developers to prepare for introduction of the standards, which have been national guidance for several years, and already been adopted as local planning policy by many other councils.

In addition to the NDSS, it is considered necessary to retain and make applicable to the whole of South Warwickshire, the existing SDC policy regarding 1 and 2 bed affordable homes being able to support double/twin occupancy, noting ongoing difficulties presented by the "bedroom tax", noting that stock is typically limited in smaller rural settlements.

Accessible Living Standards

Inclusive and accessible design approach in housing and the built environment can address the needs of both younger and older disabled / non-disabled people. Housing accessible standards are required to ensure fairness of access to housing. This is particularly important for affordable housing, which is typically provided on larger development schemes.

The enhanced Buildings Regulations are designed and built to a standard that meets the needs of occupants with differing needs, including some older or disabled people, and are only slightly more expensive to build than standard housing. They must also allow adaptation to meet the changing needs of occupants over time. Homes built to this standard are more flexible and readily adaptable as people's needs change, for example if they have children and require easy access for pushchairs, if they have a temporary or permanent disability or health issue, or as they gradually age and their mobility decreases.

The HEDNA 2022 highlights the older populations of South Warwickshire compared to West Midlands and UK. A growing ageing population will drive a need for housing which can meet the needs of older persons, including catering for limited mobility and disability, which is forecast to increase in time.

HEDNA 2022 Table 14.24 shows the estimated need for wheelchair user homes by 2032, being approximately 10% market housing and up to 30% affordable housing. The HEDNA specifically recommends all dwellings (in all tenures) should be required to meet the M4(2) accessibility standards

and a minimum of 10% of homes should be required to meet the M4(3) wheelchair user dwellings (and greater proportions for the affordable sector).

Research commissioned by the West Midlands Combined Authority on accessible homes recommends all new homes to be accessible and adaptable M4(2) unless built in line with M4(3), and all plans should set a clear M4(3) policy. The provision of accessible homes (e.g. built to M4(2) standard) ensures any further building adaptations to M4(3) standard are easier, less invasive and less costly; and supports independence, wellbeing and ability to be economically active.

It is envisaged that the standards will be applied through planning conditions or section 106 agreements, which will require an agreed number of units to be constructed to the specified Building Regulations requirements. The policy provides an element of flexibility in recognition of the practicalities of delivering these enhanced building standards, for example given the challenges that may arise around the topography of some sites, where access within the gradients specified in the Building Regulations may not be achievable.

5.3 Providing Custom and Self-Building Housing Plots

Self and custom build homes (SCB) are a unique type of housing which form one element of the government's approach to increasing housing supply and meeting demand. The definition of SCB housing covers a wide spectrum, including projects where individuals are involved in building and/or managing the construction of their home from beginning to end, as well as projects where individuals commission their home whilst making key design and layout decisions.

The NPPF defines self-build as "Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing".

The 2015 Act (as amended by the Housing and Planning Act 2016) does not distinguish between self-build and custom housebuilding and provides that both are where an individual, an association of individuals, or persons working with or for individuals or associations of individuals, build or complete houses to be occupied as homes by those individuals.

Self-build and custom housebuilding cover a wide spectrum, from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation ('turnkey').

Government guidance makes it clear that, in considering whether a home is genuinely self-build or custom-build, a local authority must be satisfied that the initial owner has a primary input to its final design and layout. This should include both the external and internal aspects of the dwelling. Conversely, off-plan dwellings purchased prior to construction and without such input from the initial owner are not considered to meet the definition of self-build and custom-build housing.

The Self-Build and Custom Housebuilding (Register) Regulations 2016 oblige all district councils in England to keep a register of individuals (and associations of individuals) who are seeking to acquire serviced plots of land in their area for this purpose.

Warwick District and Stratford-on-Avon District Councils each have their own Self-Build and Custom register, which helps to inform the level of demand to guide decision making. Local Authorities can choose to work together to publicise and promote their registers, with a single application form, provided it is clear to which authority the application is being made.

What was said in the I&O

The Issues and Options suggested three potential approaches to self-build and custom-build homes:

- 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 suitability.

The majority of the respondents favoured Option H5a, to identify a range of specific sites for self and custom build. The next most popular option was Option H5c to rely on a case-by-case approach to delivery.

The 'Individual' respondent category marginally favoured Option H5a. Developers and Land Promoters favoured Option H5a and H5c, which they did so equally. Landowners preferred Option H5a.

Draft Policy B - Providing Custom and Self Building Housing Plots

Overall Principles

Self-build and custom-build housing will be supported in the following scenarios:

As a requirement to provide serviced plots as part of large housing sites.

- Sites allocated for this purpose (small allocations).
- On unallocated sites in accordance with Part C of this Policy.

Required Provision on Large Housing Sites:

Within all large developments (100 or more dwellings):

- 5% of the developable area of a site is to be made available for the provision of self-build and custom-build homes.
- The allocated plots are to be provided at a range of costs, sizes, and types, in accordance with the latest identified local need.

Self-Build and Custom Housebuilding sites are intended to help meet a specific form of identified housing need. Applications for schemes that provide for general market housing on such sites will not be supported.

*Yield based on a net site area of 0.5 hectares @ 20 dwellings per hectare

Unallocated Self-Build and Custom Build Housing Sites

Proposals solely for self-build and/or custom-build housing will be supported in principle in the following locations subject to the following criteria:

- As individual and small groups of plots within defined settlement boundaries.
- On suitable sites adjacent to defined settlement boundaries to meet a district-wide need.
- Suitable sites within the Green Belt or Cotswolds National Landscape and adjacent to defined settlement boundaries would only be supported to meet a local need identified by the local community.
- On suitable sites within and adjacent to a defined settlement boundary to meet an identified local need by the local community.

Developments should be small-scale and appropriate to the size and character of the settlement where the site is located.

General

Where in-principle support is conditional on meeting a district-wide need, planning applications will be required to include evidence regarding the demand for and supply of self-build and custom-build dwellings.

Where in-principle support is conditional on meeting a local need identified by the local community, planning applications will be required to demonstrate community support and need through a housing needs survey.

All schemes comprising multiple plots will be subject to a legal agreement requiring:

- All plots to be offered in the first instance to individuals or households that have a local connection through living and/or working in South Warwickshire or by having close family living in South Warwickshire.
- A marketing strategy which specifies the minimum length of time for advertising plots and the appropriate means of doing so.
- An independent valuation of each plot taking into account the specific restrictions that apply to such schemes.
- Each plot to be fully serviced by the site developer prior to first occupation of the development.
- Any other matters that are deemed appropriate by the relevant District Council e.g. through an SPD, and those introduced by national legislation.

Development Management considerations

General

A design code will need to be agreed with the relevant South Warwickshire Council. It will need to be followed for each plot and individual plot passports will also be required.

If the plots are robustly marketed and there is no sale of these plots after 12 months at a reasonable price, or another period if mutually agreed between the relevant Council and developer, then dwellings may be built and brought forward for open market housing.

Integrating Self-Build and Custom-Build housing plots

On sites providing self-build and/or custom-build housing alongside other housing, schemes should also meet the following criteria:

- Provision of plots in small clusters (usually between 5-10 plots) and not as individual plots throughout a site so as to prevent an inharmonious street scene.
- Submission of a phasing plan to ensure CIL is not triggered for the self-build dwellings due to commencement of construction elsewhere on the site.

While the initial permission is likely to be outline, individual plots would come forward for reserved matters approval to allow each one to be separate chargeable development for the purposes of the Community Infrastructure Levy.

Site specific considerations

As well as all self-build and custom housebuilding schemes being expected to satisfy the provisions of national and local planning policy regarding environmental and technical matters, the following will be addressed:

- Scale of the proposed development in relation to the size and character of the settlement involved and relationship of the site to it.
- Proposed density of the proposal in relation to the character and setting.
- Design characteristics that have been used to define the character of the development.
- Treatment of highways, drives and paths, including all internal roads and shared private drives.
- Relationship of dwellings to adjacent road frontage, including boundary treatment.
- Identification of all open spaces outside plots and how they are intended to be managed and maintained.
- Identification of all structural landscaping outside plots and how it is intended to be managed and maintained.

In the case of outline planning applications for schemes involving multiple plots, all matters relating to the development that lie outside individual plots should be covered at that stage and not through a reserved matters application. This includes access, roads and footways, drainage, landscaping and open space, together with arrangements for their maintenance.

The production of a Construction Management Plan for an individual site will be considered, in collaboration between the applicant, the relevant Council and the local community.

For schemes comprising over ten plots, the development should be implemented in two or more phases to ensure that the marketing of plots and the impact of construction are managed in an appropriate manner.

Justification

To meet the demand for this type of housing within South Warwickshire, we need to increase the land made available to be able to do so. There are several ways plot availability can be increased to meet demand, with the best solution being a combination of these options, to allow greater opportunity is provided for those on the self-build registers to gain land to develop their own property in the way which suits them.

The requirement (A) for 5% of provision for self and custom build on large sites provides a reasonable proportion to meet the overall anticipated self and custom demand.

On unallocated sites (C) a criteria-based approach is utilised, which allows the Councils to assess applications for self and custom build housing on a case-by-case basis. This allows the market to identify where there is the greatest need and demand for this type of housing, as well as emphasise support for the delivery of self-build and community-led housing.

This hybrid approach provides flexibility for allowing the provision of more self-build and custom-build developments across the South Warwickshire districts.

5.4 Meeting the Accommodation Needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers

National Planning Policy requires Local Authorities to undertake an assessment of the accommodation needs of Gypsy, Travellers and Travelling Showpeople. In the SWLP area this assessment also examined the needs of Boat Dwellers. The SWLP is required to put an appropriate policy framework in place to ensure that the accommodation needs of these groups are provided for throughout the plan period. This will require the identification of a range of sites across the SWLP area.

What was said in the I&O

The Issues and Options Consultation suggested several ways that might be utilised to increase the availability of accommodation required for Gypsy and Travellers and Travelling Showpeople. It also suggested that a combination of the options set out may also be a consideration. The options are set out below:

Option 6 a: 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 6 b: 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 6 c: 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.

The responses to the above options were mixed. Options H6a and H6c were favoured fairly equally. As option H6c is a less suitable option to rely on alone, a combination of these two options may be deemed favourable. Developer and Land Promoter interest considered it unacceptable to require large developments to provide a portion of Gypsy and Traveller and Travelling Showpeople accommodation need on the edge of large sites.

Draft Policy Direction 11 - Meeting the Accommodation Needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers

To maintain an appropriate supply of sites to meet the accommodation needs of Gypsy, Traveller, Travelling Showpeople and Boat Dwellers as identified in the Accommodation Assessment the following Policy approaches are considered appropriate.

Policies will be set that:

Safeguard all existing, authorised permanent Gypsy and Traveller sites and Travelling Showpeople Yards. In doing so, this will ensure that these locations are protected and not lost to other purposes over time. Proposals for an alternative use of a safeguarded site or yard should only be considered, if as part of any such proposal an alternative replacement site or yard has been identified and developed to provide facilities of an equivalent or improved standard (including its location).

Protect New Sites and Yards. All new lawful Gypsy, Traveller and Travelling Showpeople sites and yards, or any extensions to lawful sites and yards shall also be safeguarded.

Provide for Future Gypsy, Traveller and Travelling Showpeople accommodation need.

The Local Plan will require the provision of pitches and plots on large scale development sites (of over 500 homes) to meet the identified need as set out in the latest GTAA accommodation assessment (or any subsequent update). In doing so, this will enable the provision of Gypsy and Traveller accommodation at sustainable locations with good access to a range of facilities. This approach will require appropriate developments to incorporate small-scale traveller sites. It is believed that small scale sites will better integrate with emerging localities and communities. In conjunction with this approach, consideration will be given to the potential re- use of the Leamington Football Club site at Harbury Lane, Leamington Spa for Gypsy and Traveller site needs (subject to the future re-location of the Football Club and the availability of the current site).

A criterion-based policy will be provided for the assessment of applications and any possible applications that may come forward on non-allocated sites. This policy will require the consideration of the following matters: -

That sites are sustainable economically, socially and environmentally, have appropriate access to schools and health services and provide a settled base that reduces the need for long distance travel.

Transit Provision In order to best address the need to provide for transient and or visiting gypsy and traveller encampments the councils will be considering the implementation of a negotiated stopping places policy approach. This will involve caravans being allowed to alight on suitable pieces of ground where the encampment does not cause any danger, problems or nuisance to its occupants or the local community for an agreed and limited period. This may also involve assisting the families with the provision of services such as water, waste disposal and toilets. In conjunction with this approach, the provision of transit sites may also be a consideration. The adoption of this approach may require liaison with other key stakeholders (e.g. Warwickshire County Council: Warwickshire Police).

Boat Dwellers The Accommodation Assessment Study identifies a need for an additional 35 residential boat moorings over the plan period. The local planning authorities will work with other organisations (local boat yards and the Canal and Rivers Trust) to deliver the necessary additional capacity.

Justification

The NPPF stipulates that Local Authorities should assess and plan accordingly to provide the homes that it needs to meet the future needs of its communities, including travellers. Planning Policy for Traveller Sites (PPTS 2024) sets out the Governments overarching aim to ensure fair and equal treatment for travellers in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. The Governments aims include increasing the number of traveller sites in appropriate locations to address under provision and maintain an appropriate supply.

Local planning authorities are required to make their own assessment of need for the purposes of planning and to develop fair and effective strategies to meet need through the identification of land for sites.

Comments were received from the Development Industry in the Issues and Options consultation arguing against the approach of utilising larger allocations to accommodate future needs. This policy direction is continuing with this approach because insufficient sites have been forwarded in the call for sites exercises. The Local Plan has an obligation to identify a supply of sites through the Plan period so cannot rely solely on Issues and Options approach H6c which was to rely on planning applications coming forward and being assessed on an ad- hoc case-by-case basis.

Stratford-on-Avon District and Warwick District Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Assessment – August 2024

[Stratford on Avon District and Warwick District final GTAA report 18924.pdf](#) An Accommodation Assessment was undertaken by consultants on behalf of the two Council's and was finalised in August 2024. The study's main conclusions are set out below.

There is an overall accommodation need in the South Warwickshire (Stratford-on-Avon District and Warwick District) local authority areas over the Plan period to 2050 (a 25-year period) of 89 pitches. This requirement for 89 pitches has been derived using the 'ethnic identity' methodology. This is the most robust and inclusive way of arriving at the overall need figure. This methodology meets the accommodation needs of all households that ethnically identify as Gypsies and Travellers. There is also an identified need for 18 additional Travelling Showpeople plots and 35 permanent residential moorings for boat dwellers during the same period (Subject to engagement with a Marina at Napton in relation to their delivery intentions following a recent Lawful Development Consent for a site for up to 197 moorings). In relation to transit provision, it is recommended that the authorities incorporate a policy to address negotiated stopping places for transient and / or visiting Gypsy and Traveller encampments. It is also recommended that the local authorities consider the development of transit sites, and that as a minimum, they collectively develop two transit sites, each site to accommodate between 8 and 10 caravans. Ideally, with one site located in each of the two authority areas. However, it is recommended that this is in conjunction with the implementation of a negotiated stopping places policy.

6. Delivering South Warwickshire's Economic Needs

South Warwickshire is the gateway to the West Midlands, benefitting from direct access to London via the M40 and the Chiltern mainline. It is situated only 10 miles from Birmingham, and HS2 will provide direct access to the North. Due to its location, businesses within South Warwickshire are well placed to capitalise on a wide range of economic opportunities, not only from the West Midlands but from the East Midlands, Southeast and Southwest of England. South Warwickshire is traversed by the A46 which is a key strategic route connecting the Humber Ports with the cities of the Severn Estuary. It is therefore important that the SWLP provides appropriate support and protection to existing employment assets and community facilities, as well as creates the environment for new economic opportunities to flourish. Chapter 6 sets out various options as to how we might meet our economic challenges facing us to 2050, as well as capitalise on the variety of economic opportunities, and seek your views on the following key topics:

- Locations for Industrial Employment Growth
- Core Opportunity Areas
- Existing Employment Sites and Major Investment Sites
- Provision of Office Accommodation and Refurbishment of Existing Office Stock
- Airfields
- Regeneration
- A Low Carbon Economy
- Supporting Rural Employment and Diversification
- Supporting a Range of Business Units and Affordable Employment Space
- Protecting Community Facilities
- Supporting our Changing Town Centres
- Arts and Culture

It should be noted that the overall employment need for South Warwickshire is set out within Section 4.1 (Spatial Growth Strategy). In addition, it should be noted that whilst tourism is an important issue that the Local plan will need to address, it is not considered that tourism plays a spatially strategic role and should therefore be addressed in part 2 of the South Warwickshire Local Plan.

6.1 Locations for Industrial Employment Growth

Section 4.1 sets out the employment need for South Warwickshire over the plan period. Specific site allocations for industrial employment need will be made at the next Regulation 19 (publication) stage of the Local Plan to address this need. The allocation of employment land within the South Warwickshire Local Plan will need to be informed by the employment evidence, potential sites put forward for development, as well as the spatial growth strategy in the Plan. An important consideration will be the alignment of the strategies for homes and jobs. However, at this stage we will set out broad locations that may be considered appropriate for strategic industrial employment allocations (excluding office need, which is addressed in Section 6.3). Strategic need refers to large scale employment sites typically over 25 ha and largely dedicated to units of over 9,300 sqm.

There are several employment evidence documents that have fed into the employment strategy in this Preferred Options document, as summarised within Section 4.1. Ultimately, these evidence documents have then fed into the South Warwickshire Employment Land Study (2024) which calculates the residual employment need for South Warwickshire and recommended locations for employment growth. It is also important to plan for 'windfall' i.e. unallocated employment development which may come forward during the Plan period. Whilst we will need a certain amount of rural employment development in order to meet local or community needs (see Section 6.8), it is considered that unallocated employment development should be directed to existing settlements in the first instance.

The Policy Direction for the three operating/formerly operating South Warwickshire airfields at Atherstone, Coventry and Wellesbourne is set out in Section 6.5. There is also a separate Section 6.3 covering employment provision at South Warwickshire's Major Investment Sites.

What was said in the I&O

The Issues and Options document asked if the HEDNA evidence would provide a reasonable basis for identifying future levels of employment need across South Warwickshire. However, since then, updated employment land evidence has been prepared which includes the West Midlands Strategic Sites Study 2024 (WMSESS), the [Coventry & Warwickshire HEDNA/WMSESS Alignment Paper 2024](#), and the South Warwickshire Employment Land Study 2024.

Draft Policy Direction 12 - Locations for Employment Growth

The SWLP will allocate sites to meet the employment need set out in Policy Direction 12. Specific sites for allocation will be identified in the Reg. 19 publication version of the SWLP. It is proposed that employment uses to meet this need will be broadly located in the following locations, although further work will be completed before specific allocations are proposed:

Strategic Sites

- The WMSESS (2024) recommends that 75-125ha of land be allocated along the M40/A46 corridor in South Warwickshire for strategic uses (B2/B8 class uses). As per Section 4.1, we propose to plan for the upper limit of this (125ha) as recommended by the WMSESS (2024), and due to the fact the WMSESS (2024) only forecasts need up to 2045, whilst the SWLP will plan for need up to 2050.
- There are two principal potential strategic employment site locations identified in the South Warwickshire Employment Land Study (2024) that could meet the strategic need set out in the WMSESS (2024):
 - The first potential strategic site is to the south of Leamington, where Land at Red House Farm, a 121ha. site, offers the opportunity to provide a strategic site that could potentially help to fund and deliver a new junction to replace the two one-way junctions at J13 and J14 of the M40, as well as changes to the A452 and B4100. Appropriate use classes could include E(g)(iii), B2 and B8 uses. This site falls outside of the Green Belt and would relate well spatially both to the existing urban areas and the M40. However, there are questions regarding its deliverability, delivery timescales and impact on coalescence of settlements.
 - The second potential strategic opportunity is **Wedgnock Park Farm**, a 141ha. site located to the west of Warwick, accessing the M40 at J15 via the A46. Appropriate use class could include E(g), B2 and B8 uses. This falls within the Green Belt and the SWELS (2024) notes that this might be more suitable if the broader strategy of growth is focused west of Warwick/Leamington, noting for instance the proposals put forward for strategic growth around Hatton Station. This option could be delivered in the medium-term compared to the long-term delivery of a new junction that is required for south of Leamington strategy.

Additionally, it is proposed for the existing 100ha. **JLR allocation at Gaydon** (Proposal GLH in the SDC Core Strategy) to be released to the wider market for strategic manufacturing (Use Class B2 use) uses and small-scale logistics (Use Class B8) units. Logistics units greater than 9,300 sqm should be prevented on the site so that it stands as a strategic B2 manufacturing site on a well-located junction. We will liaise with JLR to identify an alternative site(s) in the Gaydon area to meet their employment needs (see Section 6.3)

These three potential strategic sites combined would meet and indeed exceed the overarching need for 125 ha. of strategic sites in South Warwickshire identified by the WMSESS (2024).

We are including all three sites for consideration at this stage of the Local Plan process in order to seek feedback through this consultation process. However, it is likely that not all of these sites will ultimately need to be allocated, and it is probable that only one site within Warwick District (Red House Farm or Wedgnock Park Farm), along with the reallocation of the existing 100 ha. JLR site in Stratford-on-Avon District, will be taken forward for allocation in the SWLP. Further work will be done prior to the next (Reg. 19) stage of the SWLP to help determine the sites put forward for allocation.

Proposals for unallocated employment development will be directed to the main South Warwickshire settlements in the first instance. However, it is recognised that, in accordance with the NPPF, sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances, development will be required to meet the criteria set out in Section 6.6 (Supporting Rural Employment) and the NPPF 2024 (paragraph 89).

The use of previously developed land, and sites that are physically well-related to existing settlements, will be encouraged where suitable opportunities exist.

Justification

NPPF

Paragraph 85 of the NPPF states that “Policies... should create the conditions in which businesses can invest, expand and adapt.”

Paragraph 86a states that Policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.

South Warwickshire Employment Land Study (2024)

The Employment Land Study has used economic and commercial research to provide qualitative recommendations on qualitative gaps in the employment land supply profile and how these can be dealt with through Local Plan policy and allocations. This includes recommendation on how the residual strategic and non-strategic employment land need should be distributed across South Warwickshire.

6.2 Core Opportunity Area

South Warwickshire has a diverse economy with many thriving employment clusters covering a variety of sectors which include national and international businesses plus research facilities. When considered spatially, these clusters and research facilities cover a core area across the centre of South Warwickshire which includes the areas five main towns and is connected by the A46 Trans Midlands Trade Corridor and the central section of the M40. A Core Opportunity Area (COA) is proposed which brings these key clusters together as a way of attracting inward investment into South Warwickshire, encouraging businesses to co-locate in this area and take advantage of economies of scale.

What was said in the I&O

The SWLP Issues and Options consultation document posed a specific question about the inclusion of a policy directing employment to the Core Opportunity Area. Over 78% of the 134 respondents to this question felt that the SWLP should include such a policy. Many of the responses went on to name specific sites, a good number of which already fell within the proposed COA. A small number of respondents considered that the creation of a Core Opportunity Area may have a negative effect, as potential employers may see the policy as preventing economic development elsewhere, or that such a policy designation may raise land values in the COA making it less affordable for smaller occupiers.

Draft Policy Direction 13 - Core Opportunity Area

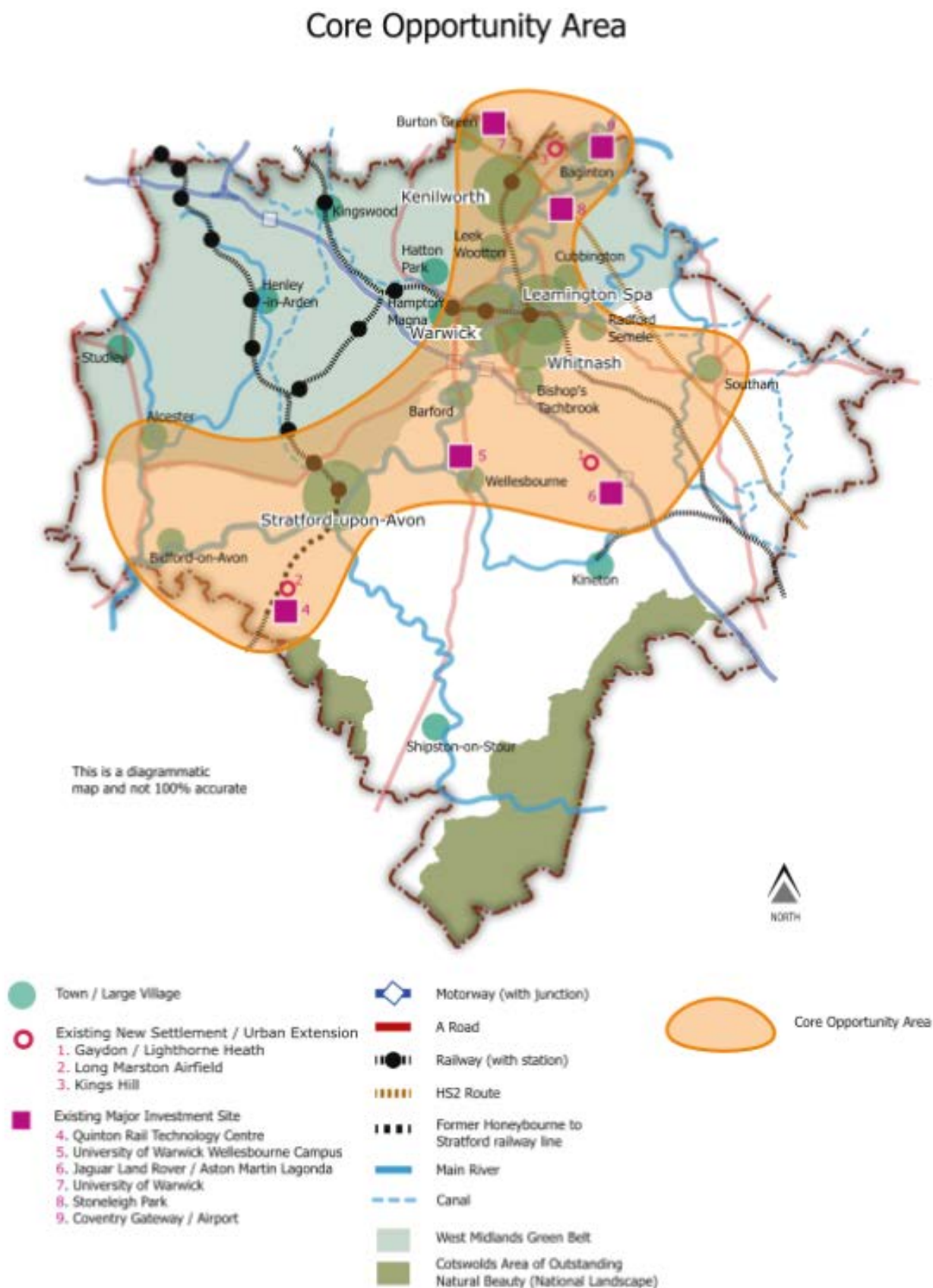
The Core Opportunity Area (as detailed in Figure 10) will be the focus for new employment development in the South Warwickshire area. The COA will build on existing employment hubs, harness the potential offered by co-locating businesses and research facilities and support the strategy for attracting significant inward investment to the area. This will be against the backdrop of national planning policies, most notably those relating to the Green Belt.

Whilst the existing road network within the area currently plays a key role for car journeys and road freight, improvements to public transport and active travel measures within the COA will be prioritised, with the aim of creating capacity on the area's roads.

Areas outside of the Core Opportunity Area remain suitable for more local investment opportunities, subject to compliance with other policies in the SWLP and the NPPF.

Figure 10: Core Opportunity Area

(NB: the Existing Major Investment Site references have since been updated from those shown in this Figure – please see Draft Policy Direction 14)



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SDC/1388/P082/1

Justification

National Policy

2024 NPPF Chapter 6 'Building a strong, competitive economy' makes clear at para 85 that the approach taken in local planning policies should allow each area to build on its strengths, going on to recognise that areas with high levels of productivity should be able to capitalise on their performance and potential. Para 86 goes on to state that planning policies should set criteria or identify strategic sites for local and inward investment. Para 87 raises the need to recognise and address the specific locational requirements of different sectors, which includes making provision for clusters or networks for different industries.

The proposed Core Opportunity Areas policy will seek to respond to the needs of the modern economy in South Warwickshire by making provision for clusters of industries to support their growth.

West Midlands Strategic Employment Site Study (2024)

There is broad alignment of the proposed COA with the Road Opportunity Area (Area 8 - A46/M40 Warwick) and potential Rail Opportunity Area (Area 4 - Warwick & Leamington) identified for Strategic Employment Sites in the [2024 West Midlands Strategic Employment Sites Study](#). This study defines strategic sites as those over 25ha.

The proposed COA also responds to the [2024 South Warwickshire Employment Land Study](#) which identifies that the main clusters of industrial premises are within Leamington, Warwick and around Coventry Airport. As highlighted under Section 6.1, two principal potential strategic site locations are identified: South of Leamington and West of Warwick, with both of these areas falling within the proposed COA. In addition, it is proposed for the allocated JLR 100 ha. site at Gaydon (also within the COA) to be released for strategic manufacturing and small-scale logistics uses.

South Warwickshire Economic Strategy 2023

In 2023, a five-year Economic Development Strategy for South Warwickshire was published, with the main objective of the strategy being to co-ordinate economic growth activities in the area and highlight the area's significance and contribution to the wider regional and national growth plans. The strategy sets out nine objectives, with the following being of particular relevance to the concept of a Core Opportunity Area:

- Objective 3 - To support existing sectors
- Objective 5 - To attract new sectors to South Warwickshire to diversify the local economy
- Objective 8 - To ensure the adequate supply of employment land
- Objective 9 - To work with the West Midlands Combined Authority in the development and delivery of the Proposed West Midlands Investment Zone (WMIZ)

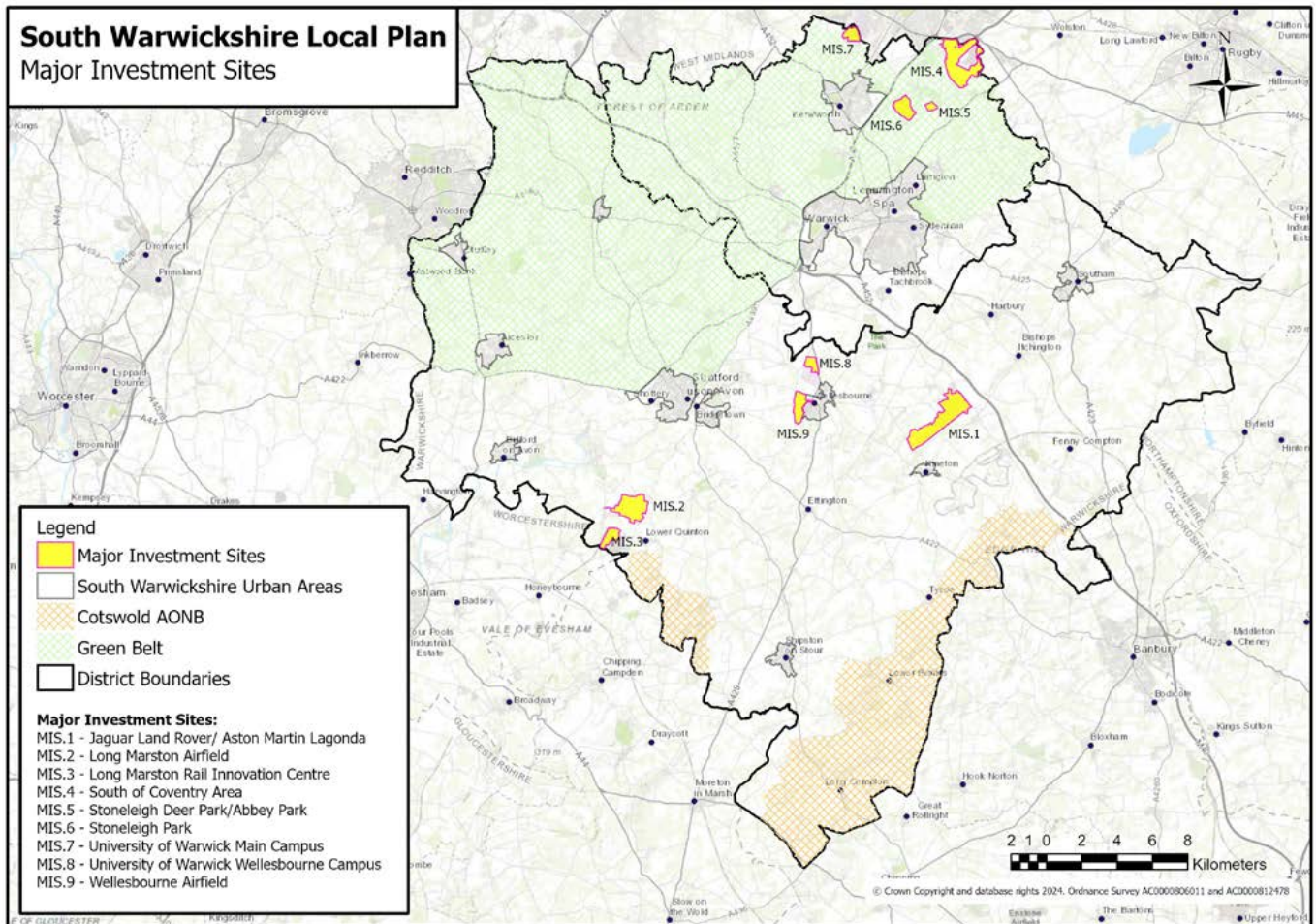
The Economic Development Strategy also goes on to set out a Core Investment Opportunity Area focusing on the towns of Kenilworth, Leamington, Stratford, Warwick and Whitnash, connected by the key roads of the A46 and M40. This area also includes many of the area's key employers and areas for employment growth - the University of Warwick's two campuses (including Wellesbourne Campus), the proposed West Midlands Investment Zone south of Coventry, Long Marston Garden Village and the Porterbrook Long Marston Rail Innovation Centre, Stoneleigh Park, the automotive hub at Gaydon and the proposed Kenilworth Gateway development. The area is also strategically located in proximity to HS2 and the related UK Central development hub nearby in Solihull Borough. The strategy goes on to outline the importance of connectivity in and to the Core Area, with the need for new investment to tackle existing congestion and maximise opportunities for public transport and use rail-based access where possible, and in the future a prospective innovation corridor concept.

6.3 Major Investment Sites

The **Major Investment Sites** in South Warwickshire include:

MIS.1	Jaguar Land Rover/ Aston Martin Lagonda
MIS.2	Long Marston Airfield
MIS.3	Long Marston Rail Innovation Centre
MIS.4	South of Coventry Area (including Coventry Airport and National Battery Innovation Centre/Coventry Gateway/ Whitley South)
MIS.5	Stoneleigh Deer Park/Abbey Park
MIS.6	Stoneleigh Park
MIS.7	University of Warwick Main Campus
MIS.8	University of Warwick Wellesbourne Campus
MIS.9	Wellesbourne Airfield

Figure 11: Major Investment Sites



MIS.1

Gaydon Area / M40 Junction 12 including Jaguar Land Rover and Aston Martin Lagonda

This automotive hub is home to the iconic British brands Jaguar Land Rover (JLR) 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; 100 ha. for JLR, and 4.5 ha. for Aston Martin Lagonda. 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).

We are reconsidering the specific allowed uses of the existing allocation at Gaydon, as the site has not come forward for the JLR related development it was originally allocated for in the SDC Core Strategy. As a key automotive cluster destination, is recommended that the existing 100 ha. JLR allocation is released to the wider market for manufacturing and small-scale logistics. Whilst well-located to the M40, this location is not seen as appropriate for strategic logistic uses (i.e. Use Class B8). Policy should prevent large (over 9,300 sqm) logistics units on the site, so that it stands as a strategic B2 manufacturing site on a well-located junction.

MIS.2/MIS.3

Long Marston Area including the Garden Village and the Long Marston Rail Innovation Centre

The Long Marston Rail Innovation Centre is the UK's only looped test track and with its connection to the national rail network, provides a unique opportunity to act as a catalyst for growth in the rail technology sector. This part of South Warwickshire has the potential to intensify use of the site, and exploit the interrelationships with automotive and advanced engineering, especially in respect of alternative fuel technology. Existing opportunities in the Long Marston Area also include the employment land on Long Marston Airfield Garden Village.

MIS.4

South of Coventry Area including Coventry Airport, Coventry Gateway and the National Battery Innovation Centre

The area of South Warwickshire to the south of Coventry has started to see considerable change. Strategic allocations in the current Warwick District Local Plan include large housing sites at Kings Hill and Westwood Heath as well as a sub-regional employment site to the south of Jaguar Land Rover's Head Quarters at Whitley. Planning permission has been granted for development on these sites and construction has commenced in the area.

Warwick University and Coventry Airport are located within the area. A planning application has been granted for a battery gigafactory on the airport site to support the country's shift towards electric vehicles and ultimately carbon neutrality. This development could complement existing facilities in the area including the Battery Industrialisation Centre, facilities at JLR and Warwick Manufacturing Group at the University.

Significant transport infrastructure improvements have been implemented, are ongoing and are being explored in the area. These include a new bridge over the A45 and transport improvements to connect JLR/Whitley Business Park to the new sub-regional employment site comprising Whitley South and Coventry Gateway. A new scheme will see a new bridge across the A46 and a new signalised gyratory system at the Stoneleigh Junction of the A46.

Further transport investment is being considered in the area. The potential for a new railway station near Kenilworth is being explored. A possible transport corridor, potentially incorporating Very Light Rail and to cater for other sustainable travel modes connecting the new Stoneleigh Junction to Warwick University and with strategic connections towards the proposed HS2 Interchange at UK Central in Solihull is also being explored.

This area has seen considerable interest from land promoters although it is important to note that much of the land is within the West Midlands Green Belt and the potential and suitability for further growth in this area would need to understand this context and the preferred option for growth.

MIS.5/MIS.6

Stoneleigh Area including Stoneleigh Park agricultural science park and Stoneleigh Deer Park/Abbey Park

Stoneleigh Park is located to the east of Kenilworth and south of the village of Stoneleigh and is a major site in the Green Belt, home to the headquarters of the Royal Agricultural Society for England and a number of other agricultural and countryside organisations. The park hosts a wide range of shows and events and is an established part of the rural economy both locally and nationally.

The site will be significantly impacted by HS2 as it intersects Stoneleigh Park. This necessity for change to the site means that the emerging Local Plan provides an opportunity to reassess the use and purpose of the site and the density of development, noting that it currently is located in the Green Belt.

Stoneleigh Deer Park/Abbey Park will be protected as an existing/committed employment site.

MIS.7

University of Warwick Main Campus Area

The University is a leading employer in South Warwickshire and plays an important role within the local economy as well as being of national and international importance. The campus has been developed following a Masterplan approved in 2009 that has now largely been implemented. A further planning application granted in 2019 enabled construction of two major projects

The University has aspirations to continue to improve and develop its campus and therefore the Plan will need to ensure that the aspirations of the University can be met, whilst ensuring any negative impacts of growth are mitigated. The relevant authorities have been working closely with the University to develop a Masterplan Framework Supplementary Planning Document (SPD) and Warwick District Council agreed to adopt the SPD in October 2024, subject to similar approval by Coventry City Council. The SPD was formally adopted by Warwick on 3rd December following final approval at the Coventry City Council Full Council meeting.

The SPD provides a framework for guiding the level and broad location of growth on the main University of Warwick campus. The SPD provides supplementary guidance to Policy MS1 – University of Warwick – of the adopted Warwick District Local Plan. The South Warwickshire Local Plan will need to continue to support this major employer and its continued benefits to the local economy.

MIS.8/MIS.9

Wellesbourne Area including University of Warwick and Wellesbourne Airfield

Wellesbourne is home to the adjacent sites of Wellesbourne Airfield and the University of Warwick's Wellesbourne Campus. The University of Warwick Innovation Campus Masterplan Framework Supplementary Planning Document was adopted in July 2023.

We would like to see an integral relationship between the university campus and airfield site, with the campus growing as a centre for cross-fertilisation research and development in high-tech automotive, battery and biosciences. The proximity of an operational airfield would hold the potential that aviation technology could add to these scientific endeavours. The airfield site also has the potential to house further industrial and research and development activities related to the campus (i.e. Use Class B2).

Other important economic assets in South Warwickshire include:

Silicon Spa – It is the home of the gaming industry. This extends from Leamington out to the surrounding areas of Southam and Warwick employing over 2,000 highly skilled people.

Automotive – Home to the UK's automotive industry. Coventry and Warwickshire has a reputation for being a world class centre for advanced manufacturing and engineering. Aston Martin, JLR and Lotus have a major presence in South Warwickshire. Manufacturing accounts for over 40% GVA in Stratford.

Food and Drink – Food and drink is important to the economy and Warwickshire is well known for its quality restaurants, locally produced artisan food and drink, farm shops delicatessens and café culture.

Highly Skilled Workforce – South Warwickshire has a well-qualified and skilled workforce which attracts businesses. Warwick and Stratford have a higher-than-average population with NVQ4 qualifications and above.

Bowls England – The HQ of Bowls England is in Leamington and each year hosts the National Bowls Championships.

Shakespeare's Birthplace – A popular attraction for overseas and UK visitors and is situated in the heart of Stratford-upon-Avon.

Castles and Country Estates – South Warwickshire is home to a number of significant country estates as well as Warwick and Kenilworth castle, both of which are major tourist attractions.

Royal Shakespeare Company – It is a major British theatre company employing over 1,000 staff and producing around 20 theatrical productions each year.

Cotswolds National Landscape – This is the third largest protected landscape in England which is popular with walkers and visitors to the area.

Agriculture – Warwickshire is home to a diverse range of farming, food and drink businesses and is approximately 70% agricultural land. Agriculture is important as it contributes to the local economy, local communities, protects the local environment and is a large employer to local people.

What was said in the I&O

A question was posed in the I&O document asking whether a policy should be included in the SWLP regarding additional economic growth at the identified Major Investment Sites. 82% of the 95 respondents to this question agreed that a policy should be included in the Local Plan.

In terms of protecting other existing employment sites in South Warwickshire, Question E6 asked if a policy should be included which protects South Warwickshire's economic assets. Out of the 99 responses, a total of 85 respondents (85.9%) were in favour of having a policy to protect South Warwickshire's economic assets.

Question E8.1 pertained to Existing Employment Allocations in the SDC Core Strategy and the WDC Local Plan, asking "Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?"

The revisions that were proposed to the existing Atherstone Airfield allocation within the I&O consultation involved retaining the allocation, but only retaining part of the site for relocating Canal Quarter Regeneration Zone businesses once the site had been developed for new businesses coming into the area.

There were 69 responses to Question E8.1. 'Yes' was selected by 52 participants (75.4%), 'No' was chosen by 8 respondents (11.9%), and 'Don't know' was selected by 9 respondents (13.0%).

Draft Policy Direction 14 - Major Investment Sites (MIS)

The Major Investment Sites will be protected for employment uses and will be the main focus of new employment development in the Plan period. The below sets out in broad terms the type of employment uses that would be considered to be acceptable in principle at these MIS. We are supportive of growth in principle in these locations, however the exact type and quantum of development to be allocated at each MIS will be determined in subsequent stages of the Local Plan process, and should be consistent with the relevant SPDs for the sites, where these are adopted.

- **MIS.1 - Gaydon - JLR/AML** – it is proposed to release the existing 100ha. JLR restricted allocation to allow general strategic manufacturing and small-scale logistics uses (under 9,300 sqm), with the emphasis on strategic B2 manufacturing. Large-scale logistics (B8 class) uses will be resisted on this site. We will engage with JLR regarding alternative sites that may be suitable for their future development needs so that their requirements are met. The existing Aston Martin Lagonda (AML) 4.5ha. allocation in the adopted SDC Core Strategy may however be retained within the SWLP, subject to further discussion with AML on their future plans for the site.
- **MIS.2 - Long Marston Airfield** – Existing allocation Proposal LMA: Long Marston Airfield remains an important part of Stratford-on-Avon's employment land supply. It is expected that the SWLP may revise what is delivered on this site in some respect; therefore, it is not proposed that this allocation is rolled forward in its existing form. If further strategic growth is brought forward in addition to the existing Proposal LMA allocation in the adopted SDC Core Strategy (see Section 4 – Growth of this document), it is considered that this should be accompanied by dedicated additional employment land provision; as well as provision of town centre uses, including offices, within a local centre.

- **MIS.3 - The Long Marston Rail Innovation Centre (Porterbrook)** will be safeguarded for rail-based employment and research and development and opportunities for intensification of site uses will be explored.
- **MIS.4 - South of Coventry area** –Coventry Airport will be allocated for a Gigafactory (i.e. a facility to manufacture batteries for electric vehicles and a range of other applications at scale) as set out in Section 6.5 (Airfields). In addition, the existing allocation of the Sub Regional Employment Site (land in the vicinity of Coventry Airport) under DS16 of the Warwick District Local Plan will be retained within the SWLP. There is also opportunity for further employment development here that could link to the automotive industry and the National Battery Industrialisation Centre, and could contribute to South Warwickshire or Coventry’s unmet need. This would be subject to consideration of greenbelt impact, residential strategy and infrastructure to provide sustainable access.
- **MIS.5 and MIS.6 - Stoneleigh Park and Stoneleigh Deer Park/Abbey Park** – Stoneleigh Park is a major employment site in the Green Belt with a focus on rural industries. Change at the site is necessitated by the proposed HS2 route cutting through the site. The site, owing to its low-level, low-density layout with large areas of open space doesn’t represent the most efficient use of the land. Therefore, further consideration ahead of the submission version of the Plan will be given to intensification of use on the site, the merits of potentially removing the site from the Green Belt, the merits of a greater diversification of uses on site and any potential expansion of the current site. There is potential to improve connectivity of the site including active travel opportunities to nearby Kenilworth and also to provide a new access to the site from the north, connecting with the improved A46 Stoneleigh Junction and thus providing better access to the strategic road network, whilst also reducing vehicle movements through the village of Stoneleigh.

Stoneleigh Deer Park/Abbey Park will be protected as an existing/committed employment site.

- **MIS.7 - University of Warwick main campus** – The adopted Masterplan SPD will bring forward the development of further research and development premises and future development of this site should be in accordance with this SPD. Further development in the south of the site will be explored but may require a link road from A46 depending on the nature of development due to access through a residential area.
- **MIS.8 and MIS.9- Wellesbourne including University of Warwick Wellesbourne Campus and Wellesbourne Airfield** – it is proposed to expand the agri-tech cluster at the University of Warwick Innovation Campus to support spin-out businesses and expansion of employment provision at Wellesbourne Airfield (see Section 6.5 on Airfields). Development of the Wellesbourne Campus should be consistent with the adopted Masterplan SPD.

Justification

NPPF

2024 NPPF Chapter 6 ‘Building a strong, competitive economy’ makes clear at para 85 that the approach taken in local planning policies should allow each area to build on its strengths, going on to recognise that areas with high levels of productivity should be able to capitalise on their performance and potential. Para 86 goes on to state that planning policies should set criteria or identify strategic sites for local and inward investment. Para 87 raises the need to recognise and address the specific locational requirements of different sectors, which includes making provision for clusters or networks for different industries.

South Warwickshire Employment Land Study (2024)

This Study provides recommendations as to which existing employment allocations in the SDC Core Strategy and WDC Local Plan should be taken forward in the SWLP. The Study recommends that the existing 100ha. JLR allocation within the SDC Core Strategy is released for general manufacturing and small-scale logistics uses going forwards, rather than retained as an allocation entirely for JLR related uses as currently allocated. We will engage with JLR on looking at alternative sites that may be suitable for their needs.

South Warwickshire Economic Strategy 2023 (SWES)

The following SWES objectives are relevant:

Objective 5.3: Develop the Wellesbourne Innovation Campus & sector supply chains. Develop the Kenilworth Gateway employment site.

Objective 5.5 Sector diversification, internationalisation and inward investment support. To work with regional partners to attract inward investment into development and delivery of the proposed EV Giga Factory at Gateway South, Coventry Airport.

6.4 Provision of Office Accommodation and Refurbishment of Existing Office Stock

It is important to ensure that there is a sufficient quantity of office accommodation to meet the needs of South Warwickshire. The South Warwickshire Employment Sites Study (2024) sets out the office need up to 2050, as set out in Section 4.1.

As well as having sufficient sites in the right places to meet office need, office accommodation needs to be high quality and of the right type to meet the requirements of occupiers. Affordable office accommodation is also required. This Policy Direction seeks to address these matters, although specific allocations for office land will not be proposed until the next Regulation 19 version of the Plan.

In South Warwickshire, office accommodation is at a premium and there is an identified issue regarding a lack of grow-on space for businesses to expand. Changing requirements have led to higher demand for hybrid workspaces, and higher quality office space. There is a move towards cellular offices, with these in demand particularly for 2 or 3 people, rather than co-working space. As well as a demand for larger commercial units, there is an ongoing requirement for small industrial starter units. In terms of location, there is a growing preference for town centres rather than out of town business parks.

In Leamington Spa, the gaming industry in particular is experiencing pressures for office space. In the wider market, there is a need for both large and small spaces. One issue identified is businesses who would prefer to move into bigger premises being unable to do so, thus reducing the availability of smaller units for smaller businesses and start-ups.

What was said in the I&O

The Issues and Options consultation did not have a specific question relating to office accommodation; however, there was a question (Issue E5) about the provision of business accommodation in general.

Issue E5 stated that “In South Warwickshire, office accommodation is at a premium and there is an identified issue regarding a lack of grow-on space for businesses to expand. Changing requirements have led to higher demand for hybrid workspaces, and higher quality office space. There is a move towards cellular offices, with these in demand particularly for 2 or 3 people, rather than co-working space. As well as a demand for larger commercial units, there is an ongoing requirement for small industrial starter units. In terms of location, there is a growing preference for town centres rather than out of town business parks.

In Leamington Spa, the gaming industry in particular is experiencing pressures for office space. In the wider market, there is a need for both large and small spaces. One issue identified is businesses who would prefer to move into bigger premises being unable to do so, thus reducing the availability of smaller units for smaller businesses and start-ups.”

The majority of respondents (76.1%) expressed agreement with the inclusion of a detailed policy in Part 1 that supports a range of business units. The results indicated that there is a need to encourage the growth of diverse businesses, including startups that may encounter challenges in securing affordable premises.

Draft Policy Direction 15 - Provision of Office Accommodation and Refurbishment of Existing Office Stock

- Sites will be allocated in Warwick and Leamington Spa town centres for office use (E(g)(i) in order to meet the office need identified in Section 4.1 (Spatial Growth Strategy); in particular, to contribute towards the need for high quality office floorspace and the growth of the gaming cluster.
- No allocations for office development will be made in Stratford-on-Avon District, as the Employment Land Study did not identify a need for further office allocations to meet the minimal identified need in this area.
- Development proposals that involve the refurbishment of existing office stock that is of poor quality or underutilised, in order to provide enhanced and upgrade office accommodation, will be supported.
- The redevelopment and refurbishment of poor quality or underutilised out-of-town office spaces into smaller, flexible units to provide move-on space for businesses that have outgrown their premises will be supported, where this would provide a more effective use of the space.
- Development that seeks to provide a substantial element of affordable office space will be supported.
- Allocations specifically for affordable office space will be explored in the Reg.19 version of the SWLP, and we will explore commissioning further evidence as to how affordable office space could be secured prior to the Reg.19 consultation of the SWLP.

Justification

NPPF

Paragraph 85 of the NPPF states that “Policies... should create the conditions in which businesses can invest, expand and adapt.”

Paragraph 86a states that Policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration.

The South Warwickshire Employment Land Study (2024) considered that the market signals indicate that a significant proportion of market demand is driven by the need for high quality office space within Leamington Spa and Warwick town centres. The Study found that there is currently a lack of high-quality space in the town centres to support the needs of the digital and creative sector. It is therefore important that Local Plan policy protects and encourages the refurbishment of existing office stock within Leamington Spa town centre to provide this space.

The Study also found that office vacancy rates in Warwick District are currently much higher than Stratford-on-Avon; and Coventry & Warwickshire (8.9%) at 10.8%. Stratford-on-Avon has a much lower office vacancy rate of 3.8%. The high vacancy rate in Warwick is partly driven by a mismatch in the available supply of stock and what occupiers want, as a significant portion of Warwick’s office stock is outdated and not of high quality.

The South Warwickshire Employment Land Study suggests a number of potential sites that could be allocated for office use, however additional work needs to be completed before we make any decisions on allocating specific sites for office development in the SWLP. It is expected that the Reg. 19 (publication) version of the SWLP will include proposed office allocations. We will also explore allocating specific sites for affordable office development.

There is significant issue with a lack of affordable office accommodation in the Districts. ‘Affordable’ in this context refers to workspace where rates are maintained below the market rate. We will explore what may be an appropriate level to set an affordable rate as a percentage of market rate. For example, this could include discounted market sales / fixed equity where the units are always sold at a percentage (for example 75%) of the market rate. Alternatively, where the units are offered for rent, these could be at a percentage of the market rate for comparable units in the locality. The definition of comparable will change over time and the locality will depend on the level of market activity in the area.

South Warwickshire Economic Strategy (SWES)

The SWES had the following relevant objectives:

Objective 8.1 of the South Warwickshire Employment Strategy 2023 is to “facilitate the provision of additional affordable employment premises across South Warwickshire through the SWLP”.

Objective 8.2 of the SWES is “to ensure adequate future supply of employment land in the right locations across South Warwickshire through the SWLP.”

6.5 Airfields

South Warwickshire has three airfields that have been proposed for an element of economic redevelopment: Coventry Airport, Atherstone Airfield, and Wellesbourne Airfield.

It is considered that Coventry Airport and Wellesbourne Airfield could be appropriate for redevelopment/partial redevelopment for employment purposes. Wellesbourne Airfield is currently protected for aviation activities within the Area Strategy for Wellesbourne in the SDC Core Strategy, therefore any future employment development of the site would need to ensure that the aviation function of the airfield would continue to be secured. Coventry Airport has already received planning permission to be developed for a Gigafactory. Land south of Coventry Airport is allocated within the WDC Local Plan (Policy DS16) for a major employment site (B1, B2 and B8 uses) of sub-regional significance.

Atherstone Airfield is currently an allocation (SUA.4) within the SDC Core Strategy for the relocation of businesses from the Canal Quarter Regeneration Zone. Whilst we did propose to retain this as an employment allocation within the I&O consultation document, it is no longer considered appropriate for development due to lack of adherence with our overall growth strategy (see Section 4.1). As such, we are now proposing to release the existing Core Strategy allocation of Atherstone Airfield.

What was said in the I&O

No specific question on Airfields was asked in the Issue and Options consultation document, however, the Issue E7 on the Core Opportunity Area and the Major Investment Sites did note Wellesbourne Airfield and Coventry Airport as Major Investment Sites in South Warwickshire.

Draft Policy Direction 16 - Airfields

The following Airfield sites are identified as potentially suitable for employment development as follows:

Wellesbourne Airfield

- It is proposed to safeguard the aviation function of the airfield in-line with existing Area Policy AS.9 in the adopted Stratford-on-Avon District Core Strategy
- However, it is also proposed to partially repurpose the site to include an element of Use Class B2 (general industrial) and Use Class B8 (storage and distribution) employment floorspace as well as ancillary Use Class E(g) uses (office/research and development/light industrial). The site has been identified within the Employment Study (2024) as being a suitable extension to the existing industrial offering at Wellesbourne and could be appropriate for E(g)/B2/B8 uses.

Atherstone Airfield

- This site is proposed to be released as an employment allocation as currently allocated within the SDC Core Strategy as Proposal SUA.4. This is as it is considered that development of this site would not accord with our Spatial Growth Strategy (see Section 4.1).

Coventry Airport

- The site already has planning permission for a Gigafactory. It is proposed to allocate this site for a Gigafactory (i.e. a facility to manufacture batteries for electric vehicles and a range of other applications at scale.) to ensure the delivery and protect the site for this purpose.

Justification

Airfields are generally considered to be Previously Developed Land under national planning policy, and therefore their redevelopment enables large scale employment sites to be delivered without the need to develop greenfield land. They can be particularly suitable for redevelopment for employment uses, due to their large scale.

Each of the three Airfields within South Warwickshire have different qualities in terms of location, scale and setting, and therefore the type and quantum of development that would be considered appropriate differs between them. Whilst Atherstone Airfield is currently allocated for employment development within the adopted SDC Core Strategy to accommodate the relocation of businesses from the Canal Quarter Regeneration Zone, we propose to remove this allocation as it is considered development of this site would not accord with our overall spatial growth strategy (see Section 4.1). Coventry Airport already has planning permission for a Gigafactory (a facility to manufacture batteries for electric vehicles and a range of other applications at scale), however, it is considered that the site should be allocated for this use in order to ensure the delivery and protect the site from an application for other uses during the process of identifying an occupier for the site.

It is considered that Wellesbourne Airfield can accommodate some employment development, as recommended by the South Warwickshire Employment Study 2024, although it is also considered that the overall aviation function of this airfield should be protected.

The South Warwickshire Economic Strategy (2023)

The Economic Strategy includes the following relevant objectives:

Objective 5.2 Support the provision of an electric vehicle “Gigafactory” and support low carbon future mobility and its associated value and supply chains within South Warwickshire.

Objective 5.5 Sector diversification, internationalisation and inward investment support: To work with regional partners to attract inward investment into development and delivery of the proposed EV Giga Factory at Gateway South, Coventry Airport.

NPPF

2024 NPPF Chapter 6 ‘Building a strong, competitive economy’ makes clear at para 85 that the approach taken in local planning policies should allow each area to build on its strengths, going on to recognise that areas with high levels of productivity should be able to capitalise on their performance and potential. Para 86 goes on to state that planning policies should set criteria or identify strategic sites for local and inward investment. Paragraphs 86 and 87, have been expanded specifically stating that policies should identify appropriate sites to meet the needs of the modern economy, such as laboratories, gigafactories, data centres and freight and logistics.

6.6 A Low Carbon Economy

It is important to try and encourage greener businesses into the area as well as encouraging existing businesses to become greener and to have the opportunity for greener initiatives.

The location and accessibility of new facilities relative to their suppliers and customers can help make substantial reductions and a significant contribution towards the goal of net zero.

Whilst many existing commercial buildings may not achieve optimal energy efficiency, there is considerable scope for industry to play a key role in harnessing renewable energy generation.

What was said in the I&O

The Issues and Options consultation document said that it is important to try and encourage greener businesses into the area as well as encouraging existing businesses to become greener and to have the opportunity for greener initiatives. Businesses may choose to do this in several different ways, for example looking at active travel promotion for employees, adapting existing buildings and looking at new buildings to become more energy efficient.

Whilst many existing commercial buildings may not achieve optimal energy efficiency, there is considerable scope for industry to play a key role in harnessing renewable energy generation.

Overall, there was majority support for a policy which would encourage businesses to be low carbon, and a significant amount of support for a policy which would look to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy.

Draft Policy Direction 17- A Low carbon Economy

- Employment development that seeks to reduce its carbon footprint through climate adaptation and mitigation techniques will be supported, provided it accords with our overall spatial strategy for employment development.
- The retrofitting of existing employment development to improve energy efficiency and incorporate low carbon technologies will be supported.
- The incorporation of renewable energy generation into employment development will be supported provided it is appropriate to the location and type of development.
- The development of businesses that contribute to the 'green economy' will be supported in principle.

Justification

In 2019, Warwick and Stratford-on-Avon District Councils both declared a climate emergency. Both have committed to reduce district wide emissions by 55% by 2030. A joint 'Climate Change Action Programme', agreed by both Councils in November 2021, sets out ambitions and how we'll achieve them. This requires the rapid decarbonisation of emission sources which fall outside of the jurisdiction of local authorities. A 2021 report produced on our behalf showed that emissions arising from energy use in non-domestic buildings and industrial processes represented 22.9% of the total carbon footprint of the Stratford and Warwick District areas. A recent report produced by Sustainability West Midlands highlighted that 65% of UK SMEs have been financially impacted by their lack of response to weather information. As the impacts of climate change continue to be felt, it is likely that this figure will increase. Economic development will play a vital role in driving the UK's transition to net zero. It is predicted that by 2050, there could be up to 1.18 million jobs in low-carbon and renewable energy sectors, and this offers great opportunities to the area given our access to research and talent. We will encourage low-carbon sectors to the Stratford and Warwick Districts to ensure that the area is well positioned to benefit from this. The Local Plan will enable a shift to a low carbon economy within the area in the following ways

1. Businesses will be supported to reduce their carbon footprint.
2. Economic development within Stratford and Warwick Districts will maximise the economic opportunity presented by the transition to net-zero and the need to adapt to a changing climate.
3. Business resilience will be increased through the provision of climate change adaptation measures.

South Warwickshire Economic Strategy (2023)

The SWES includes the following relevant objectives:

Objective 4 – To de-carbonise the existing South Warwickshire economy

- 4.1 Work with existing partners to establish a network of low carbon business champions to promote and support the de-carbonisation of existing businesses and to encourage a circular economy across South Warwickshire
- 4.2 Encourage and support the retrofitting of commercial premises with renewable energy generation
- 4.3 Work with Shakespeare's England and the new Local Visitor Economy Partnership (LVEP) tourism businesses to de-carbonise the tourism sector including through more sustainable travel

6.7 Supporting Rural Employment and Diversification

South Warwickshire is a predominately rural area, and this Policy Direction seeks to support economic activities in rural areas. The rural economy encompasses all businesses operating in rural locations; not just those engaged in agricultural or land-based activities such as farming, food production or tourism. Whilst needing to be mindful of constraints such as landscape setting and traffic on rural roads, this strategy seeks to capitalise on the potential to provide for local employment opportunities to ensure thriving rural communities, including through agricultural diversification schemes.

This policy is intended to enable the economic prosperity of rural areas by supporting the provision of employment (particularly small businesses) within rural areas, as well as the diversification of rural businesses, including agricultural uses.

What was said in the I&O

The Issues and Options consultation document identified that over half the population of South Warwickshire lives outside of the main urban areas. Whilst many of these residents will commute to these urban areas or outside the District for work, a proportion are employed in the rural economy.

The Issues and Options consultation document noted that travel to places of work by public transport in South Warwickshire is difficult due to its rural nature and the lack of regular and reliable bus services. It can hinder any job opportunities for people both in Warwick and Stratford district and with Stratford having a predominantly older population, businesses often look to locate in the north of the county where labour supply is better.

The Issues and Options consultation document considered that the South Warwickshire Local Plan should explore the diversification of the rural economy. With appropriate diversification, businesses may be able to have greater resilience by providing a range of income generating streams. For example, farm shops and tourism can supplement agricultural income which can create new jobs and help sustain the vitality of rural communities. Innovation surrounding technology can also help to support agricultural and rural businesses in adapting to changing circumstances, including helping to address climate change and increasing biodiversity.

Another component of the rural economy is the provision of general employment opportunities in rural locations, including within villages, perhaps through the conversion of historic farm buildings that are no longer suited to modern agricultural uses.

The Issues and Options consultation document asked respondents if we should include a Policy supporting the diversification of rural businesses. There was overwhelming support amongst respondents to include a policy supporting diversification.

Draft Policy Direction 18 - Supporting Rural Employment and Diversification

- Development that contributes to a prosperous rural economy will be supported in principle, including the diversification of agricultural businesses and the expansion of existing rural businesses.
- Outside of settlement boundaries, employment development will be acceptable in principle where it accords with our Spatial Growth Strategy (see Section 4.1), is of an appropriate scale to its location, is easily accessible and respects the character of the surrounding area.
- Proposals for small and start-up businesses in rural areas will be supported in principle, where appropriate to their location. The SWLP will look at allocating sites for these purposes.
- Agricultural diversification schemes will be encouraged providing they are of an appropriate scale to their location, respect the character of the surrounding landscape, re-use existing buildings where possible and any new buildings are well related to the built form and scale of the agricultural business.

Justification

NPPF

Paragraph 85 of the NPPF states that “Policies... should create the conditions in which businesses can invest, expand and adapt.”

Paragraph 86a states that Policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration. Paragraph 88 states that “Planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas”.

Para 89 states *‘Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.’*

South Warwickshire Employment Land Study (2024)

The South Warwickshire Employment Land Study identified that there are 91 ‘agri-tech’ businesses within South Warwickshire supporting 1,610 jobs. The sub-sector is driven by rural businesses such as food production, farming, food processing, food logistics rather than high-technology companies.

The Employment Land Study also found that manufacturing businesses were spread across the whole district, reflecting that there is a strong presence of industrial businesses in the smaller towns and rural areas. The Employment Land Study also identified that there has been high take-up of small units, even in rural areas, which is reflected in ultra-low vacancy rates across the whole area.

South Warwickshire Economic Strategy (2023)

The SWES had the following relevant objective:

3.2 - Support the diversification of the rural economy including through the provision of local hubs for rural and agricultural industries that foster collaboration and innovation.

6.8 Supporting a Range of Business Units and Affordable Employment Space

In South Warwickshire there is an identified issue regarding a lack of grow-on space for businesses to expand. As well as a demand for larger commercial units, there is an ongoing requirement for small industrial starter units. In terms of location, there is a growing preference for town centres rather than out of town business parks. In the wider market, there is a need for both large and small spaces. One issue identified is businesses who would prefer to move into bigger premises being unable to do so, thus reducing the availability of smaller units for smaller businesses and start-ups.

What was said in the I&O

Issue E5 identified that there is an identified issue regarding a lack of grow-on space for businesses to expand. As well as a demand for larger commercial units, there is an ongoing requirement for small industrial starter units. In terms of location, there is a growing preference for town centres rather than out of town business parks.

One issue identified was businesses who would prefer to move into bigger premises being unable to do so, thus reducing the availability of smaller units for smaller businesses and start-ups.

The majority of respondents (76.1%) expressed agreement with the inclusion of a detailed policy in Part 1 that supports a range of business units. The results indicated that there is a need to encourage the growth of diverse businesses, including startups that may encounter challenges in securing affordable premises.

Draft Policy Direction 19 - Supporting a Range of Business Units and Affordable Employment Space

- Employment development that includes a range of unit sizes, including smaller units (<1900 sqm / 20,000 sqft) and medium size units (1900 sqm – 9300 sqm / 20,000 – 100,000 sqft) for start-up businesses and move-on space for businesses to expand, will be supported in principle.
- New large scale employment development (>9300 sqm/100,000 sqft) will be expected to provide an element of employment space for small and medium-sized enterprises, including move-on space, unless proven to be financially unviable or unsuitable for the specific site.
- Proposals for large-scale employment development will be encouraged to include an element of affordable workspace for SMEs.
- We will investigate the potential for allocating sites for affordable business space and move-on units within the Reg. 19 version of the SWLP. We will also consider at the next Reg. 19 stage of the SWLP other mechanisms that may be appropriate for securing affordable business space.
- Development proposals for live-work units will be supported where appropriate to their location.

Justification

NPPF

Paragraph 85 of the NPPF states that “Policies... should create the conditions in which businesses can invest, expand and adapt.”

Paragraph 86a states that Policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration. It also sets out that policies should allow for new and flexible working practices, such as live-work accommodation.

The South Warwickshire Employment Land Study 2024

Iceni engaged with local agents and investors in Coventry & Warwickshire to gain insight into the current state of the commercial market, the profile of enquires received and where there are gaps in the supply provision.

It was identified that despite a recent ‘pause’ in activity, over the past decade, demand for industrial space has been consistently strong. As a result, rents have significantly risen, especially for new-build units.

Whilst there has been some recent development, there has been a lack of small and mid-sized units delivered. This is as a result of developers maximising their plots with the development of larger single units. Agents report that there is an ongoing mismatch between the available supply and what the market wants.

It was considered that this issue could be managed through allocation policies or the allocation of smaller sites that lend themselves to small and medium units. Available sites and units do not stay on the market long once advertised, therefore there is scope to be ‘pickier’ on what unit sizes are delivered.

There is a good provision of small units however lack of mid-box space means there is nowhere for growing businesses to move onto and therefore they relocate. There is also a lack of affordable space for SMEs.

‘Affordable’ in this context refers to workspace where rates are maintained below the market rate. When looking at specific allocations and a detailed policy to support affordable workspace in the Reg. 19 version of this Plan, we will explore what may be an appropriate level to set an affordable rate as a percentage of market rate. For example, this could include discounted market sales / fixed equity where the units are always sold at a percentage (for example 75%) of the market rate. Alternatively, where the units are offered for rent, these could be at a percentage of the market rate for comparable units in the locality. The definition of comparable will change over time and the locality will depend on the level of market activity in the area.

South Warwickshire Economic Strategy (2023)

The SWES has the following relevant objectives:

Objective 8

To ensure the adequate supply of employment land

Objective 8.1

Facilitate the provision of additional affordable employment premises across South Warwickshire through the SWLP.

Objective 8.2

Ensure adequate future supply of employment land in the right locations across South Warwickshire through the SWLP.

Objective 8.3

To ensure the appropriate availability of physical infrastructure such as offices, enterprise and innovation centres and move on space in rural market towns in support of their neighbourhood plans.

6.9 Protecting Community Facilities

Community facilities such as local shops, meeting places/village halls, medical facilities, sports venues, open space, cultural buildings, pubs and places of worship are important for supporting the health, wellbeing and inclusivity of communities.

This policy will aim to provide protection for existing community facilities, to ensure that these are not redeveloped to other non-community uses unless necessary). There are some circumstances in which the loss of a community facility may be required due to reasons of viability, however, in these cases, this Policy provides a rigorous framework against which proposals of this nature must be assessed.

What was said in the I&O

Issue E8 begins by covering existing employment allocations and goes on to acknowledge the benefits of the many business use premises across South Warwickshire. It is explained here that whilst national planning policy is clear that we cannot arbitrarily resist the change of use of such premises, it is legitimate to ensure that as the local planning authorities, we should be satisfied that all reasonable endeavours have been explored prior to change of use. Reasonable endeavours include a satisfactory marketing period with the property marketed at an appropriate value, an independent viability assessment and consideration of a range of alternative commercial uses.

Question 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?

Approximately three quarters of respondents answered 'yes' to this question. There was a 50:50 split of developers and business respondents who answered, 'yes' vs 'no'. All other respondent types showed a much clearer preference for 'yes' than 'no'.

Question E8.4: Marketing, Viability and Alternative Use Tests - Please specify what you consider to be appropriate tests

Several respondents stated that marketing periods should be at least 12 months long. It was also mentioned that the SWLP should look at example[s] from other local authorities to ensure a rigorous approach was taken. One respondent highlighted that if a building was irreplaceable in a location, this should factor as a consideration.

Protection of community facilities such as theatres and pubs were noted as particularly important by two respondents. For example, it was suggested that residents should be able to purchase unviable village pubs.

However, a couple of respondents considered that the tests should be more lenient towards businesses wanting to change use and it was suggested different scenarios should be subject to different tests, rather than a one-size-fits-all approach.

Draft Policy C- Protecting Community Facilities

Redevelopment or change of use that would result in the loss of a community facility that serves local needs will only be permitted where it can be demonstrated that all of the following criteria are met:

1. there is no realistic prospect of the facility continuing for commercial and/or operational reasons on that site and a viability assessment supports this;
2. the land and/or property has been actively marketed for a period of at least 12 months at a realistic market price or otherwise made available for a similar or alternative type of facility that would be of benefit to the community;
3. there are similar facilities accessible to the local community that can continue to meet its collective needs and expectations

Explanatory Text

The National Planning Policy Framework recognises that community facilities and services contribute to the sustainability of communities, and that planning policies and decisions should enable the retention and development of accessible local services and community facilities.

When assessing the proximity of similar facilities in accordance with criterion 3, these should be available to access by all reasonable sustainable modes of transport by the community.

Where a viability assessment is required in accordance with Criterion 1, the applicant will need to demonstrate that all reasonable measures to improve the viability of the facility have been pursued. The District Council will have any assessment independently reviewed by a qualified person and the costs of this must be met by the applicant.

It is important that the period covered by the marketing period is recent and reflects current market conditions. To ensure this is the case, the end of the marketing period should be within a maximum of six months of the date of submission of the planning application.

Consultation and engagement with the local community, including the Parish Council, must be demonstrated. Proposals for a community consultation and engagement strategy should be developed in close association with the Parish Council and advice should be sought from the District Council on the approach to engagement.

Justification

It is already recognised that community facilities such as local shops, meeting places/village halls, medical facilities, sports venues, open space, cultural buildings, pubs and places of worship are important for promoting healthy and inclusive communities. The provision of new and protection against undue loss of these facilities are vital considerations.

Many of these facilities provide an important role in promoting community cohesion, offering opportunities for diverse groups of people to socialise. They can also provide multi-functionality by hosting events, clubs, and providing informal meeting spaces for local interest groups. This is often the case with village/community halls. The National Village Halls Survey 2020 written on behalf of ACRE (Action in Communities with Rural England) found that village halls make a significant contribution to the economy, give small and local businesses a location to operate (e.g. yoga classes, dog training classes) and provide other employment opportunities (e.g. cleaners and caretakers).

Pubs also have a strong role to play in supporting the local economy. They can help bring activity and vibrancy to our high streets in town centres and in rural areas where employment opportunities are more limited and provide indirect opportunities by supporting food suppliers and brewing industries.

Much work has already been done by Stratford's Public House Task and Finish Group to ensure the foundations are laid for the enhancement of policies that protect the loss of community facilities and services. Whilst this work has, primarily, been with pubs in mind, the principles and planning guidance published in the Public Houses Planning Advice Note can be applied to other, defined, facilities and services. It is clear from the work of this group that there is a strong recommendation to convert the guidance in the Advice Note to policy. It has been advised that changes to future policies, including measures to strengthen protections against redevelopment of pubs, should be considered and consulted on as part of preparing a new local plan. For example, The Public House Task and Finish Group highlighted the need to require multiple criteria to be met not just the one criterion as stipulated under the current CS.25 Healthy Communities policy.

Paragraph 98 of the NPPF states that planning policies and decisions should "plan positively for the provision and use of shared spaces, community facilities", "guard against the unnecessary loss of valued facilities and services" and "ensure that established shops, facilities and services are able to develop and modernise and are retained for the benefit of the community".

6.10 Supporting our Changing Town Centres

Town centres play a major role in serving local communities and form an important part of South Warwickshire's identity and character. Thriving town centres support local economic growth and encourage investment. Recent changes in consumer habits such as the growth of internet shopping and the economic impacts of the Covid pandemic are changing the traditional composition of our high streets. It is therefore essential that the Local Plan sets out a policy framework that will continue to support the maintenance of and enhance the ongoing vitality and viability of our town centres.

What was said in the I&O

The Issues and options consultation document outlined a suggested policy response which would identify South Warwickshire's network and hierarchy of town centres. It was also noted that a technical study was being produced by independent consultants to examine the current health and functionality of our town centres and to advise us on any future floorspace requirements that may be required during the plan period to 2050. The retail study would also examine the relationship between our town centre and out of centre retail destinations.

The Issues and options consultation (January 2023) specifically sought opinion regarding questions suggesting two alternative policy approaches for our town centres.

The summary responses indicated a strong preference for identifying town centre retail areas and town centre boundaries in Part 1 of the Plan.

Draft Policy Direction 20 - Supporting our changing town centres

To support our changing town centres and assist in maintaining vitality and viability the Local Plan will: -

1) Protect and enhance the town centres.

We will identify the South Warwickshire retail hierarchy and ensure that that development proposals for town centre uses are only permitted where they are of an appropriate scale in relation to the identified role and function of the centre and its catchment and reflect the character and form of the centre.

Based on the findings of the Retail and Town Centre Uses Study (2022) and consistent with the NPPF, we propose the following hierarchy of centres:

Town Centres

- Leamington Spa
- Warwick
- Kenilworth
- Stratford-upon-Avon

Local Centres

- Alcester
- Bidford-on-Avon
- Henley-in-Arden
- Kineton
- Shipston-on-Stour
- Southam
- Studley
- Wellesbourne

- 2) **Define the town centre boundaries**, we will define the town centre boundaries and identify the Primary Shopping Areas (PSA) and other retail areas. In doing so this policy will also make clear the range of uses permitted in such areas.

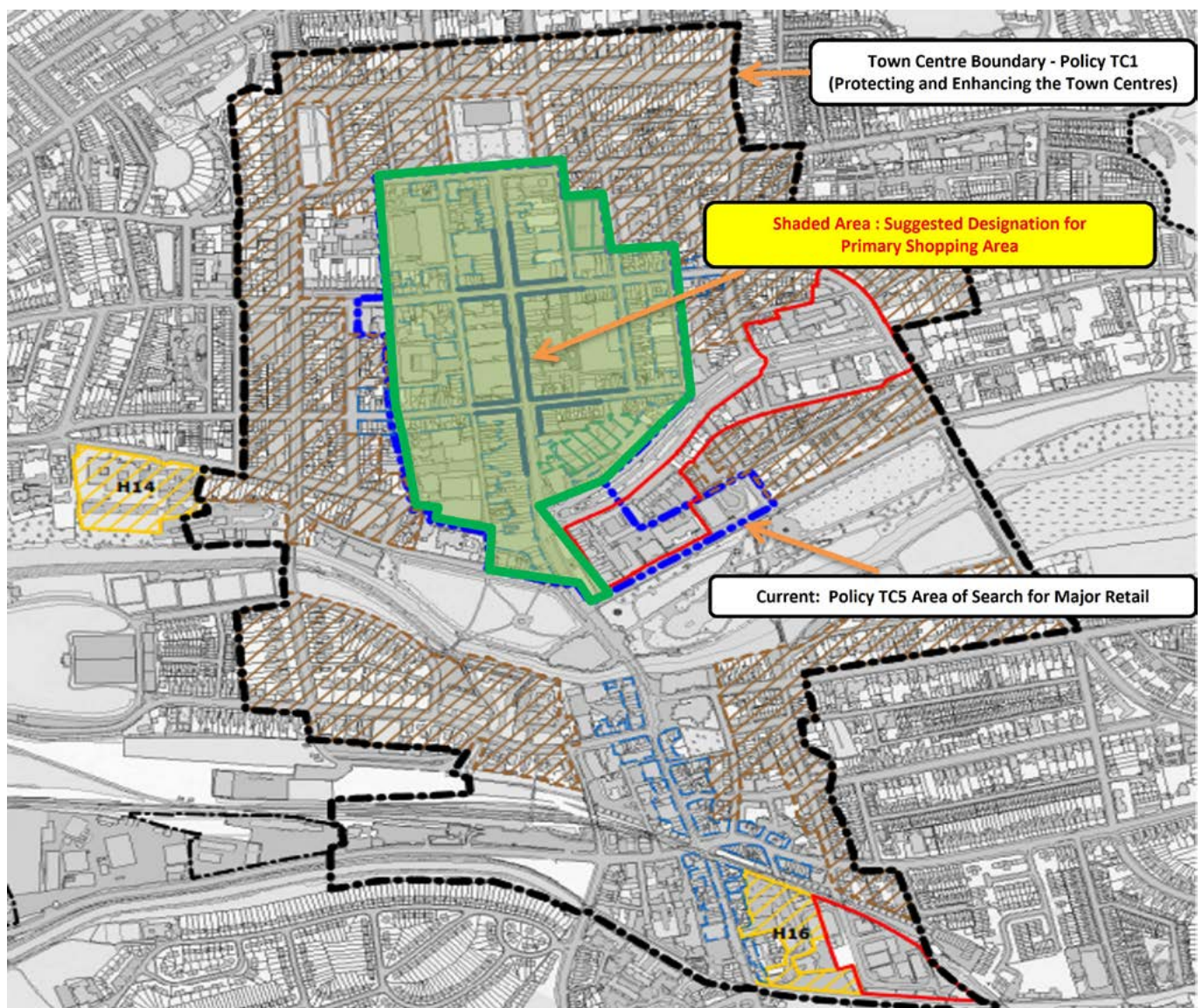
Based on the findings of the Retail and Town Centre Uses Study (2022), the following town centre boundaries and PSA are proposed for the main town centres in Warwick and Stratford-on-Avon Districts respectively:

Warwick District

Leamington Spa

No proposed change to the town centre boundary. We consider the need for a defined PSA as per the latest NPPF, and put forward a suggested area for a PSA as shown in the Figure 12 below:

Figure 12: Leamington Primary Shopping Area



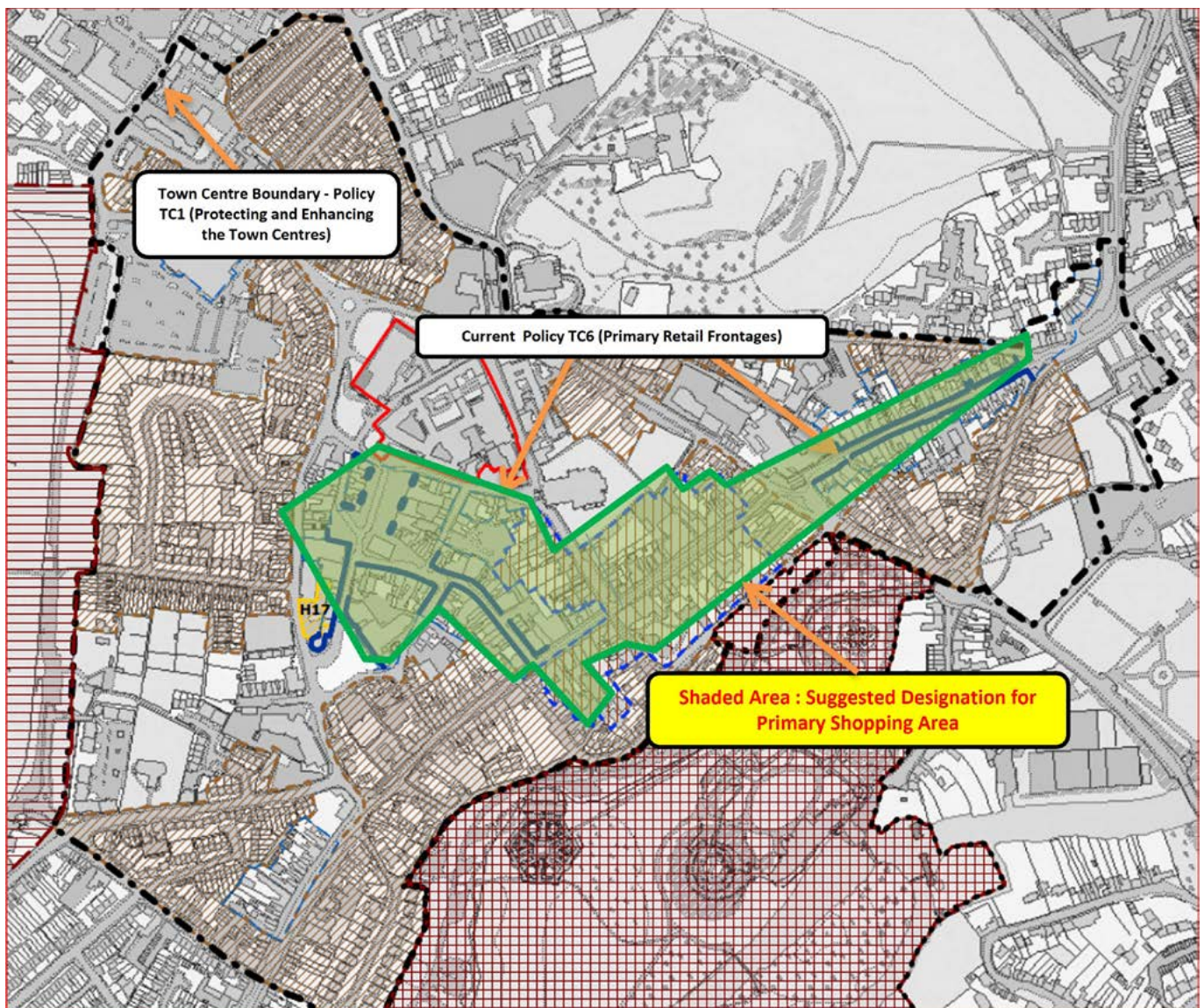
The suggested area for PSA, to reflect the where the retail provision is concentrated, will include the following locations :

- The Parade
- Warwick Street
- Regent Street
- Livery Street

Warwick

There are no proposed changes to the existing town centre boundary for Warwick contained in the Warwick District Local Plan. In relation to the PSA, there is considered to be a need to consolidate the areas of retail with a contiguous boundary as shown below:

Figure 13: Warwick Primary Shopping Area



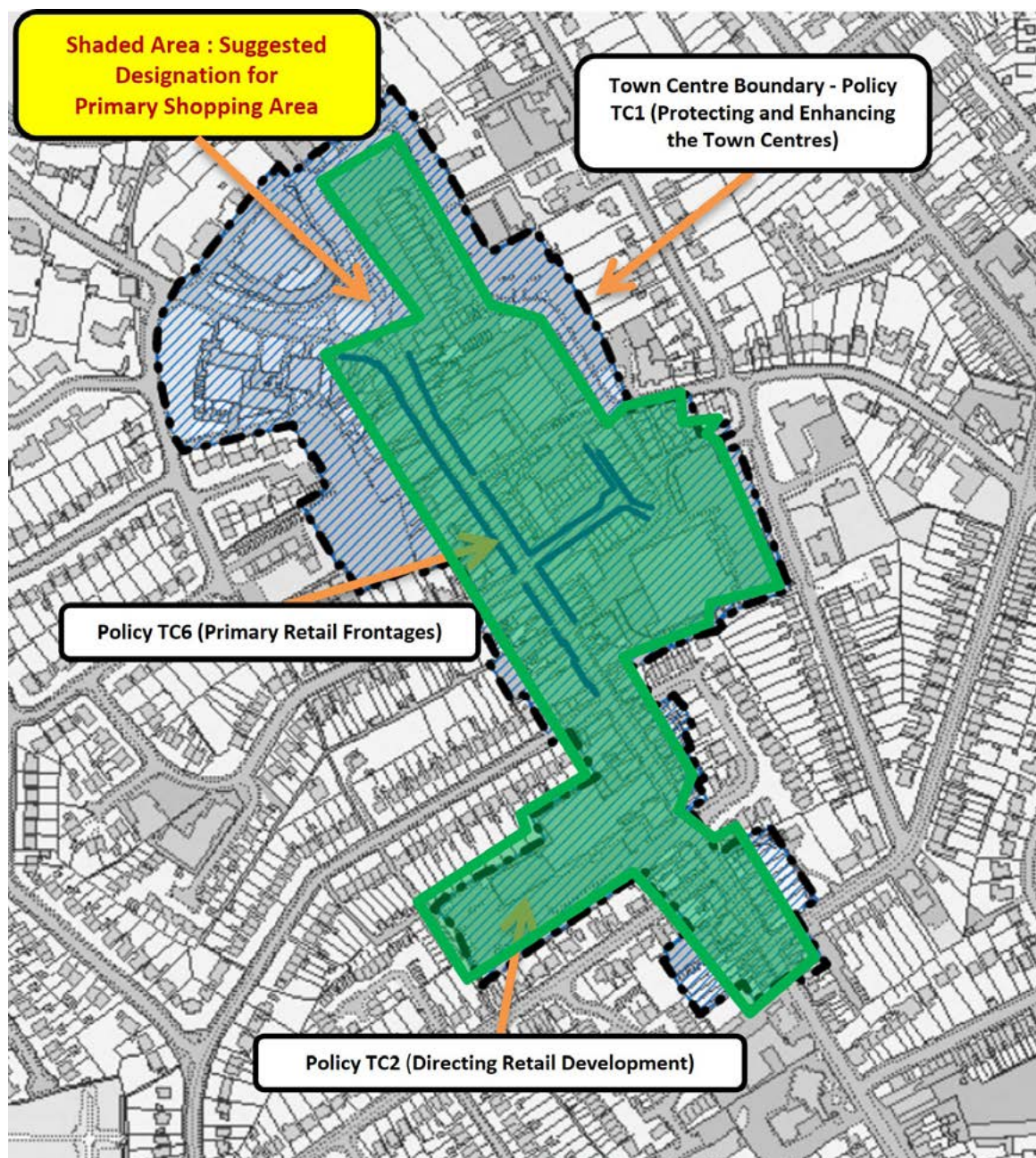
Suggested area for PSA, to reflect the where the retail provision is concentrated, will include the following locations:

- Swan Street
- Market Place
- Market Street
- Northgate Street
- Barrack Street
- Smith Street / Coten End

Kenilworth

No proposed change to the town centre boundary. In relation to the PSA there is a need to define it around the retail core of Warwick Road as shown below:

Figure 14: Kenilworth Primary Shopping Area



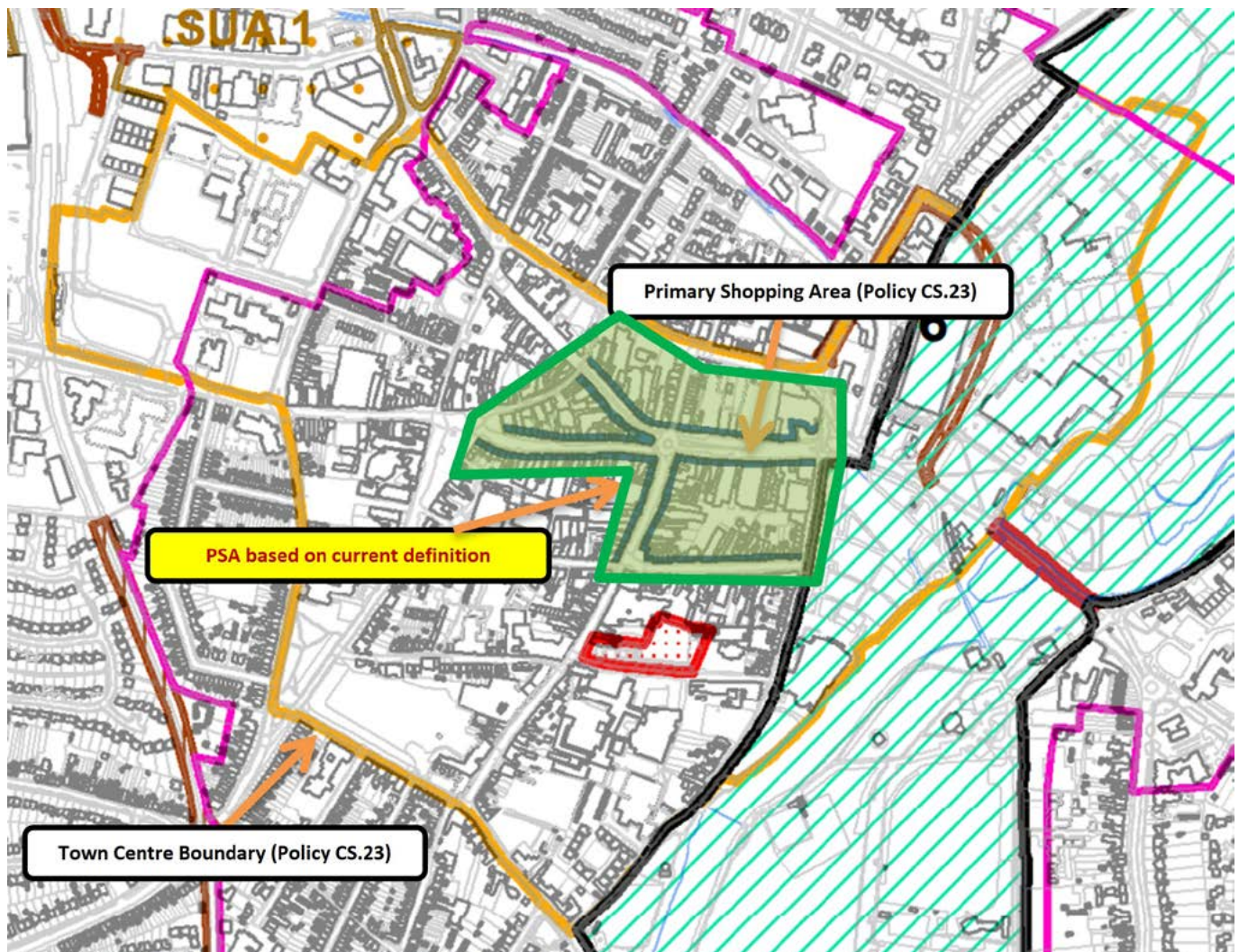
The suggested area for the PSA, to reflect the where the retail provision is concentrated in the following locations is as follows:

- Abbey End
- Warwick Road – Clock Tower Roundabout to south of the junction with Waverley Road
- Talismann Square / Waitrose

Stratford-upon-Avon

No change is proposed to the town centre boundary or PSA as currently proposed in the adopted Stratford-on-Avon Core Strategy, as shown below:

Figure 15: Stratford-upon-Avon Primary Shopping Area



The PSA, to reflect the where the retail provision is concentrated, will include the following locations:

- Wood Street
- Henley Street
- High Street
- Sheep Street
- Union Street
- Guild Street

Local Centres

The existing town centre boundaries for the Main Rural Centres (which are proposed to be renamed 'Local Centres' for consistency with NPPF), as designated in the adopted Stratford-on-Avon District Core Strategy, are considered to be adequate across all the centres as they reflect the broad urban form of the centres.

We will investigate the potential for defining PSAs in the Main Rural Centres for the Regulation 19 Local Plan consultation.

- 3) Direct Main Town Centre Developments.** This policy will support the Government's 'town centres first' approach setting out the required Sequential approach for the consideration of new main town centre development proposals. It will also explain the instances where a sequential test and an impact assessment will be required in support of a proposal that is to be located out-of-centre. This Policy will also specify a locally - set threshold requirement for impact assessments.

Based on the findings of the Retail and Town Centre Uses Study (2022), it is proposed that the Retail Impact Threshold for assessing the impacts of any proposed retail/leisure developments outside of defined centres is set at 280sqm.

- 4) Providing for Growth.** This policy will consider the potential for future allocative requirements regarding retail, leisure, office and any other main town centre uses. This will require a re- assessment of any current allocated sites that have not been developed.

Justification

NPPF

Chapter 7 of the NPPF (Ensuring the vitality of town centres) states that planning policies should support the role that town centres play at the heart of local communities. The NPPF requires Local Plans to address the following key issues: -

- (1) Define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters
- (2) Define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.
- (3) Allocate a suitable range of sites in town centres to meet the scale and type of development likely to be needed looking at least ten years ahead. Town centre boundaries should be kept under review where necessary
- (4) Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified policies should explain how identified needs can be met in other accessible locations that are well connected to the main town centre
- (5) Recognise that residential development often plays an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.

The NPPF also requires Local Planning authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to- date plan. Main town centre uses should be located in town centres, then in edge of centre locations: and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold (if there is no locally set threshold, the default threshold is 2500 sq.m of gross floorspace).

The Retail and Town Centres Uses Study (2022)

This study provided a robust series of recommendations to help the plan making process against the background of the pandemic and worsening macroeconomic position.

The headline **retail** capacity forecasts showed no immediate capacity for comparison goods to 2035 with limited capacity emerging thereafter from 2040. No convenience goods capacity is forecast across South Warwickshire over the period to 2035. In the case of both convenience and comparison goods there is no requirement to allocate any new sites for retail provision in the period to 2035. This is due to the convenience floorspace proposed as part of the Councils existing housing allocations together with the fact that some convenience capacity could also be met by the reoccupation of currently vacant units and within smaller new development or redevelopment proposals.

An assessment of the potential for new commercial leisure needs was also undertaken. The findings of the market research surveys, and health check assessments confirmed the importance of leisure uses and venues to the overall mix and attraction of centres within south Warwickshire. As a part of their future adaptation and growth, it is important that the SWLP policy approach maintains and promotes a diverse and flexible range of leisure uses in their main centres.

In the context of the issues and challenges identified in the Retail Study, retail will remain a key part of town centres overall offer, vitality and viability – helping to generate trips, footfall and spend – it is critical that policies and strategies developed for each centre help to promote greater flexibility and diversity, so that they can respond more effectively and rapidly to future trends.

The Town Centres study also emphasised the potential for new residential development in and on the edge of main town centres which may help to maintain vitality and viability. This would help generate trips, footfall and spend for the benefit of existing shops and businesses as well as supporting any new provision.

[The South Warwickshire Employment Land Study \(2024\)](#) considered that the market signals indicate that a significant proportion of market demand is driven by the need for high quality office space within Leamington Spa and Warwick town centres. The Study found that there is currently a lack of high-quality space in the town centres to support the needs of the digital and creative sector. It is therefore important that Local Plan policy protects and encourages the refurbishment of existing office stock within Leamington Spa town centre to provide this space.

The South Warwickshire Employment Sites Study suggests a number of potential sites that could be allocated for office use, however additional work needs to be completed before we make any decisions on allocating specific sites for office development in the SWLP. It is expected that the Reg. 19 (publication) version of the SWLP will include proposed office allocations.

South Warwickshire Economic Strategy 2023 (SWES)

The following SWES objectives are relevant:

Objective 7.1

To facilitate the delivery of the World Shakespeare Centre in Stratford-upon-Avon; support & facilitate the delivery of key public realm/highway schemes to help improve the place and economic wellbeing of town centres e.g. Bridge Street / High Street (SuA), Parade (Leamington Spa), Bath Street

Objective 7.5

Deliver Leamington's Future High Street Fund and wider transformation projects to strengthen the 'Silicon Spa' cluster as the national centre for digital creative industries. To work in partnership Transforming Leamington Board to progress projects to address town centre issues in Leamington Spa

6.11 Arts and Culture

The sensitive expansion of South Warwickshire's arts and cultural sector, and associated heritage and tourism assets, will contribute to social inclusion, health and wellbeing and improvements in quality of life for all sectors of the local population. Culture is recognised by national government as making a significant contribution to 'place making' and delivering sustainable communities.

The protection, promotion and expansion of existing cultural facilities, visitor attractions and associated activities will ensure their role as key economic drivers stimulating and regenerating the local economy is supported and will be enhanced as often as possible.

What was said in the I&O

References to arts and culture was primarily in relation to existing heritage assets and associated with economic development, specifically tourism. Responses recommended capitalising on South Warwickshire's heritage assets to ensure a thriving destination for tourism/culture.

Draft Policy Direction 21 - Arts and Culture

Cultural, tourist and leisure facilities within South Warwickshire will, wherever possible, be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders.

In cases where new development could potentially prejudice the successful ongoing operation of an adjacent cultural / performance venue, the agents of change principle will be applied.

Proposals for new development or uses that contribute to the attractiveness of South Warwickshire as a visitor destination (including for business tourism) will be supported in principle, subject to national guidance and the policy requirements set out elsewhere in this Plan.

Development that would lead to the loss of an existing cultural / tourism facility in South Warwickshire will be resisted unless:

- the intention is to replace it with a facility that will provide an improved cultural or tourist offer;

- it can be demonstrated that there would be significant benefits to the local and wider community in removing the use and / or redeveloping the site; or

- An appropriate contribution is made to support and sustain an alternative local cultural, tourist or leisure facility.

Justification

South Warwickshire has a rich cultural heritage, which includes a wide range of organisations and venues, which not only are important to make South Warwickshire a great place to live, work and visit, but also contribute directly to the economy of the area.

The South Warwickshire Economic Strategy 2023-2028 includes an objective "... to increase the vitality of our high streets and town centres and promote the economic value of our artistic and cultural assets. The visitor economy - including hospitality, retail, leisure, cultural heritage and the arts – is identified as a 'core opportunity sector'.

Stratford District Council's 2030 vision includes to "... be well-known internationally for the culture, heritage and countryside across the District, and for the quality of its visitor experience, as well as for being Shakespeare's birthplace." Warwick District Council's Corporate Strategy 2030 includes creating vibrant communities, with actions relating to creative communities, arts, heritage and sports.

Further guidance will draw from relevant arts and culture strategies, such as Warwickshire County Council's Heritage and Culture Strategy 2020-2025, as well as advice notes produced by Historic England, and the guidance offered within the NPPF.

The 'agent of change' principle is set out in the NPPF and is necessary, to require changes in use of land to manage the impact of that change, to protect the ongoing operation of existing arts and cultural venues.

6.12 Tourism

We are proposing to address tourism within Part 2 of the SWLP, and therefore there is no Policy Direction at this stage. Whilst tourism is an important issue that the Local plan will need to address, it is not felt that tourism plays a spatially strategic role and should therefore be addressed in part 2 of the South Warwickshire Local Plan. In the meantime, the existing tourism policies of the SDC and WDC Development Plans will continue to hold full weight.

7. A Climate Resilient and Net Zero Carbon South Warwickshire

The Government's target is to reach net zero by 2050, and its 2021 Net Zero strategy highlights the importance of the planning system in combatting climate change and supporting sustainable growth.

The Local Plan has a legal duty and decisive role in tackling climate change across South Warwickshire through helping to shape places that reduce carbon emissions and adapt to the expected changes that climate change will bring thereby improving resilience.

Both Councils declared a climate emergency in 2019 and have subsequently produced a [Climate Change Action Programme](#) which sets out the actions we must take to deliver on our climate change ambitions including from the business, housing and transport sectors. The Local Plan is one of the ways we can facilitate the delivery of the identified actions.

7.1 Large-Scale Renewable Energy Generation and Storage

A key element in achieving net zero is moving away from fossil fuels in electricity generation. While national schemes are likely to provide the bulk of our electricity, Local Authorities also have a role to play in enabling renewable energy generation schemes to go ahead and ensuring that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

In order to increase the use and supply of renewable and low carbon energy and heat, national policy requires plans to provide a positive approach that maximises the potential for suitable development whilst ensuring that adverse impacts are satisfactorily addressed. This may include renewable, such as solar, wind, hydrogen, biomass, geothermal, hydro and low carbon energy sources and supporting associated infrastructure such as storage. Where feasible, dual uses can maximise the benefits from a site, for example incorporating both a solar farm and land cultivation/biodiversity opportunities.

What was said in the I&O

The Issues and Options recognised that different areas of South Warwickshire may be more suited to solar and wind generation than others and that allocating suitable land would set the groundwork for future renewable energy proposals.

The most popular option supported the identification and allocation of land suitable for supporting renewable energy schemes, or at least having a policy supporting these schemes in principle. Overall environmental benefits were recognised as well as the potential for the local community benefit of reduced electricity costs.

Concerns centred around the potential loss of open countryside to solar and wind farm developments, impact on the landscape and degradation of existing views, and potential loss of habitat and wildlife. Responses sought consultation on the methodology for identifying suitable areas for renewable facilities and outlined where possible, solar and wind farms should be kept in dual agricultural use and returned to agricultural use if the renewable energy use is ended.

Noise and potential loss of local amenity were cited as common concerns, and to a lesser extent potential for negative health impacts. Respondents suggested that mandating solar panels on existing buildings would negate the need for large scale renewable energy developments.

Draft Policy D: Large Scale Renewable Energy Generation and Storage

General

Proposals for renewable energy generation and storage will be supported in the context of sustainable development and climate change, where they:

- a) Balance the wider environmental, social and economic benefits of renewable electricity, heat and/or fuel production and distribution.
- b) Will not result in significant adverse impacts on the local environment, including landscape character; species and habitats; amenity; agricultural land use and local heritage, that cannot be satisfactorily mitigated. This includes impacts such as noise, shadow flicker, vibration, visual impacts such as glint or glare.
- c) Provide for a community benefit in terms of either profit sharing or proportion of community ownership or deliver local social and community benefits.
- d) Include appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to its original use or an acceptable alternative use.

In cases where the land around a renewable energy facility is not used for agriculture, this land should be used to protect local habitats, enhance biodiversity, deliver carbon sequestration benefits, and protect local ecosystems.

In addition to the general policy criteria identified above, additional criteria for solar energy, wind energy and storage schemes are set out below.

Solar energy

Ground mounted solar energy proposals will be supported in principle on:

- a) Previously developed land,
- b) Lower-quality agricultural land (Grades 3b, 4 and 5) that also has low carbon sequestration potential and low biodiversity value;
- c) Higher agricultural land (Grades 1, 2, and 3a) if the scale of the development does not restrict the agricultural use of the land.

Wind energy

Wind energy development proposals will be supported in principle where they:

- e) Are located on:
 - e) Previously developed land,
 - e) Lower-quality agricultural land (Grades 3b, 4 and 5) that also has low carbon sequestration potential and low biodiversity value; OR
 - e) Higher agricultural land (Grades 1, 2, and 3a) if the scale of the development does not restrict the agricultural use of the land.

AND

- f) Demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal.

Wind energy developments must minimise and/or mitigate amenity and environmental impacts, including to:

- g) Avoid or adequately mitigate shadow flicker, noise and adverse impact on air traffic operations, radar and air navigational installations; and
- h) Ensure flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites, are not adversely affected.
- i) Ensure safety in relation to the distance to power lines and buildings, the impact on air traffic, Ministry of Defence operations, weather radar and the strategic road network.

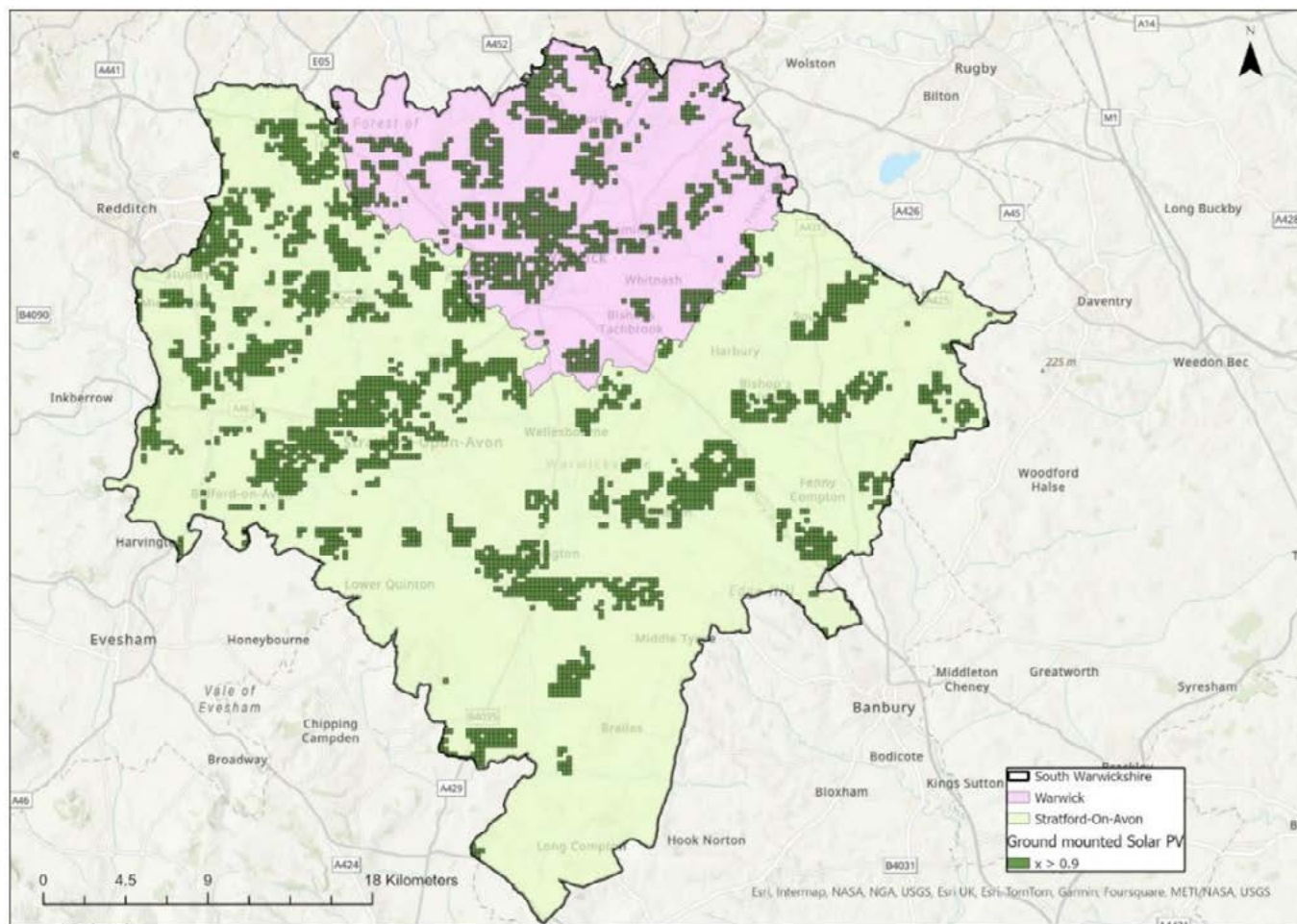
In each case, the Council will also expect the applicant to demonstrate that any cumulative visual and landscape impacts have been considered.

Energy Storage

There is a presumption in favour of energy storage where it meets one or more of the following:

- j) It is co-located with an existing or proposed renewable energy development;
- k) It can be shown that it alleviates grid constraints or contributes to meeting renewable energy supply; and
- l) It allows further renewable developments to be deployed.

Figure 16: Ground mounted solar PV combined score for the SWLP area (including consideration of baseline habitat)



Source: Figure 10 of SWLP Evidence: [Climate Change – Renewables and Decentralised Energy Opportunities](#), May 2024, prepared by Arup

Where development other than solar farm development is proposed on sites identified on Figure 16 as land suitable for Ground Mounted Solar PV (score >0.9), development in those areas will be expected to install solar PV, this could be either rooftop or ground mounted.

Justification

The latest government guidance and NPPF 2024 consultation proposes includes greater support for clean energy and the environment, including through support for onshore wind and renewables. Boosting the delivery of renewable energy is also vital to meet the Government’s commitment to reaching zero carbon electricity generation by 2030. Onshore wind and solar are cheap, efficient and quick to build technologies that are an important part of the energy mix.

The policy highlights strong support for renewable energy generation and storage in suitable locations where local amenity, environmental and landscapes are not compromised. The policy provides flexibility in the type of local community benefit to be harnessed from schemes. Further, in recognising the need to ensure suitable land for renewable energy, the policy provides a level of safeguard of suitable land.

The methodology for identifying the general suitability of sites for ground-mounted solar PV uses the technical evidence base (South Warwickshire Local Plan: [Climate Change Evidence – Renewables and Decentralised Energy Opportunities](#), May 2024, produced by Arup), and includes the following filters set out in table 7 below.

Table 7: Filters used to identify sites for ground-mounted solar PV

Fixed Constraints	Variable Constraints	Multi Criteria Assessment
Ramsar	Green spaces (e.g. parks, gardens, cemeteries...)	Solar PV output
Special Protected Areas	Urban / Built up areas	Slope
Special Areas of Conservation	All Inland Waters / Flood Zones	Aspect
Sites of Special Scientific Interest	All Woodland	Road
National Landscapes (formerly AONB)		Agricultural Capacity (exclude class Grade 1-2)
National Park		All Woodland
National Nature Reserves		All Inland Waters
Local Nature Reserves		
Ancient & Priority Habitats		
Woodland		
World Heritage Sites		

Noting the larger scale impacts of wind farms, the policy includes requirements to have fully consulted and responded to the local community views on such proposals.

In line with the latest government guidance in support of allocating sites for renewable energy to encourage its delivery, further technical work will be undertaken to establish the area’s overall energy requirements and the specific sites for allocation for solar and wind energy.

7.2 Protecting Large Scale Existing Renewable Energy Infrastructure

In addition to supporting the development of new renewable and low carbon energy schemes and installations, it is also important to protect existing large-scale schemes and installations, to ensure that their benefits to the environment and users (e.g., reduced heating bills) continue.

What was said in the I&O

The consultation highlighted general support for renewable energy infrastructure as part of climate change resilience.

Draft Policy E - Protecting Large Scale Existing Renewable Energy Infrastructure

All types of development should not harm:

- a) the technical performance of any existing or approved renewable energy generation facility;
- b) the potential for optimisation of strategic renewable energy installations; or
- c) the availability of the resource, where the operation is dependent on uninterrupted flow of energy to the installation.

Applications will be required to submit evidence to demonstrate that development does not negatively impact on the operations of the renewable energy facility.

Justification

Safeguarding renewable energy schemes, which are now specifically encouraged in local planning policy, is required to ensure the development does not adversely impact their operation.

7.3 Decentralised Energy Systems

Decentralised energy systems supply heat and/or power to specific residential and commercial developments or localities. This may be by capture of waste heat from other processes or generated on site. Decentralised energy systems can be the most efficient way to provide energy, heating and cooling to dwellings where a development is of sufficient size, use mix and density to make such a scheme viable. This may be in the form of District Heating (heat only), Combined Heat and Power, or Micro-grid (power only). These systems can be provided in different ways including through community energy schemes.

Decentralised energy generation with local storage and use will increase the energy resilience of the communities and it will enable cost optimisation based on the grid electricity prices, demand and available supply.

Promoting district heating forms an important part of central government's decarbonisation strategy. Current local plans for Warwick and Stratford districts contain policies (CC.3 and CS.3 respectively) that encourage district heat networks and for developments within to connect to the infrastructure. At present there are no active district heat networks in South Warwickshire.

What was said in the I&O

The Issues and Options noted decentralised energy systems can be the most efficient way to provide energy, heating and cooling to dwellings where a development is of sufficient size, use mix and density to make such a scheme viable.

Most responses sought decentralised energy systems to be utilised for developments over a relevant size threshold, where viable.

Draft Policy F - Decentralised Energy Systems

Council will strongly encourage the use and development of decentralised energy systems, which incorporate either heating (District Heating) or heating, power and cooling (Combined Heat and Power) or power (Micro-grid) into new developments.

Major development in South Warwickshire will be required to demonstrate a thermal masterplanning approach to maximise energy efficiency opportunities for the use of decentralised energy systems. New decentralised energy networks are to be futureproofed for future expansion opportunities.

Council will expect schemes to demonstrate proposed heating and cooling systems have been selected in line with the following order of preference:

- a) Connection with existing heating/cooling distribution networks
- b) Site wide heating/cooling fed by renewables
- c) Communal heating/cooling fuelled by renewable energy sources
- d) Gas fired heating/cooling

The development of decentralised energy systems and associated infrastructure should be approved unless it results in significant adverse impacts on the environment or does not present an affordable option to occupants.

New development will be expected to connect to existing systems where and when this is available, unless it is demonstrated that this would render development unviable.

New development of one or more dwellings (C3 or C4 use class) and/or 1,000sqm or more of new non-domestic floorspace – Gross Internal Area (GIA) including non-residential floorspace, hotels (C1 use class) or residential institutions (C2 use class) will require a detailed energy statement demonstrating how the building performance standards will be met using the energy hierarchy in the design, construction, and operation phases. This should include consideration for rooftop PV generation, local electricity storage, low carbon heating such as heat pumps, and the possibility for low carbon communal heat networks.

Justification

The policy reiterates Councils strong support for decentralised energy systems and particularly for those which align with renewable energy sources. New developments will be expected to provide or facilitate a decentralised energy system, unless demonstrated as not viable or feasible. New development will be required to connect to existing or safeguard connections to proposed decentralised energy systems.

In line with the technical evidence recommendations, and in line Warwick District's [Net Zero Carbon DPD](#) criteria, to ensure energy efficiency is maximised with developments - detailed energy statements will be required, to include potential for connection to decentralised energy systems.

7.4 Net Zero Carbon Buildings

There is a legal duty under section 19 (1A) of the Planning and Compulsory Purchase Act 2004 to ensure that climate change mitigation and adaptation is a core objective of a local authorities' planning policy. Section 182 of the Planning Act 2008 puts a legal duty on local authorities to include policies on climate change mitigation and adaptation in Development Plan Documents.

To provide clarity it is first necessary to establish clear definitions for what zero carbon means in the context of new development. We will follow the framework definition by UK Green Building Council (UKGBC) for net zero carbon buildings. The framework sets out two definitions for net zero carbon buildings – net zero carbon- construction and net zero carbon -operational.

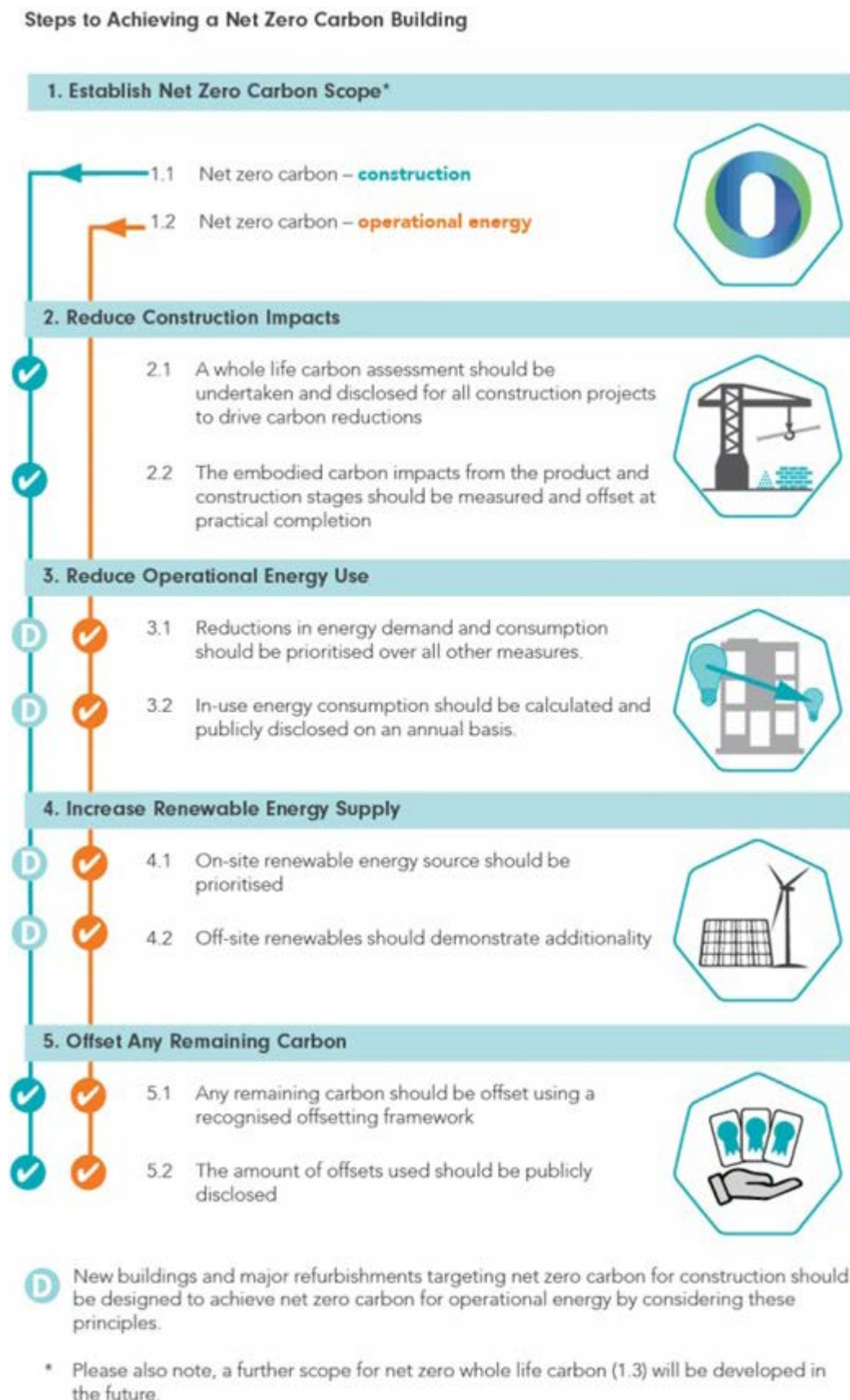
Net zero carbon – construction is when the amount of carbon emissions associated with a building's product and construction stages up to practical completion is zero or negative, through the use of offsets or the net export of on-site renewable energy.

A building is recognized as being net zero carbon - operational when the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset².

²[UKGBC Net Zero Carbon Buildings: A framework Definition-Net-Zero-Carbon-Buildings-A-framework-definition-print-version.pdf \(ukgbc.s3.eu-west-2.amazonaws.com\)](https://www.ukgbc.org.uk/net-zero-carbon-buildings-a-framework-definition-print-version.pdf)

Figure 17: Steps to Achieving a Net Zero Carbon Building

Source: Net Zero Carbon Buildings Framework | UKGBC



The Future Homes Standard (FHS) and Future Buildings Standards (FBS), expected to be introduced in 2025, will require all new homes to produce 75-80% less carbon dioxide emissions than homes delivered to current Building Regulations standards, with low carbon heating and very high fabric standards. All new homes will be 'zero-carbon ready', requiring no further energy efficiency retrofit work to enable the homes to become net zero-carbon ready, as the electricity grid decarbonises.

The Future Buildings Standard builds on this by setting out energy and ventilation standards for non-domestic buildings, providing a pathway to net zero carbon ready non-domestic buildings.

Warwick District's adopted [Net Zero Carbon DPD](#) has brought forward the FHS/FBS by incorporating these standards in the DPD. However, it is the intention of SWLP to include policies and targets that will help achieve net zero in the buildings. The Plan will explore and include policies that will exceed FHS and FBS if the evidence suggests that it is feasible and viable to do so. We will be undertaking a viability assessment for the next iteration of the Plan which is Regulation 19.

What was said in the I&O

A question was asked whether the Plan should not have a specific policy on net zero buildings and the developments should comply with national building regulations, plan should set higher target going beyond building regulation standards or have a phased approach to net zero buildings, setting a future date for developments to achieve net zero. In the interim the developments should comply with building regulation standards.

Approximately 48% of the respondents were in favour of setting standards higher than building standards. It is also interesting to note that there was a noticeable division between the type of respondents. Individuals were more choose the higher standard whereas the landowners and developers were in favour of complying with building regulations. The issue of viability was raised in relation to setting higher standards.

It was also interesting to note that 83% respondents were in favour of the higher standards to be applied to all new developments.

Draft Policy Direction 22 - Net Zero Carbon Buildings

The policy direction applies to both residential and non-residential buildings and for ease the policy requirements have been split between residential and non-residential as there are slightly different requirements for both uses. Part A of the policy sets out the requirements for residential buildings and part B set out the criteria for non-residential buildings.

Part A-Residential Buildings

All new buildings must be designed and built to be Net Zero Carbon in operation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match annual energy use. New development of one or more new dwellings (C3 or C4 use class) should achieve net zero operational regulated carbon emissions by complying with criteria 1 to 8 as set out below:

Criterion 1: Carbon reductions

Proposals should demonstrate application of the energy hierarchy through submission of an energy statement which identifies:

- i. For new dwellings, a minimum 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2).

Alternatively, applications may demonstrate the requirements of Criterion 1 are met through the Passivhaus standard with accompanying Passive House Planning Package (PHPP) calculations submitted within the energy statement (without the use of fossil fuels on site including gas). A condition will be applied requiring Passivhaus certification prior to occupation.

Criterion 2: Fossil fuel-free new development

- a. It is expected that all new developments will use a heat pump as primary heating system instead of a gas boiler. Buildings with flats that cannot have individual heat pumps should consider opportunities for building and/or community size systems (heat pumps or hybrid as necessary).
- b. In areas with low-carbon district heating networks, all new developments should consider connection to existing heating networks as priority.

Criterion 3: Dwelling airtightness and ventilation

- a. The airtightness level in FHS notional dwelling is much lower than LETI Guidance and PassivHaus specifications. It is expected that new developments will achieve higher airtightness than the FHS notional building where possible.
- b. Mechanical ventilation with heat-recovery systems should be considered as the main ventilation strategy or in combination with natural ventilation as part of mixed mode ventilation strategy. Additional indoor control systems should be considered if they deliver additional value for the additional capital costs.

Criterion 4: Renewable electricity generation and storage.

Rooftop PV generation should be maximised in new developments. Rooftop PV capacity on average of 3kWp – 4 kWp per home should be considered in the initial stages of design. Housing density, roof orientation and roof pitch should be optimised for PV generation wherever possible.

Excess generation should be used locally if possible. This could be achieved with battery storage, as part of a hot water strategy, EV charging and/or by mixed use and connection with local non-residential facilities.

Criterion 5: Compact building form with low form factors

Compact Building design simply means using the least amount of land for development and supporting infrastructure that is reasonable under the circumstances. It is recommended that the range to be the following:

- Building form – compactness: Surface area to volume (A/V) ratios $\leq 0.7\text{m}^2/\text{m}^3$
- Indicative Form factor (impacts heat loss, external surface area / heated floor area) ≤ 3

Criterion 6: Consideration of site density, layout, and coverage

All major developments should ensure that new developments are designed in a way to adapt to climate change in terms of site orientation, shading etc.

Criterion 7: Cool and Green roofs – runoff flooding risks and overheating

Developments should consider properly designed and constructed green roofs as they have multiple benefits including reducing the surface run off whilst having a positive impact on biodiversity. Roofs can use reflective materials to prevent overheating. Consideration should also be given to include green walls as they help in reducing overheating in the buildings.

Criterion 8: LED lighting with indoor controls

Low-energy LED lighting throughout all non-domestic buildings. Developments should also include occupancy control measures along with dimming features to reduce energy use.

Part B - Non-Residential Buildings

All non-residential buildings of 1,000sqm floorspace, hotels (C1 use class), or residential institutions (C2 use class) should achieve net zero operational regulated carbon emissions by complying with criteria 1- 9 below:

Criterion 1: Carbon Reductions

Non-residential developments, hotels and residential institutions should achieve at least a 35% reduction in carbon emissions through on-site measures compared to the rate set by Building Regulations 2013 (or equivalent percentage reduction on Building Regulations 2021) Alternatively, the Local Plan specifies Passivhaus certified development without fossil fuel use on site for the operation of buildings.

Best practice benchmarks:

LETI Guidance (Small offices)

EUI = 55 kWh/m².yr (excluding renewable energy contribution) | Space Heating demand : 15 kWh/m².yr

RIBA Good Practice (2021)/ Reference

EUI < 90 kWh/m².yr (including renewable energy contribution) and/or DEC C (65) and/or NABERS Base build 5

RIBA 2030 Challenge

EUI < 55 kWh/m².yr (including renewable energy contribution) and/or DEC B (40) and/or NABERS build 6

Criterion 2: High performance mechanical ventilation

Installation of high-performance mechanical ventilation with CO2 sensors and heat recovery where feasible. Consideration of variable air volume heating, ventilating and air conditioning (VAV HVAC) system and/or reversible heat pumps where feasible.

Criterion 3: Sourcing 100% renewable electricity by 2030

All new non-residential developments should consider sourcing 100% renewable electricity by 2030 with reasonable on-site renewable electricity generation being a priority.

Criterion 4: LED lighting with indoor controls

Low-energy LED lighting throughout all non-domestic buildings. Developments should also include occupancy control measures along with dimming features to reduce energy use.

Criterion 5: Building orientation and site layout to maximise on site renewable electricity generation

The orientation of the building roofs and the building design should aim to maximise roof surface areas suitable for PV generation. At the same time, window orientation and shading should be in the context of the local microclimate to reduce summer solar gains, maximise use of daylight and allow natural ventilation as part of a mixed mode ventilation strategy where possible.

Criterion 6: Sustainability performance certifications

All non-residential developments over 1000 sq. m are required to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent), or a suitable alternative sustainability strategy is proposed and agreed with the Council. If the applicant has used certification other than BREEAM it will need to be assessed by independent assessors and the applicant will be expected to pay for that assessment.

Criterion 7: Cycle storage, connection to cycling routes and changing facilities

Non-residential buildings should facilitate sustainable and active travelling by safe connections to local cycling routes, provision of cycle storage, shower and changing facilities.

It should be noted that where full compliance is not feasible or viable the applicant needs to submit robust evidence along with the energy statement setting out clearly the reasons for non-compliance.

Net Zero Buildings Policies - Next Steps

It is noted that leaving the delivery of net zero carbon to Building Regulations and Future Homes Standards will undermine the statutory duty set out in the Climate Change Act and Planning Act. Both Councils will not be able to be net zero by 2030 and will fail to meet their commitment agreed under the climate emergency declarations by both councils. This approach would also not deliver net zero carbon in line with the Paris Agreement 1.5oC trajectory. Building Regulations only consider regulated energy use. To achieve net zero both regulated and unregulated energy consumption will need to be met through renewable sources of energy.

The Future Homes Standard only requires new homes to be 'zero carbon ready', leaving further carbon reduction to achieve net zero carbon to homeowners, further adding to the retrofit burden. According to the UK Green Building Council, there are 29 million homes in the UK that will need to be retrofitted before 2050, and at least 15 million need to be retrofitted before the end of this decade. In addition, the issue of embodied carbon is not, at present, considered by any other regulatory framework, and there does not appear to be any plans for it to be considered through building regulations. This leaves a significant policy gap in the delivery of net zero carbon by 2050.

Further work has been commissioned to evaluate what net zero development will look like in SWLP and will mean in terms of deliverability. The findings of the study will be considered, and the Councils will strengthen the climate change policies in light of the new evidence.

Justification

The Climate Change Act 2008 places the United Kingdom under a statutory obligation to achieve at least 100% lower emissions levels than the 1990 baseline by 2050. The duties set out in the act require the government to set carbon budgets every five years and report on their progress and the impact of climate change. Achieving net zero requires action across all sectors including the built environment. If we do not plan to build net zero buildings now there is a risk that it will lead to expensive retrofitting costs in the future and developments will not be able to make full use of efficiencies in design at the outset.

The NPPF 2024 recognises the important role of the planning system in the transition to net zero by 2050, for a sustainable future and in fulfilling the duties set out under the Climate Change Act 2008. The planning system should help to: *'Shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure.'* (Para 161 of the NPPF 2024).

It notes further that local plans should take a: *'Proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure.'* (Para 162 of the NPPF-2024). Planning and Energy Act 2008: Section 182 of the Planning Act (2008) places a legal duty on local planning authorities to ensure that their development plan documents include policy to secure the contribution of development and the use of land in the mitigation of climate change. Provisions in the Planning and Energy Act also enable local planning authorities to set requirements for carbon reduction and renewable energy provision.

Both Councils have commissioned further work to provide up to date policy recommendations for Net Zero and Retrofit policies, which will further refine the policy recommendations for the Plan.

In 2015 the government announced an intention to amend the Planning and Energy Act 2008 through the Deregulation Act 2015. Provisions in the Deregulation Act would have removed the ability for local authorities to set standards that go beyond building regulations. A written ministerial statement was also issued that stated that local plan policies should not exceed the standards found in Level 4 of the Code for Sustainable Homes.

The Government further issued another ministerial in December 2023. The fourth paragraph of the WMS commences with the following statement: In 2015, in reference to an uncommenced provision in the Deregulation Act 2015 which amended the Planning and Energy Act 2008, a written ministerial statement (WMS) (HC Deb, 25 March 2015, vol 584, cols 131-138WS) stated that until that amendment was commenced, local plan policies exceeding minimum energy efficiency standards should not go beyond level 4 of the Code for Sustainable Homes...

This statement reiterates the position that amendments to the Planning and Energy Act 2008 were uncommenced. The Planning and Energy Act 2008 continues to permit local authorities to include policies imposing reasonable standards of energy efficiency that are above those set down in Building Regulations.

The fourth paragraph of the WMS continues to state that: *A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise.* This statement confirms that there are going to be further changes to energy efficiency in building regulations for 2025 which relate to Future Homes Standard (FHS).

Paragraph 5 of the WMS states: *The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations...* In considering this statement it is noted that the Government does not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.

However, Paragraph 5 of the WMS also states: *Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF.*
- *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*

It is clear from the above statement that the WMS does not inhibit local authorities in setting targets higher than the national targets if they are justified by robust evidence in terms of deliverability and do not have negative financial constraints on developments.

7.5 Reducing Energy Consumption in Existing Buildings

This policy needs to enable the retrofit of buildings in regard to extensions and alternations of buildings including historic buildings and change of use in determining planning applications. Whilst there are constraints on the ability to retrofit historic buildings and buildings in conservation areas, Local Authorities have introduced policy that add weighting to do this. The policy aims to assist in improving the energy efficiency of existing buildings, complementing the wider policies of this Local Plan which are primarily aimed at new buildings.

What was said in the I&O

The consultation identified the desire to have a specific policy on the retrofit of solar panels and heat pumps in addition to supporting the retrofit of traditional buildings in historic areas.

This was supported in the question regarding net zero planning applications, where over 50% of respondents wanted to 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.

Furthermore, another question was asked for net zero for planning applications. The options were whether the conversions, change of use and householder applications should be "**required**" or "**encouraged**". More than 50% of respondents were in favour of encouraging the change of use and other developments to be net zero.

Draft Policy Direction 23 - Reducing Energy Consumption in Existing Buildings

For all development proposals that involve the change of use or redevelopment of a building, or an extension to an existing building, proposals are expected where possible to improve the energy efficiency of that building (including the original building, if it is being extended) through a submitted Energy Assessment and Plan.

Proposals relating to an existing building that demonstrate that they will result in significant improvements to that building's operational energy efficiency and/or operational carbon emissions through on-site measures, will be supported.

The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be expected, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.

Retrofit schemes should align with key industry standard guidance (currently this includes LETI's Climate Emergency Retrofit Guide and the EnerPHit Passivhaus standard). Taken together, these guidance documents highlight that best practice retrofit should:

- Reduce energy consumption and space heating demand
- Prioritise occupant and building health, by establishing good indoor comfort levels and good indoor air quality through a fabric-first approach and systems-level ventilation
- Take a 'whole building' or 'deep retrofit' approach, by selecting retrofit interventions that are tailored to the property type (i.e. accounting for factors such as historical designation status, form factor⁴⁷ and construction)
- Consider the impact on embodied carbon, by maximising the re-use of existing building fabric and sourcing materials using a circular economy approach.

Justification

The NPPF advises that significant weight is attributed to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic. This includes reference to the need to consider the impact on heritage assets in line with national policy.

In early 2024, the Government published a review of the barriers to adapting homes for energy efficiency. Whilst noting the important role of historic buildings, and the need to achieve net zero, Government is looking at measures, potentially including changes to permitted development rights, inclusion of improvements to historic buildings in National Development Management Policies, and the greater use of Listed Building Consent Orders. These may reduce the need for specific policies in Local Plans on these issues. But these are not in place, presently.

Addressing the issue of retrofit is outlined by government in The Heat and Buildings Strategy October 2021, which sets a target for existing buildings to achieve an EPC C by 2035 where cost-effective, practical and affordable.

There is already a commitment by Government, to reduce fuel poverty by ensuring as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030, where practical, cost effective and affordable.

Furthermore, the Clean Growth Strategy (2017) has set a target for as many homes as possible to achieve an EPC of Band C by 2035 and commits to keep energy efficiency standards under review.

A consultation was launched in September 2024 on proposals for the private and social rented properties to achieve a minimum Energy Performance Certificate (EPC) C or equivalent by 2030 to encourage landlords to reach increased levels of home energy efficiency within homes.

In July 2019, both Warwick District Council and Stratford-on-Avon District Council declared a climate emergency, with both Council's setting a 2030 district-wide net zero ambition. The following local policies are in place to support work around the retrofitting of buildings: South Warwickshire Joint Climate Change Action Programme (October 2021), Warwick and Stratford-on-Avon District Councils Baseline and Pathways (Anthesis, June 2021) and ([Warwick & Stratford-on-Avon District Councils – South Warwickshire Climate Action Support, Anthesis, June 2021 - Download - Warwick District Council. \(warwickdc.gov.uk\)](#)).

In addressing historic buildings more widely, it should be recognised that the district of Warwick has a significant number of listed buildings and buildings within Conservation Areas and therefore, retrofit policy should reflect the need to meet both national and local carbon emissions reduction targets, whilst also protecting and conserving historical buildings of significance. To give further significant context, there are approximately 2,150 listed buildings some of which are homes divided into smaller dwellings. Furthermore, there are approximately 14,440 properties falling into one of the thirty-one Conservation Areas within the district, which makes up over 20% of the total homes.

Whilst national EPC targets are useful in the context of setting policy, it is also helpful to understand the EPC performance of buildings locally which is available from the Office of National Statistics.

Of homes within Warwick district, just over 50% of properties have an EPC of band C or above across all property ages and for pre 1930 properties, this is as low as 14%. Within Stratford district, it is a very similar picture of 56% of properties with an EPC band of C or above across all property ages and for pre 1930s properties this is even lower at just over 10% of properties. [Energy efficiency of housing in England and Wales - Office for National Statistics \(ons.gov.uk\)](#) however, This gives further evidence of the scale of the retrofit challenge particularly in older properties within South Warwickshire and of the need to make significant improvement to meet both national and local targets.

7.6 Embodied Carbon

'Embodied carbon' is the carbon dioxide (CO₂) emissions associated with materials and construction processes throughout the whole lifecycle of a building or infrastructure. It includes any CO₂ created during the manufacturing of building materials (material extraction, transport to manufacturer, manufacturing), the transport of those materials to the job site, and the construction practices used. embodied carbon is the carbon footprint of a building or infrastructure project before it becomes operational. It also refers to the CO₂ produced maintaining the building and eventually demolishing it, transporting the waste, and recycling it.

Embodied carbon accounts for a significant proportion of a buildings' whole life carbon; it includes emissions related to raw material supply, manufacturing and transport, construction process and demolition and disposal.

The importance of considering embodied carbon has been identified across the building sector. Embodied carbon thresholds are not mandated in the current Building Regulations, and the FHS and FBS, meaning the Local Plan has an important role in influencing development. There is a growing number of developers and material suppliers that assess the impact of their supply chain and evaluate sectoral pathways for material decarbonisation and alternatives for construction. Embodied carbon emissions are also an integral part of decarbonisation pathways for developers and construction companies that are setting science-based net zero targets to 2050. RIBA Good Practice, 2030 Challenge and LETI have developed guidance about embodied carbon targets of new buildings.

What was said in the I&O

Two options one suggesting that new developments should be required to have 100% reduction in embodied carbon emissions and other suggesting different targets for different types of developments. Respondents were also asked if they were not in favour of any of the two options.

Majority (57.1%) respondents were in favour of Option requiring 100% reduction in embodied carbon.

Draft Policy Direction 24 - Embodied carbon

All new major developments should demonstrate how the embodied carbon of materials has been considered and reduced where possible. New developments are expected to achieve at least the RIBA Good Practice targets and show consideration of solutions towards the RIBA 2030 Challenge targets. These practice benchmarks will help inform the policy at Regulation 19 stage.

Best practice benchmarks:

LETI Guidance

Embodied carbon = 300 kgCO₂e/m² (200 kgCO₂e/m² incl. sequestration)

RIBA Good Practice 2025 Targets

Embodied carbon <800 kgCO₂e/m²

RIBA 2030 Challenge

Embodied carbon < 625 kgCO₂e/m²

Passive House

Embodied carbon: encourages “optimisation”

Development will be expected to minimise its embodied carbon. In doing so, development shall:

- Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible before resorting to demolition.
- Be designed efficiently to minimise the quantity of materials required to meet the building's functional requirements.
- Waste generation has been minimised and re-use and recycling of materials is maximised during the construction phase including reusing the relevant demolition material.
- The carbon footprint associated with the sourcing and production of the materials is considered when selecting the materials for construction purposes. Where possible, locally sourced sustainable materials should be prioritised.

Ensure that new buildings are flexible and adaptable to future uses, easily maintained reducing the need for future redevelopment. Development should set out through the Energy Statement how these issues will be addressed. Energy statements demonstrate how improved energy performance will be achieved, and this requirement is over and above the Building Regulations. It is a detailed report demonstrating how the development will meet the energy standards set by the local authority. In addition to the above requirements proposals for development of 50 or more new dwellings and/or 5,000sqm or more of new non-residential floorspace should be accompanied by a whole-life assessment of the materials used.

All new non-residential developments are expected to achieve at least RIBA Good Practice 2025 targets or similar levels for specific use categories. Considerations should be evidenced for reducing embodied carbon to achieve RIBA 2030 Challenge targets or as close as possible.

LETI Guidance

Embodied carbon = 350 kgCO₂e/m² (250 kgCO₂e/m² incl. sequestration)

RIBA Good Practice 2025 Targets

Potable water: 13 l/p/day | Embodied carbon < 970 kgCO₂e/m²

RIBA 2030 Challenge

Potable water : < 10 l/p/day | Embodied carbon < 750 kgCO₂e/m²

Where it is not viable to meet these targets for embodied carbon, a full justification will be required as part of the embodied carbon assessment within the Energy and Sustainability Statement.

Justification

Addressing the issue of embodied carbon is closely tied with the concept of a circular economy LETI, in its [Embodied Carbon Primer](#), define the circular economy as a system that is 'restorative or regenerative by intention and design'; In this regard, products, buildings and systems are designed in a way that considers not only how these can be repaired and reused easily, but also how the energy and materials used to construct them can be remanufactured and recycled at the end of their life. This approach enables reductions in the raw materials we extract from the environment over time, our energy demands and the impacts we have upon the wider environment, and by extension, carbon emissions associated with the construction process.

A [report on embodied carbon by the House of Commons Environmental Audit Committee](#) stated that:

- The embodied carbon of construction is not assessed or controlled by policy. As a result, no progress has been made on reducing these emissions.
- The construction industry is willing and able to undertake whole-life carbon assessments and the cost of undertaking these assessments can be minimal.
- The standards, methodology and reporting framework for embodied carbon assessment exists, although there is a need for standardisation.
- There is availability of low embodied carbon building products to meet current demand but there are insufficient incentives to develop and use these products.

The report recommended that a mandatory requirement to carry out whole-life embodied carbon assessments be introduced through building regulations and planning policy. At present there is no commitment to introduce embodied carbon assessment into building regulations, just to consult on this. In the absence of this requirement, it is vital that embodied carbon be addressed by planning policy.

Both Councils have commissioned further work to provide up to date policy recommendations for Net Zero and Retrofit policies, which will further refine the policy recommendations for the Plan.

7.7 Climate Resilient Design

Climate change is anticipated to increase average annual temperatures and the occurrence of extreme weather events including heatwaves, flooding, drought and storms. Ensuring that new development and changes to existing buildings respond to these changes is therefore a crucial element in responding to the climate emergency and will create more resilient communities for the future.

Climate resilient design is an approach to development that considers current and future climate conditions to optimise building performance and energy efficiency, as well as reducing the impact of development on the natural environment. The core principles of climate resilient design include adapting to higher temperatures through passive and natural cooling measures, reducing water consumption, managing flood risk and mitigating biodiversity loss.

This policy sets out the climate resilient design requirements for new development and changes to existing buildings and requires all proposals to complete a climate change checklist.

What was said in the I&O

The Issues and Options consultation included questions relating to climate responsive design, with the following results:

- 76% of respondents supported a policy requiring new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures.
- 73% of respondents supported 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.
- Respondents were asked if they would support a policy requiring new development and changes to existing buildings to undertake either a Climate Change Checklist or a Climate Change Risk Assessment. The Climate Change checklist would set out the appropriate range of adaptation and mitigation measures to be incorporated. The Climate Change Risk Assessment would be a more detailed assessment, potentially using Representative Concentration Pathways (RCPs) as a baseline. 46% of respondents were supportive of a Climate Change Checklist, 39% of respondents were supportive of a Climate Change Risk Assessment and 15% of respondents supported neither of these.

Draft Policy G - Climate Resilient Design

In order to ensure that new development and changes to existing buildings are resilient and flexible to future changes in climate, proposals will demonstrate the following in their design:

- Applying the cooling hierarchy (below) in building design to minimise and prevent overheating and avoid the need for mechanical ventilation/cooling;
 1. **Passive design** - using energy efficient design to reduce the amount of heat entering the building in the warmer months. This can be achieved through appropriate orientation, overhangs and shading, albedo, fenestration, insulation and green roofs. Heat can also be reduced within the building through high ceilings and exposed internal mass; however, provision must be made for night purging of heat through secure ventilation. Such ventilation should be closable to preserve air tightness in cold weather.
 2. **Passive / natural cooling** - using outside air to ventilate and cool a building without using a powered system.
 3. **Mixed mode cooling** - using a mixture of both passive cooling methods and@
 - a) Mechanical cooling, such as fan powered ventilation (preferred option)
 - b) Air conditioning (not preferred option due to being energy intensive)
 4. **Full building mechanical ventilation / cooling system using the lowest carbon / energy options** - only to be considered after all other elements of the hierarchy have been considered.
- Optimising the use of permeable hardscapes and multi-functional green and blue infrastructure for local flood risk management, reducing the risk of overheating, particularly the heat island effect, to providing access to cool/shaded outdoor spaces, in accordance with the Green and Blue Infrastructure Policy and Greening Factor requirements; and
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDS in accordance with the Reducing Flood Risk Policy and future SuDS guidance (to be developed); and
- Incorporating water efficiency measures, encouraging the use of grey water and rainwater recycling, in accordance with the Water Efficiency Policy.

All proposals for new development and changes to existing buildings will be required to complete a climate change checklist to demonstrate how climate change risk has been addressed in their design. Part V (Climate Change Adaptation and Mitigation) of the Stratford-on-Avon District Council Development Requirements SPD already requires completion of climate change checklist, but this would be a new requirement for Warwick District Council. The Climate Change Checklist will be developed for the next Regulation 19 (publication) stage of the Local Plan.

Justification

The National Planning Policy Framework (NPPF) recognises in paragraphs 162 and 164 that factors such as development location, orientation and design can help to reduce greenhouse gas emissions, and it therefore encourages plans to take a proactive approach to mitigating and adapting to climate change.

In December 2021 the Government set changes to the Building Regulations (to come into effect from June 2022) as it works towards implementing the Future Homes and Buildings Standard (after in 2025). This is a set of standards that will complement the Building Regulations to ensure new homes built from 2025 will produce 75-80 per cent less carbon emissions than homes delivered under current regulations. The changes to Building Regulations will ensure that new homes in England will have to produce around 30 per cent less carbon emissions, and new buildings such as offices and shops will have to cut emissions by 27 per cent. The changes include uplifts to fuel and power (Part L) and ventilation (Part F), and notification of a new Approved Document O to mitigate the risk of overheating in new homes. A climate change Topic Paper will provide more details of the changes to building regulations and how these are being expressed in planning documents will be referenced and considered in this local plan.

The technical evidence (South Warwickshire Local Plan Climate Change Evidence: Net Zero and Retrofit Policy Opportunities, Section 5.3.3, produced by Arup) includes policy recommendations for designing neighbourhoods resilient to the effects of climate change.

How we construct and design our buildings has a crucial role in reducing greenhouse gas emissions as well as allow us to build adaptable buildings that can change and adapt to the increasingly extreme climate. Setting sustainable design and construction standards for new developments will help to lower the emissions from the built environment. It will also ensure that new buildings are easily adaptable to the impacts of climate change such as overheating.

7.8 Water Efficiency

Water resources are under significant pressure in the UK and climate change presents further challenges such as increased intensity and frequency of rainfall and a higher frequency of drought events.

The supply and disposal of water also has a significant carbon impact, with the heating of water accounting for 18% of the UK's domestic energy usage (Department for Energy Security and Net Zero, 2022). The process of treating and pumping water has an additional carbon impact. Reducing water use can therefore have a significant impact on reducing carbon emissions.

In recognition of the impact of domestic water usage and that South Warwickshire is classed as an area of serious water stress, this policy implements reduced water usage standards for new development and consideration for water reuse and recycling measures/systems.

What was said in the I&O

The Issues and Options consultation asked a couple of questions related to water efficiency with the following results:

- 73% of respondents supported 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.

Draft Policy H - Water Efficiency

- New residential development of one dwelling or more will be required to meet a water efficiency standard of 100litres per person per day using a fittings-based approach (as opposed to the calculation method). This approach provides a clear flowrate and volume metric for each fitting or appliance. Proposals that go further than this will be particularly encouraged.
- New non-residential development greater than 1000sqm will be required to meet the BREEAM “excellent” standard for water consumption representing at least 4 credits under the “Wat01” measure. Proposals that go further than this will be particularly encouraged.
- All residential dwellings with garden areas, must include a rain harvesting water butt(s) of minimum capacity of 200l, connected to a downpipe.
- Major development should consider greywater recycling systems, particularly shared/communal systems.
- All development proposals that involve change of use or redevelopment of a building, or an extension to an existing building should demonstrate that water efficiency measures using a fittings-based approach and rainwater harvesting measures have been incorporated wherever possible to reduce demand on mains water supply.
- Support will be given to proposals for irrigation water storage reservoirs for agricultural and horticultural purposes. All proposals should consider landscape and the natural environment in their design (in line with policies in the Natural Environment section).

Justification

Currently a water efficiency standard of 125litres per person per day is set in Building Regulations with the option for local authorities to require a tighter standard of 110litres per person per day in areas of high-water stress. The Water Cycle Study (2024) carried out on behalf of the Councils recommended that a domestic water efficiency target of 100litres per person per day is considered for all new homes, in line with proposals in the DEFRA Plan for Water and commitments in the [Environmental Improvement Plan](#). The Environment Agency have also stated that they support going further than the optional target in Building Regulations. The Water Cycle Study recommended that water efficiency targets should be achieved using the fittings-based approach outlined in Part G of Building Regulations.

The Water Cycle Study (2024) also recommended that non-residential development over 1000sqm should achieve the BREEAM “excellent standard for water consumption. This was supported by the Environment Agency.

7.9 Water Supply and Wastewater Infrastructure

Development has the potential to have significant impact on water resources. Without good planning it can place additional strain on the water supply and wastewater network. It is therefore essential that key water management techniques are implemented to ensure current resources are used sustainably and that the water environment is not adversely affected by development.

Severn Trent Water is the water supplier and sewerage undertaker for the South Warwickshire area. Developments with planning permission currently have a right to connect to the public water and sewerage systems, however, there is no guarantee that the capacity exists to serve the development. The planned enactment of Schedule 3 of the Flood and Water Management Act will remove this automatic right for new developments to connect to the existing sewer system. A site-by-site assessment of the impact of potential site allocations on the water supply network will be undertaken as the South Warwickshire Local Plan continues to develop.

What was said in the I&O

The Issues and Options consultation didn't include specific questions about water supply and wastewater infrastructure.

Draft Policy I - Water Supply and Wastewater Infrastructure

All development proposals will:

- Ensure that there is adequate water supply to serve the development.
- Minimise the need for new water supply infrastructure by directing development to areas where there is a guaranteed and adequate supply of water, having due regard to Severn Trent Water's Resources Management Plan and Strategic Business Plan as well as findings of the Water Cycle Study.
- Avoid surface water connections into existing surface water and combined sewer networks and manage runoff through suitably designed SuDs schemes.
- Provide an Outline Drainage Strategy to demonstrate the wastewater assets required, their locations including any points of connection to the public foul sewerage, whether the site drainage will be adopted by the water company and if any sewer requisitions will be required.
- Ensure that water quality and the ability for watercourses to reach 'good status' is not impeded by the development, in accordance with the Water Framework Directive and as set out in the Rivers Severn, Humber and Thames River Basin Management Plans (RBMP).

Justification

The NPPF 2024 requires that development plan policies should help to deliver the provision of infrastructure for water supply and water quality.

The evidence provided by the 2024 Water Cycle Study makes the following recommendations:

- Undertake a site-by-site assessment of the impact of potential allocations on the water supply network as part of a Stage 2 Water Cycle Study.
- Relieve pressure on the water supply network by requiring increased water efficiency standards.
- Developers will be expected to work with the sewerage undertaker closely and early in the planning promotion process to develop an Outline Drainage Strategy for sites.
- The Outline Drainage strategy should demonstrate the wastewater assets required, their locations including points of connection to the public foul sewerage, whether the site drainage will be adopted by the water company and if any sewer requisitions will be required.
- Developers will be expected to demonstrate to the Lead Local Flood Authority (LLFA) that surface water from a site will be disposed using a sustainable drainage system (SuDS) with connection to surface water sewers seen as the last option. New connections for surface water to foul sewers will be resisted by the LLFA.
- The Local Plan should include policies that require development sites to adopt SuDS to manage water quality of surface runoff.
- Developers should include the design of SuDS at an early stage to maximise the benefits of the scheme.
- Work with developers to discourage connection of new developments into existing surface water and combined sewer networks. Prevent surface water connections into the foul network, as this is a significant cause of sewer flooding.
- Explore the concept of water neutrality and how the Local Plan could encourage this approach.

7.10 Reducing Flood Risk

The NPPF 2024 promotes a sequential approach to identifying new land for development. This ensures that flood risk to people and property is avoided by selecting land at least risk of flooding considering the risk of flooding from all sources. Site layout and design are recognised as ways to influence the risk and impact of flooding, and to provide resilience for climate change.

South Warwickshire has a long history of flooding problems in various locations. The anticipated implications of climate change will only increase the area's vulnerability to such events and it is important therefore to appraise, manage and reduce the risk of flooding, directing development away from areas at risk of flooding wherever possible and to encourage developments to work with and to harmonise with the natural environment and surroundings.

This policy seeks to ensure that development does not place itself or others at increased risk of flooding, making sure that new development takes full account of flood risk, both current risk and future forecast risk, applying both the sequential test to flood risk and the surface water hierarchy for addressing issues of surface water management.

What was said in the I&O

- In the Issues and Options consultation, 73% of respondents supported 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.

Additional comments were received as follows, mainly from individuals rather than landowners and developers:

- There was a suggestion that Councils should work with the local flood authority to implement rural SuDS.
- There was general support for encouraging the use of SuDS to reduce flood risk.
- Schedule 3 of the Flood and Water Management Act 2010 should be incorporated into this local plan.
- Water storage should be encouraged along with SuDS and run-off attenuation in both residential and commercial buildings.
- any necessary flood mitigation measures have been agreed with the relevant bodies, where adoption, ongoing maintenance and management have been considered and any necessary agreements are in place;

Draft Policy J - Reducing Flood Risk

New development should be prioritised to areas of lowest flood risk, i.e. the areas that are least prone to flooding in event of a heavy rains or storms and must not increase flood risk elsewhere. This should consider the risk from all sources including fluvial, surface water, groundwater and sewer flood risk, making use of the Strategic Flood Risk Assessments (SFRA), available public mapping such as the Flood Map for Planning and the Flood Risk from Surface Water map and historic flood information (which is available from the Lead Local Flood Authority (LLFA) and other partners).

Flood risk should be considered proportionately for all development. A site-specific Flood Risk Assessment will be required to support planning applications for major developments or those in areas at risk of river and surface water flooding, in order to demonstrate that the risk both within the site and to surrounding/downstream sites is not increased. Submitted Flood Risk Assessments should refer to the recommendations of the latest SFRA and Warwickshire County Council's Local Flood Risk Management Strategy. Notwithstanding the requirement for a Flood Risk Assessment for major developments to be submitted, all developments will require a drainage strategy which demonstrates how surface water will be managed in accordance with the drainage hierarchy and flood risk will not be increased downstream.

New development proposals must account for climate change in their plans to ensure that the site will be safe over its lifetime. This should consider the potential for exceedance events, for example due to extreme events beyond design standards or through failure of assets, and how such overland flows are directed safely through a development without exposing new or existing property to greater flood risk.

A sequential approach to the layout of the development should be taken so that buildings and access routes are located in areas of lowest flood risk. Modification of ground levels/compensation works may be undertaken in order to reconfigure land located within flood zone 3a. However, modifications to increase land available for development is not permitted. With any changes in ground levels, detailed consideration should be given to exceedance/overland flow routes.

For development located in areas at risk of flooding, mitigation measures should be provided up to the 1% annual probability plus climate change flood event. Safe access and egress must also be demonstrated. Finished floor levels in areas at risk of flooding should be set no lower than 600mm above the 1% annual probability plus climate change flood level.

All new developments should contribute to creating space for water through use of blue and green infrastructure, and where relevant, restoring functional floodplains (flood zone 3b). New developments should also seek opportunities for river restoration and enhancement, e.g. de-culverting, removing structures and reinstating a natural, sinuous river channel. As a minimum all developments are required to provide an 8m wide undeveloped buffer strip from the watercourse (from the top of the bank or the centreline of the culvert) to allow access for routine maintenance and emergency clearance.

In terms of the risks to traditional buildings from flooding, care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.

All new development should not detrimentally impact upon existing and planned flood risk management schemes.

Land that is required for current and future flood management will be safeguarded from development.

Justification

The Flood and Water Management Act, 2010 requires better management of flood risk, creates safeguards against rises in surface water drainage discharges and protects water supplies for consumers. It gave a new responsibility to the Environment Agency for developing a National Flood and Coastal Risk Management Strategy and established upper tier local authorities (in our case Warwickshire County Council) as Lead Local Flood Authorities and provided them with a range of duties.

Paragraphs 170-182 of the NPPF 2024 set out the policy for planning for development in flood risk areas. It requires a sequential approach to development: sites should not be allocated, or permitted, if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It also requires an exception test for proposed development in areas of flood risk: this requires proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Paragraphs 180-182 focus primarily on planning applications and paragraph 182 considers that sustainable drainage systems should be incorporated where applications could affect drainage on or around the site. Local Planning Authorities need to have appropriate policies in place on sustainable drainage systems.

National Planning Policy Practice Guidance (PPG) on Flood Risk and Coastal Change (updated August 2022) provides more detailed guidance as to the application of the sequential and exception tests in the context of plan-making and planning applications. It also provides additional information on the “sequential approach to the location of the development” and provides some over-arching guidance relating to “taking flood risk into account in preparing plans”.

Strategic Flood Risk Assessment (SFRA)- Part 1

SFRA provides a comprehensive and robust evidence base to the SWLP authorities to consider main sources of flooding and provides recommendations regarding all sources of flood risk in both authorities. It also included recommendations on cumulative impact of flooding. The final SFRA reports can be accessed using the hyperlink below:

<https://www.southwarwickshire.org.uk/swlp/technical-evidence.cfm>

The reports are located under the heading A biodiverse and environmentally resilient South Warwickshire.

7.11 Multi-functional Sustainable Drainage Systems (SuDS)

SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk or adverse effect on water quality. Many existing drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable in the long term. SuDS can provide a range of additional ecosystem services, when used appropriately.

Consideration of sustainable drainage systems early in the design process for development, including at the pre-application or master-planning stages, can lead to better integration, multi-functional benefits and reduced land-take. Developers should contact the Lead Local Flood Authority (LLFA) at the earliest convenience, and ideally during the master planning process, for advice on suitable surface water drainage techniques. [The Warwickshire County Council Flood Risk Management Guidance for Development](#) should be taken into consideration when designing sustainable drainage systems.

Developments should aim to incorporate a network of smaller dispersed SuDS, instead of reliance upon a single large feature. A single storage structure, often referred to as pipe

to pond, is not considered good design. This mitigates against the risk of a single point of failure and provides improved water quality, enhanced biodiversity and aesthetic value. A system of dispersed SuDS should look to retain the first 5mm of rainfall. A single feature may function less effectively compared to a series of smaller features and undesirably deep ponds can pose a health and safety risk with little amenity value to the occupants across a large development they serve. Dispersed features can also manage pollutants contained within runoff using a treatment train approach.

Below ground attenuation is unlikely to be acceptable to the LLFA as it does not meet the requirement for multi-functional SuDS across a development site. Where insufficient space is retained in the layout to incorporate above ground SuDS, the development will likely be regarded as being too dense. Through the use of well-designed high quality, dispersed multifunctional SuDS, excessively large features can be avoided, reducing some of the spatial constraints.

Surface water should be managed as close to source as possible and discharged as high up the surface water drainage hierarchy as possible (shown below). Applicants should undertake a technical assessment using local knowledge and industry best practice guidance, such as infiltration testing, to establish the most appropriate means of discharge. This assessment should consider the condition and capacity of any channel or system receiving discharge. The NPPF and PPG also encourages the incorporation of rainwater harvesting in sustainable drainage systems. Discharge via the sewer network is considered the last resort and where discharging into third party assets (e.g. sewer network), written confirmation from the asset owner of the acceptance of such connection will be required. All redevelopment of brownfield sites should seek to remove existing connections to the public sewer for surface water drainage.

1. Water reuse / rainwater harvesting
2. Into the ground (infiltration);
3. To a surface water body;
4. To a surface water sewer, highway drain, or another drainage system;
5. To a combined system.

SuDS can provide excellent habitats and blue/green corridors for aquatic & non-aquatic flora and fauna, thereby helping to meet Biodiversity Net Gain (BNG) targets under the Environment Act (2021) and Greening Factor requirements (to be developed). SuDS design should complement local natural assets and deliver on local biodiversity objectives. Opportunities for habitat restoration or enhancement should be sought including connectivity and wildlife corridors between habitats. Layout and vegetation selection should be appropriate to the surrounding conditions and existing species. Appropriate maintenance practises must also be put in place to maintain SuDS features as high-quality habitats as well as their drainage function for the lifetime of the development. Through good design it may be possible to incorporate other areas of open space, play or leisure within SuDS basins.

The management and improvement of water quality should be considered hand-in-hand with the provision of SuDS across a development. Proposals should be accompanied by a proportionate assessment outlining the risks a development poses and how the proposed surface water drainage system will manage and mitigate those risks. The Simple Index Approach provides a useful mechanism for assessing water quality impacts for many developments, however particularly large or high-risk projects may require a detailed qualitative pollution risk assessment that reflect the scale and nature of the development. Proprietary treatment devices such as oil and petrol interceptors/separators are not considered SuDS features, and where they are incorporated within a drainage strategy, should be supplemented with other treatment trains in accordance with the SuDS principles.

This policy sets out the high-level principles for drainage design in new developments incorporating SuDS features. It provides the basis for the incorporation of SuDS in development schemes through the planning system, ensuring that SuDS features are considered at an early stage and incorporated into a scheme design. This policy should be read in conjunction with the Reducing Flood Risk and Green and Blue Infrastructure policies.

Draft policy K - Multifunctional Sustainable Drainage Systems (SuDS)

In all development the proposed drainage scheme performance should be able to demonstrate no flooding, from all sources, to properties up to and including the 1% annual exceedance probability event (AEP), plus the appropriate allowance for climate change. Development should not be permitted where there is an increase in flood risk to the site or surrounding area.

High-quality sustainable drainage systems (SuDS) should be implemented proportionately at all scales of development to manage surface water run-off. This should be demonstrated through submission of a suitably detailed drainage strategy. SuDS features must be well designed and provide the development with multiple benefits such as, but not limited to, biodiversity, water quantity, water quality and amenity value. For this reason, SuDS features should be above-ground and manage surface water runoff at source by dispersing SuDS throughout the development. Adequate space should be provided throughout the development for these features.

The Drainage Strategy shall demonstrate application of the discharge hierarchy as per the NPPF 2024 with SuDS features built in accordance with the CIRIA C753 SuDS Manual and [Warwickshire County Council Flood Risk Guidance for Development](#). The surface water drainage network must be kept separate from the foul drainage network and connecting surface water to a foul network is unacceptable, as it does not follow the discharge hierarchy. Where a brownfield site is redeveloped, the opportunity to disconnect surface water and highway drainage from combined sewers must be taken.

Surface water discharge rates should be limited to the QBar greenfield runoff rate for all modelled rainfall events up to and including the 1% annual probability event plus the appropriate [allowance for climate change](#), unless otherwise agreed with the LLFA. Run off should be managed as close to where it falls as possible.

SuDS features should be situated outside of any areas of known or modelled flood risk from rivers or surface water. Where the development includes existing watercourses, the risk of river flooding should be fully appraised. This may require applicants to undertake an independently-reviewed hydraulic modelling exercise where existing modelling data is absent or of low quality.

Applicants should give early consideration to overland and flow routing when considering the development layout. Development layout should be sympathetic to any existing watercourse and overland surface water flow routes, using effective master planning to mitigate flood risk. Blue green corridors should be retained and enhanced to provide a buffer from the built environment, enhance water quality and biodiversity, and create open spaces of amenity.

Development proposals will be required to protect and improve the quality of water bodies in and around the county, and any SuDS scheme should look to compliment the surrounding water environment.

8. A Well-Designed and Beautiful South Warwickshire

Design is an overarching concept which interacts directly or indirectly with all other aspects of the plan. It is about how a place functions and feels at all scales.

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.

This chapter will consider principles for strategic design policy, protecting and enhancing heritage assets, waterways, and policy mechanisms/vehicles to achieve the best design outcomes at all scales.

8.1 Strategic Design Principles

[The National Model Design Code](#) (Part 1, paragraph 5) defines a design code as "a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area".

The SWLP will have a strategic design policy to set out strategic design principles, covering topics as set out in the Issues and Options document, as well as requiring compliance with the relevant design code(s) where they exist; and where they don't exist, the policy will still ensure that these matters are considered by the applicant.

When this policy direction is refined into a draft policy, careful reference will be made to existing strategic design policies (SDC Core Strategy policy CS.9 and WDC Local Plan policy BE 1), to ensure that the most relevant and beneficial elements / components of these policies are retained.

What was said in the I&O

The Issues and Options asked the question whether the range of topics put forward were appropriate for a strategic design policy.

Topic outlines being covered by the policy were:

- Comprehensive development
- Attractiveness
- Sensitive to context
- Distinctiveness
- Connectedness
- Environmental sustainability
- Adapting to climate change
- The mix and amount of development

Of the total responses, most respondents agreed that the range of these topics were appropriate for a strategic design policy.

A comment by Historic England suggested the strategic design policy should also encompass reference to *“local character and history, including the surrounding built environment and landscape setting”*.

Draft Policy Direction 25 - Strategic Design Principles

South Warwickshire’s strategic design principles will encompass:

- **Designing adaptable, diverse, and flexible places.**

This will include the following principles:

- Creating distinctive and varied neighbourhoods which provide for local needs.
- Ensuring a mix of land uses to provide for local needs.
- Considering mix and amount of development and getting the right range of complementary uses.
- Ensuring a range of densities within settlements that are appropriate to the function and local character of the place.
- Ensuring development is designed and delivered in a comprehensive and coordinated way.

- **Creating safe and attractive streets and public spaces.**

- Creating attractive places where people want to be.
- Creating places which enhance local character, the historic built environment, and landscape setting.
- Street design will be considered in conjunction with other policy topics such as green infrastructure, climate adaptation, creating healthy places, and the 20-minute neighbourhood concept, providing a foundation for further details in design codes.
- Ensuring that layout and orientation create an environment that feels safe and secure to be in, with the needs of pedestrians and cyclists prioritised over vehicle movements.

- **Providing healthy and inclusive communities.**

- This will ensure that the built environment provides healthy and inclusive communities through spatial planning.
- The policy will help support and provide for community needs through appropriate physical and social infrastructure, as well as making sure there is sufficient land provision for play, sport, and recreation.

- **The principles of the 20-minute neighbourhood.**

The way settlements are laid out can impact on people’s travel choices. For settlements to be sustainable, it is beneficial to maximise any opportunities for people to be able to meet their regular day to day needs within a reasonable walking distance of their homes.

- **Environmental Sustainability and adapting to climate change.**

- Development will be considered in conjunction with necessary environmental-related adaptation and mitigation measures.

Where they exist, the strategic design policy will refer to, and require compliance with, relevant design codes.

Justification

A high standard of design will be required in all new developments, including alterations to or changes use an existing building. The NPPF is clear that 'development that is not well-designed should be refused, especially where it fails to reflect local design policies and government guidance on design'. Applicants will be expected to demonstrate how a high-quality design has been achieved and how national and local design guidance has been considered.

The strategic design principles as outlined in the policy direction have been derived from the design evidence to date and are reflective of widely accepted principles in terms ensuring high quality of design.

8.2 Design Codes

Design Codes are defined as a set of simple and concise design requirements which set principles for new development in an area. The aim of design coding is to improve the design and quality of new development within an area, ensuring it is reflective of local character and preferences.

What was said in the I&O

At the issues and options, we asked respondents their thoughts on a range of approaches for producing Design Guides and Design Codes. There were four options:

1. **Option D2a:** Develop a South Warwickshire Design Guide.
2. **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.
3. **Option D2c:** Develop design guides/codes for strategic development sites/locations.
4. **Option D2d:** None of these.

The most popular preferences for Design Codes and Design Guides were to develop specific codes for specific places (Option D2b) and/or for strategic development sites and locations (Option D2c).

Draft Policy Direction 26- Design Codes

The South Warwickshire Local Plan will have a series of design codes, covering a range of geographical areas and in varying levels of detail. All Design Codes will be created using the National Design Guide's 'Ten characteristics of well-designed places', but in general, codes covering smaller geographical areas are likely to be more detailed in their requirements.

Types of Design Codes:

- Area- wide design codes.
- Site-specific design codes.
- Densification design code.
- Settlement specific design codes.

The overarching framework used for the development of Design Codes will be the National Design Guide's 'Ten characteristics of well-designed places'. The ten characteristics have been chosen as they all contribute towards the cross-cutting themes for good design, as set out in the NPPF.

The National Design Guide's Ten Characteristics of well-designed places:

1. Context- enhances the surroundings.
2. Identity- attractive and distinctive.
3. Built form- a coherent pattern of development.
4. Movement- accessible and easy to move around.
5. Nature- enhanced and optimised.
6. Public spaces- safe, social, and inclusive.
7. Uses- mixed and integrated.
8. Homes and buildings- functional, healthy, and sustainable.
9. Resources- efficient and resilient.
10. Lifespan- made to last.

Table 8: Summary of intended design codes

Code Type:	Likely Number:	Likely Adoption:	Leading Production:
Area-wide	1	Alongside SWLP adoption	SWLP Team
Site-specific	1-10 (allocations dependent)	Most, or all, adopted after SWLP adoption	SWLP Team
Densification	1	Alongside SWLP adoption	SWLP Team
Settlement specific	20+	Throughout the plan period	Neighbourhood Planning Groups

Justification

Design coding at a district and neighbourhood level is becoming a more integral, and required, element of the planning system.

As the NPPF explains, 'design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Producing Design Codes has benefits for local communities, developers, and the environment.

The approach to having design codes with a variety of geographical area focus will ensure the design of development can be optimised at the appropriate scales across South Warwickshire.

8.3 Protecting and Enhancing Heritage Assets/ the Historic Environment

South Warwickshire has many valuable heritage assets across its area and these all contribute to the sense of place that is valued by those who live, work and visit the area. It is important that these heritage assets are preserved and where possible enhanced so that residents, and visitors can continue to enjoy their inherent value.

What was said in the I&O

Within the Issues and Options consultation, it was acknowledged that Heritage is an important consideration in where development goes, as historical assets contribute to the character of the area, and this character needs to be maintained. Therefore, there is a strategic element to consider in Part 1 of the plan. It was suggested that the detailed aspects of Heritage be saved for Part 2.

There was a clear consensus that there should be a strategic policy in Part 1 of the local plan.

Draft Policy Direction 27 - Protecting and Enhancing Heritage Assets/ the Historic Environment

The Policies contained within the existing local plans continue to be suitable. A strategic historic environment policy will:

- Preserve and enhance the historic environment (including its setting) for its inherent value, and for the enjoyment of residents and visitors.
- Proposals that positively and proactively, conserve and enhance the historic environment, will be supported. This includes safeguarding assets and supporting appropriate, viable and sustainable uses that conserve their significance.
- Prevent development if it results in substantial harm to or total loss of the significance of a designated heritage asset, unless it is demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- Where development does take place, proposals will be high quality, sensitively designed and integrated with the historic context.
- Support sustainability initiatives for heritage assets to the extent practicable without undermining the significance of the heritage asset. Sustainability measures within heritage assets will consider the provisions of the 'Reducing Energy Consumption in Existing Buildings policy.
- Particular attention will be paid to the conservation of those elements which contribute most to distinctive character and sense of place of the area. These Include:
 - Designated Heritage Assets
 - Listed buildings, conservation areas (and their setting), Registered Parks and Gardens of Special Historic Interest, Registered Battlefields, scheduled monuments and sites of archaeological importance
 - Non-designated Heritage Assets
 - Heritage at Risk
 - Historic Townscapes and street scene
 - Stratford, Warwick etc,
 - Market Towns, villages and hamlets
 - Historic landscapes
 - Including features reflecting the historic interaction of human activity on the landscape

Justification

National Policy recognises the importance of heritage assets and the historic environment, stating that they are an irreplaceable resource of outstanding universal value. South Warwickshire boasts many heritage assets which attest to the rich history of the area, from Shakespeare's Birthplace to Warwick Castle, and all contribute to making South Warwickshire a desirable place to live, work and visit. The heritage assets contribute to the character of the area and their essence should be preserved and enhanced. Strategic developments will need to consider their impact on heritage assets and as such a strategic policy is required. Additional detailed policies may follow in Part 2 of the Local Plan.

8.4 Waterways

Waterways such as canals and rivers are valuable assets that can be utilised in a number of ways. As well as being valuable cultural assets and green/blue infrastructure routes, they can help improve the health and wellbeing of individuals, help create a sense of place, and support economic vibrancy. Strategically when incorporated effectively into development proposals they can help provide multiple benefits and as such it is considered appropriate to consider them within part 1 of the plan.

What was said in the I&O

Waterways, such as Canals and Rivers, and their use were not addressed in the Issues and Options Consultation however they are a valuable asset to South Warwickshire and can have a big impact on wellbeing, ecology and tourism.

Draft Policy Direction 28 - Waterways

- The plan will seek to increase access and use of canals and navigable waterways. This will include the provision of moorings and marinas where it respects and works with the natural features and function of the watercourse and where adequate services and facilities are available. This will also include the use of waterways as routes for active travel.
- Any proposed extension to or creation of new navigable waterways must ensure there are no overall detrimental impacts on the natural environment.
- Developments that affect the potential for unnavigable waterways to be unlocked or prevent future use of the network will be resisted.
- The ecological benefits of waterways, will be acknowledged and prioritised
- Development that adversely impacts the waterways will be resisted;
 - This includes adverse impacts to the integrity of the waterways structure, water quality, the landscape, heritage and ecological quality and character.
- Development that supports the regeneration of canals and would improve access and sense of place will be supported.

Justification

Waterways are not addressed directly within the NPPF however they relate to many topics that are, such as Active Travel, cultural heritage/tourism and habitats/biodiversity. Waterways can support the objectives and policies related to these topics and as such are a vital resource within South Warwickshire. [The Warwickshire Waterways Strategy](#), is a valuable document that sets out a framework to promote the county's rivers and canals as valuable community assets that can be used and enjoyed by all. Further work looking into the best ways to make use of our existing waterways, as well as to protect and enhance them will be undertaken as the plan progresses in order to produce a comprehensive policy.

9. A Healthy, Safe, and Inclusive South Warwickshire

Good planning is about more than just bricks and mortar. To deliver a healthy, safe and inclusive South Warwickshire, it is important to consider the less tangible aspects of planning which will enable healthy lifestyles and the development of strong communities.

Many aspects which impact on health, safety and inclusion are woven through other chapters of this document – for example, sections on infrastructure, design, and the natural environment all overlap with this overarching principle. This chapter contains sections on pollution and Health Impact Assessments.

9.1 Pollution

South Warwickshire is alive to matters of pollution, and actively monitors a number of pollutants, particularly those associated with emissions from road traffic. In South Warwickshire there are currently 4 Air Quality Management Areas where pollution levels are continually monitored to ensure levels fall below the national thresholds. Whilst the existing air quality management areas look at levels of pollutants associated with traffic, pollution can take many forms including chemical, dust, fumes, sound/noise, and light. Pollution in all its forms erodes the quality of the natural environment, as well creates negative impacts on human health, local economic growth and climate change.

The purpose of an overarching pollution policy is to ensure that where pollution is a reasonably foreseeable consideration, that this approach can be consistent. In the first instance development should avoid impact from pollution, however, where it cannot be avoided, then it is mitigated against once the harms are quantified.

What was said in the I&O

The Issues and Options asked whether the plan should include a policy on pollution, where the policy would cover 'all pollution', and ensure that where development would create significant detrimental impacts to the health and wellbeing of people in an area as a result of pollution, that the development would not be permitted unless effective mitigation could be achieved.

The Issues and Options highlighted very strong support for this policy, with 100% of total respondents wanting the inclusion of this policy.

Draft Policy Direction 29 - Pollution

- Development should seek to minimise pollution and where possible contribute to the protection and improvement of the quality of air, land, and water. In achieving this, development should be designed from the outset to improve air, land and water quality and promote environmental benefits.
- Development that, on its own or cumulatively, would result in significant air, light, noise, dust, land, water or other environmental pollution or harm to amenity, health well-being, or safety will only be permitted if the potential adverse effects can be mitigated to an acceptable level, as set by the legal requirements or other environmental controls at the time of development, or by measures included in the proposals. It should also be ensured that new development proposals do not have an adverse impact on existing operations.
- Development that would lead to deterioration or may compromise the ability of a water body or underlying groundwater to meet good status standards required by the Water Framework Directive will not be permitted.
- Areas which are within Air Quality Management Areas (areas where air quality is a particular issue) will be protected, requiring air quality assessments, and where necessary, a mitigation plan that will need to demonstrate that practical and effective measures have been taken to avoid any adverse impacts.

Justification

A pollution policy is required to help address the council's climate and ecological emergency declarations, as well as ensure that development is not permitted where it may pose unacceptable levels of risks to the health of people and/or the natural environment.

In England there are regulations relating to the air pollutant fine particulate matter (PM2.5), which is of most harm to human health. The Environmental Targets (fine particulate matter) (England) Regulations 2023 set two PM2.5 targets requiring that:

- The annual mean concentration is 10 µg m⁻³ or lower.
- That the population exposure is reduced by 35% compared to the base year 2018 levels.

The NPPF emphasises that planning policies and decisions should contribute to, and enhance, the natural environment. This should be done by preventing new and existing development from contributing to, or being adversely affected by, unacceptable levels of soil, air, water, or noise pollution (paragraph 174). As well as this, it is important that planning decisions should be compliant with relevant limit values or national objectives for pollutants, considering Air Quality Management Areas and Clear Air Zones (paragraph 186).

The NPPF makes clear that any new development in Air Quality Management Areas and Clean Air Zones should be consistent with the local air quality action plan.

9.2 Health Impact Assessment for Major Development

National Planning Policy Guidance refers to Health Impact Assessments (HIAs) as a useful planning tool as they can help to address any major impacts that major development proposals may have on the health and wellbeing of the population. This is also backed up by recent National Government Guidance published in 2020 on the use of Health Impact Assessments.

A HIA is a process that identifies the health and wellbeing impacts (benefits and harms) of any plan or development project. A properly conducted HIA recommends measures to maximise positive impacts; minimise negative impacts; and reduce health inequalities. HIAs put people and their health at the heart of the planning process. An HIA supports the planning system to address local health and wellbeing needs and tackle inequalities through influencing the wider determinants of health which are a diverse range of social, economic and environmental factors.

A HIA should appraise the potential positive and negative impacts of a proposal on new communities and adjacent existing communities, identify any differential distribution of impacts on health among groups within the population, and suggest actions to minimise any potential negative health impacts and maximise potential positive health impacts.

HIAs can be a freestanding report, or they can be incorporated into another required appraisal, such as an Environmental Impact Assessment, to avoid duplication. Where HIA is integrated into another assessment, it is recommended that a separate chapter is included in the assessment on health impacts, with cross-referencing to other relevant chapters, such as transport, noise, and air quality.

What was said in the I&O

Question W2 asked whether a Health Impact Assessment (HIA) should be required for all major developments. There was strong support for a HIA policy from individual respondents, but concern expressed by developers/landowners in relation to the perceived costs and little benefit. The submissions encouraged flexibility for any HIA requirement, rather than a blanket approach - via a screening process and/or only requiring a HIA to appropriate major planning applications.

Draft Policy Direction 30 - Health Impact Assessment for Major Development

All major development (proposals, and developments resulting in the loss of educational, health, leisure and community facilities, or public open space, will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:

- Health Impact Assessment Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing; or
- Health Impact Assessment where significant impacts on health and wellbeing would arise from that proposal.

The policy will require a HIA of development proposals to a level of detail appropriate to its scale and nature and addressing the relevant elements of healthy design.

Developments which have a significant negative impact on health and wellbeing will not be supported where applicants cannot provide mitigation of, or compensation for such impacts through planning conditions and/or financial/other contributions secured through planning obligations.

Justification

Proposals for major development, or other proposals with the potential to generate significant negative effects on the mental and physical health and wellbeing of communities, should provide an assessment of their potential impacts through the use of health impact assessments, as set out in the policy.

The NPPF promotes the role of planning to create healthy and safe communities by supporting local strategies to improve health, social and cultural wellbeing for all. It also encourages applicants to engage early and proactively with the community and other consultees. It states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. Additional national planning guidance highlights the importance of planning in improving health and wellbeing and states that a health impact assessment is a useful tool to use where there are expected to be significant impacts.

The Stratford District Council Plan 2023-2027 has health and wellbeing as one its key areas and states that “health and wellbeing will be at the heart of the decisions we make”. The Warwick District Council Corporate Strategy 2030 includes “creating vibrant, safe and healthy community of the future” in its top 3 priorities.

Moving forward from Preferred Options, the SWLP authorities will liaise with Warwickshire Public Health in using the London Healthy Urban Development Unit (HUDU) in assessing HIA applications.

https://assets.publishing.service.gov.uk/media/5a7c0c6eed915d01ba1cacfe/dh_120106.pdf

10. A Well-Connected South Warwickshire

A well-functioning, sustainable transport network is essential for creating vibrant, accessible, and inclusive communities. It will support the economic growth, reduce environmental impacts, and improve the quality of life for residents in South Warwickshire.

However, there are significant issues associated with transport that this Plan needs to address. These include safety, air quality, impact on climate change, congestion and the impact that transport infrastructure can have on the historic environment and community cohesion. These impacts need to be managed carefully through this Plan so that the provision of an efficient and effective transport network is not achieved at the expense of health, the environment and community well-being.

The transport objectives and policies of this Plan need to be consistent with the Local Transport Plan. This chapter outlines our ambitions to enhance accessibility, promote sustainable modes of transport, and reduce reliance on private vehicles.

10.1 Sustainable Transport Accessibility

The provision of sustainable transport options is crucial to reducing congestion, improving air quality, and supporting public health within local communities. A well-connected, accessible transport network encourages the use of public transport, cycling, and walking, reducing reliance on private vehicles and promoting a low-carbon future. This policy seeks to ensure that development proposals within the South Warwickshire area are aligned with sustainable transport principles, supporting a modal shift toward active and public transport systems.

What was said in the I&O

The Issues and Options consultation document addresses the challenge of sustainable transport accessibility across South Warwickshire, particularly in its rural areas, which currently lack adequate public transport options and are heavily dependent on private cars. The general view is that sustainable transport needs significant improvement to provide equal access, regardless of whether residents live in urban or rural areas of the districts.

The Issues and Options consultation sought input on whether the South Warwickshire Local Plan should include a hierarchical approach to prioritising transport infrastructure development. A large majority of respondents supported option T2a, favouring such a policy. They believe that this approach would not only explore the use of existing green and blue infrastructure to promote active travel but also help tackle accessibility issues in rural areas and support local rural businesses. Additionally, respondents emphasised the importance of incorporating emerging technologies and diverse modes of transport, such as e-scooters and e-bikes, into the hierarchical approach to encourage sustainable commuting options.

Draft Policy Direction 31 - Sustainable Transport Accessibility

Encourage sustainable transport modes:

Development proposals should prioritise access to public transport, walking, and cycling routes. All new developments must be designed to support integrated and accessible transport options, ensuring safe and good connectivity to key destinations such as employment areas, schools, retail centres, and leisure facilities.

Infrastructure provision:

Proposals must demonstrate how they will incorporate or contribute to high quality infrastructure that facilitates sustainable travel. This includes:

Provision of cycle lanes, pedestrian paths, and public transport facilities.

Secure, safe, and convenient cycle parking and storage in residential and commercial developments.

Charging infrastructure for electric vehicles, including provisions for electric bikes and scooters.

Public transport links should be integrated into the development with appropriate stops, routes, and frequency.

Travel plans and assessments:

Major developments must provide a travel plan that outlines how sustainable travel options will be encouraged and how the impact on the local transport network will be mitigated.

Reducing car dependence:

Developments should aim to minimise car dependency by ensuring that parking provision is balanced. Measures should be included to encourage reduced car ownership and usage, such as car sharing schemes and the inclusion of mobility hubs.

Access for all:

Developments must ensure that sustainable transport options are inclusive and accessible to all users, including people with disabilities, elderly people, and those with reduced mobility and low income.

Justification

This policy supports the overarching goals of reducing carbon emissions, improving local air quality, and promoting healthy lifestyles through active travel. Prioritising sustainable transport will help the South Warwickshire area contribute to national and regional climate targets, reduce traffic congestion, and improve public health by encouraging physical activity. Providing adequate infrastructure, such as cycle lanes, public transport stops, and EV charging points, will ensure that developments are future-proofed and adaptable to changes in transport behaviour. Additionally, by making transport networks more inclusive and accessible to all users, the policy supports equity in mobility across different community groups, thereby enhancing social inclusion.

The NPPF provides clear support for policies around Sustainable Transport Accessibility. It sets out principles regarding sustainable transport, contributing to the creation of accessible, healthy and resilient communities. Specifically, paragraph 10 of the NPPF emphasises the need to promote sustainable transport options to reduce congestion, improve air quality, and contribute to overall sustainability and well-being.

Additionally, the inclusion of travel plans and transport assessments to mitigate the transport impacts of new development is promoted in the NPPF (paragraph 118). By requiring major developments to provide travel plans and sustainable transport assessments, this policy ensures that the impact of new growth on the transport network is managed.

By embedding the principles set out in the NPPF, the policy direction on sustainable transport ensures that future development will support the shift to a low-carbon transport system.

10.2 Electric Vehicle (EV) Infrastructure Strategy

The transition to electric vehicles is critical to achieving national and local goals for reducing carbon emissions, improving air quality, and supporting sustainable transportation.

WDC & SDC have a responsibility to install EV infrastructure in their regions to work towards meeting the demand that is coming because of the switch to EV. The responsibility for WDC & SDC is for Council owned land, normally non-highway, i.e. off-street public car parks. The anticipated EVI need for the region is significantly greater than the current provision, which will be partly met by Warwickshire County Council with on-street charging and partially by the private sector, but there is still a place for WDC & SDC in this as the landowner of sites such as car parks and social housing. In comparison, the modelled need in car parks in the region is significantly more towards high-powered charging due to the use cases of car parks, but this may change because of the increase in EVs. The modelled need also doesn't account for geographic proximity, so it is recommended to account for this to create lower and higher-powered hubs where car parks are close together.

What was said in the I&O

The Issues and Options consultation did not include a specific question on electric vehicle charging infrastructure. However, respondents expressed general support for promoting electric vehicles in South Warwickshire. Respondents suggested that policies should be developed to support the enhancement of pedestrian and cycle connectivity, as well as the provision of electric vehicle charging infrastructure.

Draft Policy Direction 32 - Electric Vehicle (EV) Infrastructure Strategy

South Warwickshire has a responsibility to install Electric Vehicle Infrastructure (EVI) to work towards meeting the demand that is coming because of the switch to EV. This is largely off-street land owned by the Councils and largely consists of public off-street car parks and social housing areas. The anticipated EVI need for the area is significantly greater than the current provision, which will partly be met by Warwickshire County Council (WCC) with on-street charging and partially by the private sector, but there is a place for WDC & SDC in this as the landowner of the car parks. In June 2022, a report entitled South Warwickshire EV Infrastructure Strategy was produced and this recommended that WDC & SDC should ensure a fair transition to EV's by contributing to the WCC vision and steering public charge point development towards locations where private sector is unlikely to deliver. The strategy should be based on two principles:

1. Providing standard and fast charge point infrastructure in council car parks near to residential areas
2. Enabling a geographical and socially inclusive transition to EVs by addressing the social housing charge point infrastructure

A Feasibility Study has been commissioned and with the results of that, a pre-market engagement exercise will take place to understand the EV infrastructure market and have all the available information to gain permission to procure for an EV infrastructure provider.

Alongside the responsibilities that WDC & SDC have for the installation of EV chargers on their own land, there needs to be robust policies to require EV charging infrastructure for new developments through the planning process and build on the current respective Supplementary Planning Documents (SPDs) from WDC and SDC. Any policy needs to ensure that it is contributing to South Warwickshire's Climate Change ambitions.

Justification

The National Planning Policy Framework (NPPF) emphasises the importance of integrating electric vehicle charging infrastructure into new developments. It aligns with the Government's broader goals for sustainable development and reducing carbon emissions. Specifically, it requires local planning authorities to encourage the provision of EV charging points in new housing and commercial developments, in line with the push for greener transportation.

Warwick District Council's Parking Standards Supplementary Planning Document sets out in paragraphs 2.27 to 2.32, the requirements for electric charging facilities on residential developments. It details the number of EV charge-points per property and design standards for Electric Vehicles.

Stratford-upon-Avon District Council's Part R – Air Quality Supplementary Planning Document requires different mitigation measures for different types of development and for minor developments it requires the installation of EV Charging Points for both residential and commercial/retail developments.

10.3 Road Travel, Employment, and Freight

This Policy Direction is intended to support and encourage more sustainable employment and freight related road travel, to ensure that we meet our climate change obligations.

Policy Direction 12 (Locations for Employment Growth) sets out that new employment development should be directed to existing settlements in the first instance. This will help to ensure that employment development is located at the most sustainable locations, reducing the amount of vehicle journeys and carbon emissions created through commuters, freight or customers to employment sites. However, there are also other ways in which the carbon impact of employment related road travel can be reduced, for example, through the use of electric vehicles and 'last mile' freight journeys.

What was said in the I&O

The Issues and Options consultation said that *"Active travel and public transport should be given high importance and be prioritised in terms of available space on the road network and influencing new development, however there is still an acknowledgement that there will be a need for people to travel by private car for several reasons. Walking and cycling are good means of sustainable transport but predominantly for shorter journeys. Where journeys are likely to be longer (10km and above) and for purposes such as employment, weekly food shopping, childcare commitments, alternative modes of transport may be more appropriate including travel by car. It is important to acknowledge this but to encourage a shift away from fossil fuel powered cars.*

Road travel will continue to be important for employment use and transport facilities that will support efficient freight journeys through and within Warwickshire will need to be provided. There is currently a large amount of work being undertaken to upgrade the A46 in order to bring it in line with expressway standards and improve traffic flows.

There are several ways in which travel by private car and freight can be more sustainable. Electric vehicles or the use of low and zero emissions vehicles should be encouraged which includes making the necessary infrastructure to support this easy and readily accessible."

There was therefore an overall preference among respondents to introduce a policy encouraging more sustainable road-based transport for businesses.

Draft Policy Direction 33 - Road, Travel, Employment, and Freight

- New employment development that enables and promotes accessibility through the use of active and low-carbon transport journeys will be supported.
- In accordance with NPPF paragraph 118, all developments that will generate significant amounts of movement will be required to provide a Travel plan, and the planning application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- Development that helps to reduce the carbon impact of freight and employment related vehicle movements will be supported; for example, through the provision of vehicle charging infrastructure.
- The use of electric vehicles to transport freight and the development of infrastructure to support this will be supported. Last mile deliveries via low carbon transport (i.e. electric vans/lorries) will be particularly encouraged.

Justification

NPPF Section 9 “Promoting Sustainable Transport” states at paragraph 109 that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued; and
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

Paragraph 110 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Paragraph 118 says that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

The NPPG clarifies this by stating *“Local planning authorities must make a judgement as to whether a proposed development would generate significant amounts of movement on a case-by-case basis (i.e. significance may be a lower threshold where road capacity is already stretched or a higher threshold for a development which proposes no car parking in an area of high public transport accessibility).”*

10.4 Vale of Evesham Control Zone

The Vale of Evesham Control Zone is another designation specific to Stratford-upon-Avon District. The designation and accompanying policy seek to control the number of additional HGV movements within the area resulting from business developments. The policy thereby seeks to reduce the impact of HGV vehicles on local communities.

What was said in the I&O

The issues and options consultation asked whether we should remove the policy if our neighbouring authorities also sought to drop the policy from their local plans, as the designation and policy would work ineffectively in isolation. 55% of respondents felt that we needed to retain the Vale of Evesham control zone to limit HGV movements within the area.

Wychavon, as part of the South Worcestershire Local Plan Review, and Cotswold within their Local Plan review, are both proposing to delete the policy and the Vale of Evesham control zone designation. Should neighbouring authorities delete their policies, consideration needs to be given to how such a policy can be effective in isolation.

Draft Policy Direction 34 - Vale of Evesham Control Zone

Warwickshire County Council have raised concerns about the removal or amendment of the policy. As such, it is proposed that the policy remains until an alternate approach is agreed.

Justification

Given the concerns of the local highways authority (Warwickshire County Council), it is considered prudent to retain the policy until an alternative approach is identified. It is worth acknowledging that whilst neighbouring councils are proposing to remove the Vale of Evesham Control Zone Policy, this has not passed examination, and the local plans proposing the removal have not yet been formally adopted. Until such a time that neighbouring authorities have officially removed the designation, it is considered appropriate to retain it within the South Warwickshire Local Plan.

10.5 Smart Cities

The smart city concept describes the use of data and technology to improve the performance of infrastructure networks and create more liveable urban areas. However, the benefits could go much further. Technological innovation can support local authorities as they work collaboratively to develop integrated plans which cover a wide range of people, places and issues.

What was said in the I&O

The Issues and Options consultation asked respondents to provide suggestions for how smart cities technologies could be supported in South Warwickshire. There was a general support for smart technologies to be used wherever applicable and practical.

Draft Policy Direction 35 - Smart Cities

Technology developments and access to digital services such as the internet is critical to South Warwickshire's economic, environmental and social development. Proposals for all new commercial and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access.

Provision of such connections should take into account:

- The need for inclusive approaches to create open and competitive services that are accessible by all.
- Efficiency such that enabling infrastructure is installed alongside and concurrent with utility connections with suppliers and providers being encouraged to create open infrastructures and share assets such as chambers, ducting and data networks.
- The need to provide for future flexibility to reflect increasing demands to provide connectivity and data traffic for a range of purposes.

The two Councils recognises that this is an area where technological change is rapid and therefore standards will evolve, and developers should seek to adopt the best current open technology standards available.

Justification

Paragraph 20 of the National Planning Policy Framework (NPPF) refers to the need for strategic policies that support the provision of infrastructure for transport, telecommunications, waste management, water supply, energy and other utilities. Smart city technologies improve the management and efficiency of such infrastructure, making it more adaptable and responsive to real time demands.

Paragraph 119 of the NPPF advocates for advanced, reliable digital infrastructure, particularly high-quality telecommunications, to support local communities. This aligns with smart city ambitions to create robust digital networks (e.g.5G) that facilitate real-time data collection and smart services, such as traffic management systems.

Smart city strategies can improve connectivity, reduce traffic, and encourage the use of cleaner transport options. NPPF paragraph 105 stresses the importance of promoting sustainable transport systems that reduce congestion, lower emissions, and support active travel. Smart mobility solutions, including real-time public transport information and electric vehicle infrastructure are crucial tools for achieving these goals.

While the NPPF does not directly refer to 'smart cities', many of its core principles support the integration of smart city initiatives into local planning. From promoting sustainable development and modern infrastructure to enhancing public safety and boosting economic growth, smart city policies align with the overarching objectives of the NPPF. Integrating smart city approaches will enable local areas to meet the NPPF's sustainability goals, improve urban living standards, and future-proof communities for technological advancements.

11. A Biodiverse and Environmentally Resilient South Warwickshire

A healthy natural environment is of vital importance to people, places, the economy and nature itself. It provides important services such as food, fresh water, clean air, climate stabilisation and resilience, flood control, recreation, tourism and much more.

Broadly speaking, there are two types of natural asset that combine to give South Warwickshire its distinct natural environment. Firstly, there are specific environmental assets, including nature conservation and biodiversity interest, and features of historic value (including geologically and geomorphologically important features). Secondly, there are particular landscape characteristics familiar to the locality based upon its topography, farming, history and settlement patterns.

South Warwickshire is experiencing concerning declines across a number of key habitats and species and there is a significant need to halt and reverse these declines for the future prosperity of South Warwickshire. This means that development delivered through the SWLP must not be done at the expense of the natural environment. Instead, opportunities will be identified to protect and enhance existing ecological assets and the prevailing landscape character.

The following section focuses on the protection and enhancement of biodiversity, geodiversity and landscape across South Warwickshire on a strategic scale. It identifies how specially protected sites, landscape and priority species will be safeguarded against future development, how progressing the Local Nature Recovery Strategy will be used to influence the creation of new habitats to increase connectivity, and how Biodiversity Net Gain will be used as a tool to deliver the biodiversity ambitions of Stratford-on-Avon District Council and Warwick District Council.

11.1 Protection of Sites, Habitats and Species

Safeguarding is more than merely preventing the destruction of natural features, but an expectation that development proposals should embody the long-term management of these features to enhance their value to biodiversity and geodiversity, as well as recognising opportunities for securing biodiversity enhancement through the built environment.

South Warwickshire has a rich array of biodiversity and geodiversity assets, valued for environmental, social, and economic benefits. These sites include those with statutory legal protection such as Sites of Special Scientific Interest (SSSIs), as well as sites of local importance such as Local Nature Reserves and Ancient Woodlands, which fall to Local Plans to determine their protection.

In addition to protected sites, South Warwickshire is home to multiple Priority Species. These species are identified in the Warwickshire, Coventry, and Solihull Local Biodiversity Action Plans, produced by the Wildlife Trust¹ and Warwick District Council's Biodiversity Action Programme². In total, there are 27 Protected Species within Warwickshire. These species have been designated as such based on multiple considerations, including their scarcity, cultural value, and their identification as internationally or nationally threatened. It is crucial that the SWLP takes the protection of these species into consideration and provides measures to enhance populations.

Safeguarding existing designated sites, expanding the network of designated sites, and enhancing the populations of protected species will form a key consideration of the new SWLP.

What was said in the I&O

Question B9 of the Issues and Options consultation asked *"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 flood or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites."*

131 responses were received to this question. 126 responses (96.2%) supported the implementation of such a policy.

The following relevant question was also asked:

"Should the South Warwickshire Local Plan introduce Wildbelt designations?"

80% of respondents supported the inclusion of Wildbelts in the SWLP. However, since the initial introduction of Wildbelts as a concept in 2020, the Environment Act has introduced the concept of Local Nature Recovery Strategies. It is proposed that LNRs are used to safeguard areas for nature in the SWLP due to their grounding in nationally recognised policy. Therefore, wildbelts will not be included as a land designation in the SWLP.

¹The Species and Habitat Action Plans | [Warwickshire Wildlife Trust](#)

²Biodiversity - Warwick District Council. (warwickdc.gov.uk)

Draft Policy Direction 36 - Protection of Sites, Habitats and Species

The SWLP will include a policy to protect and enhance internationally, nationally, and locally important biodiversity and geodiversity sites and assets, both designated and non-designated, using the evidence-based documents such as the emerging Local Nature Recovery Strategy (LNRS) and the findings of the Habitat Regulations Assessment (HRA) as a guide.

The policy will cover:

Nationally Important and Protected Sites:

- Sites of Special Scientific Interest (SSSIs)
- National Nature Reserves
- Ramsar sites
- Special Areas of Conservation
- Special Protection Areas
- Sites identified for formal designation under the above schemes/categories

Locally Important Sites and Assets:

- Ancient woodland
- Ancient and Veteran trees
- Local Nature Reserves
- Local Wildlife Sites, including potential, and in certain instances rejected ones.
- Sites not yet subject to formal designation but known to make a positive contribution to biodiversity and/or geodiversity
- Irreplaceable habitats (as defined in the [Biodiversity Gain Requirements \(Irreplaceable habitat\) Regulations 2024](#))
- Local Geological Sites
- Sites of geological or geomorphological importance
- Protected rare, endangered, or priority species, particularly those recognised in local biodiversity action plans

The policy will follow the principles outlined in the [Lawton Report](#) of more, bigger, better, and joined up. It will do this by:

- Protecting existing important sites and assets.
- Enhancing existing important sites and assets.
- Identifying opportunities to create and enhance habitat connectivity by identifying new sites for designation.
- Creating new habitats which support Warwickshire target species.

Justification

The national planning policy guidance on conserving and enhancing the natural environment and the criteria that apply to sites of international and national importance for biodiversity and geological conservation is set out in the NPPF. Paragraphs 187 and 192 of the NPPF set out the requirements to protect and enhance biodiversity and geodiversity.

Section 40 of the NERC Act 2006 places a legal duty on public authorities to conserve biodiversity.

The Apex Goal of the Environment Improvement Plan 2023 is thriving plants and wildlife. This is Government's plan for delivering legally binding targets in the Environment Act 2021. The plan aims to achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife.

11.2 Local Nature Recovery Strategy

In recognition of the need to enhance biodiversity levels across the UK, the Government has committed to ensuring 30% of land is protected for nature by 2030. To provide strategic direction to enable this to be achieved, Local Nature Recovery Strategies are being produced.

Local Nature Recovery Strategies (LNRS) were introduced as part of the Environment Act 2021 to help reverse nature's decline. They will be used to identify and prioritise opportunities for nature improvements, focussing on particular areas, species and habitats.

48 LNRSs will be produced throughout England to link together to cover the whole country, forming part of a Nature Recovery Network. The South Warwickshire Local Nature Recovery Strategy is being produced by Warwickshire County Council as the Responsible Authority.

LNRS are designed to work closely with Biodiversity Net Gain (BNG). LNRS guide the delivery of BNG to support the protection or improved resilience of important habitats.

This policy will aim to protect existing areas of importance for nature and require development to enhance, connect and expand these areas in line with the LNRS.

What was said in the I&O

The Issues and Options consultation didn't include specific questions about LNRS. At the time of consultation, they were an emerging area of national policy awaiting further detail Government.

Draft Policy Direction 37- Local Nature Recovery Strategy

Development proposals will be expected to support the principles of LNRS and demonstrate that a positive contribution will be made to the regional nature recovery network by maintaining and enhancing local ecological networks through habitat creation, protection, enhancement, restoration and/or management.

Justification

LNRS are a statutory requirement of [The Environment Act 2021](#).

11.3 Biodiversity Net Gain

Biodiversity net gain (BNG) is an approach to development that makes sure habitats for wildlife are left in a measurably better state than before.

BNG is additional to existing habitat and species protections. It aims to create new habitat as well as enhance existing habitats, ensuring that the ecological connectivity they provide for wildlife is retained and improved.

Under the mandatory system, developments (with some exceptions) are required to deliver 10% BNG. This will be achieved by delivering habitat on-site or, if that is not possible, through buying off-site biodiversity units.

BNG is designed to work closely with Local Nature Recovery Strategies (LNRS). LNRS guide the delivery of BNG to support the protection or improved resilience of important habitats.

Local Planning Authorities can seek a higher percentage for BNG where there is justified local need and opportunity.

This policy aims to reinforce the statutory framework for BNG and link the delivery of BNG to local priorities and strategies for nature recovery.

What was said in the I&O

The Issues and Options consultation included questions about wider Environmental Net Gain (ENG), rather than BNG alone. However, comments were made about BNG across other related questions.

Mixed views on going beyond statutory 10% BNG requirements – robust evidence would be needed to provide justification.

Good support for new development and changes to existing buildings to incorporate measures to increase biodiversity such as wildlife friendly and biodiverse planting and landscaping, appropriate external lighting and minimal paved/hard surfaced areas.

Draft Policy Direction 38 - Biodiversity Net Gain

All development proposals (unless exempt) must achieve a minimum of 10% BNG (or any higher percentage mandated through local or national policy/legislation) over the pre-development site value as measured by the DEFRA Statutory Biodiversity Metric.

As work on the SWLP progresses we will explore evidence to seek a higher percentage of BNG above the statutory 10% requirement to achieve greater biodiversity benefits.

Proposals should:

- Be supported by core biodiversity gain information;
- Be secured for at least a 30 year period from the substantive completion of the development;
- Be delivered in accordance with the approved habitat management and monitoring plan;
- Follow the mitigation hierarchy to avoid, minimise, mitigate, compensate/offset loss;
- Aim to achieve the required net gain on-site within the development boundary.

Where a proposal adequately demonstrates in the biodiversity gain plan that the mitigation hierarchy has been followed and the required net gain cannot be fully achieved on-site within the site boundary, it must secure alternative provision of the required biodiversity units through:

- The purchase of registered off-site biodiversity units using the Local Nature Recovery Strategy as a guide and in line with the below locational hierarchy:
 1. Within the Local Planning Authority area where the impact occurs
 2. Within a neighbouring Local Planning Authority area
 3. Within Warwickshire, Coventry and Solihull
 4. Elsewhere in England

or as a last resort,

- The purchase of statutory biodiversity credits from the government.

Justification

In England, BNG is a statutory requirement, introduced by [Schedule 7A of the Town and Country Planning Act 1990 \(inserted by the Environment Act 2021\)](#).

Local Planning Authorities can seek a higher percentage for BNG where there is justified local need and opportunity.

11.4 Environmental Net Gain

Environmental Net Gain (ENG) is an approach to development that leaves the environment in a measurably better state than prior to development. It looks holistically at all ecosystem services, beyond just biodiversity, including air quality, water quality, climate resilience, etc. and addresses these in tandem to ensure an overall net gain in ecosystem services. The broader scope, compared to biodiversity net gain (BNG) alone, provides additional benefits for both the environment and people.

The policy will require development proposals to contribute positively to the natural environment by enhancing biodiversity and ecosystem services. Further work is required to develop a comprehensive ENG framework, but an initial focus on BNG and carbon sequestration will provide a solid foundation.

What was said in the I&O

Just over 60% of respondents supported an integrated ENG policy, rather than separate policies to achieve ENG.

A firm view that ENG has wider benefits than BNG alone as it includes other areas such as air quality and water quality, as well as biodiversity.

Draft Policy Direction 39 - Environmental Net Gain

We will aim to have a policy that requires development to contribute positively to the natural environment by providing measurable net improvements in biodiversity and ecosystem services. The initial focus will be on BNG and carbon sequestration, but the policy will be updated to incorporate other ecosystem services as a comprehensive ENG framework is developed.

Justification

This is an emerging area of policy with limited coverage in other Local Plans.

It is supported by NPPF paragraph 180 which seeks to protect and enhance the natural and local environment, as well as Biodiversity Net Gain regulations (introduced by Schedule 7A of the Town and Country Planning Act 1990). It is also supported by Warwick District Council's Biodiversity Action Programme.

Further evidence is required to demonstrate the need for Environmental Net Gain and to help formulate specific policies for the Local Plan.

11.5 Green and Blue Infrastructure

“Green and blue infrastructure” (GBI) refers to the network of multi-functional green spaces and water systems that exist in an area. GBI provides multiple benefits, including providing habitats for wildlife, enhancing health and wellbeing outcomes in an area by providing space for recreation, and building resilience to a changing climate including flood control and preventing urban heat islands.

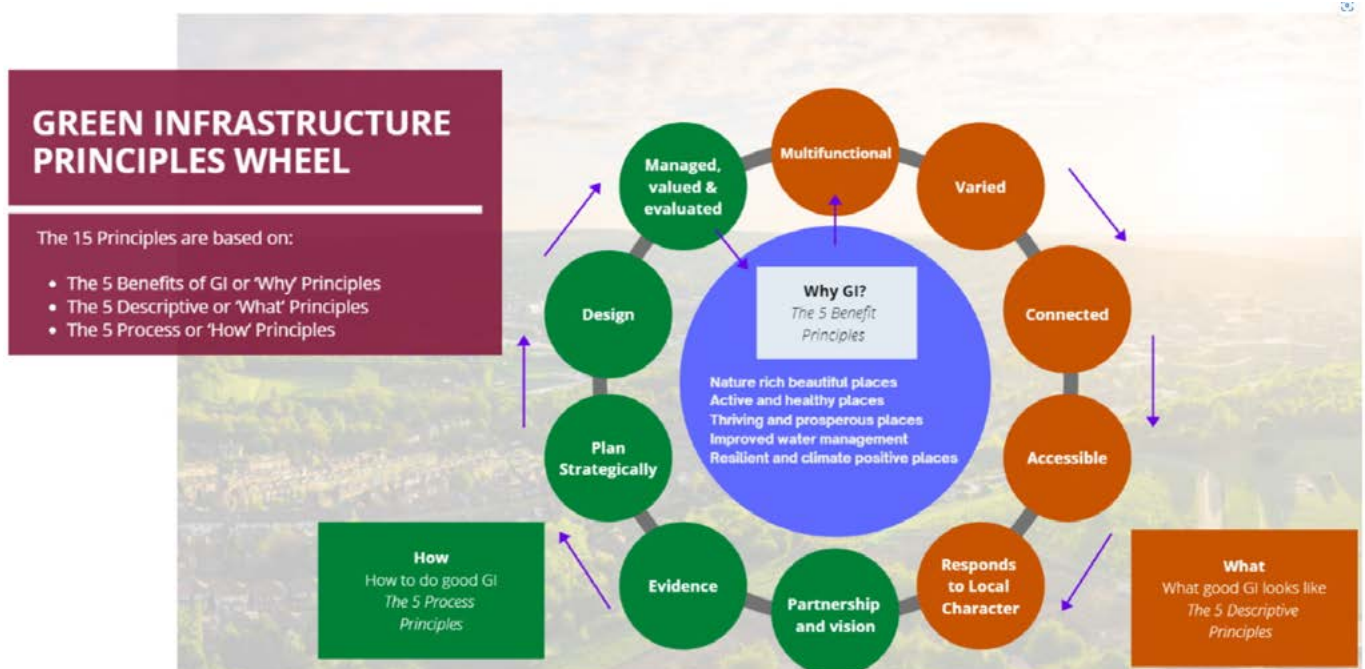
Development can impact GBI in several ways. Firstly, the delivery of new development, and the subsequent increased number of residents in an area, can exacerbate pressures on existing areas of green space. This can reduce tranquillity and availability of space, weakening its recreational value, and it can have negative impacts on on-site biodiversity due to increased levels of disturbance and disruption to habitat connectivity. Therefore, ensuring new development incorporates high quality GBI is a key consideration.

Examples of GBI which should be embedded in the design of development include street trees, multi-functional Sustainable Drainage Schemes (SuDS), areas of open green space for play, areas of green space for biodiversity, and the enhancement of waterways. Combined, they result in the “greening” of an area.

In 2023, the Government published its Green Infrastructure Framework¹. This Framework sets out a series of 15 underlying principles which should be followed to ensure the maximum benefits of green and blue infrastructure are realised. These principles are shown in Figure 18:

Figure 18: Green Infrastructure Principles Wheel

Source: [Green Infrastructure Principles](#)



When delivered in line with the above principles, the effectiveness of GBI is maximised. Given the role GBI plays in enhancing biodiversity and community health and wellbeing it is proposed that enhancing, creating, and connecting GBI will form a key theme in the new SWLP.

Draft Policy Direction 40 - Green and Blue Infrastructure

New development will ensure that existing and new GBI is considered and integrated into the scheme design from the outset. The functionality, accessibility and quality of existing open space should be reviewed and increased wherever this is possible.

One mechanism to ensure that GBI is delivered in line with the above requirements as well as the Green Infrastructure Framework, is to produce a “Greening Factor” for an area.

A Greening Factor is a planning tool used to improve the provision of Green Infrastructure in an area. When applied to a development site, it provides a threshold for the total area of a site which is expected to be covered by an element of GBI.

It is proposed that the GBI policy in the SWLP provides a Greening Factor for development across the South Warwickshire region. The policy will provide direction in line with the below:

Different Greening Factors will be calculated for major residential development, minor residential development, and commercial development. This is to take account of the significant pressure major residential development places on existing GBI.

The delivery of a greening factor on a site must be based on a baseline assessment of existing GBI, demonstrating that high value assets have been retained and enhanced where appropriate. This must be supported by the submission of a long-term maintenance plan for major developments.

The following green interventions will count towards a development’s Greening Factor. These include where green features are present on a site and are retained.

- Trees and hedges, including canopy cover
- Areas of open space, including Green Wedges
- Green roofs and walls
- Multi-functional SuDS
- Community designated Local Green Space
- The enhancement and/or creation of habitats
- Allotments and food growing spaces
- Carbon Sequestration

A Site’s BNG contribution will also count towards the overall Greening Factor of a site.

Ecological enhancements will be expected to be delivered in line with the findings of the following evidence-based documents, and designations:

- the emerging LNRS
- Habitat Regulations Assessment (HRA)
- [Warwickshire, Coventry & Solihull Local Biodiversity Action Plan](#)
- Warwick District Council’s Biodiversity Action Programme.
- Nature improvement areas (e.g. Dunsmore Living Landscape)
- [Warwickshire, Coventry and Solihull Green Infrastructure Strategy](#)

The SWLP will expect the above green interventions to be delivered in a manner which further enhances the effectiveness of their deployment. Furthermore, there are considerations for each of the above which go beyond their role in contributing to a Greening Factor. To ensure the SWLP acknowledges this, separate sub-policies will be produced for each. The next section details the direction these policies will take.

Justification

In 2023 Natural England published guidance on the delivery and enhancement of green infrastructure. As a key resource for developers and local planning authorities, the framework integrates green infrastructure tools, principles, standards and design guidance. It is structured through five key standards, addressing:

- urban nature recovery;
- an urban greening factor;
- an urban tree canopy cover standard;
- accessible greenspace standards; and
- a green infrastructure strategy.

The NPPF sets out the requirement for plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. At an area-wide scale, the Green Infrastructure Standard will see local authorities develop delivery plans to support the creation and enhancement of new and existing greenspaces.

11.6 Carbon Sinks and Sequestration

Carbon sequestration is the capture, removal and long-term storage of carbon dioxide from the atmosphere and is recognised as a key component in mitigating (or if at sufficient scale, potentially reversing) climate change. Carbon dioxide is naturally captured from the atmosphere through biological, chemical and physical processes and is stored in vegetation, soils and oceans. These are often referred to as carbon sinks. The way in which we manage these carbon sinks can have a significant impact on carbon sequestration.

Carbon sequestration can be accelerated or decelerated through changes in land use. For example, land currently used for non-crop purposes (such as trees or grasslands) which is lost to other uses (such as development or intensive agriculture) can reduce or even stop carbon sequestration from happening on that land. Likewise, land which has no material carbon sequestration currently occurring can be converted, via alternative land use, to one which commences carbon sequestration.

This policy seeks to protect and enhance land which has a positive carbon sequestration role and create additional land fulfilling that function.

What was said in the I&O

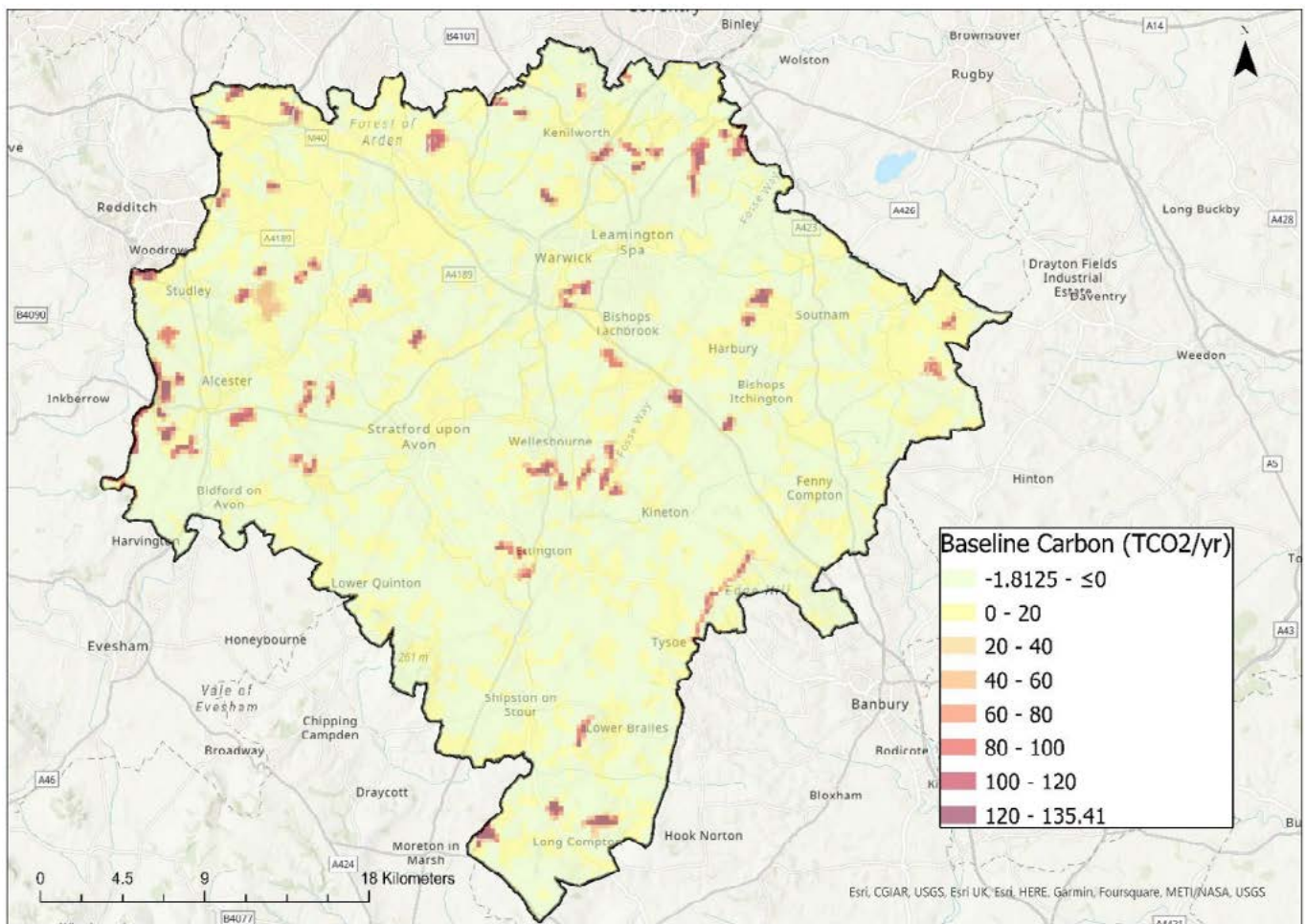
The Issues and Options consultation didn't include specific questions about carbon sinks and sequestration.

Draft Policy Direction 41 - Carbon Sinks and Sequestration

- Development will be expected to protect and enhance carbon sinks that are sequestering carbon above a certain threshold. This will be based on the data shown in the map below. The threshold has not yet been set due to the need for further evidence including further Green Infrastructure evidence.
- Where damage or loss is unavoidable then suitable mitigation must be sought through delivery of the Greening Factor as set out in the Green and Blue Infrastructure Policy.
- We will explore the possibility of policies which require a net gain in carbon sequestration.

Figure 19: South Warwickshire Carbon Sequestration Baseline

(Figure 11 from the '[Assessment of Carbon Sequestration and Habitat baseline and opportunities](#)' report).

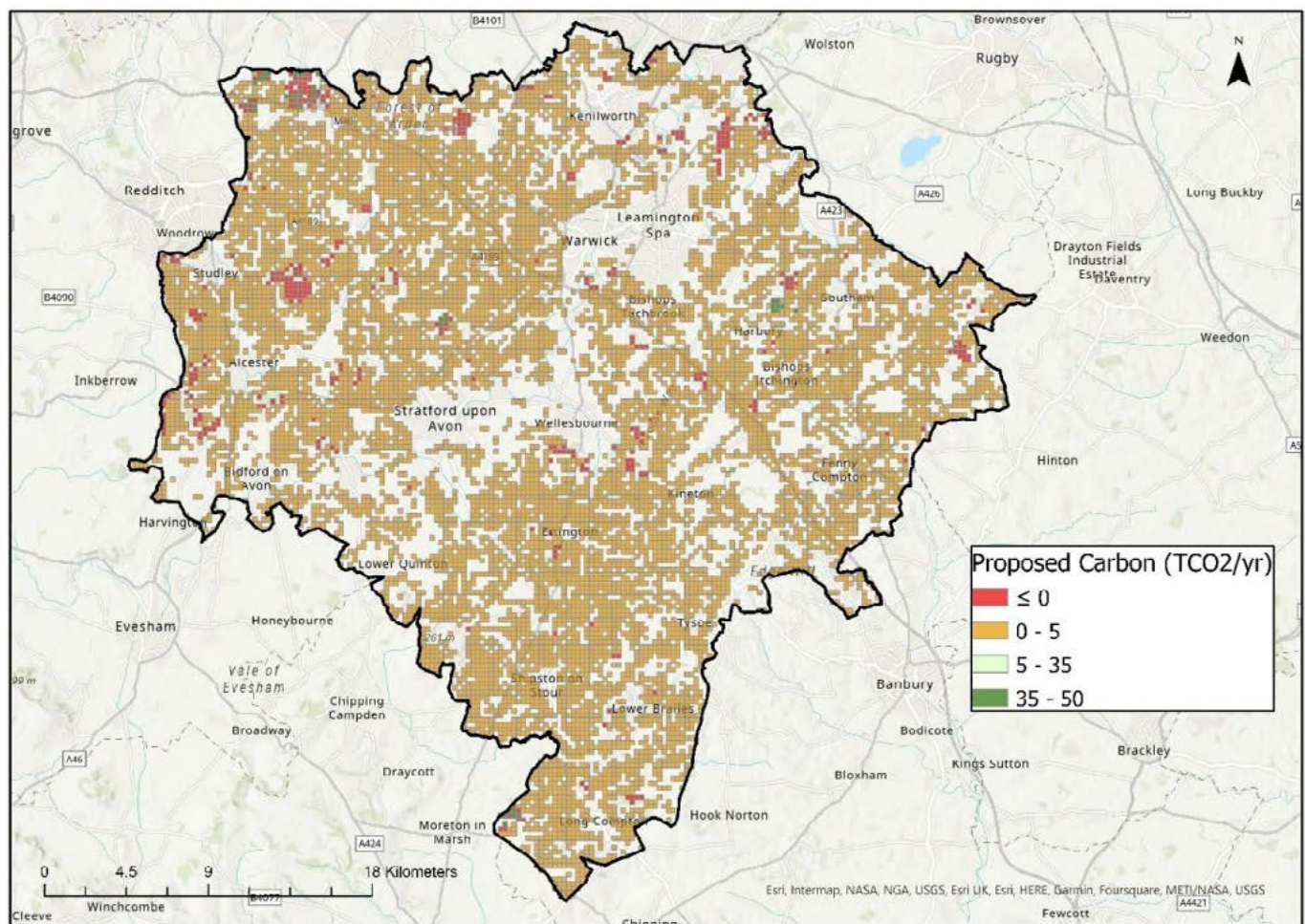


Justification

Carbon sequestration provides clear benefits in building climate resilience and having synergy with other plan objectives.

The 2024 technical evidence ([Assessment of Carbon Sequestration and Habitat baseline opportunities](#)) provides baseline mapping to identify existing carbon sinks and areas with the potential for carbon sequestration opportunities (as per Figure 19). It recommends establishing a presumption against the loss of Climate Change Resilience Assets (defined as existing features within the environment that contribute to climate change mitigation and adaptation), and for Nature-based Solutions to be provided to mitigate any loss.

Figure 20: South Warwickshire Carbon Sequestration Opportunities (Carbon Prioritised)
 (Figure 27 South Warwickshire Carbon Sequestration Opportunities (Carbon Prioritised from [2024 03 06 Task 8 10 SWLP NbS Report Final.pdf](#)).



The role of planning in supporting the development of land for carbon sequestration is limited, however planning policies do exist for protecting nature sites, which almost without exception will function as carbon sinks, and further policies exist to require new development to provide new open space, green and blue infrastructure and biodiversity net gain. In the absence of this policy there would be no requirement for the carbon sink function of land to be specifically considered in development decisions. Promotion of nature-based solutions, where natural systems are protected, restored and managed can assist with the protection of carbon sinks while at the same time provide benefits for biodiversity and health and wellbeing.

11.7 Trees, Hedges, and Woodland

Trees, hedges and woodlands provide valuable habitats for wildlife and contribute to the character of the wider landscape and the overall amenity by contributing to high quality designed desirable locations to live and work. They provide an important role in sequestering and storing carbon dioxide and the right trees in the right places also provide wide ranging resilience to climate change by soaking up excess rainwater, filtering air pollution, reducing noise pollution and cooling the urban environment during periods of excess heat. They also contribute towards improving our health and well-being. Trees on private open space, such as those located within residential gardens can also contribute to the quality of the public realm. Trees therefore play a critical role in our efforts to mitigate the impacts of climate change, while also enhancing the amenity and character of an area.

This policy will promote the retention of existing trees, woodlands and hedgerows in the first instance as these take many decades to mature and realise their full benefits. It will also require the enhancement of sites with new tree planting as part of all development proposals. The policy also intends to reduce neighbourhood disparities by increasing tree canopy cover and nurturing a healthy, diverse and climate resilient local tree population.

What was said in the I&O:

There was not a specific question asked in relation to trees, woodlands or hedges in the Issues and Options consultation document. However, there was a general feeling from respondents that they wanted to see more 'greening' and climate adaptation.

In question S1 regarding Green and Blue Corridors, people commented that trees should be protected, and this was re-iterated in responses to question S10 about the overall Distribution Strategy. In question D4.2 regarding Safe and Attractive Streets, people commented that trees contributed towards providing attractive streets and that existing trees should not be harmed by development.

Draft Policy Direction 42 - Trees, Hedges and Woodland

SDC and WDC will resist the loss of trees of value based on amenity, historic or ecological value, apart from where;

- the tree is dead, dying or dangerous; or
- the tree is demonstrated as causing significant damage to adjacent structures or felling is for reasons of good Arboriculture practice.

There will be a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on-site. Trees that fulfil the below criteria must be retained on site, unless there is a sound arboricultural reason not to:

- Tree Preservation Orders
- Trees in a conservation area
- Ancient Woodland
- Ancient and Veteran trees
- Protected hedgerows
- Traditional Orchards
- Development will be expected to increase tree canopy cover, this will be supported by a tree canopy assessment in line with guidance that is to be developed.
- Tree planting will be in line with:
 - [The UK Forestry Standard 5th edition](#)
 - [The England Tree Action Plan 2021-2024](#)
 - Local Tree Strategies and other local strategies
 - [A guide to planning new woodland in England](#)

Justification

Local Authorities have a statutory duty to consider the protection and planting of trees when granting planning permission for proposed development, as set out section 197 of the Town and Country Planning Act 1990, and paragraphs 136, 187, and 193 of the NPPF.

11.8 Parks, Gardens, Food Growing, Open Space and Local Green Space

People need to have access to high quality open space in order to increase both physical and mental wellbeing and to reduce health and social inequalities. Open spaces comprise of many different forms and may include parks and gardens, outdoor sports provision and allotments and orchards besides many other examples.

The benefits of open space include:

- providing recreational value
- providing wildlife habitats
- minimising noise, heat islands and air pollution
- facilitating sustainable travel through the provision of safe cycle routes
- contributing towards food production, for example through allotments

The section sets out the approach to protecting and enhancing valuable assets for community use, and addresses:

- a. Local Green Spaces
- b. Registered Parks and Gardens
- c. Open Spaces
- d. Urban Parks and Play Areas
- e. Allotments, Orchards and Community Gardens.
- f. Outdoor Sport and Leisure

What was said in the I&O

At the issues and options stage Public Open Space for Leisure and informal recreation was considered a topic suitable for Part 2 of the Local Plan. However, comments indicated a support for preserving these features and ensuring that development sites had sufficient green space within them. The comments related to health and well-being, climate change/climate adaptation, green infrastructure and biodiversity enhancements that green spaces could provide. As such, work has progressed to include policy directions covering green spaces within Part 1 of the local plan.

As this policy direction covers various aspects the policy direction has been subdivided to provide policy direction for each elements including the following and the numbers on the front correspond to the policy direction number given to each element of the policy direction

43 a - Local Green Spaces

43 b - Registered Parks and Gardens

43 c - Open Spaces

43 d - Urban Parks and Play Areas

43 e - Allotments, Orchards and Community Gardens.

Local Green Space

Local Green Spaces are designated spaces that are important to the community, and which are to be retained and afforded the same level of protection as Green Belt when considering development. Local Green spaces have to meet certain criteria as outlined in Planning Practice Guidance.

Draft Policy Direction 43 a - Local Green Space

- LGS currently within adopted Neighbourhood Plans will be rolled over into the SWLP.
- New Local Green Space designations will be supported, and these will be updated and shown on policies maps.
 - Existing Local Green Space proposals, including RURAL.4 of the Stratford-upon-Avon Site Allocations Plan will continue to be progressed, informed by consideration of any reasonable alternatives.

Registered Parks and Gardens

Registered Parks and Gardens are a designated Heritage Asset and are valuable assets to South Warwickshire.

Draft Policy Direction 43 b- Registered Parks and Gardens

- The policy will protect and where possible enhance registered parks and gardens.
- Support efforts to reinstate landscape or built features which contribute positively to the historic interest of the park or garden.
- where extensions are proposed to properties backing on to registered communal grounds, they must preserve the significance of views into, from and across the garden, including any impacts from pollution, as listed in the above Pollution Policy.

Open Spaces

Open spaces are defined in the NPPF as 'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.' They are an important asset that should be protected.

Draft Policy Direction 43 c - Open Spaces

- Development involving the loss of open space will not be permitted unless significant public benefits outweigh the loss.
- The Councils will seek to enhance and improve open space and to provide new areas of open space where there is a deficiency in quantity, quality or accessibility.
- New development will be required to ensure adequate provision of open spaces in line with future guidance.
- It is expected that open spaces will be provided in the first instance onsite and only when it can be demonstrated that this is not achievable physically to deliver, then an off-site contribution will be sought to enhance or provide new open space, within 400m of the development. Technical evidence will be obtained to determine thresholds for open space provision.
- We will seek opportunities to improve access and accessibility to open spaces for all users.

Urban Parks and Play Areas

There is a defined hierarchy of parks, Premier Parks, Area Parks, Neighbourhood Parks, Country Parks as outlined. These parks provide a sense of place for the local community and provide landscape quality to urban and rural areas, as well as encouraging healthy lifestyles and enhancing social interaction and community cohesion.

Provision for children and young people has focused on fixed play provision in the form of equipped play areas and other specialist provision such as multi-use games areas and wheeled play provision or skate parks. Current research suggests that there are benefits in encouraging play in wider settings, and within the public realm.

Draft Policy Direction 43 d - Urban Parks and Play Areas

- Developments will be required to ensure adequate play provision is provided in line with future guidance.
- It is expected that play spaces will be provided in the first instance onsite or in the immediate vicinity and only when it can be demonstrated that this is not achievable physically to deliver, then an off-site contribution will be sought.
- Develop better and more local and inclusive play spaces for all users
- Create a more child friendly public realm by encouraging the provision of play spaces in wider urban settings.
- Multi Use Games Areas (MUGA) will be requested as part of Major development sites and the aspiration is that every resident will have a MUGA available to them within 15 minutes' walk. This will help foster community cohesion and help with active lifestyles. Should there be insufficient space to provide a MUGA onsite or other demonstrable reason why this cannot be provided, then an off-site sum will be requested to enable the creation or enhancement of existing facilities. Design guidance for MUGA's will be outlined in future guidance.

Allotments, Orchards and Community Gardens.

Allotments, orchards, community gardens and growing spaces play an important role in enabling small scale local food production. Additional benefits include supporting community cohesion, providing educational and biodiversity benefits, and improving general wellbeing, reducing health inequalities and food justice.

The provision of allotments is a statutory function for local authorities under a number of acts including the 1950 Allotment Act. There has been a growing interest in the development and establishment of community gardens which are similar to the more traditional allotment provision but offer an alternative that is less formal and potentially easier to integrate within urban environments.

Policy Direction 43 e - Allotments, Orchards and Community Gardens

- Developments should seek to provide space for food growing. Technical Evidence will be obtained to inform and provide guidance.
- Food production spaces should be provided onsite in the first instance and only where it is robustly demonstrated that it is not feasible or practical to provide this onsite will an off-site commuted sum to enhance or provide new facilities be considered.
- Consideration should be given in orchards to the species selected which should be a mix of local species and also climate resilient species in line with future guidance. A management and maintenance plan will also be needed.
- To ensure that these developments contribute towards biodiversity at the design stage as well as at the use stage i.e. ponds, natural hedging and the inclusion where possible of bee hives.

Justification

The NPPF states in para 96 that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

11.9 Outdoor Sports and Leisure

Facilities that provide opportunities for leisure, sport and community are vital for physical and mental health. The Playing Pitch Strategy currently being prepared will be a vital piece of evidence to provide guidance on the provision of outdoor sports pitches.

The protection and enhancement of sports and leisure facilities that play a role in physical and mental well-being.

Draft Policy Direction 44 - Outdoor Sports and Leisure

- The redevelopment of existing community, sport and leisure uses and land formerly used as such to other uses will only be supported where it can be demonstrated that: there is no need or demand for such uses on the site and adequate alternative provision is available to meet the needs of the area; equivalent or better replacement facilities are secured on or off site that are equally accessible to the community or the development is for an alternative sport or leisure facility or use the benefits of which clearly outweigh the loss of the current or former use.
- Where strategic residential development is proposed the provision of new facilities will be sought. The needs for sports and leisure will be assessed on a case-by-case basis depending on the type of development, the location of the site in relation to existing facilities and the capacity of existing facilities. Evidence of this will be available within the Playing Pitch Strategy.
- Proposals for the extension or redevelopment of existing community, sport or leisure facilities to expand and/or diversify the existing use will be supported.
- Outdoor sports and leisure provision will be easily accessible for all users.

Justification

Providing open spaces is an important objective of the NPPF, and is a key aspect to providing sustainable development, particularly with regards to the social objective of sustainable development. People need to have 'access to a network of high quality open spaces' which 'reflect current and future needs and support communities health, social and cultural wellbeing'. The NPPF makes clear under Paragraph 135 that developments should 'optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space)'.

11.10 Areas of Restraint

Areas of Restraint are currently a Stratford only designation that seek to protect sensitive areas within a settlement that make an important contribution to the character of that settlement.

What was said in the I&O

The issues and options consultation asked whether we should remove Areas of Restraint across South Warwickshire, whether we should maintain them and introduce Areas of Restraint across all of South Warwickshire, or whether we should keep them within Stratford District and not introduce within Warwick. There was support for maintaining Areas of Restraint, and identifying areas within Warwick District.

Some developers felt that the areas could be captured in landscape and historic policies.

Draft Policy Direction 45 - Areas of Restraint

- Areas of Restraint will be utilised across the two districts, with Stratford designations being reviewed, and new designations being identified within Warwick where appropriate.
- Areas of Restraint will seek to protect areas that make an important contribution to the character of the settlement.
- The policy will seek to ensure that development does not harm the open nature of these identified areas, unless the scheme has demonstrable community benefits and contributes significantly to the Local Plan's core objectives.
- Projects which enhance the character and visual amenity of Areas of Restraint will be encouraged, as will the promotion of beneficial uses such as public access, nature conservation and food production.

Justification

Many of the settlements within South Warwickshire benefit from the open areas in and around them, these open areas help contribute to the sense of character that people value and the settlement is known for. Whilst open countryside is protected from most forms of development, this may not always be sufficient to protect areas of sensitive land such as river valley corridors on the fringes of a settlement which can be under particular pressure for development and intensified use.

Areas of Restraint would not be considered as local landscape designations in that they would not relate primarily to the quality of the landscape itself. They would apply to relatively small areas within or adjacent to settlements and their overriding purpose would be to protect the inherently open nature of a particular area because of the valuable contribution it makes to the character and physical form of the settlement. This could include significant areas of open space within the urban area or a physical feature which is important in establishing its setting.

It is not intended to restrict all forms of development within Areas of Restraint. It is proposed that there would be a range of activity supported within them, mainly of an agricultural or recreational nature. On this basis, various forms of development may be appropriate, including limited extension or alteration to existing buildings, buildings related to existing or proposed outdoor sport and recreation facilities, cemeteries, allotments, farm diversification schemes and small-scale additions to existing groups of farm buildings.

A study to review and identify Areas of Restraint across South Warwickshire would be undertaken to help inform the designations.

11.11 Protecting the Cotswold National Landscape

The Cotswold National Landscape (formerly referred to as the Cotswold Area of Outstanding Natural Beauty (AONB)) falls within the southern edges of Stratford-on-Avon District and covers approximately 104km of the local plan area. The designation is not relevant to Warwick District. The National Landscape already affords significant protection through national policy and exists to protect the area's special qualities, including its landscape and scenic beauty. It is important that any policy seeks to conserve and enhance National Landscape and its unique properties.

What was said in the I&O

The question was asked in the I&O as to whether to create a buffer around the Cotswold AONB. 59.5% of respondents selected the option that sought to implement a buffer, and 40.5% felt that the current approach should be maintained. It is perhaps worth noting that the difference was only 14 respondents. However, the Cotswold National Landscape Board were in favour of implementing a buffer.

Draft Policy Direction 46 - Protecting the Cotswold National Landscape

- The Cotswold AONB/National Landscape Policy will remain largely the same, however a buffer zone will be introduced to help ensure that we are pro-actively responding to the duty to 'seek to further' the purpose of conserving and enhancing the natural beauty of the area.
- The Buffer Zone will assist development management officers, and those wishing to develop within the setting of the National Landscape.
- The buffer zone will not be an extension to the National landscape Designation.

Justification

Section 85 of the Countryside and Rights of Way Act (2000) was amended by the 2023 Levelling-up and Regeneration Act (2023). This amendment amended the duty wording from to 'have regard' to, 'seek to further' the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. This alteration is seen as a change from passive regard to pro-active regard, and as such an amendment to how the national landscape is considered is seen as appropriate.

Creating a buffer zone of approximately 3km around the National Landscape, as suggested by the National Landscape Board, will provide greater clarity to development management officers and reduce ambiguity when they are considering planning applications within the setting of the National Landscape. The purpose of the buffer is to ensure that developments which may impact the National Landscape and its setting are assessed appropriately, and consistently, with the Cotswold National Landscape Board being consulted on certain development proposals if they fall within the buffer zone. The buffer is not an extension of the National Landscape, and instead will be a tool to ensure consistency of approach and to ensure great weight is given to the impacts of development within the setting of the National Landscape. The creation of a buffer would not prevent Development Management officers consulting the Cotswold National Landscape Board on sites outside this buffer, should they feel that they would have an impact on the National Landscape and its setting, such as in the instances of large urban extensions, new settlements or large scale wind turbines.

11.12 Special Landscape Areas

Special Landscape Areas (SLA) are another Stratford-upon-Avon designation. Special Landscape Areas are areas of high quality landscape that also contain associated historic and cultural features. The existing SLA Policy seeks to protect, enhance and facilitate better management of the best of the area's landscapes outside the Cotswolds National Landscape. The policy does this by resisting development proposals that would have a harmful effect on the distinctive character and appearance of the relevant SLA.

What was said in the I&O

The issues and options consultation asked whether Special Landscape areas should remain as a Stratford designation only, whether they should be removed as a designation entirely, or whether they should be introduced in Warwick District.

54% of respondents believed we should introduce the designation in Warwick so that there are Special Landscape Areas across the whole of South Warwickshire. 30.7% of respondents felt that we should discard special landscape areas, and 15.3% felt we should maintain the current approach of using SLA's in Stratford but not in Warwick. Therefore, there was a clear indication that Special landscape Areas should be utilised across the whole of South Warwickshire.

Draft Policy Direction 47 - Special Landscape Areas

South Warwickshire contains some very special landscape areas, and in order to ensure these are suitably protected and their character maintained Special Landscape Areas will be designated across both Stratford-on-Avon and Warwick.

The SLA designation will not restrict development, but instead ensure that development in these areas does not have a harmful impact on the areas' distinctive character and appearance.

Justification

The NPPF does not mention Special Landscape Areas specifically, however it does contain a number of policies that address how Landscape/Character matters are to be considered and it makes clear that landscape and character need to be suitably considered.

The rural nature of South Warwickshire means there are areas of particularly high landscape quality. To ensure this is maintained, Special Landscape Areas can be used to ensure their distinctive character and appearance is not harmed by development.

The purpose of the Special Landscape Area designation is to protect, enhance and facilitate better management of the best of the area's landscapes outside the Cotswolds National Landscape. Special Landscape Areas are a way to ensure developments are protecting and enhancing valued landscapes, and that any developments are sympathetic to the landscape setting.

SLAs have to be, by definition, 'special' at a district level to merit inclusion. All landscapes are important, especially to their local residents. However, to define an entire district as 'special' would potentially undermine the purpose of designating specific areas for their landscape quality. Designation has to be driven by the key qualities of a particular area of landscape. On that basis, any SLAs identified will represent particularly high quality countryside in the context of the Local Plan area, based on their landscape and scenic quality, as well as natural and historic features. A study will need to be undertaken that identifies particularly high quality areas that are considered suitable for designation as a Special Landscape Area.

11.13 Protecting and Enhancing Landscape Character

Landscape character contributes to the sense of place across South Warwickshire, and it is important that the landscape is protected and enhanced as much as possible. At a National Level landscape has been divided by Natural England in their National Character Area Profiles. Within Stratford and Warwick, the landscape areas consist of Dunsmore and Feldon (96), Arden (97), Cotswolds (107) and the Severn and Avon Vales (106). These areas “contain distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse” (Natural England). These areas have been assessed at a finer grain in the Warwickshire Landscape Guidelines, which contain the Landscape Character Assessments (LCA’s).

Given the sensitivity of the landscape within Stratford and Warwick, landscape has been further broken down into Landscape Description Units (LDUs). These represent the landscape type in a specific location, for example soil, tree cover character, geology, topography, land use and settlement pattern, and are the ‘building blocks’ of the LCAs. Within these LDU’s nest Land Cover Parcels (LCPs), and these are the finest grain units of landscaping, describing any local variation that is present and visually apparent within the LDUs, such as patterns of field enclosures. Combined, this Landscape Evidence is key to help inform planning decisions and ensure that policies can be effectively implemented. At present the Landscape Evidence pertaining to Landscape Description Units and Land Cover Parcels dates to the previous local plans, and therefore it is acknowledged that this information needs updating.

What was said in the I&O

Within the Issues and Options landscape was considered throughout the document as part of numerous other topic areas and landscape character was considered a matter for Pt.2 of the local plan. However, as work has progressed it has been possible to incorporate a draft policy direction at this earlier stage of the plan making process.

Draft Policy Direction 48 - Protecting and Enhancing Landscape Character

Development will avoid detrimental effects on the landscape setting and on features which make a significant contribution to the character and setting of an asset, settlement or area. Where a proposal would result in landscape harm, the general principle is that it should be refused unless there would be an over-riding benefit of the development for instance to meet an evidenced local housing need. Developments will require high quality landscaping schemes that positively contribute towards enhancing the character and amenity of the landscape and seek to incorporate measures to minimise and mitigate the effect of development upon the landscape, while also seeking to minimise the cumulative effect of development to prevent coalescence. These schemes will consider the landscape context, local distinctiveness and historic character and landscape, including tranquillity.

- Developments will take into account the local topography and built form, as well as key local views and vistas and seek to avoid creating hard developed edges to the open countryside.
- We will explore the need for major developments applications to require a full Landscape Visual Impact Assessment.
- We will explore the possibility of requiring long-term management and maintenance (minimum of five years) of new landscape proposals to ensure their establishment. Evidence will be gathered to inform this approach.

Justification

The NPPF states in paragraph 135 that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). Within Para. 187, the NPPF highlights that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). Conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.

11.14 Agricultural Land

The best and most versatile agricultural land should be protected from development. This is increasingly important in the view of producing more food locally to reduce overall greenhouse gas emissions and reduce reliance on other countries for imported food items that can be grown locally. Lower grade agricultural land may be used to cultivate non-food crops such as biomass.

The policy should aim to protect the best and versatile agricultural land and only allow development if the benefits of the developments outweigh the protection provided to the land.

What was said in the I&O

Issue B8- Agricultural land was included to get views on this issue. A question was asked as to whether to include a policy safeguarding the best and versatile land agricultural land, unless it can be demonstrated that the harm to the agricultural land outweighs the benefits of the development to the area.

90% respondents were in favour of including a policy that would safeguard the best and most versatile agricultural land.

Draft Policy Direction 49 - Agricultural Land

- Development outside the identified growth strategy sites/ settlements will be required to protect best and most versatile agricultural land.
- Any development that is put forward in the best and most versatile agricultural land will need to demonstrate that the benefits of the development outweigh the harm.
- The large-scale renewable energy developments will be prioritised on the poor-quality agricultural land (Grades 3b, 4 and 5).

Justification

NPPF (2024) Paragraph 187 (b) states that *“Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*.

Paragraph 187 and footnote 65 of the NPPF also provide some guidance on agricultural land.

[A Green Future: Our 25 Year Plan to Improve the Environment](#) sets out the Government’s 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. One of those measures include providing protection to best and most versatile agricultural land.

[Defra’s guidance](#) on soils also provides reference to agricultural land.

12. Glossary

Word/Acronym	Abbreviation	Meaning
Accessibility		The ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.
Accessible Neighbourhoods		Where land uses (local services, schools, employment and housing) are better aligned, spatially, with transport planning (transport infrastructure), to make it easier for people to walk, cycle and use public transport.
Active travel		Transport of people or goods, through non-motorised means, based around human physical activity.
Affordable housing		Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions for it to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency. Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as "low-cost market" housing, may not be considered as affordable housing for planning purposes.
Air Quality Management Area	AQMA	These are defined geographical areas where air pollution levels are, or are likely to, exceed national air quality objectives at relevant locations.
Annual Monitoring Report	AMR	Document that assesses implementation of the Local Development Scheme and the extent to which policies in Local Development Documents are being successfully implemented. Part of the Local Plan.

Areas of Outstanding Natural Beauty	AONB	An Area of Outstanding Natural Beauty (AONB) is an area of countryside in England, Wales, and Northern Ireland, that has been designated for conservation due to its significant landscape value.
Biodiversity		The variety of life on earth. It encompasses the whole of the natural world and all living things including plants, animals, and other organisms which, together, interact in complex ways with the inanimate environment to create living ecosystems.
Biodiversity Action Plan	BAP	A biodiversity action plan (BAP) is an internationally recognised program addressing threatened species and habitats and is designed to protect and restore biological systems
Biodiversity Net Gain	BNG	A way to contribute to the recovery of nature while developing land. It is making sure the habitat for wildlife is in a better state than it was before development.
Biodiversity Offsetting		Biodiversity offsetting involves activities to create biodiversity benefits in order to compensate for biodiversity losses resulting from development. This is to ensure that when a development damages nature in a way that is unavoidable or cannot be mitigated, new nature sites will be created to offset the negative impact on biodiversity.
Building Research Establishment Environmental Assessment Method	BREEAM	A nationally recognised benchmark to measure the environmental performance of buildings.
Built Up Area Boundaries		A planning policy term used to define urban areas of a settlement from countryside.
Brownfield Land		Land which is or was occupied by a permanent structure, excluding agricultural buildings. Also known as previously developed land.
Blue Infrastructure		Blue infrastructure relates to water features and systems including ponds, lakes, streams, rivers , storm water provision such as raingardens and Sustainable Drainage Systems schemes (SuDS). Good management of these features can provide benefits for biodiversity and also protect communities from flooding and storm surges, as well as absorb and filter pollutants.
Built Up Area Boundaries	BUAB	A planning policy term to used to define urban areas of a settlement from countryside.
Call for Sites		A period of time where landowners are encouraged to come forward with sites, they are interested in developing.
Carbon Sequestration		A natural or artificial process by which carbon dioxide is removed from the atmosphere and held in solid or liquid form.
Climate Change		A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.

Climate Change Adaptation		Adjustments to natural or human systems in response to actual or expected climatic factors or their effects (including from changes in rainfall and rising temperatures) which moderate harm or exploit beneficial opportunities.
Climate Change Mitigation		Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Climate Resilience		According to UK Green Building Society Climate Resilience is "The ability of a system, community or society exposed to climate hazards to resist, absorb, accommodate to, and recover from the effects of a hazard. A climate-resilient system responds in a timely and efficient manner, including through the preservation and restoration of its essential basic structures and functions".
Combined Cooling Heat and Power	CCHP	(CCHP), is the simultaneous production of electricity, heat and cooling all from a single source.
Combined Heat and Power	CHP	Combined heat and power (CHP) is a highly efficient process that captures and utilises the heat that is a by-product of the electricity generation process.
Community Garden		A piece of land gardened or cultivated by a group of people individually or collectively.
Community Infrastructure Levy	CIL	The Community Infrastructure Levy (CIL) is a charge that local authorities can set on new development in order to raise funds to help fund the infrastructure, facilities and services - such as schools or transport improvements - needed to support new homes and businesses.
Decarbonisation		The process of removing or reducing the carbon dioxide (CO ₂) output of a country's economy. This is usually done by decreasing the amount of CO ₂ emitted across the active industries within that economy.
Delivery and Viability Studies		Assessment to determine that the contents of the Plan and its development strategies can be achieved.
Demographics		Statistical data relating to the population and particular groups within it.
Densification		Densification, sometimes referred to as intensification, refers to the process of adding dwellings to existing residential or mixed-use areas. For example by: <ul style="list-style-type: none"> • Re-using brownfield sites • Conversion of upper floors of buildings to residential use • Additional storeys on buildings • Re-using empty homes • Infill in residential areas, e.g. filling gaps in the street frontage, developing disused garage blocks, car parks • Mews dwellings on service roads
Development Plan		The statutory plan that provides the basis for determining planning applications. Comprises development plan documents that have been adopted by the Council and any "made" neighbourhood plans.

Development Plan Document	DPD	A document forming part of the local plan that is subject to independent examination and becomes part of the development plan when adopted by the council.
Economic Development		Industrial, commercial retail and tourism development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).
Electric Vehicle	EV	A vehicle that can only be powered by an electric motor that draws electricity from a battery.
Energy Hierarchy		The Energy Hierarchy is a classification of energy options that prioritises a sustainable approach. The top of the energy hierarchy aims to reduce the need for energy, and the bottom falls back on using conventional fossil fuels. The middle tiers look at using renewable energy sources and being efficient with the energy created to reduce waste.
Environmental Impact Assessment	EIA	A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.
Equalities Impact Assessment	EqIA	An assessment to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations.
Evidence Base		Collection of baseline specific data for the County which is used to inform the development of all Local Plan policies and Supplementary Planning Documents.
First Homes		First Homes are a specific kind of discounted market sale housing considered to meet the definition of 'affordable housing' for planning purposes. This is discounted at 30% below market value and, at the time of writing, must not exceed £250,000 after discount. The percentage discount is protected for future purchasers. Further details are in the national Planning Practice Guidance and its associated written ministerial statement.
Flood Zone 1 - Low probability		This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
Flood Zone 2 - medium probability		This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.
Flood Zone 3b - the functional floodplain		This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. But land which would flood with an annual probability of 1 in 20 (5%) or greater in any year, or is designed to flood in an extreme (0.1%) flood, should provide a starting point for consideration and discussions to identify the functional floodplain.

Full lifetime of a development		Residential development should be considered for a minimum of 100 years, unless there is specific justification for considering a shorter period.
Green Belt		The Green Belt is an area of open land around a city, on which building is restricted.
Green Belt Review		An assessment of how different areas of land contribute to the purposes of Green Belt set out in national policy.
Green Corridor		A 'green corridor' (also known as wildlife corridor, biological corridor or habitat corridor) is a strip of land that is established to enable the bridging of habitat populations that have been split by human development such as a road, settlement or other human activity.
Green Infrastructure	GI	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Green/Blue Infrastructure	GBI	Green Blue Infrastructure is a network of green spaces and water environments that sustains the ecosystems needed for a good quality of life. The GBI network, comprises both public and private green and blue spaces.
Habitats Regulations Assessment	HRA	An assessment the likely impacts and possible effects of policies on the integrity of the internationally designated wildlife sites (e.g. Bredon Hill Special Area of Conservation).
Health Impact Assessment	HIA	A practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups.
Help to Buy		A government scheme to help first-time buyers get a property with just a 5% deposit.
Heritage Asset		A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Historic Environment Records	HER's	Sources of, and signposts to, information relating to landscapes, buildings, monuments, sites, places, areas and archaeological finds spanning more than 700,000 years of human endeavour. Based mainly in local authorities, they are used for planning and development control, but they also fulfil an educational role.
Historic Landscape Characterisation	HLC	A range of approaches to the identification and interpretation of the historic dimension of the present-day landscape (including townscape) within a given area that can be used to manage change to the historic environment.
Housing and Economic Development Needs Assessment	HEDNA	The Housing and Economic Development Needs Assessment (HEDNA) looks at a wealth of evidence, including population, household and economic growth projections, to assess the need for housing and employment land.

Housing Market Area	HMA	A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.
Housing Strategy		Document detailing how Councils and their partners plan to work together to ensure that more people get the opportunity to live independently in good quality housing of their choice.
Impact Assessment	IA	An impact assessment shows the impact of a retail or leisure proposal on the vitality and viability of existing town centres within the area of the proposed development.
Industrial Strategy		A document that looks at the strengths and weaknesses of the local economy and sets out a plan of action to build on existing successes, and to develop and support areas that may be struggling.
Infill development		Defined as the filling of small gaps within the settlement and would normally involve development of a gap in a continuously built-up frontage.
Infrastructure		The network of essential physical services that most buildings or activities are connected to. It includes not only physical services in an area (e.g. gas, electricity and water provision, telecommunications, sewerage) and networks of roads, public transport routes, footpaths etc. but also community facilities and green infrastructure. New or improved infrastructure will generally need to be provided where significant levels of new development are proposed.
Infrastructure Funding Statement	IFS	The infrastructure funding statements are required to set out the infrastructure projects or types of infrastructure that the authority intends to fund, either wholly or partly, by the levy or planning obligations, though this will not dictate how funds must be spent and in turn collected.
Inset into Green Belt		Settlements where the Green Belt designation comes up to the edge of the built-up area, but where the built-up area itself is excluded from the designation.
Intensification		See “densification”
Landfill		The deposition of waste into hollow or void space in the land, usually below the level of the surrounding land or original ground level in such a way that pollution or harm to the environment is prevented. Landfill sites have to be sited where an existing void is available; former mineral workings have historically been used for this purpose. The term ‘landfill’ is often used when referring to ‘landraising’.
Lead Local Flood Authority	LLFA	Established under the Flood and Water Management Act in 2010. They are required to develop, maintain, apply and monitor a strategy for local flood risk management in its area.
Local Development Scheme	LDS	The LDS is a rolling business plan for the preparation of key planning policy documents that will be relevant to future planning decisions. It outlines the programme and resources for completion and adoption of each relevant planning document.

Local Enterprise Partnership	LEP	A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
Local Nature Recovery Strategies	LNRS	They identify practical, achievable proposals developed with the input of people who know and understand the area, especially landowners and managers.
Local Nature Reserve	LNR	A Local Nature Reserve or LNR is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities in England, Scotland and Wales. Local Nature Reserves (LNR's) are for both people and wildlife. They are places with wildlife or geological features that are of special interest locally. They offer special opportunities to study or learn about nature or simply to enjoy it.
Local Plan	LP	The plan for the future development of the local area, drawn up by the Local Planning Authority in consultation with the community. In law this is prescribed as a Development Plan Document adopted under the Planning and Compulsory Purchase Act 2004.
Local Green Space	LGS	Green areas of particular importance identified for special protection. A designation which was introduced in the National Planning Policy Framework.
Local Housing Need	LHN	The government's standard method for calculating housing requirements for local authorities.
Local Transport Plan	LTP	The document that sets out the Council's local transport strategies and policies and an implementation programme.
Local Planning Authority	LPA	The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the district council, London borough council, county council, Broads Authority, National Park Authority and the Greater London Authority, to the extent appropriate to their responsibilities.
Local Wildlife Site	LWS	Non-statutory areas of local importance for nature conservation that complement nationally and internationally designated geological and wildlife sites.
Masterplan		A plan that sets out the proposals or aspirations for the development of buildings, street blocks, public spaces, streets and landscape.
Mechanical heat treatment	MHT	The mechanical sorting or pre-processing stage with technology often found in a material recovery facility. The mechanical sorting stage is followed by a form of thermal treatment. This might be in the form of a waste autoclave or processing stage to produce a refuse derived fuel pellet. Mechanical heat treatment is sometimes grouped along with mechanical biological treatment. Mechanical heat treatment does not however include a stage of biological degradation (anaerobic digestion or composting).

Mineral Reserve		A mineral reserve is that part of a mineral resource, which has been fully evaluated and is commercially viable to work; in relation to the Local Plan this means those minerals for which a valid planning permission for extraction exists (i.e. permitted reserves).
Mineral Resource		Natural concentrations of minerals or, bodies of rock that are, or may become, of potential economic interest due to their inherent properties.
Nationally Described Space Standard	NDSS	A form of technical planning standard about minimum internal space standards for residential amenity.
National Planning Policy Framework	NPPF	The government's statement of planning policies for England and how these are expected to be applied.
National Planning Policy Guidance	NPPG	The National Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF) and it is intended that the two documents should be read together.
Neighbourhood Plan		A plan prepared by Parish/Town Councils or Neighbourhood Forums to establish general planning policies for the development and use of land within a particular neighbourhood area. Subject to conformity with the strategic policies of the Local Plan, an independent examination and support in a community referendum, a Neighbourhood Plan will become part of the planning framework for land uses in the local area.
Net Zero		The point at which the amount of greenhouse gases being put into the atmosphere by human activity in the UK equals the amount of greenhouse gases that is being taken out of the atmosphere. Source: Powering our Net Zero Future. Energy White Paper. Department for Business, Energy and Industrial Strategy. HM Government, Dec. 2020.
Net Zero Carbon	NZC	Having Net Zero Carbon dioxide emissions, either by balancing carbon dioxide emissions with removal, or simply eliminating carbon dioxide emissions altogether.
New Settlements		New settlements are new, large- scale developments, planned to provide housing, work places and related facilities within a more or less self - contained environment.
Office for National Statistics	ONS	The UK's largest independent producer of official statistics and the recognised national statistical institute of the UK

Previously developed land or Brownfield land	PDL	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Primary Shopping Areas	PSA	Primary shopping areas are defined in the NPPF as: Defined areas where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).
RAMSAR site	RAMSAR	Ramsar sites are wetlands of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands for containing representative, rare or unique wetland types or for their importance in conserving biological diversity.
Renewable Energy		Renewable Energy includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.
Resilience		The capacity of people and places to plan for, better protect, respond to and to recover from flooding and coastal change [or other impacts of climate change]. Source: National Flood and Coastal Erosion Risk Management Strategy for England. Environment Agency, Jul. 2020.
Rural Exception Sites		Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
Section 106 contributions		Developer contributions, often known as 'S106 contributions', are paid by developers to mitigate the impact of new homes and other buildings, which create extra demands on local facilities.
Self and Custom build housing		"Self-build" refers to projects where individuals or groups directly organise the design and construction of new homes. Custom housebuilding involves individuals or groups working with a specialist developer to deliver new homes that meet their specific aspirations and needs.
Settlement Design Analysis		A form of analysis that looks at the structure and design of existing settlements to help identify where growth might best be integrated.

Severance		The term applied to the effects that roads and their traffic can have on.
Shared Equity		A lender agrees to give a loan alongside a main mortgage in return for a share of any profits when the house is sold or the loan repaid.
Shared Ownership		Where a home can be bought through the shared ownership scheme if cannot afford all of the deposit and mortgage payments for a home that meets their needs.
Sites of Special Scientific Interest	SSSI	Specifically defined sites or areas designated as being of national importance because of their wildlife, plants or flowering species and/or their unusual or atypical geological features. SSSIs are designated by Natural England and have protected status under the under the Wildlife and Countryside Act 1981. The protection is subject to Government Regulations.
Social Isolation		Social isolation can be defined structurally as the absence of social interactions, contacts, and relationships with family and friends, with neighbours on an individual level, and with “society at large” on a broader level.
Soundness		To be considered sound, a Development Plan Document must meet four tests, it must be positively prepared, justified (have a robust and credible evidence base and be the most appropriate strategy) as well as effective (deliverable, flexible and able to be monitored) and consistent with national policy.
Specialist housing		There are different types of specialist housing designed to meet the diverse needs of older people, which can include: <ul style="list-style-type: none"> • Age-restricted general market housing • Retirement living or sheltered housing • Extra care housing or housing-with-care • Residential care homes and nursing homes Further information is in the national Planning Practice Guidance, reference ID: 63-010-20190626. Variations of these may be used to house people with other disabilities where appropriate.
Special Protection Area	SPA	A designation under the European Union Directive on the Conservation of Wild Birds.
Standard method		The standard method is a government formula used to determine the minimum number of homes anticipated to be planned for, in a way which addresses projected house growth and historic under-supply. The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure.
Statement of Community Involvement	SCI	Document setting out when, with whom and how consultation will be undertaken on Local Development Documents.
Strategic Environmental Assessment	SEA	Document setting out the environmental assessment of policies, to meet the requirements of the European SEA Directive.

Strategic Flood Risk Assessment	SFRA	A high-level assessment of flood risk carried out by or for Local Planning Authorities with the purpose of assisting them to deliver sustainable development and to avoid development in areas that are at risk of flooding or that would increase flooding elsewhere.
Supplementary Planning Document	SPD	Document that expands on policies and proposals in development plan documents. Part of the Local Plan but not subject to formal public examination and not part of the development plan.
Supplementary Planning Guidance	SPG	Generic term for non-statutory planning policies and documents. Not part of the development plan.
Sustainability Appraisal	SA	The Planning and Compulsory Purchase Act 2004 requires Local Development Documents (LDDs) to be prepared with a view to contributing to the achievement of sustainable development. Sustainability appraisal is a systematic process that assesses the social, environmental and economic effects of the strategies and policies in a LDP from the outset of the preparation process. This helps to ensure that decisions are made that accord with sustainable development requirements.
Sustainable Urban Drainage Systems	SuDS	The SuDS approach involves slowing down and reducing the quantity of surface water run off for a developed area to manage flood risk downstream, and reduce the risk of run off causing pollution. This is achieved by harvesting, infiltrating, slowing, storing, conveying and treating run off on site. SuDS allow water to become a more visible and tangible part of the built environment, which can be enjoyed by everyone.
Tenure		In housing and planning, tenure is a financial arrangement and ownership structure under which someone has the right to live in a dwelling. Some examples are private rented housing and owner-occupation. There are a number of affordable housing tenures, such as Social Rent, Affordable Rent, Shared Ownership and First Homes.
Transport Assessment	TA	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and what measures will need to be taken to deal with the anticipated transport impacts of the development.
Urban Capacity Study		An urban capacity study identifies sites which may have the potential to come forward for residential development within existing urban areas, to assist in limiting the number of dwellings which would need to be developed on greenfield sites in the open countryside.
Warwickshire County Council	WCC	
Washed over by Green Belt		Settlements where the built-up area is included in the Green Belt designation

Water Cycle Strategy	WCS	Document identifying the water services (incl. supply, and waste) required to support the development within the Plan. It establishes where any constraints exist and identifies measures to eliminate or mitigate these constraints.
Water Neutrality		For every development, total water use in the wider area after the development must be equal to or less than total water use in the wider area before development". (Environment Agency b, 2009).
Wellbeing		The state of being comfortable, healthy, or happy.
Windfall Sites		Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.
Zero Carbon		Where no carbon emissions are being produced from a product/ service.