

**South Warwickshire Local Plan**  
**Preferred Options Consultation**  
**(Regulation 18)**  
**10<sup>th</sup> January-7<sup>th</sup> March 2025**

**Consultation Statement Summary**  
**February 2026**

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## Introduction

This document sets out the key messages from the questions set out in the Preferred Options document. The consultation statement sets out key summaries identified from the representations that were received for each question/draft policy direction/draft policy/strategic growth location and potential new settlements.

The preferred options document was made up of 12 chapters and contained 113 questions. The summaries below provide headline summary for each for each question. The detailed analysis and summaries of the representations are included in the Consultation Statement.

## Chapter 1: Introduction

Do you broadly support the proposals in the Introduction? If you have any additional points to raise with regards to this chapter, please include them here.

- Most responses did not relate to the overall question but objected to individual sites contained within the document.
- Majority of the representations were in general support of the chapter.
- The other common theme was the approach of producing Part 1 and 2 Plan. Respondents felt that the document was too vague and listed too many sites and making it more like Issues and Options consultation rather than preferred options.
- There was a concern about the lack of infrastructure to support the proposed quantum of growth.
- It was considered that the proposed amount of growth will have a detrimental impact on the plan area.
- Other issues which were highlighted in this chapter include providing greater protection to the Green Belt, environmental impact of development – climate change, biodiversity, and health impacts from increased pollution and/or loss of green spaces, plan not reflecting local priorities.

## Chapter 2: Have your say

Do you broadly support the proposals in the How to Have Your Say chapter? If you have any additional points to raise with regards to this chapter, please include them here.

- Most comments did not relate to this chapter. Some major themes identified in the responses to this question included objections to sites, concerns about infrastructure constraints, the impacts of development on the green belt and the environment, and village character and heritage.
- Comments were raised to difficulties in using the consultation platform. There was a sentiment that it was confusing to navigate between the portal.
- Comments were expressed at the frustration at the amount of technical jargon and document's length and its complexity and the amount and volume of supporting documents.
- Many of these respondents felt they had not received adequate notification of the consultation.

- Comments which raise multiple issues will have been counted under multiple theme groups which include objection to development, lack of infrastructure.
- Concerns were raised to development in Green Belt, biodiversity impacts of development, loss of productive agricultural land impacting on food security.
- Concerns were raised to the potential loss of village character, heritage, conservation areas.
- There were issues raised relating to brownfield first approach, promoting specific sites, providing gypsy and traveller sites into larger developments.

### Chapter 3: Vision and Strategic Objectives-South Warwickshire 2050-

Do you broadly support the proposals in the Vision and Strategic Objectives: South Warwickshire 2050 chapter? If you have any additional points to raise with regards to this chapter please include them here.

- The proposed Vision for South Warwickshire 2050 aims to create a flourishing, healthy, and vibrant area that meets sustainable development needs while responding to climate emergency.
- However, commentary from respondents revealed a significant divide between the Councils' aspirations and the public's perception of the plan's feasibility, with a wide range of responses received.
- Many stakeholders argued that five overarching principles are too generic and fail to reflect the urban/rural character of South Warwickshire.
- Whilst the development industry was more supportive, a recurring theme from developers and promoters was that the vision for South Warwickshire requires a stronger commitment to economic growth alongside focus on health, beauty and sustainability.
- Members of the public were concerned about the amount of development and felt that the delivery of 54,700 homes contradicted the focus on environmental and infrastructure elements of the vision.

## Chapter 4: Meeting South Warwickshire's Sustainable Development Requirements

### SGO1- South of Coventry Group- Do you agree with proposed strategic growth location SG01 being considered for inclusion within the plan?

- The green belt is valued for preventing urban sprawl and preserving the separation of Coventry, Kenilworth and Burton Green, and Policy SG01 is seen to risk permanent loss of high-quality farmland and countryside.
- Existing links to motorways and rail are offset by local roads at capacity, peak congestion and limited public transport and cycling routes.
- Loss of historic landscapes, ancient woodland and wildlife corridors is said to threaten biodiversity and heritage assets.
- Shortfalls in schools, medical centres and recreational facilities are highlighted, prompting calls for early infrastructure delivery.
- Eco-parks, green corridors, high-density walkable housing and sustainable drainage measures are suggested to mitigate impacts.

### SG02-Stoneleigh Park Employment Group- Do you agree with proposed strategic growth location SG02 being considered for inclusion within the plan?

- Respondents highlighted risks to Green Belt integrity and urbanisation of the rural area if SG02 is developed, noting possible merging of nearby towns and loss of distinct identities, and argue that brownfield land at Stoneleigh Park offers more efficient use of existing infrastructure.
- Concerns about transport include single-access roads, increased traffic and pollution, and lack of bus and cycling facilities, prompting calls for major upgrades.
- Threats to biodiversity involve the loss of ancient trees, hedgerows and wildlife corridors.
- Utilities and community services are viewed as inadequate without improved wastewater and power. Noise from HS2 and the A46 and harm to Stoneleigh Abbey's setting and conservation area village character are also flagged.
- Additional comments propose mixed-use development, exclusion of Echills Wood and closer coordination with neighbouring sites to balance housing, employment and heritage protection.

### SG03-Coventry- Airport Group- Do you agree with proposed strategic growth location SG03 being considered for inclusion within the plan?

- Respondents note SG03's proximity to key roads (A45, A46, M1, M6, M40, M69) and rail links, plus bus routes to Coventry, Leamington and Warwick, but warn of local road capacity, safety and active-travel shortfalls.
- They emphasised the site's green belt designation, historical landscape and biodiversity value.
- The airport and surrounding commercial areas are considered valuable and there are concerns that the gigafactory proposal is undeliverable as no end user can be found.
- Concerns include impacts on local wildlife sites, heritage assets and noise, prompting calls for detailed environmental, traffic and health assessments and closer coordination with local authorities to ensure practical delivery.

### SG04-South of Kenilworth Group- Do you agree with proposed strategic growth location SG04 being considered for inclusion within the plan?

- SG04 South of Kenilworth is designated green belt land providing a buffer between Kenilworth and Leek Wootton and viewed to meet all five national criteria for green belt designation, with removal lacking the exceptional circumstances required by the NPPF. Local services and infrastructure, including healthcare, education, roads and drainage, are at capacity, while shops and public transport lie beyond easy walking distance.
- Narrow country lanes with dangerous bends, flooding and heavy lorry traffic would compromise cyclist and pedestrian safety and increase congestion.
- Development at SG04 would erode separation between settlements, harm landscape character and views from Kenilworth Castle, damage biodiversity by removing hedgerows and ancient trees, and reduce productive Grade 2 Agricultural land.
- Alternative brownfield sites are seen as a better option to meet housing needs while safeguarding heritage, landscape and ecological networks.
- Infrastructure upgrades and a shorter plan period to reduce the housing requirement are also suggested.

### SG05-East of Lillington Group- Do you agree with proposed strategic growth location SG05 being considered for inclusion within the plan?

- Respondents highlighted narrow roads; limited junction capacity may increase car use.
- They stressed that SG05 sits within the green belt, acting as a buffer between settlements and supporting biodiversity, footpaths, recreation and agricultural uses that would be lost under development.
- Respondents noted that local healthcare, school, and utility services are at or near capacity and require expansion and cite flood risk and drainage constraints associated with sloping, spring-fed, and marshy ground.
- They also identified engineering challenges on uneven terrain and raise the issues of noise, air pollution, HS2-related disruption, and farmland loss as further concerns.

### SG06-North of Leamington Group- Do you agree with proposed strategic growth location SG06 being considered for inclusion within the plan?

- Respondents raised concerns that SG06's green belt location would undermine the separation of settlements, risk urban sprawl and damage heritage landscapes, with brownfield sites seen as preferable.
- Transport links are deemed insufficient, likely increasing car dependency and congestion.
- Biodiversity-rich habitats, veteran trees and wildlife corridors would be lost, alongside public footpaths that support recreation and health.
- The site lies beyond 20-minute neighbourhood distances, lacking nearby shops, schools and medical facilities and placing pressure on oversubscribed services. Fertile grade-2 farmland would be permanently removed, affecting food production.
- Local schools and GP practices are already at capacity.
- Flood risk and drainage constraints are cited as a concern without clear mitigation proposals.
- Some respondents highlight town-centre renewal or small-scale extensions as alternatives but note that infrastructure upgrades would be needed for any development.

### SG07-Wedgnock Park Farm Employment Group- Do you agree with proposed strategic growth location SG07 being considered for inclusion within the plan?

- Local roads and junctions around the A46 and Birmingham Road are already congested and unsafe, with narrow lanes unsuitable for heavy goods vehicles and rail and bus services lacking capacity, accessibility or realistic scope for expansion.
- SG07 lies entirely within the green belt, risking breach of national policy and loss of farmland, habitats, heritage features and countryside separation.
- The site adjoins ancient woodland and key wildlife corridors, endangering protected species and landscape character, while high-grade agricultural land vital for food security could be irreversibly lost.
- Existing healthcare, schools, utilities and drainage systems are at capacity, with flood risk raised due to inadequate infrastructure.
- Brownfield and non-green belt sites are cited as preferable alternatives.

### SG08-West of Warwick Group - Do you agree with proposed strategic growth location SG08 being considered for inclusion within the plan?

- Transport infrastructure around SG08 is viewed as a concern due to peak-hour congestion on major roads and access limitations.
- There were concerns that the loss of open fields, hedgerows and farmland would erode the landscape, reduce biodiversity and harm wildlife habitats.
- Floodplain conditions and high-water tables heighten surface-water runoff risks, while education, healthcare and utility services are already strained.
- SG08 is viewed by some respondents as infill development, which could weaken rural character, increase car dependency and disrupt settlement patterns without new walking and cycle links.
- Though some felt that SG08 may be an appropriate extension of urban Warwick given its adjacency to existing residential development.

### SG09-South of Europa Way Group- Do you agree with proposed strategic growth location SG09 being considered for inclusion within the plan?

- Most respondents raised concerns about transportation infrastructure and traffic issues in SG09.
- Respondents note that site SG09 benefits from immediate access to the M40 and A452.
- The delivery of the new motorway junction could also help address existing traffic issues. However, some respondents were concerned that the new development could exacerbate peak-time congestion.

- Other concerns include increased noise, air pollution and parking pressures. Other respondents expressed concerns that the development would harm the rural character and identity of Bishop's Tachbrook.
- Some respondents also raised concerns that the development could place additional strain on existing community facilities, including GP surgeries, schools and recreation spaces.
- Habitat fragmentation, biodiversity loss and increased flood risk on floodplain land are highlighted, alongside calls for wetland's creation and comprehensive active-travel routes.
- Some respondents supported the allocation of SG09 because of its sustainable location and proximity to motorway junctions. SG09 is also one of the few Strategic Growth Locations that are not located within the Green Belt, with some respondents preferring the Council to prioritise the use of non-green belt land.

### SG10-Bishops Tachbrook Group- Do you agree with proposed strategic growth location SG10 being considered for inclusion within the plan?

- Respondents emphasised that existing roads and rural lanes lack capacity for additional housing traffic and may require widening, with peak-time congestion on routes serving JLR, Aston Martin, and local villages.
- They warned that the scheme risks eroding rural landscapes, village gaps and ancient footpaths, threatening prime agricultural land, protected habitats, listed buildings, scheduled archaeological sites and mature trees.
- Respondents also noted that local schools, GP surgeries, drainage systems and sustainable travel options are already at capacity, and that building on floodplain slopes with a failing SUDS may increase flood risk.

### SG11-South East of Whitnash Group- Do you agree with proposed strategic growth location SG11 being considered for inclusion within the plan?

- Respondents were most concerned about road infrastructure capacity and transport issues around SG11, with Harbury Lane and local junctions described as operating at capacity and requiring new link roads.
- Existing schools, health services, and utility infrastructure are considered insufficient to support additional growth at SG11.
- Development is viewed as potentially harmful to the rural character and identity of the village. Heritage is also identified as a concern by respondents, due to the site's proximity to listed buildings, scheduled monuments and Roman settlements. Part of the site lies within floodplain areas, posing drainage and safety risks. Development on greenfield land may also destroy farmland, wildlife habitats and raise pollution.

### SG12-Southam Group- Do you agree with proposed strategic growth location SG12 being considered for inclusion within the plan?

- It was widely noted by respondents that there was a preference for non-green belt sites, and that this made SG12: Southam a good option for growth, given its existing amenity offer.
- Respondents stressed that settlement expansion requires robust transport infrastructure, noting current dependence on cars amid limited rail access, substandard roads and inadequate bus services.
- Overloaded GP surgeries, schools and leisure facilities highlight the need for new health, education and community facilities alongside housing.
- Respondents felt that these infrastructure requirements were severe enough to preclude bringing the strategic growth location forward.
- Detailed assessments are required for local waterways and low-lying areas, with consideration of the impact on heritage assets such as the Holy Well scheduled monument.
- Some respondents were concerned about the impact on existing infrastructure provision in the context of broader opposition to the amount of growth proposed.
- Concern was raised about the impact on local services following the significant amount of development that Southam has seen recently.

### SG13-Gaydon Lighthorne Heath Group- Do you agree with proposed strategic growth location SG13 being considered for inclusion within the plan?

- Respondents highlighted strong transport links via the M40 and potential new rail options but warn of reliance on private cars, congestion and safety risks on narrow local roads.
- They note SG13's capacity to accommodate new housing near major employers yet caution against loss of farmland, rural character, heritage assets and biodiversity.
- Comments call for early infrastructure upgrades, active travel measures and public transport to align growth with sustainability.
- Feedback also stressed insufficient local schools, health services, shops and emergency facilities, advising that these be delivered before development.
- Concerns about flood risk, drainage, utilities capacity and ecological impacts underline the need for detailed assessments and mitigation.
- Additional points include MOD safeguarding constraints, footpath disruption and pollution effects, with calls for clear commitments to green space and community amenities.

### SG14-East of Gaydon Group- Do you agree with proposed strategic growth location SG14 being considered for inclusion within the plan?

- Respondents noted that the SG14 site lies beside M40 junction 12 but that narrow, busy local roads and limited bus services mean total reliance on cars.
- The consultation responses highlight the absence of a railway station, the potential for a Chiltern line parkway station and the lack of schools, GP surgeries and upgraded water, sewage and power networks.
- There is flood risk due to clay soils. The current inadequate drainage schemes are flagged as likely to worsen flooding without the robust SuDS being proposed and provided to address current flooding issues as well being part of any proposed development within the proposed SG14 growth option area.
- Development on agricultural farmland that is not in the green belt is seen as less damaging compared to development that is proposed on designated protected areas, yet development may cause harm to biodiversity, heritage assets and the rural character within SG14 and the wider Gaydon area.
- Suggestions from the representations include the provision of high-density development, the creation of mixed-use neighbourhoods with the provision of integrated public transport, pedestrian and cycle corridors with the provision of extensive open-space buffers together with the early delivery of the required utilities (upgrade and new utilities) together with the provision of social infrastructure.
- The preference is for the use and development of existing brownfield sites in order to reduce urban sprawl and transport impacts from potential future development.

### SG15-North of Wellesbourne Group- Do you agree with proposed strategic growth location SG15 being considered for inclusion within the plan?

- Respondents described heavy congestion and narrow junctions on the A429 and B4087, frequent gridlock delaying emergency vehicles and raising emissions.
- They warn that lack of rail links and limited bus services would increase private car use. Respondents note that local schools, GP surgeries, and dental practices are at capacity with no clear expansion plans.
- They highlighted that the site lies on a floodplain with past floods and insufficient drainage, raising the risk of increased surface water runoff.
- Respondents emphasised that loss of prime agricultural land may undermine food production and natural flood mitigation.
- They also express concerns over harm to rural landscape character, heritage settings in Charlecote, Wellesbourne and neighbouring villages and potential village coalescence.

- Respondents raise worries about habitat loss and fragmentation affecting protected species and local wildlife.
- They reported that sewage treatment works and water supply infrastructure are nearing capacity.
- Respondents advocate using brownfield or non-greenbelt sites and advancing transport, education, healthcare and utilities upgrades before new housing.

### SG16-South of Wellesbourne Group- Do you agree with proposed strategic growth location SG16 being considered for inclusion within the plan?

- Respondents highlighted that the local road network along the A429, B4086 and B4087 is already congested at peak times, with limited bus and rail options likely to increase car dependency, noise and emissions while narrow lanes and historic bridges pose safety risks.
- Respondents warned that proposed development may alter the rural settlement pattern, erode distinct identities and remove green buffers, open countryside and habitats, with development effecting ancient woodland and flood places.
- Respondents noted the absence of plans for road or junction improvements public transport enhancements or green-space mitigation.
- Capacity constraints at GP practices, schools and leisure facilities, alongside strained sewage, water, power and telecoms infrastructures, are underlined, as are significant flood-risk concerns associated with the River Dene.
- Preference was expressed for brownfield or infill alternatives, retention of prime farmland for food security and detailed procedural assessments such as flood-risk appraisals, housing-impact evaluations and utilities modelling.

### SG17-Shipston-on-Stour Group- Do you agree with proposed strategic growth location SG17 being considered for inclusion within the plan?

- Respondents noted that local schools, the medical centre and sewage network are at capacity, and that narrow roads, single-track bridges and infrequent buses create car dependency and parking pressure.
- Parts of the SG17 proposed growth area lie within the existing flood zones 2 and 3, with annual inundation at Angela's Meadow.
- There are concerns that proposed new housing development would worsen the levels of surface water runoff and that this would create issues for local drainage capacity. Shipston-on-Stour's existing town heritage setting, including its listed buildings and bridges, conservation areas and the Cotswolds National
- Landscape buffer zone (formally the Cotswolds AONB) could be harmed by proposed new development.

- There is a need for archaeological surveys to be carried out and for road upgrades as part of any proposed development. There are currently limited existing green spaces, wildlife corridors.
- This proposed development may result in the loss of the existing local waste and recycling centre which would result in increased and longer journeys for waste disposal and recycling for current and future residents and businesses.
- There are no proposals for on-site schools, healthcare expansion and flood defences as part of this proposed SG17 growth area option.
- Respondents recommended prioritising brownfield land, carrying out detailed flood risk assessments, health impact assessments and land contamination assessments.
- Respondents recommend the need for infrastructure planning and ensuring the securing infrastructure investment before any development proceeds.

### SG18-West of Stratford-Upon-Avon Group- Do you agree with proposed strategic growth location SG18 being considered for inclusion within the plan?

- Respondents highlighted that Birmingham Road, Evesham Road and A46 junctions suffer daily gridlock and poor air quality and call for a relief road, improved rail and bus services, cycle lanes and train electrification.
- They noted that green belt development would reduce openness, damage wildlife sites near the Welcombe Hills and Clopton Park House Meadow, and increase flood risk in zones 2 and 3 without upgraded SuDS and defences.
- Heritage concerns focus on Bordon Hill approaches, Clopton House setting and medieval remains, prompting a request for a Heritage Impact Assessment and landscape-led design.
- Deliverability is said to hinge on major investment in roads, drainage, utilities, community services and enforceable planning obligations, with brownfield sites favoured to protect privacy and local amenity.

### SG19-East of Stratford-Upon-Avon Group- Do you agree with proposed strategic growth location SG19 being considered for inclusion within the plan?

- Transport infrastructure around SG19 is deemed insufficient to support additional traffic, with road layouts constrained by Clopton Bridge and peak-time congestion on key routes.
- Rail, bus and cycle links are underdeveloped. Services and facilities, including water, sewage, schools, healthcare and shops, are reported at capacity.

- Respondents warned that housing growth without phased delivery of a relief road, river crossing and active-travel networks could gridlock existing roads.
- Development on agricultural land is said to threaten landscape character, flood storage and biodiversity, and development in this area may breach the strategic gap between settlements.
- Sequential testing is judged to favour brownfield and new settlements over greenfield development.

### SG20-Bidford-on-Avon Group- Do you agree with proposed strategic growth location SG20 being considered for inclusion within the plan?

- Respondents highlighted narrow lanes, medieval bridges and flood-prone routes around the SG20 area, noting pinch points and rat-runs that cause congestion and safety risks and call for bridge replacement and road upgrades.
- They report no regular bus or rail links, oversubscribed schools, limited GP and dental capacity and floodplain and drainage issues linked to new hard surfaces.
- Loss of grade 1 and 2 agricultural land, harm to ridge-and-furrow features and high visual impact on open countryside and views are flagged.
- The absence of foul and surface water drains, risks to habitats and heritage assets prompt suggestions for hydraulic modelling, heritage assessments, phased delivery of infrastructure, and prioritisation of brownfield sites, safe travel routes and green spaces.

### SG21-Alcester Group- Do you agree with proposed strategic growth location SG21 being considered for inclusion within the plan?

- With regards to the proposed SGL West of Alcester, respondents highlighted insufficient public transport links, reliance on cars, congested and accident-prone roads and a lack of pedestrian and cycle connections, prompting calls for major upgrades or alternative sites.
- The respondents caution that developing land within the Green Belt lacks exceptional circumstances, would use grade 3 agricultural land, risks biodiversity loss and may encourage further sprawl.
- Local schools, healthcare, sewerage infrastructure and utilities are already at capacity and would need substantial investment.
- The proposed scale would nearly double Alcester's existing population, and the suggested location next to the A435 could isolate the site from the town and require new centres and services.

- Respondents also warn of harm to wildlife sites, listed buildings and conservation areas and note that increased paved areas could exacerbate flooding. Brownfield or infill options are seen as more sustainable.

### SG22-West of Studley Group - Do you agree with proposed strategic growth location SG22 being considered for inclusion within the plan?

- Respondents highlighted that the existing road network is unable to cope with projected traffic without junction upgrades or new bypasses and that poor public transport and missing active travel routes would create reliance on private cars.
- Local health, education and emergency services are seen to be operating at capacity with no clear expansion plans, while retail, banking and postal services are limited within Studley. SG22's green belt farmland and hilltop landscape is valued for safeguarding the countryside and preventing urban sprawl, and its development is said to risk habitat loss, visual intrusion, settlement coalescence and worsened flooding due to constrained drainage.
- Utilities infrastructure is described as insufficient and in need of major upgrades.
- Respondents argue that detailed traffic, landscape and flood impact assessments and firm infrastructure commitments are essential before any development, and they suggest that brownfield or non-green belt sites may offer more sustainable alternatives.

### SG23-North of Henley-in-Arden Group- Do you agree with proposed strategic growth location SG23 being considered for inclusion within the plan?

- Respondents highlighted that Policy SG23 would overload the single-carriageway A3400 and surrounding roads, with bottlenecks at Stratford Road, Warwick Road and the High Street.
- There is no bypass to absorb extra traffic, risking noise, pollution and safety; local
- GP surgeries, dental practices, the pharmacy and A&E are at capacity.
- Schools lack spare places; ageing drainage and clay soils could worsen flooding along the A3400, Blunts Green and the High Street without mains sewerage.
- Loss of green belt habitat threatens species, carbon capture and the town's rural character.
- Hall End Road and narrow lanes are unsuitable for heavy vehicles; public transport is sparse, and the conservation area and listed buildings would face harm without alternative brownfield options.

### SG24-Hockley Heath Group- Do you agree with proposed strategic growth location SG24 being considered for inclusion within the plan?

- Respondents noted that Hockley Heath is a cross-boundary area that falls partly within Stratford-on-Avon District and partly within Solihull Metropolitan Borough Council.
- Respondents highlight that policy SG24 would encroach on green belt land, threaten ecosystems and reduce natural drainage, increasing flood risk, noise, air pollution and wildlife collisions.
- Respondents note outdated environmental assessments and missing net biodiversity gain plans.
- They report narrow country lanes, infrequent bus services and no rail station, risking congestion, pollution and unsafe junctions absent realistic transport upgrades.
- Existing schools and healthcare facilities lack capacity, with no plans for expansion, forcing longer journeys and straining community services.
- Respondents warn that large-scale development could erode rural character, overwhelm infrastructure and provoke cross-boundary governance and funding disputes without clear Section 106 contributions or shared planning mechanisms.
- Updated assessments and mitigation strategies are deemed essential before progress.
- Concerns with the publicly documented financial state of Solihull Metropolitan Borough Council in which part of Hockley Heath is located. Solihull MBC are having to sell off some of their assets, have had emergency funding from the government and there is concern with its future ability to manage, fund and deliver facilities and services in relation to existing developments and future developments including in Hockley Heath and for this proposed growth option SG24.

### Policy Direction 1: Do you agree with the approach laid out in Draft Policy Direction 1 - Meeting South Warwickshire's Sustainable Development Requirements?

- Respondents emphasised that the local housing requirement should follow the revised 2024 NPPF standard method with a 5–20% buffer, remove reference to the outdated HEDNA requirement, and include periodic reviews.
- With regards to the ability to meet this level of growth, respondents highlighted that roads, rail, public transport and utilities are at capacity and urged delivery of upgrades, relief roads, park-and-ride and active travel routes before new housing.

- Ecological concerns centred on protecting green belt, habitats and landscape character by favouring brownfield and infill sites.
- Feedback called for balanced site scales, robust evidence for windfall allowances, clear procedural guidance and a focus on existing infrastructure capacity.

**Policy Direction 1: Do you have any comments on a specific site proposal or the HELAA results? (please include site name and reference number as identified on the interactive map).**

The key points regarding the HELAA methodology were as follows:

- Several Respondents noted that the most recent Local Wildlife Site Layer should be used. Concerns were also raised regarding the potential for more recent SSSI Buffer layers being available from Natural England, and more recent flood risk mapping.
- There were queries from several different developers/promoters requesting greater clarity about the weighting given to various factors and the methodology that had informed this, with the view that it provided a somewhat arbitrary way of penalising some sites and supporting others. A noteworthy point was raised regarding the weighting applied to sites in priority areas, which unduly increases the scores for Sites in those locations.
- Promoters were also concerned about the use of buffers for some constraints, including listed buildings/scheduled monuments and ecological designations, noting that this penalised sites in an arbitrary way that did not consider their specific contexts and focused on mechanical issues.
- Further to this, there were several points made, stating that constraints within a red line boundary for the site promotional purposes wouldn't necessarily be included within a developable area of a site in terms of assets such as an ancient woodland, and constraints such as areas of flood risk.
- There was also concern about constraints where Sites have been penalised by default where evidence wasn't available. This was focused especially on cases such as connectivity, accessibility, and areas not covered by a heritage assessment, where sites were scored moderately regardless of whether they impact on a heritage asset or not. This also applies to sites that are in locations not assessed under the High-Level Transport Assessment.
- Respondents stated that transport assessments in the HELAA are challenged as being overly optimistic with connectivity and accessibility scores underestimated real world limitations.

- Respondents felt that the HELAA evaluation underestimated the real extent of areas at risk of flooding. This led to requests for updated modelling and further consultation with the LLFA and Environment Agency.
- Respondents were concerned about the HELAA assessment underestimating biodiversity and wildlife. Calls were made to use the most up-to-date Local Wildlife Layer and to factor in SSSI designations, ancient woodlands, and protected species.
- Some Respondents felt that the allocation of any land within the Cotswold National Landscape would harm its character and lead to a loss of dark skies. Note that this was disputed by the Cotswold National Landscape Board as set out below.
- Respondents felt that the HELAA scoring for proximity to listed buildings, conservation areas and scheduled monuments is criticised as being overweighted and inconsistent, with call for zero scoring where mitigation measures and buffers may fully avoid harm.
- Respondents considered the HELAA methodology to underestimate parcels with strong Green Belt functions, whilst sites scoring a moderate contribution were still often considered to play a vital role in preventing unrestricted sprawl.
- Respondents raised concerns that the HELAA methodology underestimates the value of agricultural land, and requests were made for a recalibration to reflect Natural England classifications and sustainability assessments.
- Broad concerns were raised regarding inconsistencies in weighting, unclear application of scoring factors, and over reliance on desktop GIS data without local input and outdated assessments. A number of HELAA B sites are identified as having incorrect overall scores that misrepresent constraints.

## Draft Policy Direction 2: Potential New Settlements

### A1-Land south of Tanworth-in-Arden\* - Do you agree with proposed New Settlement Location A1 being considered for inclusion within the plan?

- Development at A1 south of Tanworth-in-Arden was seen as likely to harm the Green Belt's rolling hills, hedgerows and open fields, and to affect nearby listed buildings and the Tanworth-in-Arden Conservation area.
- Narrow rural lanes and flood-prone roads were judged unsuitable for increased traffic without major upgrades, while rail and bus services were deemed too infrequent.
- Local schools, healthcare, utilities and community services were considered unlikely to absorb substantial additional demand without clear delivery plans.
- Ancient woodlands, ponds and habitats for protected species were highlighted as at risk, potentially breaching biodiversity targets.

- Flood risk from surface water and local watercourses was also raised, and brownfield or smaller, better-connected sites cited as more sustainable alternatives.

### A2-Land east of Wood End - Do you agree with proposed New Settlement Location A2 being considered for inclusion within the plan?

- Respondents noted that A2 Land East of Wood End is in a designated green belt location and any allocation would conflict with its purpose of safeguarding open countryside, preventing settlement coalescence and protecting ecological functions.
- Respondents warn of harm to landscape character through loss of ancient woodlands, hedgerows and open views, and highlight narrow, flood-prone lanes and limited rail and bus services that could encourage car use and strain the road network.
- Utilities are considered inadequate with poor drainage, sewerage, power and digital connectivity, and expansion of schools and healthcare facilities would be required.
- The ecological sensitivity of ancient woodland and local wildlife sites is stressed, along with potential impacts on carbon sequestration and nearby SSSIs.
- Respondents favour prioritising brownfield or non-green belt sites to avoid undermining green belt policy and protect natural and heritage assets.

### B1- Land at Hatton - Do you agree with proposed New Settlement Location B1 being considered for inclusion within the plan?

- Respondents raised concerns that policy B1 would undermine green belt integrity and the ancient Arden landscape and erode the buffer between Warwick/Leamington and the West Midlands.
- Respondents warned of irreversible loss of productive farmland, ancient hedgerows, woodland, species-rich habitats and public footpaths.
- Local roads on the A4177, B4439, A46 and M40 are already congested at peak times, and narrow rural lanes lack pavements, lighting and safe passing points.
- This could lead to gridlock, rat-running through villages, higher accident risk and a decline in air quality. The scheme would fragment ecosystems, displace wildlife such as barn owls, bats and hedgehogs, and remove trees and hedges without adequate net gain. Health services at GP practices.
- Warwick Hospital, urgent care and mental health centres are deemed at capacity with no clear plans or funding for expansion.

- Rail services at Hatton station are considered unreliable, overcapacity and unable to expand platforms or car parks without prohibitive costs.
- Respondents also cited the loss of high-grade agricultural land, pressures on schools and childcare, and insufficient water, sewage and flood management, suggesting that brownfield or urban-extension sites would be more sustainable.

### C1- Land south of Kingswood\*- Do you agree with proposed New Settlement Location C1 being considered for inclusion within the plan?

- Respondents highlighted narrow, winding roads prone to flooding, low bridges and limited public transport and station capacity, which could increase car dependency, emissions and road-safety risks.
- The green belt site includes grade 2 and grade 3 farmland and wildlife corridors, with development seen as harming biodiversity, habitats and rural character without exceptional circumstances or mitigation. Local schools, GP surgeries and shops are lacking.
- Heritage assets, ancient woodlands and open landscapes could face visual harm and structural damage, while utilities and connectivity are strained by poor mobile and broadband coverage, limited water and power capacity, and inadequate drainage in flood-prone areas.
- Brownfield alternatives and detailed impact assessments are recommended.

### E1-Long Marston Airfield - Do you agree with proposed New Settlement Location E1 being considered for inclusion within the plan?

- Respondents noted severe transport constraints on local roads and river crossings, limited rail provision south of the Avon, and inadequate bus and cycle links alongside hopes for rail reopening tempered by funding and delivery doubts; they urge phased delivery of relief roads, railway links, schools and healthcare before housing, coordinated through planning documents.
- Environmental feedback praises potential sustainable transport and brownfield reuse but warns of increased pollution, biodiversity loss, flood risk and landscape harm, particularly within Areas of Outstanding Natural Beauty and dark sky zones.
- Some responses highlighted that Community Infrastructure Levy would not be sufficient, with new schools, clinics, leisure spaces and local shops being needed ahead of development.
- Some responses noted that a standalone settlement may prevent urban sprawl yet risks landscape character erosion without strict growth limits.

- It is thought by some respondents that economic self-containment is plausible via mixed-use provision but challenged by local job shortages and commuting demands.
- Heritage concerns focus on impacts to ancient woodlands, listed sites and conservation areas that require design mitigation.
- Responses call for robust water management at flood zones and existing drainage limits at the former airfield site.
- The site's brownfield status and open land are seen as positives, although some felt that this depends on there being significant infrastructure investment and a detailed masterplan SPD.

### F1- Land to the west of Ufton - Do you agree with proposed New Settlement Location F1 being considered for inclusion within the plan?

- Respondents felt that fragmented land ownership and the lack of willing sellers at site F1 will make it difficult for New Settlement F1 to be developed.
- Some comments suggested that a steep escarpment and existing solar farm would mean that large areas would be unbuildable, and therefore housing capacity would be limited.
- It was mentioned that gas pipes and overhead power lines cross the site, requiring early mitigation, and road access via the Fosse Way or A425 is thought to already be at capacity and deemed unsafe without major upgrades.
- Some comments state that bus services are infrequent and no rail option exists, and that this will likely increase car use and congestion on what they describe as narrow, frost-prone village roads. Local schools, GP surgeries and shops are thought to lack the capacity to support thousands of homes without the delivery of accompanying infrastructure and services.
- Some responses suggest that sewage, water and electrical networks need substantial upgrades, with existing flood-plain conditions and clay soils exacerbating drainage issues.
- Concerns were expressed that development could harm nearby SSSIs, ancient woodlands and ground-nesting birds, while a lack of local jobs would intensify commuting.
- Respondents consider that Land to the west of Ufton's infrastructure, environmental and logistical challenges must be addressed before housing could proceed.

## F2-Lands south of Deppers Bridge - Do you agree with proposed New Settlement Location F2 being considered for inclusion within the plan?

- Respondents highlighted poor transport links via narrow lanes, limited bus services and no nearby rail station, leading to car dependency, congestion and required road upgrades.
- Some respondents felt that local schools, surgeries, shops, water and sewage systems lack capacity and would need major investment.
- Electricity and gas supply are considered in by some as inadequate.
- Responses point out that the site supports priority habitats, species and protected areas and provides wildlife corridors and flood control, with development being identified as potentially posing risks to biodiversity and increasing surface water runoff.
- It was felt by some respondents that regular flooding on low-lying land is underestimated by official maps.
- Medieval field systems, ancient roads and listed buildings are thought to face disturbance from construction.
- Some suggested that a resulting loss of fertile grade 2 farmland would reduce food production. Respondents noted that brownfield or other non-green belt sites might deliver housing more sustainably.

## F3-Land north-east of Knightcote - Do you agree with proposed New Settlement Location F3 being considered for inclusion within the plan?

- Respondents deemed the lack of a nearby railway station or reliable bus services would likely result in high car dependency for future occupiers which in turn would increase congestion on narrow rural roads and flood-prone junctions.
- Respondents claimed nearby minor roads are at or beyond capacity, indicating a need for major upgrades or bypasses to handle associated extra car journeys.
- A transport-focused masterplan and new rail links are cited as opportunities to improve connectivity and sustainability.
- The site lies outside the green belt which received support within some responses, however contrary responses raised the loss of agricultural land as a concern.
- Respondents consider F3s visibility within the landscape from wider areas and the erosion of existing vistas, particularly views of Burton Dassett Hills Country Park.
- Respondents also raised themes surrounding harm to biodiversity through loss of habitat. Responses did raise the proximity to HS2 and regional commerce corridors and support for economic growth.

- Oversubscribed schools and healthcare services were also of concern.
- Flood risk was also highlighted with areas in flood zone 2, clay soil and inadequate drainage and sewerage systems all highlighted as matters of concern.
- Pressure on utility services such as water supply pressures, mains gas and distant treatment works highlighted the need for comprehensive utilities investment.
- The absence of land submissions in the call for sites was repeatedly raised and disputes over housing land supply raise questions about deliverability.

### G1-Land west of Knightcote - Do you agree with proposed New Settlement Location G1 being considered for inclusion within the plan?

- Respondents believe G1 would require substantial transport upgrades due to absent rail links, congested roads and limited bus services, though proximity to the M40 and A46 and a potential new station could support sustainable commuting.
- Respondents raised concerns about adverse effects on the countryside's visual character, loss of productive farmland and wildlife habitats, flooding and drainage challenges as well as overstretched schools and healthcare.
- Existing utilities are deemed insufficient without major investment.
- Subsurface heritage assets and archaeological features are also claimed to be at risk of damage without a thorough impact assessment.
- Procedural queries include site selection justification and transparency of assessments.

### X1-Land south of Leamington/north of Wellesbourne/east of Barford - Do you agree with proposed New Settlement Location X1 being considered for inclusion within the plan?

- Respondents were most concerned about road infrastructure capacity and transport issues around X1, including narrow rural lanes and peak-time congestion on the A429 and B-roads.
- The lack of reliable rail and bus services is seen as likely to increase car dependency.
- Some respondents suggest mitigation measures such as a new M40 junction, upgraded links and a park-and-ride to improve traffic issues.
- Beyond transport, respondents highlight broader environmental and infrastructure impacts.
- Development at X1 is viewed as potentially intruding into open countryside and eroding the gaps between Warwick, Leamington Spa and surrounding villages.

Local schools, GP services, hospital capacity, water supply, sewage treatment, electricity and broadband are described as already operating at capacity.

- Development could also result in the loss of Grade 1–3a Agricultural Land, posing risks to food production.
- The allocation may adversely impact biodiversity, with red- and amber-listed species, veteran trees and wildlife corridors potentially facing habitat loss due to increased traffic noise and air pollution.
- Surface water flooding risks and limited drainage infrastructure are flagged. Heritage and archaeological features, including scheduled monuments, listed buildings and ancient woodland, are seen as at risk.

### X2-Land south of Leamington Spa/Whitnash and west of B4455 Fosse Way - Do you agree with proposed New Settlement Location X2 being considered for inclusion within the plan?

- Representations reflect a mixed position regarding the suitability of X2 as a new settlement location.
- Respondents acknowledge its location outside the Green Belt and its proximity to strategic transport corridors, employment areas and existing urban services.
- However, substantial concerns are raised in relation to transport congestion, infrastructure capacity, utilities provision, flood risk, heritage impacts and overall deliverability.
- While the site benefits from nearby road, rail and bus connections, including access to M40 junctions 13 and 14 and Leamington Spa railway station, many respondents consider that significant upgrades would be required to ensure development does not exacerbate existing pressures.
- Education, healthcare and drainage infrastructure are widely described as operating at or beyond capacity.
- Environmental and heritage constraints are also identified as important considerations.
- Several representations recommend further technical evidence, including heritage impact assessment, hydraulic modelling and infrastructure capacity studies, before the site could be considered deliverable in accordance with national policy.

### BW-Land at Bearley and Wilmcote - Do you agree with proposed New Settlement Location BW being considered for inclusion within the plan?

- Respondents consider the road network around the proposed settlement incapable of absorbing extra traffic, with concerns made regarding existing traffic on the A3400 and A46 and what are described as narrow and unsafe local lanes.

- Bearley and Wilmcote stations are thought to lack capacity, parking and step-free access.
- Respondents feel that community services, utilities and schools are already at capacity with no new facilities planned.
- Converting green belt farmland into thousands of homes is viewed by some as eroding rural character, heritage settings and high-quality agricultural land, fragmenting wildlife corridors and increasing flood risk on heavy clay soils.
- Some responses state that major infrastructure upgrades are costly or impractical and brownfield sites are preferred to meet housing needs without breaching green belt policy.

## Policy Direction 2: Do you agree with the approach laid out in Draft Policy Direction 2 - Potential New Settlements?

- Respondents highlight the need for adequate infrastructure from the outset – roads, schools, medical centres, utilities and genuine public transport – to support new settlements, noting risks of capacity constraints on highways, water and power networks and the reliance on private cars where rail and bus services lack parking or frequent services.
- Respondents stress that settlements of around 6,000–10,000 homes could achieve self-sufficiency and 20-minute neighbourhood goals if matched by local services, caution against green belt release and biodiversity loss, call for a mix of site sizes and phased delivery to meet housing targets within realistic lead-in times, and seek transparent criteria for site selection and environmental assessment.

## Draft Policy Direction 3: Do you agree with the approach laid out in Draft Policy Direction 3- Small Scale Development, Settlement Boundaries and Infill Development?

- Respondents call for detailed settlement boundary reviews based on clear evidence, with flexible adjustment mechanisms and heritage assessments, while avoiding speculative infill, settlement creep and coalescence.
- Respondents emphasised preserving green belt integrity, with small-scale housing strictly within built-up areas to meet NPPF purposes and protect biodiversity and infrastructure.
- Concerns regarding overstretched infrastructure prompt calls for independent capacity checks and upfront developer contributions.
- Distinct settlement character should be maintained through controlled scale, design codes, green buffers and cumulative impact assessments.
- A balanced mix of small, medium and strategic site allocations, clear size thresholds, grey belt references and timely mapping is viewed as essential to secure a five-year housing supply.
- Precise definitions of ‘small-scale’, allocation timing and affordable housing requirements are sought to ensure plan clarity and deliverability.
- Comments regarding Draft Policy Direction 3 were inherently mixed given a wide range of commentators, with high engagement from the development industry often offering contrasting perspectives from members of the public.

### Draft Policy Direction 4- Do you agree with the approach laid out in Draft Policy Direction 4- Accommodating Growth Needs Arising from Outside South Warwickshire?

- With regards to accommodating unmet needs from outside of South Warwickshire in the SWLP, respondents seek clarity on the level of unmet need to be met in the area and also clearer details on which authority's unmet need the plan intends to meet.
- Responses ask for transparent calculations of unmet need and alongside an up-to-date evidence base and formalised Duty-to-Cooperate arrangements. In terms of delivery of sites to meet unmet need, some call for a reserve site policy with defined release triggers, robust whilst others suggest that such sites should come forward early in the plan period.
- Many other common concerns relating to the level of development in the SWLP are raised in response to this question such as the need for prioritisation of brownfield and underused urban sites over green belt release, upfront planning for transport and connectivity improvements, environmental and biodiversity safeguards, balanced employment land provision, firm and guarantees for schools, healthcare and other infrastructure. Failure to address unmet needs is viewed as risking the soundness of the plan and undermining its positive preparation and effectiveness.

### Draft Policy Direction 5: Do you agree with the approach laid out in Draft Policy Direction 5- Infrastructure Requirements and Delivery?

- Respondents emphasised that substantial upgrades to road capacity, rail services, bus provision and cycle routes are required to accommodate growth, with utilities, schools, healthcare and drainage delivered before or alongside new homes.
- Detailed, site-specific infrastructure plans should define requirements, funding sources, delivery timetables and enforceable obligations, underpinned by viability testing and clear delivery triggers.
- The Infrastructure Delivery Plan requires greater specificity, cross-boundary coordination and regular updates to track obligations and procurement milestones. Alternative funding mechanisms are needed for strategic projects beyond developer contributions.
- Proportionate provision of community, sports and green infrastructure, sustainable drainage and climate resilience measures is urged.

- Early collaboration with utility providers, neighbouring authorities and site promoters is essential to secure land, funding and ensure schemes remain deliverable and serve local needs.

### Draft Policy Direction 6: Do you agree with the approach laid out in Draft Policy Direction 6- Safeguarding land for transport proposals?

- Respondents emphasised the need for improved public transport and active travel routes alongside new development.
- They called for cycle and pedestrian connections, bus priority measures and improvements to railway infrastructure.
- Comments expressed that active and public transport modes should take precedence over road expansion to meet net-zero targets, although targeted relief roads and junction upgrades are noted as necessary to ease congestion.
- Concerns over funding, delivery timelines and a lack of enforceable developer contributions stress that they feel infrastructure improvements will be necessary to accommodate housing growth. It was expressed in responses that robust policy wording, and evidence-based safeguarding are needed to ensure that all infrastructure development is appropriate for its location.
- It is stated in responses that there is a need for environmental protection of greenways, wildlife corridors and amenity spaces, with fears that transport works could harm habitats.
- Concerns about induced traffic from new roads and park-and-ride schemes further underscore the need for demand management.
- The need for co-location of development with strategic network upgrades and maintainable enhancements to existing infrastructure is emphasised in responses.

### Draft Policy Direction 7: Do you agree with the approach laid out in Draft Policy Direction 7- Green Belt?

- A number of respondents felt that preserving the green belt is vital to maintain separation between Warwickshire settlements and prevent urban sprawl, with priority placed on brownfield and “grey belt” land ahead of any green belt release under a clear sequential hierarchy.
- Respondents call for defined exceptional circumstances tests aligned with NPPF guidance and feel that boundaries should follow strong physical features.

- Feedback felt that green belt has a role in preserving biodiversity, wildlife corridors, health and recreation, and warns of transport and infrastructure risks from new development.
- Many propose concentrating growth in strategic new settlements, enforcing long-term boundary permanence and exhaustive regeneration of underutilised urban sites before considering any green belt amendments.

### Draft Policy Direction-8: Do you agree with the approach laid out in Draft Policy Direction-8- Density?

- Respondents called for density policies and design codes to remain adaptable, setting indicative ranges based on NPPF guidance rather than fixed minima or maxima and allowing site-specific assessments of local character, infrastructure capacity, viability and market conditions.
- Many highlighted the priority of brownfield reuse and higher densities around town centres and transport nodes, with lower densities on peripheries, to enable efficient land use, 20-minute neighbourhoods and mixed-use hubs.
- They stressed that infrastructure improvements in schools, healthcare and transport must accompany any densification and that design codes should be local, flexible and that any policy relating to density cross-references design codes policies to ensure deliverability.
- Environmental concerns featured prominently, with calls to preserve green spaces, deliver biodiversity net gain and safeguard adjacent countryside. Viability and housing mix requirements were also noted, emphasising that density policy must align with evidence on local needs, space standards and feasibility of any given density to secure sustainable, high-quality development.

### Draft Policy Direction 9: Do you agree with the approach laid out in Draft Policy Direction 9 - Using Brownfield Land for Development?

- There was strong support amongst most respondents for prioritisation of brownfield land for redevelopment. However, some concern was expressed that a sequential approach to bringing forward brownfield sites ahead of greenfield opportunities doesn't exist in the NPPF and could prioritise less sustainable brownfield land over more sustainable greenfield sites.
- Respondents identified several advantages to redevelopment of brownfield sites including improvements to the urban environment and provision of homes close to workplaces and existing services.

- Respondents frequently cited a desire for all brownfield sites to be investigated for redevelopment, including viability testing, before greenfield options are considered.
- There were differing views amongst respondents on the amount of brownfield land available for redevelopment.
- Several matters relating to the delivery of brownfield developments were highlighted by respondents, particularly around the costs of remediation, which can impact on developer contributions, including affordable housing delivery.
- Several points relating to the wording of the policy and the underlying evidence were raised. It was suggested that the language used in policy should be strong and unambiguous in committing to the brownfield first principles.
- Several other matters were noted, including a suggestion that development should only proceed where there is adequate infrastructure—including roads, schools, public transport, cycleways and walkable communities—to reduce car dependency, support an ageing population and enable 20-minute neighbourhoods.

**Chapter 4: Meeting South Warwickshire's Sustainable Development Requirements- Overall Question: Do you broadly support the proposals in the Meeting South Warwickshire's Sustainable Development Requirements chapter? If you have any additional points to raise with regards to this chapter please include them here.**

- Respondents highlighted gaps in evidence for delivering roads, public transport, utilities, schools and healthcare and called for co-ordinated funding and timing.
- They suggested housing growth to be spread across urban, rural and strategic sites, favouring brownfield and small-scale infill to protect landscapes and community character.
- Many noted that roads and public transport links are currently inadequate and need upgrades. Improvements to active travel routes, rail and bus are all considered necessary.
- Concerns were raised about loss of green belt land, citing impacts on farmland, wildlife and separation between settlements.
- Housing targets were viewed as out of step with the updated standard method and potentially unsustainable without more urban capacity.
- Calls were made for stronger biodiversity protection, habitat corridors, robust flood-risk measures and clearer plan mapping, buffer zones and infrastructure delivery schedules.

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

### Draft Policy Direction 10: Do you agree with the approach laid out in Draft Policy Direction 10- Providing the Right Tenure and Type of Homes?

- Respondents highlighted a shortage of genuinely affordable homes in a range of sizes and tenures, including starter homes, family dwellings and specialist older persons' accommodation.
- They called for clear local definitions tied to incomes, viability-tested affordable housing contributions and specified minimum social rent proportions.
- They urged flexible, evidence-based policies that can respond to changing national guidance and site constraints and propose separate district targets to reflect local variations.
- Many argued for housing requirements above the standard-method minimum, backed by up-to-date evidence, to meet identified needs. Deliverable infrastructure—transport, schools, healthcare—and sustainable locations are seen as essential, with a preference for brownfield and infill sites to protect the Green Belt and avoid isolation.

### Draft Policy- A: Do you agree with the approach laid out in Draft Policy- A- Providing the Right Size of Homes?

- Some comments received covered the policy as a whole, rather than specific parts of it. These included further commentary about the potential impact of the policy on development viability, but conversely a push that viability concerns are not used to weaken the policy as quality housing is essential for long term sustainability.
- It was also requested that developers should not be allowed to alter agreed proposals after obtaining planning permission on the grounds of viability and that lack of funds shouldn't exempt a developer from meeting the requirements.
- The need for flexibility in the policy to adapt to both changing regulations and evidence along with the differing requirements of registered providers was referenced along with a suggestion that blanket rules should be avoided in favour of site-by-site consideration.
- A request for flexibility for well-evidenced exceptions where alternative layouts better serve specific local needs was also included as was a request that the

SWLP must not exceed national standards to avoid onerous requirements and delays in delivering new homes.

- A desire for more bungalows was also suggested to help with downsizing, but concern was raised that the policy conflates wheelchair user needs with those of older people and risks inadequate specialist older persons housing.
- A separate policy for older people's housing was suggested, noting that specialist housing can provide benefits that adaptable homes cannot.
- Support for garage conversions to granny flats or carer's accommodation was also noted by one respondent.
- It was also suggested that the policy does not include anything to ensure roads and parking of appropriate size adjacent to new homes are provided.

### Draft Policy B-Providing Custom and Self Building Housing Plots

- Respondents emphasised that allocating small, dedicated sites for self and custom-build homes adjacent to settlement boundaries better meets demonstrated local need than imposing a fixed 5 percent of developable area requirement on large schemes.
- They called for up-to-date evidence and refreshed demand assessments to justify any thresholds, alongside policy flexibility through demand-trigger mechanisms and fallback options to prevent oversupply and land sterilisation.
- Strict controls on Green Belt and landscape intrusion, clear marketing processes, timely infrastructure servicing.
- Viability testing of cumulative policy impacts and recognition of multiple delivery sources including windfall sites.

### Draft Policy Direction-11: Do you agree with the approach laid out in Draft Policy Direction-11- Meeting the Accommodation Needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers?

- Respondents questioned the blanket requirement for traveller pitches on residential schemes over 500 homes and call for individual site suitability assessments based on local constraints and need distribution.
- It was considered that there would be a preference for smaller, dedicated sites, yards and moorings for improved management, maintenance and security, while noting that large schemes may risk segregation and hinder integration.
- Flexible delivery via off-site provision funded by s106 contributions or specific allocations (for example Leamington Football Club) is highlighted over rigid thresholds.

- Criteria-based assessments should consider proximity to schools, healthcare, waste and recycling facilities, plus environmental safeguards.
- Additional boat moorings should be provided in partnership with bodies such as the Canal & River Trust.
- Respondents also stress ongoing monitoring, windfall site reviews, cost-recovery mechanisms and clear responsibilities for addressing unauthorised encampments to ensure sustainable and deliverable provision.

## Chapter 5: Delivering Homes that Meet the Needs of all our communities -

Overall Question: Do you broadly support the proposals in the Delivering Homes that Meet the Needs of all our communities chapter? If you have any additional points to raise with regards to this chapter please include them here

- In respect of the tenure and size mix of new homes there was support for more dwellings suitable for downsizing—specifically two-bedroom houses or apartments, bungalows, sheltered accommodation and care facilities including dementia care—to free up larger homes for young families.
- The Council were encouraged to use flexible wording in policies to allow them to respond to changes in national policies and updated evidence throughout the plan period, ensuring policies remain effective.
- The Council was encouraged to seek further evidence is required relating to tenure and type of homes, including viability testing for M4(2) and M4(3) and Nationally Described Space Standard's needs.
- Several respondents noted the impact of the proposed policies on viability. It was argued that viability testing and further evidence base is required relating to requiring M4(2) and M4(3) accessibility standards.
- The Councils were encouraged to review their Self-build and Custom Build registers and secondary data to ensure an accurate evidence base.
- Respondents called for more community support and care homes for elderly people and those needing care to reduce large homes being occupied by older people living alone.
- There was support for a brownfield first development strategy and that this should be prioritised over greenfield or greenbelt sites.
- It was suggested that further evidence is required for a Gypsy and Traveller locational strategy and to assess the genuine housing needs of the Gypsy Traveller community.

- Concern was expressed that local services—schools, hospitals, doctors, dentists, libraries and parks—are already under strain, and therefore full use should be made of existing housing stock before building more.

## Chapter 6: Delivering South Warwickshire's Economic Needs

### Draft Policy Direction- 12: Do you agree with the approach laid out in Draft Policy Direction- 12-Locations for Employment Growth?

- Respondents emphasised site selection should favour locations with minimal flood, ecological and heritage constraints, direct motorway access or existing transport links, flexible unit sizes and brownfield options before any green belt release.
- They questioned the evidence for allocating 125 ha at the upper end of the 75–125 ha range, called for updated land need data, smaller sites for SMEs and innovation, robust strategic alignment with targets to 2050, transport network and junction upgrades, thorough environmental and heritage assessments and high design standards.

### Draft Policy Direction-13: Do you agree with the approach laid out in Draft Policy Direction-13-Core Opportunity Area?

- Respondents noted opportunities to build on existing employment hubs to capture cluster economies and utilise, enhance, and create active travel links, citing Stratford 46, JLR, Wellesbourne and the A46 corridor as strategically placed.
- They stressed that Core Opportunity Area roads are near capacity and that relief roads without major junction upgrades could shift congestion, urging prioritisation of public transport, rail connections and dedicated cycle routes. Boundaries should respect Green Belt and Cotswolds National Landscape designations and avoid encroachment onto these wherever possible.
- Adequate infrastructure provision was highlighted, with new and improved transport routes, flood defences and required before further development.
- Feedback also urged co-location of housing with employment, a market-aligned mix of uses and clear plans for transport delivery and landscape protection.

### Draft Policy Direction 14: Do you agree with the approach laid out in Draft Policy Direction 14- Major Investment Sites (MIS)?

- Respondents highlighted limitations in road and public transport networks around proposed major investment sites, calling for targeted upgrades to Junction 12 of the M40, Station Road, the A429 and the Fosse Way, route

widening, traffic management to prevent rat-running through Hampton Lucy and Charlecote and protection of heritage bridges.

- They identified inadequate rail links and bus services, urging intermodal facilities, cycle and pedestrian routes and active travel priority.
- Infrastructure capacity around Wellesbourne, Long Marston and other sites was deemed insufficient without staged highway and public transport enhancements, with site permissions conditional on these measures.
- Respondents highlighted opportunities for economic integration in agri-tech, advanced manufacturing and university-linked research, subject to environmental and heritage safeguards, green belt buffers and Cotswolds National Landscape views.
- Calls were made for use class flexibility, mixed-use development and clearer site boundaries with defined phasing and guidance.

### Draft Policy Direction-15: Do you agree with the approach laid out in Draft Policy Direction-15- Provision of Office Accommodation and Refurbishment of Existing Office Stock?

- Respondents advocated prioritising brownfield redevelopment and refurbishment of existing office stock over new green-belt construction, concentrating office provision in Warwick and Leamington town centres to reinforce walk-to-work patterns and evening vibrancy.
- They call for enhanced transport infrastructure—improved parking, safer junctions and upgraded road and rail links—to support workforce access from surrounding areas.
- Stronger building sustainability measures are recommended, including mandatory solar panels, heat pumps and geothermal systems alongside decarbonisation of refurbished stock.
- Adequate electricity supply and high-speed digital connectivity are seen as essential, with flexible co-working spaces proposed in new large-scale housing settlements.
- Measures to secure office affordability—revising tenancy terms, flexible tenure, reduced rents and affordable office units within built-up boundaries—are advised.
- Heritage conservation must guide town-centre and Warwick office refurbishment to protect historical character.
- Hybrid working's influence on demand is noted, with caution against creating a commuter-focused Stratford district and there are calls to align office growth with housing expansion across urban and rural areas.

### Draft Policy Direction-16: Do you agree with the approach laid out in Draft Policy Direction-16-Airfields?

- Majority of responses to this question related to Wellesbourne Airfield. Respondents were largely in favour of safeguarding Wellesbourne Airfield's aviation use while allowing complementary non-aviation functions only where the capacity for it to function as an airfield is unaffected.
- Some respondents were not in favour of redeveloping Coventry Airport for a gigafactory while others suggested it needs more analysis.
- Modernisation measures such as electric charging points for aircraft and aviation related research facilities appear to be encouraged, with Oxford Airport named as a successful example of a similar site to Wellesbourne Airfield providing facilities similar to those proposed.
- Some respondents felt that large-scale warehousing, and B2/B8 uses would be harmful, although the prospect of office/light industry facilities appears to be more popular among respondents.
- Transport concerns were expressed in a number of responses, with highway capacity, heavy goods conflicts and limited public transport being identified as problems which should be addressed.
- The need for environmental and noise mitigation, brownfield over green belt and heritage conservation, including recreation of the World War II control tower, were also highlighted in comments.
- One comment expressed concerns that the development described could impact a noise sensitive area.

### Draft Policy Direction-17: Do you agree with the approach laid out in Draft Policy Direction-17- A Low carbon Economy?

- Respondents highlighted the need to incorporate on-site photovoltaic panels and battery storage (minimum 5 kW and 7 kWh for new homes, scaled for larger dwellings), retrofit commercial buildings, and install solar canopies over car parks with clear targets and incentives.
- They called for policy wording to mandate emission reductions in employment development, set a net-zero trajectory from 2045, and include time-specific deadlines while protecting green belt and prioritising brownfield land.
- Future Building Standards from 2025 and Building Regulations are expected to require improved energy efficiency and low-carbon generation was mentioned in one response.

- Sustainable transport measures include local and inter-town cycle routes, electric-vehicle charging at employment sites, and locating large developments near active travel links.
- Respondents also stressed the development of green skills, training and certification, clear definitions, circular economy approaches and practical support for implementation.

### Draft Policy Direction-18: Do you agree with the approach laid out in Draft Policy Direction-18-Supporting Rural Employment and Diversification?

- Respondents emphasised the need to prioritise sustainable agricultural diversification to bolster local food production.
- It was considered by one respondent that an increase in local food production will help with climate change resilience.
- Repurposing existing farm buildings for commercial uses was generally well-received in comments, although a number of respondents felt that high-quality farmland should not be used for renewable energy generation development.
- Clear definitions, guidance on scale, location, settlement boundaries and business-case requirements were identified by respondents as ways which would help to ensure consistent application.
- The protection of hedgerows, biodiversity and landscape character is mentioned in some responses as being essential, alongside robust infrastructure provision and improved digital connectivity.
- Case-by-case assessment of rural schemes would be preferred by one respondent. Some responses expressed that existing employment land should be expanded before farm diversification is explored as an option.
- Enforceable rules and alignment with national and emerging policies are also highlighted as important aspects of any policy relating to farm diversification.

### Draft Policy Direction-19: Do you agree with the approach laid out in Draft Policy Direction-19- Supporting a Range of Business Units and Affordable Employment Space?

- Respondents highlighted uncertainty over policy details on location, size, tenure and concessions, noting that allocating specific sites with defined unit mixes may ensure delivery of smaller and affordable business units.
- Demand for varied unit sizes across the plan area is emphasised, alongside calls for clarity on affordable tenure requirements and potential incentives such as long-term business rate or rent reductions.

- Improved transport and infrastructure, including public transport links, active travel routes and parking guidance for live-work units, is seen as essential.
- Proposals to integrate live-work accommodation within new settlement town centres are noted, as is encouragement to repurpose redundant retail premises to provide low-cost space.
- Preventing housing on designated employment land is viewed by some respondents as key to safeguarding allocations and meeting SME demand.

### Draft Policy C: Do you agree with the approach laid out in Draft Policy C- Protecting Community Facilities?

- Respondents generally support the policy approach to protecting community facilities while calling for clearer wording and stronger safeguards.
- Respondents identify the need for a clear facility typology to safeguard a wide range of community amenities, including pubs, allotments, public rights of way, community hubs, medical and cultural facilities, open spaces, sports grounds and small-scale commercial units.
- They recommend expanding the policy to require new developments and settlements to provide local shops, meeting places, clinics and sports and cultural venues before housing starts.
- The fragility of rural bus services and the risk of isolating vulnerable groups prompt a call for support for accessible services and integrated transport links.
- Community stewardship and asset transfer mechanisms, underpinned by clear marketing and viability criteria, are seen as vital to maintain facility viability. Respondents also call for stronger terminology on accessibility, marketing, and viability.

### Draft Policy Direction-20: Do you agree with the approach laid out in Draft Policy Direction-20- Supporting our changing town centres?

- Pedestrianisation and traffic control are seen as vital to reduce car use, create low-traffic shopping areas, support café culture and protect historic streets.
- High parking charges are criticised for shifting trade to out-of-town retail parks.
- Park-and-ride schemes and stronger rail links, including direct Stratford-London services and the Honeybourne reinstatement, were suggested to boost visitor numbers and economic activity.
- Concerns about town-centre boundaries call for clear criteria to assess capacity and accommodate growth.

- Mixed-use development and conversion of vacant retail units into housing, offices or community spaces are highlighted to foster sustainable, walkable centres.
- Business rate relief and targeted incentives are deemed necessary to attract and retain retailers. Improved public realm maintenance is requested, with durable paving, reduced pollution, and consistent management.
- A presumption against large out-of-town retail developments and regulations on unit size and retail mix aim to strengthen local shopping areas.
- Greater clarity in decision-making processes and regular town centre health reviews were proposed to guide adaptive strategies.

### Draft Policy Direction-21: Do you agree with the approach laid out in Draft Policy Direction-21- Arts and Culture?

- Respondents highlight strict application of the agent of change principle to ensure any development that places an arts or culture venue at risk is required to deliver replacement facilities locally prior to closure.
- Respondents also call for robust safeguards for listed buildings, churches and local hamlets and suggest that proposals to co-locate or expand cultural assets must avoid harm to countryside character, heritage sites and tourist attractions.
- Improved transport connectivity and parking/cycling provision is deemed essential to support visitor numbers, while local library and voluntary arts initiatives are highlighted as vital for communities.
- Other comments include removing discretionary policy wording and defining arts and cultural facilities.

### Chapter 6: Delivering South Warwickshire's Economic Needs-Overall

Question: Do you broadly support the proposals in the Delivering South Warwickshire's Economic Needs chapter? If you have any additional points to raise with regards to this chapter please include them here.

- Respondents emphasised tourism's central role in South Warwickshire's economy and urged its inclusion in the local plan's strategic policies, with provision for hotels, self-catering units and camping sites alongside enhanced visitor amenities and promotion of rivers, heritage sites and green spaces.
- They highlighted severe traffic congestion in Stratford-upon-Avon and proposed a bypass for Clopton Bridge, improved parking, public transport and safe active travel routes.

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- Employment land provision was said to need a mix of large and small sites, careful viability assessments and a focus on brownfield rather than Green Belt land.
- Calls were made for policies to support town centre retail, protect cultural assets and align infrastructure improvements with growth.

## Chapter 7: A Climate Resilient and Net Zero Carbon South Warwickshire

### Draft Policy D: Do you agree with the approach laid out in Draft Policy D: Large Scale Renewable Energy Generation and Storage?

- Respondents emphasised protecting high-grade farmland by directing ground-mounted solar to brownfield or poorer quality land and expanding rooftop PV on new and existing buildings with possible mandatory panel and battery provision for new homes.
- They call for landscape sensitivity assessments to avoid visually sensitive areas and account for cumulative impacts, with screening measures limited by seasonal foliage.
- Site selection criteria should exclude grades 1–3 farmland, embed grid capacity and landscape studies, and allow flexibility around mapped squares while incorporating heritage guidance.
- Biodiversity net gain through wildflower meadows, wildlife corridors and woodland planting is urged, with enforcement to exceed statutory requirements. Community benefits should focus on ongoing low-cost energy and profit sharing rather than one-off payments, though some view mandatory schemes as burdensome.
- Reliable grid connections are deemed fundamental to feasibility, with calls for explicit proof of connection capacity and consideration of network operator advice.
- Integration of energy storage with solar installations is recommended as standard practice alongside proposals for specified panel and battery capacities.
- Additional clarity is sought on definitions, decommissioning requirements and thresholds for large-scale and micro-generation

### Draft Policy-E: Do you agree with the approach laid out in Draft Policy-E- Protecting Large Scale Existing Renewable Energy Infrastructure?

- Respondents highlighted community-led schemes to boost energy security and subsidise household bills.
- The non-harm adjacency criteria may restrict NHS site expansions near renewable assets and risk legal challenges over minor income changes.
- Site allocation should favour employment locations capable of integrating large-scale renewable and decentralised systems.

- Distribution network operators require clear exemptions to prevent enforcement conflicts. Ministry of Defence consultation is needed for turbines above specified heights or rotor diameters.
- Robust governance is called for to maintain operational resilience. Explicit definitions of solar overshadowing angles and wind-shadow effects are requested.
- Other remarks cover grid security, financing, intermittency, defence radar interference and removal of unsuitable infrastructure.

### Draft Policy-F: Do you agree with the approach laid out in Draft Policy-F- Decentralised Energy Systems?

- Respondents emphasised a robust evidence base to demonstrate feasibility and viability of decentralised energy systems.
- Respondents urged independent verification of viability testing and justification for gas-only heating.
- There were calls for clarity on the “major development” threshold with quantitative definitions.
- Respondents urged explicit consideration of the 2025 Future Homes and Buildings Standards in energy statements and heat-density assessments.
- Respondents sought defined scope and rationale for thermal masterplanning.
- There was a request for a clear hierarchy of heating and cooling that ranks grid-powered heat pump systems above fossil-fuel options; and highlighted the need for site-specific analysis to prevent universal mandates from undermining scheme viability.

### Draft Policy Direction-22: Do you agree with the approach laid out in Draft Policy Direction-22- Net Zero Carbon Buildings

- Respondents emphasised independent viability assessments for net zero measures—such as heat pumps, high airtightness, mechanical ventilation with heat recovery and battery storage—allowing for site constraints and cost uplifts.
- They urged alignment with current and future building regulations to avoid duplication and viability risks.
- Mandatory rooftop solar PV with battery storage and EV charging was advocated, although roof-space, design features and conservation areas require flexibility.
- Heating solutions ranged from hydrogen-ready boilers and heat pumps to district systems and smart controls.

- Fabric standards beyond national rules were seen as needing heritage-sensitive guidance and a robust costed rationale, with Passivhaus noted for closing performance gaps.
- Compact form and orientation requirements were viewed as potentially constraining dwellings and local character.
- Respondents also requested clear wording, officer training, transitional arrangements, monitoring and financial support to ensure policy deliverability.

### Draft Policy Direction 23: Do you agree with the approach laid out in Draft Policy Direction 23- Reducing Energy Consumption in Existing Buildings?

- Respondents called for clearer policy scope and definitions of terms such as 'sensitive' and 'appropriate', de minimis thresholds and triggers for retrofit standards.
- They highlighted constraints on heritage asset retrofits, citing bans on double glazing, loss of permitted development rights and burdensome consent processes in conservation areas.
- It is suggested for proposals to include dedicated guidance, design codes, quantified minor-works distinctions and fast-track home energy advice services.
- On retrofit certifications, respondents prefer overall heat-loss targets over full EnerPHit compliance, they support PAS 2035/2038 and TrustMark for assurance and seek clarity on LETI and Passivhaus requirements.
- They questioned the suitability of Energy Performance Certificate (EPC) targets, where Government reform is anticipated. Financial support in terms of grants, loans or sliding-scale fees and enhanced officer training is seen as crucial.
- In addition, the integration of Historic England and National Retrofit Hub guidance is recommended.

### Draft Policy Direction- 24: Do you agree with the approach laid out in Draft Policy Direction- 24- Embodied carbon?

- Respondents called for a robust evidence base and viability assessment, including local analysis by development type and scale, to underpin any embodied carbon targets and to allow justification when targets prove unviable.
- They emphasise that local plan provisions must align with national policy and forthcoming building regulations to prevent conflict or redundancy.
- Views diverge on focusing on upfront emissions or full lifecycle assessments, with concerns that complex stage definitions and whole-life assessments could burden SME builders. Benchmarks from LETI and RIBA are viewed as

insufficiently tailored to local conditions, covering limited building types and carrying extra costs, so feasibility appraisal is advised before mandating targets.

- Respondents suggest updated guidance, officer training and streamlined supplementary documents, clearer definitions for major development and thresholds, and local performance benchmarking.
- They support material reuse and circular economy principles for new schemes, while noting end-of-life recycling may be inefficient.
- Calls for clarity on funding, non-compliance consequences, infrastructure scope and extending carbon benchmarks towards 2050 are also highlighted.

### Draft Policy G: Do you agree with the approach laid out in Draft Policy G- Climate Resilient Design?

- Respondents noted that existing building regulations and national guidance already cover climate resilient design, so any requirement beyond these should be justified with evidence and viability assessment.
- They called for a clear climate change checklist aligned with statutory standards, integrated into planning submissions and design statements, with defined targets and stakeholder input to avoid tokenism.
- The cooling hierarchy and passive overheating measures—such as orientation, shading, green infrastructure and permeable surfaces—were highlighted as priorities before mechanical systems, although high airtightness with mechanical ventilation was seen as an alternative.
- Flood risk concerns emphasised the need to prioritise low flood-risk sites, apply consistent scoring in site assessments and include climate change allowances for surface water.
- Green infrastructure, water efficiency and defined ventilation standards (with airtightness criteria and reference to TM52 or Passivhaus) were viewed as essential, along with maintenance planning.
- Respondents also called for clarity on policy scope, updates to guidance documents and examples to support practical implementation.

### Draft Policy-H: Do you agree with the approach laid out in Draft Policy-H- Water Efficiency?

- Respondents raised questions regarding the evidence and viability for a 100 litres per person per day water efficiency target, suggesting a 110 litres standard better aligns with national guidance and is more achievable.

- They call for up-to-date data, thorough cost analysis and clear justification within the plan's evidence base and viability assessment.
- Concerns that a stricter target could affect development viability and housing affordability were raised.
- Rainwater harvesting, greywater recycling and BREEAM Excellent requirements for non-residential development may help achieve reductions but face cost, space and carbon challenges.
- Proposals include raising rainwater butt capacity to 350–400 litres, using soakaways for surface water and reviewing technical feasibility at the next plan stage.

### Draft Policy- I: Do you agree with the approach laid out in Draft Policy- I- Water Supply and Wastewater Infrastructure?

- Respondents raised concerns about water supply capacity and reliability, recommending flow and pressure assessments, network reinforcement and statutory provider upgrades prior to development.
- They identified the need for wastewater network assessments and pre-funded upgrades to prevent discharges and flooding.
- They emphasised mandatory Sustainable Drainage Systems with defined ownership, maintenance arrangements and capped discharge rates, alongside off-site impact assessments for downstream protection.
- Respondents sought clarity on funding and responsibilities for water and wastewater infrastructure, alignment of infrastructure phasing with provider cycles and strengthened cross-boundary coordination.
- Alternative water sources and reuse measures, including grey-water harvesting and on-site storage, and the inclusion of climate change and environmental cost considerations were also highlighted.

### Draft Policy- J: Do you agree with the approach laid out in Draft Policy- J- Reducing Flood Risk?

- Respondents emphasised prioritising brownfield and low-risk sites over greenfield and agricultural land to protect food production, limit impermeable surfaces and reduce flood impacts, and they call for explicit integration of the sequential and exception tests in policy text in line with NPPF guidance.
- They highlight the need for site-specific flood risk assessments and drainage strategies submitted early in the process, enforceable SuDS measures and limits on runoff rates to prevent displacement of flooding.

- Effective floodplain and watercourse management is urged through defined buffer strips, natural channel restoration and no built development in high-risk zones.
- Flexibility for future NPPF updates and climate change scenarios, strengthened assessment timing and technical standards, full application of Environment Agency guidance and clear ownership and maintenance responsibilities for watercourse buffers are also recommended.

### Draft policy-K: Do you agree with the approach laid out in Draft Policy- K- Multifunctional Sustainable Drainage Systems (SuDS)?

- Respondents noted Draft Policy K offers limited flexibility where ground conditions or space constraints render SuDS impractical and urged site-by-site assessments with clear exceptions in line with national guidance.
- They emphasised that above-ground features deliver biodiversity and amenity benefits but may require below-ground systems where the site is constrained to deliver above ground improvements.
- Alignment with NPPF flood-risk requirements was highlighted, including avoiding high-risk allocations and excluding SuDS ponds from green-space calculations.
- Technical issues cited the need for attenuation basins, post-construction checks, predictable maintenance funding and viability assessments that reflect additional adaptation costs.
- Proposals for multifunctional SuDS at Cophams Hill, flexible dispersal criteria and locating ponds away from play areas were also raised.

### Chapter 7: A Climate Resilient and Net Zero Carbon Warwickshire- Overall Question: Carbon Warwickshire- Overall Question: Do you broadly support the proposals in the A Climate Resilient and Net Zero Carbon South Warwickshire chapter? If you have any additional points to raise with regards to this chapter please include them here.

- Respondents urged alignment with current and upcoming national building regulations and the Future Homes Standard, avoiding duplication of measures such as the 110 l/p/d water efficiency standard, with any local enhancements backed by robust costed justifications.
- They called for viability testing of all policy requirements and flexibility to accommodate emerging, cost-efficient technologies over the plan's 25-year horizon.

- Clear, evidence-based technical guidance and sufficient officer expertise are requested to prevent confusion and ensure practical implementation.
- Site selection criteria should factor in flood risk, landscape and agricultural land protection, and sustainable connectivity.
- Sustainable drainage systems with defined long-term maintenance, on-site renewable energy installations such as rooftop PV, and electric vehicle charging infrastructure are highlighted as key measures.

## Chapter 8: A Well-Designed and Beautiful South Warwickshire

### Draft Policy Direction-25: Do you agree with the approach laid out in Draft Policy Direction-25- Strategic Design Principles?

- Respondents highlighted that Draft Policy Direction 25's 20-minute neighbourhood requirement is often impractical outside urban centres and rural areas with limited supermarkets, schools and healthcare, and recommend flexible interpretation and collective village networks.
- They point to infrastructure gaps—including bus routes, roads and healthcare—and urge the delivery of services before further housing.
- It is suggested that densities should reflect local context and avoid uniform, low-quality estates, with townhouses and apartments used to support walkability.
- Active travel should be prioritised via safe, legible pedestrian and cycle networks and integrated public rights of way.
- Local character must be reinforced through vernacular materials, varied design and landscape-sensitive layouts.
- Green and blue infrastructure, play and sports spaces and tree-lined routes should address existing shortfalls.
- It is felt that Design Codes must be evidence-based, adaptable to site conditions and avoid 'copy-and-paste' solutions.
- Inclusive and safe travel infrastructures, well-lit routes and hierarchies prioritising pedestrians are needed.
- Clear definitions of walking distances and attractive development, backed by enforcement and detailed procedures, are seen as essential.
- Developer contributions for renewable features and community facilities could support future-proof, balanced growth.

### Draft Policy Direction-26: Do you agree with the approach laid out in Draft Policy Direction-26- Design Codes?

- Respondents emphasised that the South Warwickshire Local Plan (SWLP) Part 1, Draft Policy Direction 26 should refer to the national design guide and National model design code, with settlement-specific codes produced alongside the plan by the SWLP team, informed by neighbourhood planning groups and other stakeholders.

- Respondents called for varying levels of detail including, more focused detail for small or strategic sites and broader detail for area-wide plans, while retaining flexibility to address environmental, heritage and technical factors.
- Multiple overlapping codes and overly prescriptive criteria were seen as risks to timely housing delivery and efficient use of resources, prompting suggestions for interim guidelines.
- Clarification on roles, timing and support for parish or neighbourhood groups was also requested.

### Draft Policy Direction- 27: Do you agree with the approach laid out in Draft Policy Direction- 27 Protecting and Enhancing Heritage Assets/ the Historic Environment?

- Respondents emphasised preserving green belt land, open views to Arden Wood, Burton Dassett Hills and key heritage landmarks, with calls for buffer zones around Clopton Corner, Little Clopton House and Kenilworth Castle to prevent visual blight. Further Alignment with the Planning (Listed Buildings and Conservation Areas) Act 1990 and NPPF Chapter 16 was urged, including balancing harm against public benefits and replacing 'undermine' with 'harm to'.
- Policy scope should cover designated and non-designated assets, archaeological remains, historic landscapes, conservation areas, commons and canal heritage.
- Traffic reduction, pedestrianisation, HGV restrictions and relief roads were also highlighted to protect historic cores.
- Respondents also deem new development should be directed to favour brownfield sites, major towns and infill over greenfield growth.
- Energy-efficiency retrofit guidance is suggested to permit minor alterations for double glazing, insulation and solar panels where this doesn't undermine significance.
- Archaeological management plans and developer contributions for asset upkeep were recommended.

### Draft Policy Direction- 28: Do you agree with the approach laid out in Draft Policy Direction- 28- Waterways?

- There was a general support for this policy.
- Respondents emphasise access and recreational amenity on canal towpaths and call for management guidelines to balance cyclists, pedestrians and anglers, with regular maintenance but unclear funding responsibilities.

- They seek clear criteria for adverse impacts to protect structure, water quality, heritage and ecological character, and propose expanded conservation areas to safeguard biodiversity.
- Active travel on waterways is seen as beneficial for commuting and leisure, yet potential conflicts and financial burdens are noted.
- Safety concerns underline the need for towpath design features for walkers and children and clear use policies.
- Heritage conservation at sensitive stretches such as Charlecote Park is deemed essential.

**Chapter 8: A Well-Designed and Beautiful South Warwickshire- Overall Question: Do you broadly support the proposals in the A Well-Designed and Beautiful South Warwickshire chapter? If you have any additional points to raise with regards to this chapter please include them here.**

- Respondents called for clear design codes that align with local character as well as attribute to consistent decision making.
- Fewer responses called for flexibility within design codes as well as suggested merging guidance.
- Emphasis was placed on high-quality, context-sensitive design that respects heritage fabric whilst advancing sustainability such as solar panels.
- Respondents sought precise policy wording in line with national planning policy as well as reference made to NHS building standards.
- Feedback highlighted concerns over green belt erosion, with preference instead for brownfield sites and added green infrastructure such as hedgerows and parks to support biodiversity.
- Respondents also stressed the need for improved public realm and active travel, prioritising pedestrian-friendly spaces with reference to twenty-minute neighbourhood principles.
- A few respondents noted practical challenges in affordable housing distribution and health facility compliance.
- Further comments addressed enforcement, infrastructure capacity, climate priorities and administrative efficiency.

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

### Draft Policy Direction-29: Do you agree with the approach laid out in Draft Policy Direction-29-Pollution?

- Respondents emphasised locating new housing outside Stratford upon Avon to ease traffic-related air pollution and protect public health, warning that 7000 homes at Bearley and Wilmcote or edge-of-town developments would increase vehicle journeys.
- Active air quality management with monitoring, education campaigns and a strategy covering all development stages is called for, along with integrated pollution prevention and environmental enhancements such as urban greening, sustainable drainage and low-carbon transport infrastructure.
- Clear definitions of “existing operations” and thresholds are requested to safeguard current sites, and noise mitigation through the Agent of Change principle and detailed assessments is urged.
- Upgrading water and sewage systems to prevent overflows, applying controlled outdoor lighting and maintaining ongoing monitoring and enforcement to limit air, noise, light and water pollution are also highlighted.

### Draft Policy Direction-30: Do you agree with the approach laid out in Draft Policy Direction-30- Health Impact Assessment for Major Development?

- There was a general strong support for this policy.
- There was a general consensus that a clear definition of “major development” should be provided to ensure consistent HIA screening.
- There should be a broader assessment criteria covering both physical and mental health determinants, and site-specific mitigation underpinned by defined S106 contributions.
- The respondents also urged independent governance to avoid conflicts of interest and recommend integrating HIA requirements into design and access statements.
- It was acknowledged that there are already existing environmental health regulations, national space standards and policies on sustainability and renewable energy that consider health in the planning process.
- Housing and mixed-use schemes provide health benefits through provision of high-quality homes, green spaces and social infrastructure.

## Chapter 9: A Healthy, Safe, and Inclusive South Warwickshire- Overall

Question: Do you broadly support the proposals in the A Healthy, Safe, and Inclusive South Warwickshire chapter? If you have any additional points to raise with regards to this chapter please include them here

- Respondents emphasised the need for targeted screening and health impact assessments for developments likely to cause harm, with clearer definitions of major development and guidance on HIA tools.
- They called for meaningful local engagement, stronger liaison with public health teams and robust monitoring to guarantee thorough evaluations.
- Concerns included insufficient healthcare infrastructure—GP surgeries, hospitals and mental health services—and pressure on rural facilities.
- Integration of accessible green and recreational spaces was viewed as vital for physical and mental wellbeing, along with detailed pollution control measures.
- Improved active travel links, adequate parking for infirm residents and inclusive facilities for disabled users were also highlighted as essential.

## Chapter 10: A Well-Connected South Warwickshire

### Draft Policy Direction-31: Do you agree with the approach laid out in Draft Policy Direction-31- Sustainable Transport Accessibility?

- Respondents called for reliable frequent bus and rail services, new rail links and park and ride facilities to reduce car travel and improve air quality.
- They stressed that development sites should have good walking, cycling and public transport connections, with flexibility for smaller or rural schemes.
- Dedicated cycle lanes, pedestrian paths, traffic calming and safe crossings were seen as essential for active travel.
- Accessible station facilities and dropped kerbs were urged to ensure mobility for all users. In rural areas, respondents noted that private car use will remain common and suggested community minibuses and reinstated rail services.
- Concern over road capacity near Stratford prompted calls for bypasses, relief roads and junction upgrades alongside sustainable transport options.
- Parking standards should balance car dependence with enforceable controls, park and ride, EV charging and disabled access.
- Coordination between planning and transport authorities, stable funding and cross-boundary service planning were viewed as key to long-term delivery.

### Draft Policy Direction-32: Do you agree with the approach laid out in Draft Policy Direction-32- Electric Vehicle (EV) Infrastructure Strategy?

- Respondents emphasised strategic placement of charging infrastructure across urban terraces, rural centres, social housing and new developments.
- They note barriers in terrace housing, limited front gardens and narrow pavements.
- Calls include on-street and off-street chargers in village centres, supermarket and council car parks, and dedicated points for employees, visitors and social housing tenants.
- Planning permissions could mandate sufficient chargers per dwelling while referencing Approved Document S to avoid duplication.
- Expansion of fast-charging capacity is seen as essential, alongside assessments of grid resilience and simplified cross-pavement installations.
- Concerns also cover lifecycle impacts of batteries and infrastructure, evidence and viability requirements for any policy beyond current standards, and clear rules on pavement width and cable channels.

### Draft Policy Direction-33: Do you agree with the approach laid out in Draft Policy Direction-33- Road, Travel, Employment, and Freight?

- Respondents emphasised the need to strengthen rail and bus services by adding new stations and improving connectivity to reduce traffic and emissions.
- They called for development on sites that minimise travel distances and offer real transport choices, backed by clear travel plans and transport assessments.
- Many highlighted severe congestion on local roads and urged coordinated highway upgrades to serve new growth.
- Safe and well-maintained cycle and walking routes with proper lighting, signage and segregation were seen as vital.
- Strategic freight management, including designated lorry routes, delivery plans and support for low-carbon logistics, was recommended.
- Protecting local employment sites was viewed as key to encourage walking and cycling. Respondents also noted the need for accessible electric vehicle charging points and alignment with national policy to assess travel impacts.

### Draft Policy Direction-34: Do you agree with the approach laid out in Draft Policy Direction-34-Vale of Evesham Control Zone?

- Respondents emphasised the need for effective HGV routing restrictions in and beyond the Vale of Evesham Control Zone, including retention of the South Warwickshire lorry routes plan, weight limits and traffic calming to deter use of unsuitable country roads, and consideration of a Bishop's Tachbrook control zone.
- They seek stronger cross-boundary coordination on weight limits and enforcement, alignment of measures in adjacent local plans, and inclusion of rail-freight options for improved sustainability.
- Concerns are raised that existing controls have shifted traffic onto the A46 trunk road without reducing overall HGV volumes.
- Clarification is requested on potential freight consolidation centres, mandatory transport assessments for new developments and protection of heritage assets such as River Avon bridge crossings.

### Draft Policy Direction-35: Do you agree with the approach laid out in Draft Policy Direction-35- Smart Cities

- Respondents emphasised upfront installation of full-fibre broadband and reliable wired and wireless networks in all new housing, with accessible ducting and chambers to allow future upgrades.
- They called for policy flexibility to accommodate evolving technologies, clearer definitions of “smart cities” or a renaming to better reflect rural contexts, and consistent application across urban and rural developments.
- Suggestions included expanding scope beyond broadband to electric-vehicle charging, smart mobility and energy-efficient solutions, measures for data privacy and ownership, and cross-boundary interoperability.
- Private-sector incentives and council support for community-led schemes were noted as ways to ensure equitable digital access and to avoid service gaps along travel corridors.

### Chapter 10: A Well-Connected South Warwickshire- Overall Question- Do you broadly support the proposals in the A Well-Connected South Warwickshire chapter? If you have any additional points to raise with regards to this chapter please include them here.

- Respondents emphasised the priority of walking, cycling and public transport over road building, calling for safe cycle lanes, pedestrian paths and expanded bus and rail services to lower emissions and reduce car dependency.
- They highlight narrow or incomplete cycle routes, dangerous crossings and a lack of traffic calming in rural areas.
- They stress precise policy wording to align with the National Planning Policy Framework.
- Enhanced digital connectivity and smart city measures are urged alongside privacy safeguards.
- Concerns include environmental harm from new roads, inadequate EV charging strategies and mapping inaccuracies affecting proposed development sites.

## Chapter 11: A Biodiverse and Environmentally Resilient South Warwickshire

### Draft Policy Direction-36: Do you agree with the approach laid out in Draft Policy Direction-36 - Protection of Sites, Habitats and Species?

- Respondents highlighted a lack of specificity in policy 36, calling for detailed definitions of locally important sites, and mandatory biodiversity net gain targets above 10 percent supported by evidence-based tools.
- They urged explicit safeguarding of ecological connectivity and wildlife corridors through a comprehensive green/blue infrastructure map, and clear site hierarchy based on statutory status.
- They emphasised robust noise and light pollution controls, and strong enforcement of mitigation measures.
- Recognition of agricultural land's habitat and food-security value, stakeholder consultation, cross-boundary cooperation and ongoing monitoring are also recommended.

### Draft Policy Direction-37: Do you agree with the approach laid out in Draft Policy Direction-37- Local Nature Recovery Strategy?

- Respondents emphasised the importance of protecting existing habitats and wildlife corridors, urging mandatory policy wording and clearer targets for nature recovery, with suggestions to change “expected to support” to “must support” and to set land-use targets of 30–40% by 2030.
- They highlighted the need to balance clear obligations with flexibility until the local nature recovery strategy is finalised and to integrate LNRS provisions into the plan to guide habitat creation, restoration and biodiversity net gain.
- Clarification on how biodiversity net gain aligns with local strategies, avoidance of duplicating statutory requirements, and a robust strategic evidence base were also seen as essential.
- Additional calls included detailed implementation mechanisms and connections to existing biodiversity frameworks and green infrastructure.

### Draft Policy Direction-38: Do you agree with the approach laid out in Draft Policy Direction-38 - Biodiversity Net Gain?

- Respondents noted the policy should clearly state the statutory 10 % net gain minimum and the current evidence is insufficient to mandate a higher requirement.
- Any increase above 10 % was seen as needing viability testing and robust local evidence of need, opportunities and impacts.
- On-site delivery was preferred over off-site units or credits to secure local ecological benefits, with off-site schemes requiring transparent local arrangements and clear long-term management.
- Concerns were raised that higher net gain targets could reduce developable land, raise costs and affect infrastructure and affordable housing delivery.
- The metric methodology and monitoring arrangements were judged at risk of producing paper gains without clear sanctions, adequate resources or use of remote sensing to detect pre-application habitat loss.
- Protection of existing habitats such as hedgerows and mature trees was deemed crucial, and the 30-year management requirement needs specified enforcement.
- Practical suggestions included ecology-led design, native species planting, a national land register for net gain and clear guidance on costs, delivery options and obligations.

### Draft Policy Direction –39: Do you agree with the approach laid out in Draft Policy Direction –39- Environmental Net Gain?

- Respondents criticised the absence of published evidence and called for updated data on natural capital, comprehensive metrics, and a clear measurement, control and monitoring framework aligned with NPPF requirements.
- They warned that duplication with existing biodiversity net gain and carbon sequestration policies could add obligations, costs and delays.
- Concerns were raised over the feasibility and viability of new targets, the definition of environmental net gain beyond biodiversity, the scope of ecosystem services covered, enforcement arrangements and the realism of models for complex natural processes.
- Suggestions included reviewing other authorities' targets, integrating landscape-scale connectivity and ensuring requirements remain proportionate to development scale and kind.

### Draft Policy Direction-40: Do you agree with the approach laid out in Draft Policy Direction-40 Green and Blue Infrastructure?

- Respondents sought a firmer evidence base and clearer guidance for the greening factor, including baseline assessments, area-specific calculations and enforcement mechanisms aligned with national policy.
- They urged mapping existing habitats, retaining mature features and improving ecological connectivity through strategic corridors and multifunctional sustainable drainage.
- Clarity was requested on quantitative greening factor rationale, on-site versus off-site provision, locational hierarchies and interactions with biodiversity net gain and open space requirements.
- Viability considerations should allow flexibility in thresholds, maintenance costs and affordable housing commitments.
- Strengthened long-term management, monitoring and penalties were highlighted to ensure genuine delivery.
- A higher biodiversity net gain target and early integration of green and blue infrastructure were also emphasised.

### Draft Policy Direction-41: Do you agree with the approach laid out in Draft Policy Direction-41 - Carbon Sinks and Sequestration?

- It is acknowledged that the Assessment of Carbon Sequestration and Habitat Baseline and Opportunities (March 2024) does suggest that the South Warwickshire authorities should consider setting a threshold, and that to maximise climate change resilience, environmental features that make contributions towards carbon sequestration should be protected.
- Respondents express concern that the policy may impose constraints on development viability if sequestration thresholds are not set appropriately. Thresholds for net carbon gain may limit land availability for housing and industry, particularly when set too low. The carbon sequestration assessment (page 48) indicates potential negative effects on land supply and build-out rates.
- A specific policy for Carbon Sinks and Sequestration is not required as there are sufficient other policies providing protection to nature sites and this policy will not add any value to the plan. Carbon sequestration is a very complex phenomena which may be limited by reliance on greening factors for mitigation.
- Climate change may undermine the long-term sequestration capacity of forests and wetlands.

- Developers may need to oversee sequestration outcomes for around 30 years post-development. Strict, enforceable standards could be imposed on new developments to increase carbon sequestration.

### Draft Policy Direction-42: Do you agree with the approach laid out in Draft Policy Direction-42-Trees, Hedges and Woodland?

- Respondents emphasised the inclusion of an ambitious formal tree canopy target but highlight the need for feasibility evidence, flexibility where sites have limited scope, and clear assessment and maintenance frameworks.
- They also stress native species diversity, protection of ancient trees, hedgerows and habitats, and strategic woodland creation.
- Mandatory planting requirements are noted to risk development viability and may be better framed as advisory measures or paired with two-for-one replacement schemes.
- Defined exceptions are proposed for removal of low-quality, dead, diseased or dangerous trees with compensatory planting, and clearer protection criteria beyond TPOs are recommended. Integration of existing trees into site layouts is advised to avoid shading or damage.
- Robust long-term maintenance plans and streamlined guidance on monitoring, compliance and buffer zones are deemed essential to preserve and enhance trees, hedgerows and woodland without duplicating existing policy layers.

### Draft Policy Direction 43a: Do you agree with the approach laid out in Draft Policy Direction 43a- Local Green Space?

- Respondents call for councils to include and permanently protect all local green and open spaces in their plans, extending protection to habitats, corridors and community growing sites regardless of current designation.
- They call for councils to lead designation processes, using faster adoption routes, robust evidence to meet national tests and clear thresholds for on-site and off-site provision.
- Accessible green spaces are seen as vital for physical activity, mental health and biodiversity, with recommendations for durable surfaces, community orchards and higher thresholds for multi-use games areas.
- Respondents also seek stronger ecological connectivity, private land access mechanisms and clarity on addressing existing shortfalls, maintenance and public rights of way.

### Draft Policy Direction-43b: Do you agree with the approach laid out in Draft Policy Direction-43b- Registered Parks and Gardens?

- Policy definitions require clearer detail and broader coverage to safeguard registered parks, gardens and village greens, as the phrase “where possible” may allow development to override protection.
- Community orchards, allotments and parks are valued for health, wellbeing and wildlife, yet the draft omits plant species to boost insect habitats. Brownfield development should not conflict with historic green-space protection, with concerns over Site SG11’s impact on Mallory Garden.
- Year-round access could be improved with all-weather surfaces and enhanced circulation, alongside stronger maintenance standards and application of Direction 43b for feature restoration.
- Parks also contribute to air quality, heat mitigation and resilience, while local green spaces warrant permanent safeguarding for exercise, mental wellbeing and heritage.

### Draft Policy Direction 43c: Do you agree with the approach laid out in Draft Policy Direction 43c- Open Spaces?

- Respondents called for strict safeguarding of existing open spaces in varied typologies—such as local parks, public footpaths, buffer zones, orchards and allotments—with clear mapping and public ownership to prevent overdevelopment.
- They recommend on-site provision of new spaces wherever feasible and off-site contributions within 400 metres only “where practical and site-specific”, aligning policy justification with national planning guidelines.
- They highlight the need for robust evidence on open space needs and loss-justification tests, clear quality and design standards (including all-weather surfaces, accessible equipment and suitable pitch specifications), and secure maintenance funding through public ownership or commuted sums.
- Respondents also advocate a proactive council role, early community involvement, strengthened policy definitions and consistent enforcement to ensure lasting health, wellbeing and environmental benefits.

### Draft Policy Direction 43d: Do you agree with the approach laid out in Draft Policy Direction 43d-Urban Parks and Play Areas?

- Respondents questioned requiring multi-use games areas for all developments and recommend thresholds aligned with national guidance, limiting MUGAs to larger schemes (for example 100+ dwellings) where local need is demonstrated.
- They favour on-site provision but note unclear maintenance responsibilities and dangers of poor surface materials, suggesting all-weather surfacing for paths and play areas.
- Calls include clearer definitions of major development contributions, higher quality equipment, multifunctional green infrastructure (orchards, natural shade and water-runoff measures) and definitive guidance on upkeep and adequate play provision.

### Policy Direction 43e: Do you agree with the approach laid out in Draft Policy Direction 43e-Allotments, Orchards and Community Gardens?

- Respondents called for a flexible contribution mechanism that prioritises on-site food-growing spaces while allowing off-site payments where on-site provision is impractical, backed by clear definitions, minimum site-area thresholds and variable plot sizes.
- They urged design and management standards covering soil quality, water, long-term maintenance and funding, and emphasised safeguarding existing allotments, orchards and community gardens from loss or redevelopment.
- Easy access within walking or cycling distance, technical evidence such as viability assessments and soil surveys, and incorporation of biodiversity features like ponds and hedgerows were deemed essential.
- An overarching strategy was recommended to coordinate provision, address demand and ensure consistent implementation.

### Draft Policy Direction-44: Do you agree with the approach laid out in Draft Policy Direction-44- Outdoor Sports and Leisure?

- Respondents called for comprehensive site assessments covering all sports and leisure uses, clear trigger mechanisms and defined 'adequate' alternative provision.
- They request full audits and strict monitoring. Precise quantitative standards are needed on open space and facility contributions, with requirements to replace lost provision in equivalent or better quality and accessibility.

- Robust evidence base and completed playing pitch and outdoor water sport strategies are required.
- Respondents urge broadening the scope to include indoor and multipurpose venues.
- Defined connectivity criteria should ensure improved footpaths, cycle routes, and transport links.
- Safeguards on surface quality and maintenance are needed. Greater certainty is requested on developer contributions and funding sources.

### Draft Policy Direction-45: Do you agree with the approach laid out in Draft Policy Direction-45- Areas of Restraint?

- Respondents welcomed the proposal to designate areas of restraint for open landscapes, key views, biodiversity and grade 3 agricultural land, while emphasising the need for clear criteria distinguishing these designations from existing green belt, green infrastructure corridor and wildbelt protections.
- Requests for precise definitions extended to location, purpose, exemptions and mapping of restraint areas, with calls for policy wording to explicitly state whether they would replace or coexist with current designations.
- Views differed on the permissibility of development within restraint areas, with concerns that ambiguous community-benefit exemptions could undermine landscape integrity.
- Participants stressed the importance of safeguarding versatile farmland for food security, maintaining public access and wildlife corridors, and aligning local policies with the National Planning Policy Framework.
- Additional points included tighter environmental controls on pollution, flood risk and traffic, the need for an evidence-based justification and consistent application across districts, and preference for conservation incentives or brownfield regeneration over new development.

### Draft Policy Direction-46: Do you agree with the approach laid out in Draft Policy Direction-46- Protecting the Cotswold National Landscape?

- Respondents sought clear justification and operational guidance for the proposed 3 km buffer zone around the Cotswold National Landscape, including confirmation of which sites such as Meon Vale and SG17 at Shipston-on-Stour fall within its limits and how it differs from AONB designation.

- They propose reviewing the buffer's depth, considering extension to 5 km or treating it as an area of restraint, and ensuring robust enforcement powers without caveats for local housing or other schemes.
- They highlight the need to align the buffer policy with national planning policy given the NPPF's requirement for 'great weight' in conserving landscape settings, and to assess larger proposals beyond the buffer on a case-by-case basis.
- They also call for clear visual impact criteria for views from within the landscape, recognition of grade 3 agricultural land in decision-making, encouragement of additional public rights of way, and policy flexibility for development in sustainable locations that does not harm natural beauty.

### Draft Policy Direction 47: Do you agree with the approach laid out in Draft Policy Direction 47- Special Landscape Areas?

- Respondents requested clearer policy language to ensure special landscape areas safeguard habitats and ancient hedgerows while allowing development in identified sustainable locations.
- They urge directing growth towards lower-value sites to minimise ecological impact and stress the role of these areas in preserving biodiversity and wildlife corridors.
- Concerns over inconsistent boundaries prompt calls for restoring or extending designations and for evidence mapping to justify spatial coverage.
- Respondents highlight the need for transparent evidence under NPPF guidance, consistent alignment with national character areas and integration with existing landscape policies.
- They seek detail on the timing of designations and public consultation procedures.
- Additional observations note the value of these areas for tourism and heritage and recommend clarifying policy wording to balance conservation with housing needs.

### Draft Policy Direction-48: Do you agree with the approach laid out in Draft Policy Direction-48- Protecting and Enhancing Landscape Character?

- Respondents called for strict protection of areas where development effects cannot be mitigated.
- Respondents want caveats allowing housing-need exceptions removed and proposals risking harm to landscape character, biodiversity or heritage features refused by default.

- Respondents urge clear, strong policy language—replacing phrases like “will try” or “seek to avoid”—and removal of any clause permitting development on the basis of an “overriding benefit”.
- Respondents state that housing land allocations should avoid sensitive greenfield sites and village edges to safeguard open views and local character.
- Respondents seek proportionate definitions and thresholds for “major development” and impact assessments, with clear criteria or numerical triggers to avoid undue burdens on small schemes.
- Respondents propose referencing district-wide housing need to clarify priorities. Respondents note alignment with the NPPF is welcomed, alongside explicit mention of heritage assets and support for design innovation.
- Respondents urge long-term management and maintenance plans, ideally beyond five years, to secure lasting landscape enhancements.
- Respondents highlight gaps in evidence and methodology and call for refined landscape units, collaboration with local bodies and avoidance of policy overlap.

#### Draft Policy Direction-49: Do you agree with the approach laid out in Draft Policy Direction-49- Agricultural Land?

- Respondents emphasised protecting prime agricultural land to safeguard food production and long-term sustainability.
- They call for a clear, consistent grading system with soil surveys to prevent irreversible loss. Development and renewables are preferred on brownfield sites and lower-grade land (grades 3b–5), with raised solar arrays to allow grazing and support biodiversity.
- Housing and infrastructure growth should focus on poorer-quality land first, with strong justification required for any high-quality land use and caution around strategic growth exemptions.
- Alignment with national planning policy is advised to avoid duplication and ensure exceptions serve a clear purpose.
- Respondents highlight the need to assess economic impacts on farm livelihoods, manage soil sustainably, verify land-quality data and monitor cumulative land loss.

## Chapter 11: A Biodiverse and Environmentally Resilient South

Warwickshire- Overall Question: Do you broadly support the proposals in the A Biodiverse and Environmentally Resilient South Warwickshire chapter? If you have any additional points to raise with regards to this chapter please include them here.

- Respondents called for clearer, enforceable policies that secure at least 20 per cent biodiversity net gain maintained for 50 years, stronger monitoring and rationalised wording to avoid overlaps.
- Respondents also mentioned specific measures for habitat protection, including 50 metre buffers around ancient woodland and root protection areas of 15 times trunk diameter for veteran trees.
- They emphasise safeguarding high-quality agricultural land for future food supply, limiting large-scale renewable schemes on productive fields and directing offsetting to poorer land.
- Detailed green and blue infrastructure evidence, strategic ecological corridors, sustainable drainage, hedgerow retention and enhanced canal links are urged before housing allocation.
- Tree standards could follow the Bristol method, with hedgerow margins of three metres.
- Formal policy tools for Local Nature Recovery Strategies and assessments of ammonia impacts within 5 kilometres are recommended, alongside incentives for sustainable farming and climate-adapted land management.

## Chapter 12: Glossary

Do you broadly support the proposals in the Glossary chapter? If you have any additional points to raise with regards to this chapter please include them here.

- A cluster of 10 identical comments was submitted on behalf of various landowner and land promoter clients. Each of these comments suggested identical amendments to 10 definitions. The comments suggest the amendments are required for “accuracy and alignment with national policy”. The alternative definitions suggested are listed in the ‘Recommendations’ in Chapter 12 in the consultation statement.
- A respondent also suggested removing the definition of Local Enterprise Partnerships as these no longer exist.