



**SOUTH WARWICKSHIRE LOCAL PLAN PART 1  
ISSUES AND OPTIONS CONSULTATION (REGULATION 18)  
MARCH 2023**

**MILL LANE, KINGSWOOD**

**REPRESENTATIONS ON BEHALF OF MR JAMES BUSHELL**

**MARCH 2023**

**REF: PF/10606**

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## 1. INTRODUCTION

- 1.1. These representations are made to the South Warwickshire Local Plan Issues and Options Consultation, on behalf of Mr James Bushell, in relation to land at Mill Lane, Kingswood.

**2. SECTION 3 VISION AND STRATEGIC OBJECTIVES – SOUTH WARWICKSHIRE IN 2050**

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

Response: Yes

### 3. SECTION 4 MEETING SOUTH WARWICKSHIRE'S SUSTAINABLE DEVELOPMENT NEEDS

#### South Warwickshire's Development Requirements

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

**Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan**

**Option I3b: Each District Council to produce its own Levy**

Response: Neither option 13a or 13b are appropriate for a Development Plan. All planning obligations must satisfy the statutory requirement of the CIL Regulations 2010 as amended (Regulation 122). A statement in a Development Plan cannot make lawful a demand for obligations which fail to meet its statutory tests. A Development Plan can include a general policy as to the formal Council seeking planning obligations to offset the impacts of new development where such a requirement meets the statutory tests.

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

Response: Yes

#### Development Distribution Strategy for South Warwickshire

**Q-S1:** Please select the option which is most appropriate for South Warwickshire

**Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced**

**Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy**

Response: Option S1b is considered to be the most appropriate for South Warwickshire.

**Q-S2: Please select all options which are appropriate for South Warwickshire**

**Option S2a: Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.**

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

**Option S2c: Do not have a policy which encourages intensification**

Response: Option S2c is considered to be the most appropriate for South Warwickshire.

**Q-S3.2: Please select the option which is most appropriate for South Warwickshire**

**Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.**

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

Response: Option S3.2a is considered to be the most appropriate for South Warwickshire.

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

Response: Yes

**Q-S5.3: In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?**

Response: Yes

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

**Option 5: Dispersed**

Response: Appropriate strategy

Further Comments: Where some development is identified in settlements that have rail connection or provide day to day services.

**Q-S8.1: For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward?**

Response: Yes

**Q-S8.2: For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?**

Response: A higher limit is appropriate

**Q-S9: Please select the option which is most appropriate for South Warwickshire**

**Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP**

**Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.**

**Response: Option S9b is considered to be the most appropriate for South Warwickshire.**



**4. SECTION 5 DELIVERING SOUTH WARWICKSHIRE'S ECONOMIC NEEDS**

**Q-E2:** Please select all options which are appropriate for South Warwickshire  
**Option E2a:** Include a policy which encourages businesses to be low carbon  
**Option E2b:** Do not include a policy encouraging businesses to be low carbon  
**Option E2c:** Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy.

Response: Option E2a is considered to be the most appropriate for South Warwickshire.

**Q-E3:** Please select all options which are appropriate for South Warwickshire  
**Option E3a:** Include a policy expanding on SDC's current existing policy  
**Option E3b:** Have separate policies for individual sectors  
**Option E3c:** Include a policy that secures employment strategies through S106.  
**Option E3d:** None of these

Response: Option E3b is considered to be the most appropriate for South Warwickshire.

**Q-E4.1:** Please select the option which is most appropriate for South Warwickshire  
**Option E4.1a:** Include a policy supporting diversification  
**Option E4.1b:** Do not include a specific policy on diversification

Response: Option E4.1a is considered to be the most appropriate for South Warwickshire.

**Q-E4.2: Please select the option which is most appropriate for South Warwickshire**

**Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas**

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

Response: Option E4.2a is considered to be the most appropriate for South Warwickshire.

**Q-E5: Please select the option which is most appropriate for South Warwickshire**

**Option E5a: Include a policy which supports a range of business units.**

**Option E5b: Do not include a policy in Part 1.**

Response: Option E5a is considered to be the most appropriate for South Warwickshire.

**Q-E6: Please select the option which is most appropriate for South Warwickshire**

**Option E6a: Include a policy which protects South Warwickshire's economic assets.**

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

Response: Option E6b is considered to be the most appropriate for South Warwickshire.

**Q-E7.1: Please select the option which is most appropriate for South Warwickshire**

**Option E7.1a: Include a policy directing employment to the Core Opportunity Area.**

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

Response: Option E7.1a is considered to be the most appropriate for South Warwickshire.

**Q-E7.2 Please select the option which is most appropriate for South Warwickshire**

**Option E7.2a: Include a policy relating to additional economic growth at the major investment sites.**

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

Response: Option E7.2a is considered to be the most appropriate for South Warwickshire.

**5. SECTION 6 DELIVERING HOMES THAT MEET THE NEEDS OF ALL OUR COMMUNITIES**

**Q-H1-1: The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?**

Response: Yes

**Q-H2-2: Please select the option which is most appropriate for South Warwickshire:**

**Option H2-2a: A single South Warwickshire wide affordable housing requirement**

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

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

Response: Option H2-2a is considered to be the most appropriate for South Warwickshire.

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

Response: By a policy that responds to the PPG and encourages the delivery of a wide cross section of house types suitable for older people.

**Q-H3: Please select all options which are appropriate for South Warwickshire**

**Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.**

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

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

**Option H3d: None of these**

Response: Option H3a is considered to be the most appropriate for South Warwickshire.

**Q-H4-1: Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District?**

Response: Yes

**Q-H4-3: If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?**

Response: Following the spatial growth options.

**6. SECTION 7 A CLIMATE RESILIENT AND NET ZERO CARBON SOUTH WARWICKSHIRE**

**Q-C1.1: Please select the option which is most appropriate for South Warwickshire**

**Option C1.1a: Identify and allocate land that is considered suitable for wind or solar energy generation schemes**

**Option C1.1b: Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location.**

**Option C1.1c: None of these**

Response: Option C1.1b is considered to be the most appropriate for South Warwickshire.

**Q-C2 Please select the option which is most appropriate for South Warwickshire**

**Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable**

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

**Option C2c: None of these**

Response: Option C2b is considered to be the most appropriate for South Warwickshire.

**Q-C3.1: Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site?**

Response: No

**Q-C4.1: Please select all options which are appropriate for South Warwickshire**

**Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time.**

**Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.**

**Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards**

Response: Option C4.1a is considered to be the most appropriate for South Warwickshire.

**Q-C5: Please select all options which are appropriate for South Warwickshire**  
**Option C5a: Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications**  
**Option C5b: Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas**  
**Option C5c: None of these**

Response: Option C5b is considered to be the most appropriate for South Warwickshire.

**Q-C6.1: Please select the option which is most appropriate for South Warwickshire**  
**Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a ‘business-as-usual’ approach to construction**

**Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.**

**Option C6.1c: None of these**

Response: Option C6.1b is considered to be the most appropriate for South Warwickshire.

**Q-C6.2: If a phased approach is used, what dates and thresholds should be used?**

Response: 80% reduction by 2040 and 100% reduction by 2050.

**Q-C7: Please select the option which is most appropriate for South Warwickshire**

**Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures?**

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

**Option C7c: None of these**

Response: Option C7b is considered to be the most appropriate for South Warwickshire.

**Q-C8: Please select the option which is most appropriate for South Warwickshire Option**

**C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events**

**C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events**



**Option C8c: None of these**

Response: Option C8b is considered to be the most appropriate for South Warwickshire.

**Q-C9.1: Please select the option which is most appropriate for South Warwickshire**

**Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity**

**Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity**

**Option C9.1c: None of these**

Response: Option C9.1a is considered to be the most appropriate for South Warwickshire.

**Q-C10.1: Please select all options which are appropriate for South Warwickshire**

**Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This could this be in line with RCP 8.5 in order to maximise the level of interventions incorporated?**

**Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated?**

**Option C10.1c: None of these**

Response: Option C10.1b is considered to be the most appropriate for South Warwickshire.

**Q-C11:** Please select the option which is most appropriate for South Warwickshire  
**Option C11a:** Do not include a policy on water quality in the SWLP Part 1

**Option C11b:** Include policy along similar lines to the existing policies, where supported by up-to-date evidence

**Option C11c:** None of these

**Response:** Option C11b is considered to be the most appropriate for South Warwickshire.

**7. SECTION 8 A WELL DESIGNED AND BEAUTIFUL SOUTH WARWICKSHIRE**

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

Response: Yes

**Q-D2: Please select all options which are appropriate for South Warwickshire**  
**Option D2a: Develop a South Warwickshire Design Guide**  
**Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change.**  
**Option D2c: Develop design guides/codes for strategic development sites/locations.**  
**Option D2d: None of these**

Response: Option D2c is considered to be the most appropriate for South Warwickshire.

**Q-D3: Please select all options which are appropriate for South Warwickshire**  
**Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.**  
**Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h.**  
**Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.**

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

**Option D3e: None of these**

Response: Option D3a is considered to be the most appropriate for South Warwickshire.

**Q-D4.1: Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?**

Response: Yes

**Q-D5: Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2?**

Response: Yes

**8. SECTION 9 A HEALTHY, SAFE AND INCLUSIVE SOUTH WARWICKSHIRE**

**Q-W1: Should the Part 1 plan include a policy on pollution?**

Response: Yes

**Q-W2: Please select the option which is most appropriate for South Warwickshire**

**Option W2a: Include a policy on Health Impact Assessments.**

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

Response: Option W2b is considered to be the most appropriate for South Warwickshire.

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

**Option W3a: Include an overall policy on health.**

**Option W3b: Do not include a policy on health.**

Response: Option W3a is considered to be the most appropriate for South Warwickshire.

9. SECTION 10 A WELL-CONNECTED SOUTH WARWICKSHIRE

- Q-T1:** Please select all options which are appropriate for South Warwickshire
- Option T1a:** Include no policy on the principles of the 20-minute neighbourhood for new development.
- Option T1b:** Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy.
- Option T1c:** Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals

Response: Option T1b is considered to be the most appropriate for South Warwickshire.

- Q-T2:** Please select the option which is most appropriate for South Warwickshire
- Option T2a:** Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.
- Option T2b:** Do not include a policy which takes a hierarchical approach

Response: Option T2a is considered to be the most appropriate for South Warwickshire.

- Q-T3:** Please select the option which is most appropriate for South Warwickshire
- Option T3a:** Include a policy encouraging more sustainable road-based transport for businesses.
- Option T3b:** – Do not include a policy encouraging more sustainable roadbased transport for business.

Response: Option T3a is considered to be the most appropriate for South Warwickshire.

**10. SECTION 11 A BIODIVERSE AND ENVIRONMENTALLY FRIENDLY SOUTH WARWICKSHIRE**

**Q-B1: Please select the option which is most appropriate for South Warwickshire**  
**Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District**  
**Option B1b: Remove Areas of Restraint designations**  
**Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District.**

Response: Option B1a is considered to be the most appropriate for South Warwickshire.

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

Response: Yes

**Q-B3: Please select the option which is most appropriate for South Warwickshire**  
**Option B3a: Introduce Special Landscape Areas across all of South Warwickshire**  
**Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District**  
**Option B3c: Discard Special Landscape Areas and bolster general landscape policy**

Response: Option B3c is considered to be the most appropriate for South Warwickshire.

**Q-B4: Please select the option which is most appropriate for South Warwickshire**

**Option B4a: Maintain the current policy approach, without the use of a buffer**

**Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape**

Response: Option B4a is considered to be the most appropriate for South Warwickshire.

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

Response: Yes

**Q-B7: Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?**

Response: Yes

**Q-B8.1: Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?**

Response: Yes

**Q-B9: Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites.**



Response: Yes

## 11. SECTION 12 PLAN CONTENT

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

Response: Yes

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

Response: Yes

**Q-P2.1: Are there any areas where equality and inclusivity in planning needs further attention?**

Response: Yes