

TOWN AND COUNTRY PLANNING ACT 1990

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

> ON BEHALF OF ELLIS MACHINERY LTD LAND AT OLD TOWN, KINETON ROAD, GAYDON (South Warwickshire Call for Sites Ref.ID. 444)

> > **MARCH 2023**

BY FRAMPTON TOWN PLANNING

OUR REF: PF/9766

Chartered Town Planning Consultants





CONTENTS

1.0	Introduction	4
2.0	Response to Questions	5
	Chapter 3: Vision and Strategic Objectives – South Warwickshire In 2050	5
	Chapter 4: Meeting South Warwickshire Sustainable Development Needs	6
	Chapter 6: Delivering Homes That Meet The Needs Of All Our Communities	12
	Chapter 7: A Climate Resilient And Net Zero Carbon South Warwickshire	15
	Chapter 8: A Well Designed and Beautiful South Warwickshire	16
	Chapter 10: A Well-Connected South Warwickshire	18
	Chapter 11: A Biodiversity and Environmentally Friendly South Warwickshire	18

APPENDICES

Appendix 1: Dwg no: 0029 PA 100 Site Location Plan



1.0 INTRODUCTION

- 1.1 This representation to the Regulation 18 Issues and Options Consultation of the South Warwick Local Plan (SWLP) is made on behalf of Ellis Machinery in relation to their interests at land at Old Town, Gaydon ('the Site'). The Site lies within Stratford-on-Avon District Council. The Site was previously submitted the Site to the SWLP Scoping Consultation (2021) and the Site was submitted in response to the Call for Sites exercise in 2021 (Site RefID. 444).
- 1.2 The Site is edge red on the attached Site Location Plan **(Appendix 1).** The Site can deliver new housing in an area of strong demand within Stratford-on-Avon. This is due to its location in Gaydon, and further assisting housing need arising from growth at Jaguar Land Rover. The Site is suitable, available and viable.
- 1.3 Submissions have already been made on behalf of Ellis Machinery Ltd as part of the emerging Site Allocations Plan process. The submissions confirm that the Site has the ability to accommodate up to 80 dwellings comprising private market and affordable dwellings with associated access and open space, including significant landscaped buffers.
- 1.4 The Site is deliverable, available and suitable to deliver a high-quality residential development that will significantly assist in meeting South Warwickshire's identified housing need as well as the unmet need from Coventry and from Greater Birmingham and the Black Country.



2.0 RESPONSE TO QUESTIONS

CHAPTER 3: VISION AND STRATEGIC OBJECTIVES – SOUTH WARWICKSHIRE IN 2050

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

2.1 Ellis Machinery supports the vision in principle, which seeks to create a prosperous, strong and sustainable South Warwickshire. The vision provides a positive framework for the Strategic Objectives and is generally reflects the three overarching sustainability objectives set out in NPPF Paragraph 8.

Strategic Objectives

- 2.2 Ellis Machinery is supportive of the Strategic Objectives, which will address the key strategic challenges and opportunities that have arisen since the Stratford on Avon Core Strategy was adopted in 2016. We consider that the Site, which has the potential to deliver 80 new homes in Gaydon would assist the South Warwickshire Authorities in achieving these objectives.
- 2.3 In seeking to achieve the strategic objective there will be competing needs, which will have to be carefully assessed in the planning process, in both allocating strategic development sites and in the decision making and determination of planning applications. This should be acknowledged in the wider planning context.



CHAPTER 4: MEETING SOUTH WARWICKSHIRE SUSTAINABLE DEVELOPMENT NEEDS

Q-I1: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

ISSUE 11: SUSTAINABLE APPRAISAL (SA)

2.4 NPPF Paragraph 32 states:

'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed the relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).'

2.5 The conclusion for the Sustainability Appraisal it states, at paragraph 7.15.11:

'High level assessment of Spatial Growth Options that are not all distinct from each other, with the exception of Option 5, means that **sustainability performance can only be evaluated with several caveats.** These include the fact that detailed locational information is not available and the ability to identify effects with precision is challenging. The scores in Table 7.1 are strictly a guide and do not represent a diagnostic analysis. **Mitigation has not been factored into the performance of the Growth Options since it is best worked up once more detailed locational information is available.'** [emphasis added]

- 2.6 At this early Issues and Options stage, the findings included in the SA have to be heavily caveated. No mitigation measures have been considered which may impact assessment conclusions. As set out in section 1.82, as the Local Plan progresses, a further series of Technical Reports will be commissioned to underpin the decision-making process.
- 2.7 Frampton Town Planning, on behalf of Ellis Machinery, reserve the right to comment further at a later stage, once the Sustainability Assessment has advanced following the outcome of key evidence base documents.

ISSUE 13: COMMUNITY INFRASTRUCTURE LEVY

Q-13: Please select the option which is most appropriate for South Warwickshire

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

2.8 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?

2.9 To ensure that the viability of delivery of strategic allocation sites, it is essential that specific infrastructure schemes which may affect this are addressed within the Local Plan. A policy to safeguard this should be included in the Local Plan.

ISSUE S1: GREEN AND BLUE CORRIDOR

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
- 2.10 The preliminary landscape proposal for the Land at Old Town, Gaydon Site has demonstrated that a range of elements such as: the retention of existing and new hedgerows, additional tree and woodland planting, and the potential ecological benefits associated with Sustainable Urban Drainage systems, will provide multiple ecological benefits.
- 2.11 Green and blue infrastructure can be incorporated within a development in a number of ways. As the layout design of such sites as Land at Old Town, Gaydon progress, it would be advantageous for additional evidence from the emerging Sub-Regional Green Infrastructure Strategy to be made available as soon as possible in order to inform the proposal.
- 2.12 Ellis Machinery would support Option S1a as preferable, considering the production of a Local Nature Recovery Strategy will come after the SWLP Spatial Growth Strategy has been determined.

ISSUE S4: GROWTH OF EXISTING SETTLEMENTS

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

- 2.13 Yes, Ellis Machinery consider that growth of some of South Warwickshire's existing settlements should be part of the overall strategy.
- 2.14 As stated within the consultation document, South Warwickshire has a dispersed settlement pattern (as set out in Policy CS.15 of the adopted Stratford-on-Avon Core Strategy) and is home to a significant number of existing settlements of varying sizes. The approach to growth across South Warwickshire seeks to maximise the capacity of its existing urban areas in order to meet development needs to 2050. The approach acknowledges growth around the edges of the existing settlements, potentially alongside and in combination with other options such as new settlements.



- 2.15 Gaydon is identified as a Category 4 Local Service Village (LSV) in the Stratford-on-Avon Core Strategy (SOVCS). Policy CS.15 of the Local Plan sets out the distribution of development across the District, promoting a pattern of balanced dispersal in settlements. These smaller villages often have the capacity (in terms of limited impact on landscape, biodiversity etc) to accommodate small/medium scale residential developments.
- 2.16 The Old Town, Gaydon Site immediately adjoins the built-up area boundary of Gaydon with existing residential development to the north and east. The Site would be well connected to the built-up area of the village and would:
 - Assist in meeting the District's housing need, including a diversity of housing stock for both market and affordable housing;
 - Assist in maintaining the viability and vitality of the Gaydon village services and facilities, and
 - Ensure that there is a supply of small and medium sized sites, that are free of infrastructure constraints and can be delivered quickly.
- 2.17 Given the pressing need for additional housing within the Stratford-on-Avon District, Gaydon is a sustainable location to accommodate additional housing growth. Initial Technical Reports for the Site have been prepared and included in the Call for Sites submission. The Technical Reports demonstrate that the Site has no constraints that would preclude a speedy delivery of new homes.
- 2.18 Accordingly, it is considered that the Site should be allocated as a residential site within the South Warwickshire Local Plan.

Q-S4.2: Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on

- 2.19 In support the spatial strategy for South Warwickshire, the South Warwickshire Settlement Analysis (SWSA) has centred its search for sustainable development locations around the 20-minute neighbourhood principle. This has limited the settlement assessed as part of the growth strategy to those settlements in the urban area and higher-level rural villages.
- 2.20 The Summary page (Page 2) sets out the context for the SWLP Local Plan Part 1, in that it will set out the overall strategy for the pattern, scale and design quality of places within South Warwickshire. Part 2 of the SWLP will set out the planning policy documents setting out detailed policies for specific areas, neighbourhoods or types of development, which could include site allocation.
- 2.21 Whilst it is appreciated that specific site allocations will come forward in Part 2 of the plan, it is important that the benefits of smaller sites on the edge of smaller villages are taken into account in the SWLP spatial approach to growth. Paragraph 69 of the NPPF acknowledges the contribution to housing delivery that smaller sites can make to ensure that everyone has the opportunity to have a decent home to live in.
- 2.22 To facilitate this, the spatial strategy within the SWLP should include provision for residential development on the edge of smaller settlements. The Settlement Analysis should also consider 'networks of villages' which can provide local amenities for new residential development.



2.23 Accordingly, the settlement analysis should therefore be updated to include all settlements in the District, to do so would be in line with Paragraph 79 of the NPPG (2021) which states that:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'



ISSUE 5: THE POTENTIAL FOR NEW SETTLEMENT (S)

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

- 2.24 Ellis Machinery does not object to the consideration of new settlements as part of the Council's Growth Option.
- 2.25 A range of sites varying in scale and size should be explored in order to secure the delivery of new homes. The expansion of existing settlements and new settlements allocated in the Local Plan should also be explored further to see whether there is capacity to be extend these further. Smaller sites that are unlikely to have significant infrastructure or utility constraints, such as Land at Old Town, Gaydon, as well as providing direct benefit to the local community are able to be delivered quickly.

ISSUE S7 REFINED SPATIAL GROWTH OPTIONS

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

- Option 1: Rail Corridors
- Option 2: Sustainable Travel
- Option 3: Economy
- Option 4: Sustainable Travel and Economy
- Option 5: Dispersed
- 2.26 Ellis Machinery consider Option 5: Dispersed is the most appropriate growth option for South Warwickshire. This option reflects the current Stratford-on-Avon Core Strategy, particularly the distribution of development established in Policy CS.15, which is based on a pattern of balanced dispersal in accordance with the distinctive character and function of the wide range of sustainable locations across the District.
- 2.27 This option follows the advice in the Framework, which expects development to be focussed in the most sustainable locations in terms of availability of shops, facilities and services, as well as access by modes of transport other than the private car. In addition, this growth option allows development to be distributed over a range of settlements rather than in single settlements in order to ensure their vitality and viability in accordance with the principles of sustainable development set out in the Framework.
- 2.28 The merits of allocating a range of size of sites, including locations such as Gaydon is that the overall housing market will simultaneously be more fluid and competitive due to a larger number and wider range of house builders being involved in the delivery of housing. Smaller sites, favouring smaller house builders, will also favour more sub-regional and local builders. They are more likely to use locally sourced trainees, apprentices and materials suppliers, bringing more inward investment per home than a large-scale national house builder would typically bring.
- 2.29 As previously mentioned, housing delivery on smaller sites can significantly contribute to a continuing supply of new homes, that lack the site constraints that may constrain the delivery of larger sites.



ISSUE 8 SMALL SCALE DEVELOPMENT OUTSIDE THE SPATIAL GROWTH OPTION

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

2.30 No, the scale of a development should reflect the character of the locality and any specific housing need of the local area.

ISSUE S9: SETTLEMENT BOUNDARIES AND INFILL DEVELOPMENT

- Q-S9: Please select the option which is most appropriate for South Warwickshire
 - Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.
 - Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.
- 2.31 Ellis Machinery would support Option S9a, existing boundary that have already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.



CHAPTER 6: DELIVERING HOMES THAT MEET THE NEEDS OF ALL OUR COMMUNITIES

Issue H1: Providing the right number of new homes

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

Q-H1-2: If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?

- 2.32 It is acknowledged that there have been issues with estimating and projecting the population in Coventry, meaning population growth in the City has been systematically over-estimated by ONS (dating back to at least 2001) and that the over-estimation works through into population projections that are demonstrably too high and unrealistic.
- 2.33 The draft Plan considers that as the overall housing need in Coventry is lower in the HEDNA (compared to the previous 2014-based projections), it follows that the Local Plan will be likely to need to accommodate fewer additional homes from Coventry based on these figures.
- 2.34 However, it is important to emphasise that the Planning Practice Guidance is clear in its approach that the 'standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area' (Paragraph 010; Reference ID: 2a-010-20190220). The draft South Warwickshire Local Plan should therefore reflect that the proposed 'Housing Need' figure is only the starting point and additional housing may be required to facilitate economic growth or the delivery of affordable housing.
- 2.35 For example, an appeal decision for up to 800 dwellings at the Former North Warwickshire Golf Club (Appeal Ref. APP/P4605/W/18/3192918 a decision which was 'called-in' by the Secretary of State) highlighted the chronic shortfall in affordable housing which has come forward within Birmingham City since 2011. Paragraph 14.108 of the Inspector's Report states that only 2,757 new affordable homes were provided in the City over the first 6 years of the Plan period. This represents less than half of the target provision and a net increase in only 151 affordable homes if Right to Buy sales are taken into account. The Inspector goes on to state that given the heavy reliance in the five-year housing land supply on City Centre apartment schemes, it is difficult to se how that trend can be reversed in the short to medium term (paragraph 14.109).
- 2.36 Whilst it is noted that Birmingham City Council does not form one of South Warwickshire's Authorities, it highlights recent difficulties with delivering homes on brownfield sites. The high proportion of flatted developments, coupled with the increased likelihood of viability issues, has led to a chronic shortfall in the provision of affordable homes. Should the South Warwickshire Authorities follow a similar approach, it may therefore be necessary to increase the Housing Requirement, in accordance with national guidance, to improve affordability.
- 2.37 We note that work is ongoing to confirm how much housing can be provided from various sources, both in terms of existing and future capacity to help meet the need. This includes an understanding of what has already been built, has planning permission or is identified for development in existing Plans and the capacity of small 'windfall' sites.
- 2.38 Overall, Ellis Machinery support a trend-based approach in principle. However, it is considered that any shortfall in housing supply should be regarded as a minimum given that it is currently



calculated against an untested housing target that may require an upward adjustment to take account of affordability.

ISSUE H2: PROVIDING THE RIGHT TENURE TYPES OF HOMES

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
- 2.39 Ellis Machinery consider Option H2-2b; providing a separate affordable housing requirement for Stratford-on-Avon and Warwick Districts, would be the most appropriate in terms of reflecting local requirements and local viability issues.
- 2.40 The tenure and type of affordable homes sought should be determined on a site-by-site basis, based on national planning policy and best available information regarding local housing needs, site surroundings and viability considerations.

ISSUE H3: PROVIDING THE RIGHT SIZE OF HOMES

Q-H2 -3: 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
- 2.41 Ellis Machinery has no objection to a requirement to meet optional Building Regulations M4(2)/M4(3) in principle (Option H3c). It is considered that this should be achieved by requiring a certain proportion of homes on sites in medium or higher value zones to meet the optional standards. However, Ellis Machinery reserve the right to comment further at a later stage, once the specific requirements for sites have been clearly defined.



ISSUE H5: PROVIDING CUSTOM AND SELF-BUILD HOUSING PLOTS.

Q-H5: Please select all options which are appropriate for South Warwickshire

- Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.
- Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.
- Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.
- 2.42 Ellis Machinery consider that both Option H5b and H5c would be appropriate for South Warwickshire. Both approaches align with the aims of Paragraph 62 of the NPPF in terms of providing opportunities for people wishing to commission or build their own homes. For each option, it must be demonstrated that there is currently a need for self-build and custom build plots identified in the self-build and custom build register for the local authority where the Site is located.
- 2.43 Option H5b should include a fall-back option of reverting any unsold self-build plots to the developer to build, should any of these plots not be sold after an appropriate marketing period (of, say, 12 months, for example).



CHAPTER 7: A CLIMATE RESILIENT AND NET ZERO CARBON SOUTH WARWICKSHIRE

Net Zero Carbon buildings

ISSUE C4: NEW BUILDINGS

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.
- Option C4d: None of these
- 2.44 Ellis Machinery would not support any of the above. Any such proposed policy would be a duplication of control and is unnecessary.

ISSUE C9: MITIGATING BIODIVERSITY LOSS

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

- Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity
- 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
- 2.45 NPPF Paragraph 32 advises that local plans should address relevant environmental objectives, including opportunities for net gains. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). Further, Paragraph 174 advises that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological network that are more resilient to current and future pressures.
- 2.46 Ellis Machinery is supportive of the requirement to enhance biodiversity across development sites. The provisions of the Environment Act 2021 requiring a 10% net gain secured through a planning condition will come into force in November 2023. Planning Policy should reflect this change to the planning context. Option C9.1a is considered to be the most appropriate for South Warwickshire.



CHAPTER 8: A WELL DESIGNED AND BEAUTIFUL SOUTH WARWICKSHIRE

ISSUE D1: STRATEGIC DESIGN PRINCIPLES

ISSUE D2: DESIGN CODES AND DESIGN GUIDES

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
- 2.47 District Design Codes can be helpful in setting out guidance on the different character areas within the District, from the urban to the rural and include basic good urban design principles. District wide Design Guides can be by nature generic and in some instances stifle design innovation.
- 2.48 A more practical and informative approach to design would be through design codes for specific strategic sites and locations. Ellis Machinery would support Option D2c.

ISSUE D3: DESIGNING ADAPTABLE, DIVERS AND FLEXIBLE PLACES

Q-D3: Please select all options which are appropriate for South Warwickshire

- Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.
- Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e., minimum 30d.p.h.
- Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire 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
- 2.49 The density of development has to reflect location. Higher density development would be more appropriate in built up areas, with lower densities in more rural areas. However, density of development has to be specific to the capacity of the site as well as the location to ensure that the land is most effective used. As such, Ellis Machinery would support Option D3a.



ISSUE D5: PROTECTING AND ENHANCING HERITAGE ASSETS

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?

- 2.50 Yes, Ellis Machinery support this approach. The information that previously accompanied both the South Warwickshire and the Stratford-on-Avon Call for Site submissions has been updated to include a Heritage Note that assessed the capacity for the Site to accommodate residential development.
- 2.51 The Heritage Note concluded that the heritage issues related to the development of the Site for housing are extremely limited, with development likely to result in no harm to any heritage assets.

CHAPTER 9: A HEALTHY, SAFE AND INCLUSIVE SOUTH WARWICKSHIRE

ISSUE W2: HEALTH IMPACT ASSESSMENT

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
- 2.52 Ellis Machinery would support the requirement for impacts on health as a result of development on strategic site allocations that could be included in the strategic allocation planning policy. For smaller schemes such as a residential development on Land at Old Town, Gaydon, other environmental planning polices should cover issues such, as pollution, noise, land contamination.
- 2.53 Ellis Machinery would support Option W2b.

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

2.54 Ellis Machinery would support Option W3b.



CHAPTER 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.
- 2.55 Ellis Machinery would support Option T1a. This option is more appropriate to reflect the context of specific locations and places.

ISSUE T2: Sustainable transport accessibility across South Warwickshire

Q-T2: Please select the option which is most appropriate for South Warwickshire

- Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.
- Option T2b: Do not include a policy which takes a hierarchical approach.
- 2.56 Ellis Machinery is supportive of Option T2a as a hierarchical approach in terms of prioritising transport infrastructure for those living in rural areas and urban areas would be most appropriate.

Chapter 11 A BIODIVERSE AND ENVIRONMENTALLY FRIENDLY SOUTH WARWICKSHIRE

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.

2.57 Ellis Machinery considers that Option B3c is considered to be the most appropriate for South Warwickshire. The Landscape Appraisal (LA) that supported the Call for Sites Submission concluded that the Land at Old Town, Gaydon has the capacity to accommodate residential development. The LA sets outs series of parameters to ensure that development of the Site would not cause any significant harm to the landscape. These include, the incorporation of landscape buffer to the south eastern and south western boundaries; retention and reinforcement of hedgerows; building height not to exceed 2 storeys; and, the use of a sympathetic palette of materials.

Appendix 1: Dwg no: 0029 PA 100 Site Location Plan

