

Cabinet

Thursday 17 October 2024

A meeting of the Cabinet will be held at Shire Hall, Market Place, Warwick on Thursday 17 October 2024 at 6.00pm.

Councillor I Davison (Chair)

Councillor H Adkins
Councillor E Billiald
Councillor J Chilvers
Councillor J Harrison

Councillor C King
Councillor W Roberts
Councillor J Sinnott
Councillor L Williams

Also attending (but not members of the Cabinet):

Chair of the Overview & Scrutiny Committee
Liberal Democrat Group Observer
Conservative Group Observer
Whitnash Residents Association Group Observer

Councillor A Milton
Councillor A Boad
Councillor A Day
Councillor J Falp

Emergency Procedure

At the commencement of the meeting, the emergency procedure for Shire Hall will be announced.

Agenda

- 1. Apologies for Absence**
- 2. Declarations of Interest**

Members to declare the existence and nature of interests in items on the agenda in accordance with the adopted Code of Conduct.

Declarations should be disclosed during this item. However, the existence and nature of any interest that subsequently becomes apparent during the course of the meeting must be disclosed immediately. If the interest is not registered, Members must notify the Monitoring Officer of the interest within 28 days.

Members are also reminded of the need to declare predetermination on any matter.

If Members are unsure about whether or not they have an interest, or about its nature, they are strongly advised to seek advice from officers prior to the meeting.

- 3. Minutes**

To confirm the minutes of the Cabinet meeting held on 4 September 2024.

(To Follow)

Part 1

(Items upon which a decision by Council is required)

4. Fees and Charges

To consider a report from Finance.

(To Follow)

5. Minor revisions to the complaints policy

To consider a report from Governance.

(Pages 1 to 19)

6. Warwick District Council response to proposed changes to the NPPF and other reforms to the planning system

To consider a report from Place, Arts, and Economy.

(Pages 1 to 48)

Part 2

(Items upon which a decision by Council is not required)

7. University of Warwick Campus Framework Masterplan Supplementary Planning Document (SPD) – consultation update and proposed adoption

To consider a report from Place, Arts and Economy.

(Pages 1 to 70)

8. Compliance Policies (Asbestos, Building Safety, Electrical Safety, Gas and Heating, Lift Safety and Water Hygiene)

To consider a report from Housing.

(Pages 1 to 82)

9. Local Growth initiatives Plan – West Midlands Investment Zone (WMIZ)

To consider a report from the Chief Executive.

(To Follow)

10. Armed Forces Community Covenant

To consider a report from Safer Communities, Leisure, and Environment.

(Pages 1 to 9)

11. Leamington Town Centre Transformation Proposals

To consider a report from Place, Arts, and Economy.

(Pages 1 to 5)

(Appendices B to C and Appendix A To Follow)

12. Procurement Exercises over £150,000

To consider a report from Finance.

(Pages 1 to 4)

13. Public and Press

To consider resolving that under Section 100A of the Local Government Act 1972 that the public and press be excluded from the meeting for the following items by reason of the likely disclosure of exempt information within the paragraphs of Schedule 12A of the Local Government Act 1972, following the Local Government (Access to Information) (Variation) Order 2006, as set out below.

Item Numbers	Paragraph Numbers	Reason
14,15, & 16	3	Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Part 1

(Items upon which a decision by Council is required)

14. Lift Replacement Works at two high rise blocks

To consider a report from Housing.

(Pages 1 to 5)
(Not for publication)

Part 2

(Items upon which a decision by Council is not required)

15. Kenilworth Wardens Sports Club Property Matter

To consider a report from Place, Arts and Economy.

(Pages 1 to 62)
(Not for publication)

16. Confidential Appendix to Item 12 - Procurement Exercises over £150,000

To consider a confidential Appendix.

(Pages 1 to 2)
(Not for publication)

Published Wednesday 9 October 2024

General Enquiries: Please contact the Committee Services team via email at committee@warwickdc.gov.uk. Alternatively, you can contact us at:

Warwick District Council, Town Hall, Parade, Royal Leamington Spa, CV32 4AT or telephone 01926 456114.

For enquiries about specific reports, please contact the officers named in the reports. You can e-mail the members of the Cabinet at cabinet@warwickdc.gov.uk

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**The agenda is available in large print on request,
prior to the meeting, by telephoning (01926)
456114**

Title: Minor revisions to the complaints policy
Lead Officer: Graham Leach, Head of Governance & Monitoring Officer,
01926 456114 and graham.leach@warwickdc.gov.uk
Portfolio Holder: Councillor Davison
Wards of the District directly affected: None

Approvals required	Date	Name
Portfolio Holder	7/10/2024	Ian Davison
Finance		
Legal Services		
Chief Executive	7/10/2024	Chris Elliott
Programme Director Climate Change	7/10/2024	Dave Barber
Head of Service(s)	7/10/2024	Graham Leach
Section 151 Officer	7/10/2024	Andrew Rollins
Monitoring Officer	7/10/2024	Graham Leach
Leadership Co-ordination Group	30/9/2024	
Final decision by this Committee or rec to another Cttee / Council?	No part recommendation to Council	
Contrary to Policy / Budget framework?	No	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No	
Accessibility Checked?	Yes	

Summary

The report brings forward the revised complaints Policy for Warwick District Council.

Recommendations

- (1) That the Cabinet adopts the minor revisions to the Complaints Policy, including the addition of the Building Safety Risk Complaints Policy (Appendix 3 of the Complaints Policy) for Warwick District Council, as set out at Appendix A to the report, to come into force from 1 November 2024.
- (2) That the Cabinet adopts the Compensation Policy for Warwick District Council, as set out at Appendix B to the report, to come into force from 1 November 2024.
- (3) Cabinet notes the ongoing work on complaints development within the Council as set out in the report.
- (4) That Cabinet recommends to Council revised delegations to replace G(7) and CE(3) as follows:

Revised G(7) Delegated authority is given to the Head of Service, (for values over £5,000 the Head of Finance, Head of Governance & Monitoring Officer & Chief Executive, and over £10,000 also the Group Leaders) to authorise compensation payments arising as remedies for complaints at Stage 1. (Any compensation amounts of £5000 or above will be reported to Overview & Scrutiny Committee)

New Delegation: Delegated authority is given to the Head of Governance Services, in consultation with the relevant Head of Service (and for values over £5,000 the Head of Finance & Chief Executive and over £10,000 also the Group Leaders) to authorise compensation payments arising as remedies for complaints at Stage 2 or from the Ombudsmen. (Any compensation amounts of £5000 or above will be reported to Overview & Scrutiny Committee)

1 Reasons for the Recommendation

- 1.1 The Complaints policy was last updated in February 2024 and since then the handling of complaints has remained largely consistent even with the introduction of the Housing Ombudsman complaint handling code.
- 1.2 The Complaints considered by the Council are subject, ultimately, to consideration by one of two Ombudsmen and therefore the Council needs to have consideration of this when setting its policy.
- 1.3 A few minor changes have been made to the wording of the policy. This provides clarification and ensures the policy follows best practice and the Complaint Handling Codes of the Local Government & Social Care and Housing Ombudsmen.
- 1.4 The Pennington and HQN reports identified the requirement for a Building Safety Risk Complaints Policy – this has been developed in accordance with the requirements of the Building Safety Act 2022 to ensure compliance with the standards set by the Regulator.
- 1.5 The Warwick District Council Compensation Policy has been developed to satisfy the requirements of the Housing Ombudsman in respect of being able to provide evidence for compensation amounts awarded and to ensure consistency

is applied when compensation is considered as a necessary remedy to a complaint.

- 1.6 The Policy, Performance and Complaints manager is conducting a review of Complaint Handling Practices, working closely with colleagues in Housing Services. The need for investment in the Councils "corporate core" was identified in a Peer Review conducted in 2023. An updated version of the Complaints Policy was approved by Cabinet in February 2024 (in line with the Housing Ombudsmans Complaint Handling Code). The review is Council wide but has been adopted first by Housing Services and consists of the following aspects:
- 1.7 Creation of template documents and a "useful information" factsheet provided to all investigating officers.
- 1.8 All housing complaints are handled by the Customer Engagement Team.
- 1.9 The Policy, Performance & Complaints Manager has been updated as the point of contact for the Housing and Local Government & Social Care Ombudsmen.
- 1.10 Plans for promotion of the complaints policy and best practice through our ICT training system "MetaCompliance" and a newly created Intranet page.
- 1.11 Plans for complaint handling training briefings for all staff and elected members – the briefings will be added to an introductory course for all new starters as well.
- 1.12 Plans for all relevant Staff to complete Housing Ombudsman eLearning.
- 1.13 Plans to train officers in identifying complaints and Heads of Service delegating their authority to the trained officers.
- 1.14 A "complaint recommendations" SharePoint list has been created to record and track progress of Orders/Recommendations/Learning Points from WDC complaint reports and those completed by the Housing and Local Government & Social Care Ombudsmen – the list is being trialled throughout September and October.
- 1.15 All Stage 2 complaints will be undertaken by the Policy, Performance & Complaints Manager from 1 November 2024.
- 1.16 WDC has purchased a (Customer Relationship Management) CRM system, and the Policy, Performance & Complaints Manager will be working with colleagues to implement the complaints process in the CRM. This will bring about improvements in communication with residents and internal stakeholders, record keeping, access of data, monitoring & reporting and learning from actions in respect of complaints.
- 1.17 A creation of a compensation policy to be reviewed by Cabinet alongside minor changes to the complaints policy and addition of Building Safety Complaints appendix (in line with the Building Safety Act 2022).
- 1.18 The revised delegations provide improved clarity on the authority in place and assurance for Councillors on the process used which is the practice normally used at present. The current delegations are as follows:

G(7) All Heads of Service have authority to Authority to agree remedies for a complaint at Stage 1

CE(3) the Chief Executive has authority to agree (1) any proposed remedy at stage 2 includes compensation. This will be considered by the Chief Executive

as part of the investigator's report; and any proposed compensation following an investigation by the Local Government Ombudsman in consultation with the Head of Service

2 Alternative Options

- 2.1 The changes being brought forward are recognised as best practice and aim to address consistency of administration of complaints, the way progress of complaints is measured, how the Council acts on learning points from complaints and improve customer engagement. In time, the process will be implemented in the CRM.

3 Legal Implications

- 3.1 There are no specific legal implications of the report and the proposals comply with the relevant aspects of legislation.

4 Financial

- 4.1 There are no specific financial implications of the report.

5 Corporate Strategy

- 5.1 Warwick District Council has adopted a Corporate Strategy which sets three strategic aims for the organisation. The Policy indirectly contributes to all themes within the Corporate Strategy through ensuring good governance by bring forward learning and understanding of complaints. This should allow for issues to be resolved and processes revised to reduce the risk of a repeat.

6 Environmental/Climate Change Implications

- 6.1 There are no direct impact from the Policy on Climate Change.

7 Analysis of the effects on Equality

- 7.1 It is not considered that an equality impact assessment needs to be undertaken for these proposals.

8 Data Protection

- 8.1 There is no change in the handling of personal data as a result of these proposals.

9 Health and Wellbeing

- 9.1 There are no direct impacts on health and wellbeing as a result of these proposals.

10 Risk Assessment

- 10.1 The report presents no significant risks to the Council at this time.

Background papers: None

Supporting documents:

Housing Ombudsman Complaint Handling Code

Local Government & Social Care Ombudsman and Housing Ombudsman Complaint Handling Code

[Pennington and HQN Reports](#)

[Warwick District Council Complaints Policy \(Agreed February 2024\)](#)



COMPLAINTS POLICY

Version 2.0
December 2023

Warwick District Council is committed to providing the highest standards of services to its customers.

Complaints play a role in maintaining and improving standards and the quality of service provided. When the Council receives a complaint, this is a way of getting an important insight into how services are being delivered. By listening to customers, the Council can look at actions that can be taken to improve procedures and ultimately the services we provide.

This Policy details the way in which complaints are managed, investigated, and acted upon, based on the requirements of the proposed model code for handling complaints from the Local Government & Social Care Ombudsman and Housing Ombudsman.

Aim of the complaints policy

The Council recognises the need to provide a first-class public service, which is responsive to customer views, and this is reflected in our Vision: To make Warwick District a great place to live, work and visit by improving lives and our environment.

The Council is committed to making it easier to provide feedback and for the Council to use feedback to improve services. Through the Complaints Policy, the Council will try to resolve complaints speedily, effectively, and fairly.

In investigating complaints, the Council will seek to ensure it has acted within relevant legislation, followed the appropriate policy and procedures and have acted in a fair and reasonable way.

When dealing with complaints, it is the aim of the Council to work with customers to understand the issues and what they would like to happen to resolve them.

The tone of our contact will be open, responsive and avoid jargon. Our written correspondence will use Plain English and will be backed up with agreed positive action to resolve the complaint.

The Council is committed to treating all customers fairly and we take equality and diversity into account in a positive way. The Council will make sure that individual needs are taken into account when applying this policy and that any reasonable adjustments are made as required.

The Council has a Policy, Performance & Complaints Manager who will take responsibility for complaint handling, including liaison with the relevant Ombudsman and ensuring complaints are reported to the Senior Leadership Team and information on performance shared with Councillors.

All customer feedback will be treated equally whether it is by:

Website: www.warwickdc.gov.uk/complaints

Email: information@warwickdc.gov.uk

Phone: 01926 456116

Post: Warwick District Council, Town Hall, Parade, Royal Leamington Spa CV32 4AT or any other form of communication.

Where complaints are received through social media, we will encourage a complainant to provide details through direct messages to maintain confidentiality. This may then include giving to customers a link to the online complaints reporting form so that all customers can describe the nature of their complaint and submit them.

What is a complaint?

The Council defines the complaint as:

"an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals."

Our staff can resolve most issues of dissatisfaction as part of their job, without the need for a formal complaint to be made. However, there may be cases that require further investigation and the involvement of other officers to find out what went wrong. We will deal with these as complaints under this policy.

What cannot be dealt with under this policy?

Not all complaints can be dealt with under this policy. The Council provides a wide range of services and there may be more appropriate ways for some matters to be addressed (See Appendix 1)

If a formal appeal process exists, then this will be used to address these concerns. Appeal processes exist for several areas including, benefit claims and planning applications.

Appendix 2 gives guidance on the correct route to be used for these issues.

Stages of the policy

Upon receipt of the complaint, the relevant service will look at the issues contained within the complaint. We will look at whether we need to start a full investigation or if we could resolve the issue quickly. If we think we can do so, we will contact the customer to discuss and try to resolve the issue informally.

If we cannot, the Council has a two-stage complaint process and a complaint will be dealt with in the following way.

Initial investigation (Stage 1)

This is the first formal stage, and we will acknowledge receipt of a complaint within five working days. Our acknowledgement will be made in writing and include:

- confirmation that the complaint has been received and if possible, the name and contact details of the investigating officer, however this may not be possible in all cases.
- date or timeframe by which a response can be expected.

Our policy is to respond in full within 10 working days of receipt of a complaint, wherever possible with an ideal maximum of a further 10 working days to complete.

If an extension beyond this time is required to enable the Council to respond to the complaint fully, this should be agreed by both parties. In relationship to Housing Landlord complaints where agreement over an extension period cannot be reached, the Council will provide the Housing Ombudsman's contact details so the resident can challenge the plan for responding and/or the proposed timeliness of a response.

If the Council cannot respond in full within the acknowledged timescale, it will provide regular updates every week. These will detail the reason for the delay and when a response can be expected.

The investigating officer may need to ask for further information to assist with their investigation.

The response can be provided by letter, email, face to face or by telephone. Where a response is given by telephone or in person, the Council will provide a written confirmation of the response.

As part of the response, the Council will advise on how a complaint can be taken to a further stage should the customer wish to do so.

Review (Stage 2)

If the customer remains dissatisfied following the initial investigation, they can ask for the complaint to be considered by the Policy, Performance & Complaints Manager.

This should be done within a reasonable timescale, normally within a calendar month of a Stage 1 response, however, this can be longer in exceptional circumstances.

The Policy, Performance & Complaints Manager will undertake the review (Stage 2) of the complaint. In some circumstances, they may ask another officer to undertake this role. The complaint will be acknowledged within three working days of the request being received to escalate.

In the review, at Stage 2, consideration will be given to the adequacy of the Stage 1 response, as well as any new and relevant information not previously considered. It will not be a detailed investigation of the complaint as this detailed investigation will have occurred at Stage 1.

Our policy is to respond in full within 20 working days of receipt of the complaint, wherever possible.

If we cannot respond in full within the acknowledged timescale, we will provide regular updates every week. These will detail the reason for the delay and when a response can be expected, which should be no more than a further 20 working days.

Next steps

There is no further right of appeal to the Council following completion of a review at Stage 2 of this policy.

Within the final response, Council will inform the customer of their right to take their complaint further if they remain dissatisfied. There are two ombudsman's offices: Local Government and Social Care Ombudsman and the Housing Ombudsman. The response will contain the contact details for the appropriate ombudsman's office.

Local Government and Social Care Ombudsman

The Local Government and Social Care Ombudsman look at individual complaints about councils, all adult social care providers (including care homes and home care agencies) and some other organisations providing public services.

PO Box 4771
Coventry
CV4 0EH
Phone: 0300 061 0614
Website: www.lgo.org.ukexternal link

Housing Ombudsman Service

The Housing Ombudsman Service look at complaints about housing organisations and looks to resolve disputes involving the tenants and leaseholders of social landlords. Residents and landlords can contact the Ombudsman at any time for support in helping to resolve a dispute.

Housing Ombudsman Service
PO Box 152
Liverpool
L33 7WQ
Phone: 0300 111 3000
Website: Housing Ombudsman websiteexternal link
Email: info@housing-ombudsman.org.uk

Complaints of discrimination and harassment

The council has developed an approach for dealing with incidents of reported harassment or discrimination.

These issues will be dealt with sensitively, considering the nature of the issues raised when appointing an investigator who will liaise with the Council's Equalities, Diversity & Inclusion Business Partner. In cases of harassment, the Council will consider the characteristics of the investigating officer, and if appropriate, discuss this with the customer before appointing an investigator.

Complaints received via Councillors or Members of Parliament

When the Council receives a complaint via an elected representative, it will direct the response directly back to the customer but will ask the customer if they wish the Council to provide a copy to the elected representative who originally passed it on.

Complaints relating to more than one council service

Where a complaint includes issues for more than one part of the council, the investigation will be led by the person who has responsibility for the major part of the complaint. We will aim to provide a single response whenever possible.

Complaints against members of staff

If an issue about a member of staff is raised (this includes people who volunteer with the Council), the Council will investigate and take appropriate action, in accordance with this Policy.

If during the investigation we find that staff have acted in a way that requires disciplinary action, then internal policies will apply. It will not be possible to share the outcome of any management actions.

Anonymous complaints

Anonymous complaints will be investigated as far as possible, and a record of the complaint kept.

Reasonable adjustments

The Council are committed to understanding the impact of a complaint on a customer, taking their individual circumstances into account. To assist in this, where reasonable adjustments are required concerning how complaints are made, considered, or responded to, it will accommodate requests where possible. In the first instance to discuss any reasonable adjustments with the Policy, Performance & Complaints Manager

Dealing with unreasonable behaviour

There are a small number of customers whose behaviour in pursuing the resolution of their complaint or behaviour in general is unreasonable. A separate policy exists to deal with these instances and explains our approach. A copy of this is at Appendix 2.

This is supported by the Council's Violence and Aggression at Work Policy.

Review

To ensure that the Policy remains relevant it will be reviewed every 2 years.

This Policy will next be reviewed in April 2026 by the Head of Governance & Monitoring Officer.

Limitation of this Policy**Requests for service or information**

As an example, if a request for a repair to a council property is raised, this is alerting us to work that needs to be done.

These requests may however become a complaint if we do not deal with them appropriately.

Appeals procedures

If an appeals procedure applies to the complaint, we will refer the customer to this, and notify them of the actions at the outset.

Appeals procedures must be completed before we can investigate any other issues raised with us. If this is the case, we will let the customer know.

The following are examples of complaints where there is an appeals process and so we will not deal with them under this policy:

- issuing of penalty charges, for example parking tickets and the recovery process
- a decision on a planning application or planning enforcement matter
- a re-housing decision
- an eviction decision
- an offer of council accommodation
- entitlement to housing benefit or universal credit
- a decision about council tax support
- a ban from or restriction on entering council premises
- homelessness

Existing right of objection

This is where there is a more appropriate individual or organisation to deal with a complaint such as a tribunal, ombudsman or court.

Complaints regarding issues that occurred over 12 months ago

We would not normally investigate complaints about something that happened more than a year ago, unless there are exceptional circumstances.

Complaints about Conduct of councillors

Any complaint regarding a councillor must be submitted to the Head of Governance & Monitoring Officer

Details of how to complete this can be found on the Council's website

<https://www.warwickdc.gov.uk/standardscommittee>

Allegations of fraud, or corruption

If you have concerns about possible fraud or corruption involving Warwick District Council, details of how to raise these concerns can be found on the Council's [website](#).

Where legal proceedings are involved

When a legal challenge is being made regarding whether a decision, action (or lack of action) is lawful. This is a separate process to the ombudsman so will not be considered under the complaint policy.

Employment Issues

Complaints made by employees concerning their employment will be referred to Human Resources to be considered in line with internal HR procedures.

Complaints made by job applicants who wish to complain about the recruitment and selection process will be dealt with by the relevant recruitment manager.

Warwick District Council Managing Unreasonable Customer Behaviour Policy

Warwick District Council is committed to providing a quality service to all its customers. In return, the Council expects everyone who comes into contact with employees to treat them with respect.

Most of our customers are satisfied with services provided. But the Council recognises that sometimes this isn't always the case. To carry out its work the Council needs to make sure we are using our resources in the best way. To do this our decisions are made in line with our appropriate policies and procedures. This might mean we can't respond to every issue in a way an individual may want if it means using a disproportionate amount of time and resource on a single case.

We understand that, in times of trouble or distress, people may act out of character, and, in a very small number of cases, may behave in an unacceptable way despite our best efforts to help.

This makes it difficult for us to deal with queries or complaints effectively. We also have a duty to protect the welfare and safety of our staff. They should be able to come to work without fear of violence, abuse, harassment, or discrimination.

Purpose of this policy

This policy means we can manage unacceptable customer behaviour consistently and fairly. It sets out clearly what we consider to be unacceptable and the steps we may take to deal with such behaviour. It applies to everyone who accesses our services to help us protect staff from abuse and harm.

You can expect that our employees will always:

- provide a fair, open, proportionate, and accessible service
- listen and understand
- treat everyone who contacts us with respect, empathy, and dignity
- behave in line with the Employee Code of Conduct

We expect people accessing our services to:

- be courteous
- engage with us in a way that does not hamper our ability to carry out our work effectively and efficiently for the benefit of all

Safeguarding and disclosures

If, in the course of Council work, an individual threatens to harm themselves or others, it will consider disclosing this to a relevant health professional. The Council may also contact the police if others are threatened with harm.

Definition of unacceptable behaviour

Unacceptable behaviour means acting in a way that is unreasonable, regardless of the level of someone's stress, frustration or anger. It may involve acts, words or physical gestures that could cause another person distress or discomfort.

Aggressive or abusive behaviour

Warwick District Council supports a zero-tolerance approach to abusive or aggressive behaviour towards its staff. Staff have a right to assist clients without fear of being attacked or abused. Any incidents of this nature will be considered under the Council's Violence and Aggression at Work Policy.

Unreasonable demands and vexatious complaints

Customers might make requests that we cannot reasonably accommodate. This may include but is not limited to:

- the amount of information they seek
- the nature and scale of service they expect
- the volume of correspondence they generate
- a remedy or outcome that cannot be achieved

The Council accepts that someone who is persistent is not necessarily guilty of unacceptable behaviour. What is seen as an unreasonable demand will depend on the circumstances of each case. The Council will always consider each complaint on its own merits.

However, the behaviour of someone who persistently contacts the Council about the same issue, when that issue has been dealt with in line with the Council's usual processes, can, in some circumstances, amount to unreasonable demand.

Such behaviour takes up a disproportionate amount of our time and resources and can affect our ability to provide a service to others.

Examples of behaviour which we consider as unreasonable demands and vexatious complaints include but are not limited to:

- refusing to follow our complaints procedure
- persistently pursuing a complaint where the Council's complaints procedure has been fully and properly implemented and exhausted, but no appeal has been made to either the Housing Ombudsman or Local Government & Social Care Ombudsman.
- after the Ombudsman has considered and concluded the case, making a further complaint on the same issue
- contacting us repeatedly and frequently without giving us enough time to respond to previous correspondence
- insisting on seeing or speaking to a particular member of staff when a suitable alternative has been offered
- visiting our offices without an appointment *and insisting on meeting an individual*
- focusing disproportionately on a matter in relation to its significance and continuing to focus on this point despite receiving proportionate responses addressing the matter
- adopting a 'scatter gun' approach: pursuing parallel complaints about the same issue with different members of staff
- threatening or using actual physical violence towards staff or their associates
- being personally abusive or verbally aggressive towards staff dealing with their issue or their associates
- recording meetings or conversations (whether face-to-face or on the telephone) without the prior knowledge or consent of other people involved

How we will respond to incidents of unacceptable behaviour

The Council does not expect its employees to tolerate unacceptable behaviour when communicating with its customers. When this happens, its employees have the right to:

- place callers on hold
- end the call
- not reply to an abusive email or letter - we will only review these communications to ensure no new issues have been raised

Before taking such action, officers will always warn customers that they are behaving in an unacceptable way to give them the chance to change their behaviour.

However, a warning will not be given in extreme cases to protect our staff, for example, when a physical threat is made.

Where these circumstances arise, we will take the following steps:

- we will ask customers to modify their behaviour and explain why
- if the behaviour continues to be unacceptable, our employees will remove themselves from the situation. If the communication is by telephone, the caller will be told that the call will be ended
- the employee will inform their manager who will keep a record of the incident. In all cases a manager will investigate the situation and decide what action to take. This could include limiting a customer's contact with us
- we will refer the matter to the police where a criminal offence has been threatened or committed

Communication restrictions

If customers continue to behave unacceptably, a Head of Services after consultation with the Policy Performance and Complaints Manager can put in place restriction on a customer. If the Council decides to do this, it will tell the customer that it is doing, setting out:

- why it considers their behaviour unacceptable
- what action it is taking and the time limit on the restrictions

If it decides to limit communication, will make a note of the limitation and inform relevant officers, Ward Councillors and Portfolio Holders.

Communication might be:

- limited to being conducted in writing
- limited to a specific individual
- removed from Council's social media and be blocked from our accounts
- limited to a specific email address or telephone number
- placed on file without a further response if the issued raised in the correspondence has previously been considered
- limited in other ways which we consider appropriate in the circumstances, in line with this policy

In addition, we reserve the right to:

- limit telephone contact to set times on set days
- restrict contact to a nominated employee who will deal with all future calls or correspondence
- restrict the issues on which we will correspond
- block emails or telephone numbers if the number and length of communications sent is excessive

- refuse to consider a complaint or any further contact in exceptional circumstances
- take any other action which we consider necessary or appropriate to make this policy effective.

Where circumstances are serious enough to warrant further restrictions, the Council may take legal action to prevent further contact/unacceptable behaviour.

In making any decision to take legal action in such cases, we may consider:

- how legal action may affect our staff
- how legal action may affect the individual (including their personal circumstances and any reasonable adjustments)
- the extent to which we can engage or assist
- the extent to which the process or subject matter has been exhausted

Equality Act 2010

The Council will make sure that it meets the requirements of the Equality Act 2010 and the Public Sector Equality Duty. This includes making sure we consider adjustments for people with protected characteristics.

Some people may have difficulty expressing themselves or communicating clearly and/or appropriately. We will always consider the needs and circumstances that we have been made aware of, before deciding how best to manage the situation. This will include making reasonable adjustments.

However, this does not mean we will tolerate abusive language, shouting, or other unacceptable behaviour or actions.

If an individual with a protected characteristic becomes the subject of a restriction under this policy, we will consider whether the restriction may affect them more than someone without that characteristic. If this is the case, we may make different arrangements so they can still access the service.

Review

Any decision to restrict communications will include a time period for review and when appropriate we may lift some or all restrictions.

Warwick District Council

Compensation Policy

Compensation

The Council may consider awarding compensation if the standard of service is below the standard residents could reasonably expect and/or failures occur that fall outside of the Council's policies.

Officers responsible for complaint investigations will use the complaints process to consider compensation if service(s) fail to meet the expected standards. An evidence-based approach will be used when calculating and awarding compensation.

The following will be considered when deciding to issue a compensation award:

- Whether the event has caused the resident financial loss or distress and/or inconvenience.*
- Whether a Council tenant has lived in poor conditions longer than is reasonable due to failure by the Council to deal satisfactorily with repairs that are its responsibility and which the resident has told the Council.*

It is recognised there are instances where the distress or inconvenience caused by a failure in service can be made worse by a resident's individual circumstances. The Council will use its complaints process to understand whether there has been any unfair impact and, if so, the severity of this. Compensation calculations reflect the additional detriment that may have been caused due to these individual circumstances.

Exceptions for reimbursement

Residents will not be reimbursed if they decide to employ an individual contractor or tradesperson to complete work without getting written permission and agreement from the Council beforehand.

If a Council tenant undertakes any work on or in their home and it is deemed to be unsafe or non-compliant, the Council reserves the right to arrange for the work to be corrected and seek reimbursement costs from the tenant.

Utility costs, such as the water or energy used to carry out a repair, will not be reimbursed e.g. the water used in draining down a system, or the electricity used for power tools.

If a resident has any rent arrears or arrears for other Warwick District Council services, compensation awards will be paid towards these unless sufficient evidence of financial hardship is provided. If there are no such debts, compensation payments will be made directly to the complainants bank account.

Compensation payments awarded by the Housing Ombudsman Service (HOS) or Local Government & Social Care Ombudsman (LGSCO), separate from any compensation the Council may have already offered or paid, will not be offset against arrears, and will be paid directly to the resident.

To receive compensation directly to a bank account, residents will need to sign an acceptance form, providing their bank details and proof of ownership of the bank account to ensure that the payments can be made accurately to the correct person.

Payments will be arranged by the Policy, Performance & Complaints Manager, or their team, and made by BACS within 14 days of receipt of the signed acceptance form.

Calculating compensation awards

When calculating compensation awards the following will be considered:

- the duration of any avoidable distress or inconvenience.*
- the seriousness of any other unfair impact.*
- actions by the complainant or the landlord which either mitigated or contributed to actual financial loss, distress, inconvenience, or unfair impact.*
- the level of rent or service charges by the Council*
- Council policies and procedures and how they have or have not applied them*
- how the Council handled the associated complaint*
- whether there are any required awards relating to home loss (full or partial)*
- whether any resident belongings have been damaged*

Limitations of the compensation policy

The Council will not consider calculating or awarding compensation, or making remedies in the following circumstances:

- Where the fault is caused by a third party or is something for which the Council is not responsible*
- Where the desired action would adversely impact another individual and/or their property*
- Where the resident's desired outcome for their complaint is disciplinary action to be taken against any employees. Any such scenarios will be managed in line with the Warwick District Council disciplinary policy.*
- Where a claim can be made on the resident's home contents or buildings insurance. However, insurance excess will be considered for complaints relating to recurring issues or delayed repairs where the resident is not at fault.*
- Claims relating to injury, damage or loss of personal property/belongings will be passed to the Council's liability insurers*

- *Issues that are the subject of tribunals or legal proceedings.*
- *Circumstances beyond Council control. For example, damage to flooring from extreme weather or any other natural disaster.*
- *Claims previously dealt with under the Council complaints and compensation/remedies policies.*
- *If a resident has not taken reasonable steps to limit the damage caused in their home.*
- *The Council do not compensate residents for loss of earnings, which includes the use of annual leave or needing to be available for a (reasonably booked) appointment.*

Title: Warwick District Council response to proposed changes to the NPPF and other reforms to the planning system

Lead Officer: Philip Clarke, Head of Place, Arts & Economy; Andrew Cornfoot, Planning Policy & Major Sites Delivery Manager

Portfolio Holder: Councillors King

Wards of the District directly affected: All

Approvals required	Date	Name
Portfolio Holder	17/9/24	Councillor Chris King
Finance	12/9/24	Andrew Rollins
Legal Services	12/9/24	Nigel Bell
Chief Executive	12/9/24	Chris Elliott
Director of Climate Change	12/9/24	Dave Barber
Head of Service(s)	12/9/24	Philip Clarke
Section 151 Officer	12/9/24	Andrew Rollins
Monitoring Officer	12/9/24	Graham Leach
Leadership Co-ordination Group	30/9/24	
Final decision by this Committee or rec to another Cttee / Council?	Yes	
Contrary to Policy / Budget framework?	No.	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No.	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	Yes, Forward Plan item 1,496 – scheduled for October 24	
Accessibility Checked?	Yes	

Summary

To confirm the response submitted on behalf of Warwick District Council to the government consultation on the proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system and to propose an amendment to the scheme of delegation in respect of future similar consultations.

Recommendations

- (1) That Cabinet endorses the comments attached as appendix 1 to the recent government consultation on National Planning Policy Framework (NPPF) and other changes to the planning system.
 - (2) That Cabinet recommends to Council that the scheme of delegation is amended as set out in the text following paragraph 1.13 below.
-

1 Reasons for the Recommendations

Recommendation 1

- 1.1 On 30th July, the new government launched a public consultation on some proposed changes to the planning system which will impact Warwick District Council (and all other local authorities across England). The government is seeking views on a proposed approach to revising the National Planning Policy Framework (NPPF) and also on a series of wider policy proposals in relation to increasing planning fees, local plan intervention criteria and appropriate thresholds for certain Nationally Significant Infrastructure Projects.
- 1.2 The consultation was supported by a revised draft of the NPPF which can be [viewed here](#). More information and explanation of the consultation can be [viewed here](#).
- 1.3 Although there is no requirement for the Council to make a formal response to consultations such as this, it is our usual practice to do so. Given the relatively short period for the consultation (which closed on 24th September) and its timing over the summer period, it was not possible to bring a report to Cabinet with a proposed response from Warwick District Council before the end date of the consultation. Accordingly, it was agreed through the Leadership Coordination Group that a group of councillors, working alongside the portfolio holder for Place, would agree the text of an interim response which would be submitted in accordance with the government deadline, and all councillors were given an opportunity to review and comment on these. This response is attached at **appendix 1** to this report. It was also agreed that this response would be formally presented to Cabinet at the first available opportunity. This report provides that opportunity. Any further comments made by way of amendments to the recommended response will be submitted to the government as additional comments of this Council, although it should be noted that this will be beyond the closing date for the consultation and therefore, we cannot guarantee they will be considered by government.
- 1.4 The consultation has been structured as a series of 106 questions. The decision has been made to focus on those which are of most direct relevance to, or which have the greatest impact on, Warwick District. Accordingly, as can be seen in appendix 1, responses are provided to most but not all questions.

- 1.5 Because this council is working alongside Stratford-on-Avon District Council to prepare the South Warwickshire Local Plan (SWLP), it is appropriate that the two councils together consider how we would respond to any matters that will impact on the SWLP. These would include matters concerning plan-making, meeting housing needs and Green Belt. Accordingly, officers have worked together with colleagues at SDC in the preparation of some of these responses, however these may in some cases be amended to reflect local concerns and priorities.
- 1.6 The issues raised through the changes proposed by this consultation are important and wide ranging. In presenting these consultation responses, officers would draw Cabinet's attention particularly to the following (cross references have been made where appropriate, to the consultations questions):-
- 1.7 Meeting housing needs
- The government is proposing to reintroduce mandatory housing targets to underpin work on Local Plan preparation (questions 1-14). (These were abolished under the previous version of the NPPF.). Importantly, in calculating this, the government has developed a new "standard method" for calculating housing needs (15-19). The current standard method approach was introduced in 2018 and is a trend-based model, which looks back at house building in the local area over a number of years. It also factors in levels of affordability of housing (with additional homes directed to those areas where affordability is more challenging). Finally, it includes an arbitrary 35% uplift for major cities including, in this area, Coventry. The proposed new standard method has a baseline based on a percentage of existing housing stock levels. It retains the affordability multiplier but does not apply the urban uplift.
 - The current standard method has been criticized locally, both because it is a trend-based model which focuses more housing on those areas which have seen greater levels of housebuilding in recent years, and also because it is based on largely historic (and out of date) data. The major cities uplift has also had the effect of putting more housing into areas such as Coventry which then puts pressure on Warwick District when Coventry has not been able to make provision to meet its needs within its area.
 - There is also helpful clarity around affordable housing provision (34, 40, 47-61). Housing colleagues have helped draft the response to these questions.
- 1.8 Green Belt
- There have been a number of significant changes to Green Belt policy (20 – 46). Amongst these changes are proposals to:-
 - a. Set criteria for the release of Green Belt land for development and make some minimum planning requirements for land that is released (including (subject to viability) at least 50% affordable housing)
 - b. Redefining "inappropriate development" in cases where there is no five-year supply of housing land (as is currently the case in Warwick District)
 - c. Defining "grey belt" areas within the Green Belt. These are areas comprising previously-developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes.

- These changes would have a significant impact on Warwick District, both in terms of how we would consider Green Belt land as we prepare the SWLP, and how we would determine planning applications. Given that it has been determined that Warwick District does not have a five-year supply of housing land, the current NPPF would exclude Green Belt areas from those that may have to be considered favourably for planning approval. The proposed NPPF would not exclude Green Belt land in the same way, opening up the possibility of more development taking place in Green Belt areas outside of the Local Plan process.

1.9 Plan-making (43, 103 - 106)

- The consultation sets out transitional arrangements for Local Plans that are currently in preparation as to how they would be impacted by the changes proposed in this consultation. These mainly impact on those at an advanced (regulation 19 and beyond) stage of preparation. This does not cover the SWLP. Our Plan will be expected, under these proposals, to follow all the policy direction in this NPPF. This would include the use of the new “standard method” as a basis for deriving housing needs.

1.10 Planning fees (89 – 102)

- At the present time, fees for the submission of planning applications are set centrally by government. Outside of the changes to the NPPF, the government is also consulting on proposals to allow local planning authorities to set their own planning fees. They are consulting on the principle of helping local planning authorities recover the full costs of processing planning applications. As an example given in the consultation, all householder planning applications have a set fee of £258. The government estimates that the average cost (nationally) for local authorities to process such applications is £528. The consultation is asking for views both on the principle of the local setting of fees based on full cost recovery (including how much latitude councils should be given), and its scope.

Recommendation 2

- 1.11 This is a national planning policy consultation. There is no requirement for the Council to respond however, along with many other local authorities, it is our usual practice to do so.
- 1.12 A problem with such consultations is that often the timing of committee cycles makes it impossible to formally prepare and agree a response within the consultation period. This is the case with this consultation. It is also relevant that whilst any responses to such national consultations reflects views within the Council at the time, they are not binding on the Council in any way in terms of future decisions that we make.
- 1.13 Currently, there is delegated authority for the Head of Place, Arts & Economy, in consultation with the relevant portfolio holder, to respond to Planning Policy consultations, that may affect Warwick District undertaken by neighbouring or overlapping authorities. This delegation specifically excludes national Planning Policy and other national planning-related consultations. Given that such consultations are not binding on the Council, and that sometimes it is not possible to prepare formal Cabinet reports within the timeframe of the consultation, it is proposed that the current delegation is amended as follows. (Text to be deleted has been ~~struck through~~; new text is shown **in bold**.)

Amendment to current delegation PE(4) to the Head of Place, Arts & Economy.

*make representations, in consultation with the relevant Portfolio Holder, in relation to Planning Policy consultations, that may affect Warwick District undertaken by neighbouring or overlapping authorities; **also to make representations, in consultation with the relevant portfolio holder and all Group Leaders, in relation to National Planning Policy and other national planning-related consultations.***

This does not include where, in the judgement of the Head of Place, Arts & Economy or the relevant Portfolio Holder, the issues arising from the consultation are such that they have important strategic implications for Warwick District. the following:

- ~~• National Planning Policy and other national planning-related consultations; and~~
- ~~• Where in the judgement of the Head of Development **Place, Arts & Economy** or the relevant Portfolio Holder, the issues arising from the consultation are such that they have important strategic implications for Warwick District.~~

2 Alternative Options

- 2.1 There is no requirement on the council to respond to this consultation and so an alternative option would be for the Council not to make a response. This is not recommended as it is felt helpful for the Council to make any concerns it may have about the changes known to Government through this consultation. It is also an important opportunity to register support for any proposed changes which it is considered would be helpful to the Council, particularly in its plan-making work and in any opportunities to increase planning fees which would help the Council to cover the cost of supporting the services it provides.

3 Legal Implications

- 3.1 There are no legal implications associated with this report.

4 Financial Services

- 4.1 There are no financial implications associated with this report. There will be potential positive financial implications in the event that, following this consultation, the council is given the discretion to set its own fees for planning applications or nationally set planning fees are increased.

5 Corporate Strategy

- 5.1 Warwick District Council has adopted a Corporate Strategy which sets three strategic aims for the organisation. If the changes proposed in this public consultation are brought into effect, this will have an impact on many aspects of the way in which the planning service is delivered. Many aspects of the proposed changes will impact upon the Council's strategic goal of promoting vibrant communities, a welcoming atmosphere and good mental and physical health and wellbeing within all our towns and villages.
- 5.2 The potential increase in planning fees will have a positive impact on the strategic goal of continuing to ensure that the Council's finances remain on a firm and sustainable footing.

6 Environmental/Climate Change Implications

- 6.1 These are considered as part of any proposed response to the public

consultation.

7 Analysis of the effects on Equality

- 7.1 The Government will undertake its own Equality Impact Assessment of these changes.

8 Data Protection

- 8.1 No issues.

9 Health and Wellbeing

- 9.1 These are considered as part of the proposed response to the public consultation.

10 Risk Assessment

- 10.1 There are no risks associated with the decision on whether the Council makes a formal response to this public consultation. As part of the Council's place shaping role, there may be an expectation by some stakeholders that the Council will respond to such a consultation, and so there may be some very minor reputational risks if the Council decided not to do so.
- 10.2 There is a risk that the government will not take additional comments made at this time into account, as these would be made after the close of the consultation period.

11 Consultation

- 11.1 All councillors were given the opportunity to comment on the proposed response.

Background papers:

All documents relating to the Government consultation can be viewed [here](#).

Warwick District Council response to the government consultation on [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework)

Question Number	Question	Response
Chapter 3 – Planning for the homes we need		
1	Do you agree that we should reverse the December 2023 changes made to paragraph 61?	<p>Yes. It is important to create certainty around the approach to assessing housing needs. The greater the uncertainty, the more likely there will be delays in plan-making as it introduces more scope for challenge, argument and debate for alternatives. If the Government wishes for more local authorities to have up-to-date plans and to speed up the plan-making process and also in turn housing delivery, then creating greater clarity and certainty from the outset is helpful to these aims.</p> <p>The revised text provides greater clarity and equally importantly fits better with the Government's overall objectives set out in the revised NPPF proposals.</p> <p>The changes to the Standard Method, and consequential policy changes will require parallel measures to boost capacity to deliver the required additional homes.</p> <p>We do however wish to question whether the delivery of 1.5 million homes nationally is genuinely realistic and achievable. The proposed changes to the planning system may not in themselves be sufficient to achieve a level of housebuilding not achieved since the 1950s. For example, the outputs of the Standard Method for Warwick District result in a 65% increase in the per annum housing figure. The government perhaps should also consider what other measures it can undertake to ensure this ambitious target is achieved, for example to prevent developers from land banking or delaying implementing planning permission or incentivise higher build out rates.</p>
2	Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?	As per our response to question 1, creating more certainty and clarity around the approach that a local authority should take with regards to assessing its housing needs will be beneficial to speed up plan-making and ultimately delivering on the ambitious national house building targets.

Question Number	Question	Response
		<p>However, there will always be specific cases where an alternative approach could be robustly argued and therefore, we would suggest including provision for exceptional circumstances where alternative approaches may be appropriate and indeed desirable.</p>
3	<p>Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</p>	<p>Yes. The urban uplift appeared to be an arbitrary figure that did not appear to be particularly justified. It also placed significant pressures on certain cities on top of already challenging housing need starting points as set out in the Standard Method.</p> <p>Paragraph 62 also required the uplift to be accommodated in those cities and urban centres. However, what may well have happened in a number of situations is that the 35% urban uplift would be accommodated in those cities/urban centres and as a result some of their initial housing need from the Standard Method prior to applying the urban uplift will have had to be passed on to neighbouring authorities through the duty to cooperate.</p> <p>However, this only serves to highlight the importance of having robust strategic planning arrangements in place to accommodate any ‘displaced’ needs alluded to in the final sentence (re-numbered) para. 62 (and which remains unchanged).</p> <p>We also support the principle of directing housing growth to larger urban areas as they are often the most sustainable locations for walking, public transport, active travel and are often well served by various infrastructure required to support housing.</p>
4	<p>Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</p>	<p>We are supportive in principle of promoting an uplift in density in urban areas. It is however important in all situations that development is well-designed and appropriate in its context. The existing Paragraph 130 seeks to ensure that where density is increased, that it isn’t wholly out of character within the existing area. This seems appropriate. However, it is also clear that Paragraph 130, if retained, may prove an obstacle to delivering the ambitious levels of housing that the government wants to see across the country.</p>
5	<p>Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas</p>	<p>Yes. Local Planning Authorities have limited resources and therefore design codes should be focussed on specific areas for change rather than being fairly generic by necessity if they are district-wide.</p>

Question Number	Question	Response
	that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?	
6	Do you agree that the presumption in favour of sustainable development should be amended as proposed?	<p>Generally, agree with refinement of meaning around presumption in favour of sustainable development, notably more emphasis on the design and location of development and provision of affordable housing. The proposed deletion of the reference to the 'most important policies' clarifies the requirement and strengthens the presumption in favour of sustainable development. It ensures that 11D acts as a failsafe to support housing supply and introduces new safeguards to make it clear that its application cannot justify poor quality development, albeit that the references to 'beautiful' have been deleted as well and there is no definition or methodology for defining 'quality'. 11D applies the tilted balance where there is no 5YHLS or where policies for the 'supply of land' are deemed out of date.</p> <p>Of concern, however, is the reference 'supply of land' with no other definition or caveat. Presumably it could therefore refer to all land for types of development.</p> <p>Where policies for a particular proposal are deemed out of date, let alone in areas where there is no 5YHLS, the change could be disproportionately significant as the reference to the 'most important policies' is removed. This may have unintended consequences by undermining the strategic aims of the Local Plan and the settlement hierarchies.</p> <p>With the re-introduction of mandatory housing targets and the deletion of the words requiring consideration to be of 'the most important policies for determining the development', the amendments to 11D could be interpreted as undermining the Strategic aims of the Local Plan and the settlement hierarchies and lead to unintended consequences. Also, where a site is not specifically allocated or allocated for an alternative use, the strategic aims could be compromised in an appeal situation.</p> <p>So, although it appears as a subtle change to the wording, it could be disproportionately significant where policies are deemed out of date, or in areas where there is no 5YHLS.</p>
7	Do you agree that all local planning authorities should be	Re deletion of 2023 NPPF para 76 - Do not agree that LAs with LPs less than 5 years old should still be required to demonstrate a 5YHLS. Housing supply will have been thoroughly considered at Examination with a focus on

Question Number	Question	Response
	required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?	<p>the sites in the first five years following adoption being deliverable (current para 69), and the detailed scrutiny of this evidence should be more than sufficient for the first five years of the plan.</p> <p>However, it is helpful to have consistency across all authorities with plans of 5+ years old by standardising the requirement for five years' worth of housing supply and removing the newly introduced requirement for authorities with emerging plans (2023 NPPF para 226) to only demonstrate 4 years' worth of supply.</p>
8	Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?	<p>No, past oversupply should be able to be factored in and be set against upcoming supply.</p> <p>Clarification was given by staff from MHCLG at the PAS NPPF event in Wolverhampton on 5/9/24 that the proposed change ONLY refers to the deletion of reference to the planning practice guidance from this paragraph of the NPPF and NOT the deletion of guidance on the use of oversupply from the PPG altogether. We are grateful for this verbal clarification as we feel that if Councils have delivered strongly against their housing requirement, this should be reflected in their 5YHLS calculations.</p>
9	Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?	Agree with the application of a 5% buffer to ensure choice and competition in the market for land.
10	If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	5% is appropriate.
11	Do you agree with the removal of policy on Annual Position Statements?	Neither Warwick District Council, or our South Warwickshire neighbour Stratford-on-Avon District Council has submitted an Annual Position Statement since their introduction in 2018. Housing Land Supply Annual Position Statements - GOV.UK (www.gov.uk) indicates that only a very small number of LPAs have ever submitted one.
12	Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	Yes, the current arrangements are overly resource intensive partly due to the lack of sufficiently detailed clear and consistent legislation and/or guidelines and the use of legal documents which can lead to overly protracted negotiations. It relies too much on 'good-will' between authorities and also enables the 'duty' to be met without actually finding solutions to strategic issues and can thus leave strategic planning at a regional or sub-regional level in a hiatus and unable to make the big strategic decisions that are necessary at that scale. A system which introduces a level of regional strategic planning is welcomed as a way of focusing on strategic planning issues and as a vehicle to enable key decision making and delivery at a regional level. It should result in more joined up approaches, a more solution led approach and ultimately better Local Plans that are not

Question Number	Question	Response
		<p>unduly delayed in preparation due to the lack of strategic co-operation and which are able to be successfully delivered as a result of key strategic decision making on issues such as development needs and cross-boundary infrastructure requirements.</p> <p>It is noted that the government will explore the most effective arrangements for outside of mayoral areas and this is welcomed. An understanding and recognition of the strategic inter-relationships between the more urban areas and its rural hinterlands of a region in identifying the Strategic Development Strategy areas is critical to the success of the proposed system and should not be underestimated. The NPPF should therefore provide clarity on the approach to and importance of cross-boundary/strategic planning matters outside of mayoral areas and in locations such as Warwick's where there is a two-tier system of local government.</p>
13	Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	<p>Yes, if it is accompanied by a more robust approach to strategic planning and co-operation to enable Local Plans to be able to satisfy such tests, as it is difficult under the current system to suitably address strategic planning issues.</p>
14	Do you have any other suggestions relating to the proposals in this chapter?	<p>This question relates to the ability of the planning system to enable long-term planning. The Government will require other firm proposals to address this point.</p> <p>Current policy (existing NPPF para. 69) requires that policies should identify specific deliverable or developable sites for periods extending up to 15 years. However, the development of some larger sites can be expected to take place over even longer periods.</p> <p>The ability and willingness of developers (especially Registered Providers (RPs)) to invest in the long-term delivery of such sites is affected by issues around:</p> <ul style="list-style-type: none"> (1) The funding available. In addition to grant funding, in the case of RPs, this includes a reasonable degree of certainty around revenue streams arising from rented affordable housing, as this will affect their business plans – which are subject to oversight by the Regulator of Social Housing (RSH). Both Government and RSH are encouraged to address this point. (2) The delivery of the necessary infrastructure. A wide range of physical and social infrastructure is needed to support the delivery of <i>all</i> types of housing.

Question Number	Question	Response
		<p>That said, it is essential to recognise that: (a) the needs of many households occupying affordable housing are such (for example, on account of impaired mobility) that they may have greater calls on the use and availability of such infrastructure and (b) ensuring mechanisms are in place for meeting such needs effectively will be a factor affecting the confidence of RPs and their subsequent investment decisions.</p> <p>Early identification of key infrastructure requirements is crucial for <i>all</i> new housing. However, where housing development is likely to take place over the long-term – typically with new settlements or major urban extensions – it will be important to identify ‘big ticket’ infrastructure items at an early stage so that they can be factored into viability appraisals and reflected in the reduced land values necessary to make such development viable.</p>
Chapter 4 – A new Standard Method for assessing housing needs		
15	Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?	<p>Yes. By using short term trends, the standard method locks in the most recent household projections. This has caused problems in recent times, e.g. in Coventry. Furthermore, as indicated in paragraph 3 of the consultation, household projections can be volatile and change frequently. We also agree that the 2014-projections are out of date and no longer fit for purpose.</p> <p>The proposed switch of the Standard Method to a model based on housing stock rather than household projections would provide a better measure of housing need for two main reasons:</p> <ol style="list-style-type: none"> (1) Household projections were always tenuous and for many different reasons never reflected reality. For example, household projections never properly took account of the impact of high property prices in areas such as ours in making market housing unaffordable for existing residents, especially first-time buyers. This is reflected in our ageing demographic since high average house prices/rents have tended to price out younger households. Historic in-migration data about households is a reflection of those households who <i>are</i> able to afford to move into our District and not local households who cannot afford to remain. (2) A standardised method of assessing need is very welcome and will save resources and arguments about interpretation and methodology and thus enable a greater focus on actual delivery.

Question Number	Question	Response
		<p>Ultimately, what really matters is what new housing any new system will actually deliver and how well those new homes meet people's needs. In our context, this means placing a particular emphasis on delivering new affordable homes.</p> <p>It is essential to also factor in the those matters which affect the capacity of affordable housing providers. There will be differences as well as overlaps between the constraints affecting the capacity of the development sector to deliver affordable housing as well as market-driven schemes.</p> <p>Also, for all types of housing all necessary supporting physical and social infrastructure should be provided in step with new housing.</p>
16	Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?	Yes. We agree that using an average over a 3 year period rather than solely the most recent datapoint is sensible.
17	Do you agree that affordability is given an appropriate weighting within the proposed standard method?	<p>Whilst we do agree that increasing the significance of affordability will help address supply failing to keep up with demand, increasing its significance has notable impacts upon the two South Warwickshire local authorities where affordability can be challenging as it means that the local authorities will have to deliver a level of homes that have the potential to change the character and attractiveness of the South Warwickshire area.</p> <p>We believe that neither the current standard method nor the proposed approach to increase the weight of affordability actually will have the desired effect of significantly improving the affordability of housing in areas where affordability is an issue. A more effective approach would be for national policy to require more affordable homes in such areas and specifically more smaller 1 or 2 bedroom homes.</p>
18	Do you consider the standard method should factor in evidence on rental	Yes, but only if it is possible to do this <i>simply</i> because private rented is part of local housing markets. Query whether using VOA figures may be appropriate.

Question Number	Question	Response
	affordability? If so, do you have any suggestions for how this could be incorporated into the model?	
19	Do you have any additional comments on the proposed method for assessing housing needs?	Consideration should be given to whether the NPPF and associated Government objectives as set out in the consultation represent a plan or project giving rise to a requirement to undertake a formal Environmental Assessment.
Chapter 5 – Brownfield, grey belt and the Green Belt		
20	Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?	<p>Yes, we agree that the brownfield first principle is strengthened, and the development should now be regarded as acceptable in principle.</p> <p>However, this will be a challenge to existing settlement hierarchies. Development of brownfield land for housing in very minor settlements where there are not services would not be considered sustainable. Without concomitant changes to the definition of PDL, particularly in respect of gardens in rural areas (which are PDL), this may have significant unintended consequences and could result in developments which would undermine the character, appearance and settlement patterns of historic villages.</p> <p>Whilst the change does seem a logical first step towards brownfield passports, further information would be required as to the logistics/implications of brownfield passports before detailed comments can be provided.</p>
21	Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?	<p>Agree in principle with the proposed change to the paragraph 154g as it makes it easier to develop previously developed land in the Green Belt, in circumstances where substantial harm is not caused to the openness of the Green Belt.</p> <p>However, it is considered that the proposed changes are ill conceived and too broad brush.</p> <p>Without concomitant changes to the definition of PDL, particularly in respect of gardens and equestrian uses in rural areas (which are PDL), this change may have significant unintended consequences resulting in significant areas of land which the public would consider countryside becoming developed.</p>

Question Number	Question	Response
		<p>It is not clear how the proposed changes would relate to the other provision within para 154. For example, clause d) for a replacement building which cannot be materially larger would be redundant as the test of materially larger (which is quite restrictive) would be undermined by the comparatively permissive test proposed in g)</p> <p>Although it is understood that the term ‘substantial harm’ would be left as a matter of planning judgement it is considered that the test of demonstrating that any harm would be ‘substantial’ is quite high. As a consequence, without changes, the land release allowed would be extensive and uncoordinated.</p> <p>The land released would often be in unsustainable locations and would undermine the character, appearance and settlement patterns of historic villages.</p> <p>The current NPPF suggests that new buildings could be regarded as acceptable in the Green Belt if the development would reuse the PDL and contribute to meeting an identified affordable housing need in the local area. The proposed change removed the criteria regarding the contribution of affordable housing which may not favour to meeting the affording housing needs.</p>
22	Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?	<p>It is noted that some glass houses may be considered PDL already depending on what purpose they are put to.</p> <p>Where glass houses have been developed for the purposes of agriculture it is considered that they should remain greenfield. This is particularly the case where high grade BMV agricultural land is considered.</p> <p>It is likely that the changes under consideration would increase the demand for glass houses as they could be seen as a convenient ‘stepping-stone’ to move the use of large amounts of land into PDL in advance of later applications to redevelop the land. Moreover, it would be expected that the prevalence of uncharacteristic and unattractive polytunnels in the landscape would increase to compensate for the loss of glass house facilities.</p>
23	Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?	<p>No. Planning is littered with subjectivity but the introduction of ‘Grey Belt’ would appear to add more unhelpful subjectivity that will slow down plan making. The change is likely to mean endless discussion in appeals or public examinations about the quality of green belt and whether land is actually grey belt.</p>

Question Number	Question	Response
		<p>It is considered that the definition is far too broad and would result in harm to the character, appearance and settlement patterns of historic villages. The definition should expressly exclude gardens within Conservation Areas and equestrian land.</p> <p>The proposed definition of Grey belt land may well result in unsustainable patterns of development, with scattered parcels of land around what is currently being green belt being brought forward for residential development.</p> <p>If the term grey belt is introduced, there needs to be absolute clarity on its meaning and application with relevant terminology tightly defined and clear guidance to hopefully avoid lengthy debate around such land or potential grey belt land. In particular, we would need more guidance on what land will be classed as “limited contribution” as it might lead to challenges from developers and opposers to development.</p> <p>We do not agree with the guidance that is proposed to be included within the glossary appended to the NPPF. Under b) items ii.) and iv.) are already covered by the 5 purposes and therefore are simply a repetition of two of the purposes that are already covered under part a). Therefore, these elements should be removed from b).</p> <p>Additionally, the government hasn’t defined a single Green Belt review methodology or scoring system in assessing whether the Green Belt parcels fulfil the five purposes of the Green Belt. Local Authorities are using different methodology/terminology and different thresholds for assessing the five purposes of the Green Belt land, resulting in different outcomes in different authorities. For instance, a recent Green Belt Review has been undertaken for the South Warwickshire Local Plan. This review assessed the existing land parcels and broad areas against the five purposes of the Green Belt. A significant number of the Green Belt parcels west of Warwick were scored “Weak contribution” in the Green Belt Review.</p> <p>If these large areas are classified as making “limited contribution” as defined in the NPPF consultation, it could have a substantial impact to the area, as developers might use this reason to justify that these areas are suitable for development. Therefore, it is recommended that the government provide a clear definition and methodology for assessing the five Green Belt purposes.</p>

Question Number	Question	Response
		It is also recommended that the Government clarifies the second purpose of Green Belt – b) to prevent neighbouring towns merging into one another. Please can the NPPF or PPG clarify whether this solely means ‘towns’ or also ‘cities’ or ‘villages’. This clarification will avoid debate that currently has the potential to slow down plan making.
24	Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?	See response to Q23 As highlighted in the response to question 23 more detailed guidance should be provided to help local authorities identify low quality green belt. This will ensure a more consistent approach in identification of grey belt land which is a new designation for all authorities across England.
25	Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?	Yes, we strongly agree that additional guidance would be helpful. We suggest that this guidance would be most usefully contained within the NPPF itself (either in the main text or Glossary). However, if the guidance is lengthy, it should be within the PPG but with a clear link/reference in the NPPF. Expressly stated exclusions from the Grey Belt land definition should also be included – for example garden land. This should principally be placed in the NPPF with additional commentary in the PPG. There is no current agreed methodology for Green Belt reviews. Consultants/LPAs have developed methodologies using good practice but there is variation across the country. Introducing guidance on which land makes a limited contribution to GB purposes could helpfully be extended to wider guidance on conducting GB reviews as a whole.
26	Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?	As per our response to Question 23, we recommended that the Government clarifies the second purpose of Green Belt – b) to prevent neighbouring towns merging into one another. Please can the NPPF or PPG clarify whether this solely means ‘towns’ or also ‘cities’ or ‘villages’. This clarification will avoid debate that currently has the potential to slow down plan making. This should include a clear reference to openness. Would recommend an addition that any such land should not be isolated from services or impractical or inaccessible. The additional guidance appears overly permissive at present, given the use of the phrase “at least one of” in part b). For example, it is likely that criteria b)ii and b)iv could result in huge swathes of open countryside being reclassified as grey belt.

Question Number	Question	Response
		<p>The guidance would need consistency/an agreed definition of proposed criteria a) not ‘strongly perform’ against any GB purpose. Not all LPAs use this terminology in their GB reviews. Some use numerical ranking or RAG rate the performance of Green Belt parcels so a definition of a strong performance and vice versa would be required.</p> <p>With regard to criteria b)iv) – this is not currently applied consistently across the country. The PAS 2015 guidance ‘Planning on the Doorstep’ states with regard to Green Belt Purpose 4: To preserve the setting and special character of historic towns; <i>“This purpose is generally accepted as relating to very few settlements in practice.”</i> Further, a 1988 Hansard extract clarifies which historic settlements in England were considered ‘historic towns in the context of the Green Belt purposes.’¹ Many LPAs and consultants undertaking Green Belt Reviews cite this and use it to determine whether Purpose 4 applies in their area. In other instances the existence of Conservation Areas in proximity to the Green Belt have been used to determine the relevance of Purpose 4, and Green Belt parcels scored accordingly. This goes to show the variation in the interpretation of this particular purpose and how areas without a defined historic town could easily have large areas of Green Belt classified as making a limited contribution to the purposes. Equally, without a tighter definition, some local authorities could interpret Purpose 4 more widely to avoid Green Belt around historic settlements or Conservation Areas being deemed to make no contribution to preserving the setting or special character of an area.</p>
27	Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?	Nature Recovery Strategies will identify locations where nature recovery efforts are strategically most valuable in improving natures connectivity. If areas are identified within the green belt then the LNRS will help identify areas of green belt land that can be enhanced.
28	Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning	If the term Grey belt is to be introduced, we agree with a sequential approach to site allocation through the plan making process. However as currently worded, this might end up undermining the sustainability arguments of the local plan. “...undertake a review where an authority cannot meet its need without altering GB boundaries.” In theory, we could easily accommodate all our housing need outside of the Green Belt; but we don’t want to because those locations are less sustainable. Will this end up forcing us to use less sustainable non-GB locations? Clarity is required for such circumstances.

¹ Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) Response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

Question Number	Question	Response
	authorities to prioritise the most sustainable development locations?	
29	Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?	<p>Agree that this in an appropriate test at plan making stage in theory, however demonstrating that any individual proposal would fundamentally undermine the function of the Green Belt across the area of the plan, as a whole, is an unreasonably high test and is not reflective of the purposes of the Green Belt.</p> <p>It is felt that quite often the Green Belt serves quite local purposes in protecting a historic village or the coalescence of towns. It is concerning that even in a scenario where a development would result in quite profound impacts this would not cross the threshold of fundamentally undermining a designation which is some 1500 square kilometres in breadth.</p> <p>It is curious to understand why this refers to the area of the plan as a whole; rather than the area of the Green Belt as a whole? There is presumably a logic to this but it hasn't been explained.</p>
30	Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?	<p>No. It is flawed in a number of ways. It is likely to have unpredictable outcomes in terms of local and regional impact particularly resulting in unsustainable development remote from services.</p> <p>As a very substantial departure from established Green Belt policy it is likely to render many Development Plans out of date. We would recommend reverting to established green belt policy and are firmly of the view that important decisions relating to the release of Green Belt land should be taken through the mechanism of a Local Plan review and not through decisions on planning applications.</p> <p>If not reverted, para 155 should be substantially expanded to ensure requirements for transport planning and public transport, energy efficiency/renewables, sustainable urban drainage and biodiversity enhancements.</p> <p>Additional clarity is considered necessary in relation to defining grey belt in order to prevent potential unintended consequences for decision making. As referenced previously, there is no set methodology for Green Belt Reviews and for determining Green Belt value based on the 5 purposes, but recent Green Belt Reviews (such as that undertaken for the South Warwickshire Local Plan) have determined that comparatively large swathes of Green Belt deliver a 'weak' contribution overall when considering the 5 purposes altogether. The proposed definition of Grey Belt is "land in the green belt comprising previously developed land <u>and/or</u></p>

Question Number	Question	Response
		<p><u>areas of Green Belt land that make a limited contribution to the five Green Belt purposes...</u>". It is unclear how "limited contribution" is to be defined. In the absence of a detailed definition and confirmation that grey belt must only be defined as part of the Local Plan/Local Plan Review process, developers could argue that any land assessed as having a "weak" contribution overall meets the definition of 'grey belt' and so, under draft paragraph 152, for areas that cannot demonstrate a 5 Years Housing Land Supply (like Warwick District) would not be regarded as inappropriate for housing, commercial and other development. As a result, large areas of Green Belt that are currently protected from development could be deemed appropriate in principle for housing, commercial and other development. This seems to conflict with the aims set out in para. 139 of retaining the openness and permanence of green belt land and in fact could see developers targeting green belt locations over more preferable brownfield sites in urban areas/non-green belt locations. To illustrate the scale of the issue, the following areas have been determined as offering a 'weak' contribution overall as part of the emerging SWLP Green Belt Review – almost all land north and west of Warwick, south east of Kenilworth, south of Baginton, and almost all land around Kingswood and Hockley Heath (with more isolated parcels also north and east of Leamington and north west of Stratford-upon-Avon).</p> <p>We therefore query whether these implications for decision making are intended – if not, additional detail is required for local authorities to better understand how grey belt is to be defined. Our recommendation is that the NPPF is amended to clarify that grey belt must only be defined as part of the Local Plan/Local Plan Review process.</p> <p>If further detail is required in relation to the issues referenced such as existing and emerging Green Belt Reviews, we would be happy to provide further clarification.</p>
31	Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?	In principle, we would agree that grey belt land shouldn't only be considered for housing needs, and that commercial development and other development needs could be capable of being accommodated on such land which is located in sustainable locations. However, the 'golden rules' to releasing Green Belt land have clearly been drafted with housing development in mind, with new para 155 criteria a and c being almost exclusively relevant to residential proposals. Infrastructure requirements for commercial development and other land uses can often be minimal, so without firmer criteria added to the new para 155, we would be concerned that this would be an open door to Green Belt development with the bare minimum planning gain.

Question Number	Question	Response
		<p>Consider that the guidance to be too vague. No standard means of assessing commercial or other need is described - or at what point GB review is triggered.</p> <p>If release of Grey Belt land is triggered for commercial or other purposes, we would recommend new para 155 be enhanced to include requirements for transport planning and public transport, energy efficiency/renewables and biodiversity enhancements.</p>
32	Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?	<p>We agree that the approach to the release of Green Belt through plan making should apply to traveller sites. However, we believe the Local Plan is the place to make decisions on the release of Green Belt land, rather than leaving this to decision-making. The 2015 PPTS makes clear that the Government's aim is to ensure fair and equal treatment for travellers and therefore it would be perverse for the proposed approach to Green Belt release for general housing needs not to apply to the needs of travellers.</p>
33	Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?	<p>This question goes wider than the proposed reforms to the NPPF and would entail changes to be made to the 2015 PPTS, and sensibly for such changes to be incorporated into the PPG. Policy A of the PPTS currently sets out broad criteria to follow in evidencing traveller need but this is nowhere near as prescriptive as the PPG and standard method are with regard to assessing general housing need. Clarity is also needed in the NPPF reforms as to whether a shortfall in traveller sites alone would be enough to trigger the need for a GB review, as implied by para 16 of the consultation documentation.</p> <p>It is presumed that the same type of evidence as is used for determining need in a Local Plan, but clarity on this would be helpful. Similarly, the sequential approach i.e looking for sites outside the Green Belt first and then PDL in the Green Belt.</p>
34	Do you agree with our proposed approach to the affordable housing tenure mix?	<p>It is taken that this question only relates to the tenure mix on sites released from the Green Belt for housing. In such circumstances the draft NPPF proposes at least 50% of the housing should be affordable with an appropriate amount for social rent. The final tenure split would be determined by local authorities.</p> <p>This approach would give local authorities flexibility to set their affordable housing tenure split to meet the needs of their local communities and local housing markets, and is therefore welcomed (but this could affect viability and therefore flexibility should be allowed at a local level).</p>

Question Number	Question	Response
		<p>Para 64: We welcome the emphasis on social rent here and elsewhere in the NPPF as it is the most affordable rented tenure. We also agree with the proposed deletion of some text to the affordable housing definition in Annex 2: Glossary. However, we would like some changes to the affordable housing definition in Annex 2: Glossary i.e.</p> <ul style="list-style-type: none"> (i) The Affordable Rent definition should be expanded to state that Affordable Rents will be the lower of 80% market rents or below the Local Housing Allowance rate for the Broad Rental Market Area. This is something we include in our s106s, but it would be helpful if it could be made more explicit (ii) Build to Rent and Affordable Private Rents. Build to rent is becoming more popular but we have had trouble with developers approaching us and wanting to do so called Affordable Private Rents at 80% or even 90% of market rents. This is not affordable housing. Please add something about it must be in line with identified local needs. <p>Para 66: We strongly agree that the final affordable housing tenure mix should meet both identified rented and affordable home ownership tenures. The word “both” is essential as it should stop developers trying to build e.g. only shared ownership but no rented homes. We also welcome the deletion of the remainder of the current paragraph as the wording lacks clarity and can distort supply.</p> <p>Para. 69: This Authority has been applying a mixed tenure approach since at least 2016. However, achieving integration between market and affordable housing is an essential corollary.</p>
35	Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?	<p>In an area of high land and property values such as Warwick, it may be possible to achieve 50% affordable housing on some Green Belt sites, however given the wide variety of land values and affordable housing needs across the country, it would be sensible to allow discretion for local authorities to set different targets if evidence shows they are necessary.</p> <p>If a higher affordable housing requirement is taken forward it is likely to result in more viability challenges from developers. Viability is a specialist area, and it can be difficult for local authorities to oversee the independent assessment of a viability appraisal. More guidance and support on viability assessment would be welcomed. Homes England grant funding could be made available for all affordable housing, including the s106 properties in green/grey belt areas.</p>

Question Number	Question	Response
		<p>There is a risk that on some schemes, particularly those involving previously developed land with high remediation or infrastructure costs, viability issues could remove all affordable housing. Whilst a minimum level of affordable housing could be introduced, this could also act as a barrier to delivering new homes. An alternative could be requiring viability appraisals on Green Belt sites to be subject to scrutiny by an independent government appointed viability panel.</p>
36	<p>Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</p>	<p>All residents should have access to public open space. It would be useful if there was clarification over what 'short walking distance' means, and whether this is a 'as the crow flies', or whether the measurement is more nuanced to take consideration of physical barriers.</p> <p>The consultation does not make it clear whether Local Authority policies relating to local green space within green belt developments should go beyond the requirements for open green space in other areas. Or is the consultation simply saying that green belt developments would be subjected to the same requirements as elsewhere in the plan area, particularly as we would expect other policies relating to other non-green belt locations to also deliver good access to good quality green spaces within walking distance of homes?</p>
37	<p>Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?</p>	<p>Yes, in principle, if the purpose of the inclusion of new Annex 4 is to deter the creation of "hope value" and more generally accelerate housing delivery. Arguably the same principles should also apply to non-Green Belt land. Indeed, it is difficult to understand if creating an artificial distinction between Green Belt and non-Green Belt land is justified.</p> <p>If benchmark values are to be set they need to be in the 'sweet spot' that provides an incentive for landholders to bring sites forward, otherwise there is a danger that they will delay making land available for development in the hope that a future Government will remove or revise the benchmark value. Another unintended consequence might be that landowners seek interim uses on land in the Green Belt, such as renewable energy, again in the hope that there will be a change in approach in the future.</p> <p>It is not clear how the introduction of benchmark land values would interact with the requirement that public sector bodies achieve best value and the requirement on local authorities that housing land is disposed of at market value (The 2013 General Consent under section 32 of the Local Government Act 1988).</p>

Question Number	Question	Response
		<p>Reference is made to the hope value associated with Green Belt land being low. However, the reality of the new Grey Belt proposals is that hope value of Green Belt land will increase.</p> <p>See also further in response to Q38 below.</p>
38	How and at what level should Government set benchmark land values?	<p>To answer this question, it is first necessary to understand the purpose for which benchmark land values would be set. If, as noted in our response to Q37, this is to deter the creation of “hope value” and to accelerate housing delivery more generally, this approach is welcome. This is implicit in para. 28 of the consultation. However, it should be noted that suppression of hope value, however desirable, is not one of the five purposes of Green Belt designation at existing NPPF para. 142. Furthermore, it would appear to create an unwelcome artificial distinction between Green Belt and non-Green Belt land which could actually be quite harmful for affordable housing delivery within our Authority’s area.</p> <p>In order to take a workable approach towards setting benchmark land values, it is essential to understand that they would not in and of themselves be determinative when developers (especially Registered Providers) assess the viability of individual schemes.</p> <p>Financial appraisal is a separate process, that involves taking into account both the costs of and income from development. This outcome of this process typically generates a residual land value above which it would not be viable to develop. It is that value, rather than a notional benchmark value, that will form the basis of an offer to buy land (or compensation payable in the event of compulsory purchase).</p> <p>Whilst benchmark values might be useful as a ‘reality check’ to inform negotiations, they cannot determine the economics of individual schemes. This is because even if the purchase price of land were to be set at no more than a specified benchmark value, this would not of itself guarantee viability of any given scheme. Amongst other things, it would also be necessary to consider the income streams generated by development. In the case of affordable housing, those values would be de-coupled from prevailing market conditions but vary according to the tenure product(s) to be developed – which should, of course, reflect local need.</p> <p>In the case of mixed tenure schemes (promoted at NPPF new para. 69) there is also the issue of cross-subsidy generated from the sale of open market properties for affordable housing to consider.</p>

Question Number	Question	Response
		For the above reasons, it would be preferable to establish a clear policy expectation that the value, and hence purchase price, of land should be set at no more than that necessary to produce fully policy-compliant schemes and with the expectation that any surpluses generated would be recycled to generate additional affordable housing. If benchmark values are to be stated, it should be for no more than 'reality check' purposes.
39	To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?	<p>Setting a benchmark land value could disincentivize landowners to bring land forward. An open book approach could be encouraged to demonstrate that the golden rules can be achieved at the desired land value. Viability testing should ensure that a scheme is viable, allowing for any site-specific requirements and upgrades required to off-site infrastructure.</p> <p>It could be argued that any or all three possible approaches outlined at para. 29 are as equally applicable to non-Green Belt land as to Green Belt land. Indeed, for many authorities, housing supply is likely to come wholly or mainly from non-Green Belt designated land. It must be recognised that lower land values do not <i>automatically</i> make new housing development – especially affordable housing – viable or deliverable.</p>
40	It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?	Is the reference to 'policy compliance' relating to the NPPF or the relevant development plan? If the former, it is not clear how the provision would be implemented. The golden rules do not put a maximum limit on the amount of affordable housing to be provided, paragraph 23 a) of the consultation document says that in the case of schemes providing housing, at <u>least</u> 50% affordable housing, with an appropriate proportion being Social Rent, subject to viability.
41	Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are	Yes, there should be arrangements for clawback if a scheme performs better than anticipated. Guidance and an explanation of the approach used in London (referenced at paragraph 29c) would be helpful.

Question Number	Question	Response
	required? What support would local planning authorities require to use these effectively?	
42	Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?	<p>Subject to viability, any non-residential development could be required to provide open space, consistent with paragraph 23c) to compensate for the loss of land from the Green Belt and to contribute to the objectives of the residual Green Belt.</p> <p>It is not clear how the golden rules would apply to types of development already considered not inappropriate in the Green Belt, criterion a) applies wholly to schemes involving housing, as does the second half of criterion c).</p> <p>Any necessary improvements to local infrastructure associated with uses that are not considered inappropriate could be secured through existing planning arrangements.</p>
43	Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?	<p>Transitional arrangements may be required, recognising the long lead in times for sites, particularly strategic urban extensions and new settlements. There could be an unintended consequence of stalling sites that are currently being promoted. Any transitional arrangements should be evidenced based.</p> <p>Clearer guidance is needed on whether existing/historic Green Belt reviews can be utilised to identify grey belt; or whether new reviews are required, which actively use the terminology 'limited contribution' and specifically identify land as grey belt.</p>
44	Do you have any comments on the proposed wording for the NPPF (Annex 4)?	<p>It is not clear what the missing text is referring to – is it a value or an acceptable percentage increase based on the existing use value?</p> <p>The wording in paragraph 2 could trigger the need for a review of a Local Plan if the site concerned is of strategic importance. If the new paragraph 152 is added, refusing an application on these grounds could lead</p>

Question Number	Question	Response
		<p>to Green Belt releases elsewhere if, because of the refusal, a five year land supply cannot be maintained or performance in the Housing Delivery Test drops below 75%.</p> <p>Paragraph 3 seems to contradict the consultation document – which seems to try to limit land values, irrespective of policy compliance. The reference to ‘higher levels of affordable housing’ not being sought is also unclear – is this referring to locally set requirements? If referring to the requirements set out in the golden rule, as noted earlier this does not set a ceiling – paragraph 23a of the consultation document refers to <u>at least</u> 50% affordable housing.</p>
45	Do you have any comments on the proposed approach set out in paragraphs 31 and 32?	The use of compulsory purchase powers (CPO) to bring sites forward, particularly strategic sites, may be cost prohibitive for local authorities and is also time/resource consuming. There could be significant risk associated with compensation, given that land values are not established until late into the CPO process and application of the 'no-scheme principal' is a potential area of legal challenge. Complex developments are also subject to change but the nature of the CPO process means that subsequent changes to the project may not be possible.
46	Do you have any other suggestions relating to the proposals in this chapter?	<p>The Golden rules should apply in perpetuity. For example, there might be a scenario where land is taken out of the Green Belt as part of a sustainable urban extension, part of it is initially used as open space (or another non-residential use or meanwhile use) but then it is later developed for residential development.</p> <p>The rules should also apply to land that is taken out of the Green Belt and safeguarded for future use (as referred to in Paragraph 148 c) of the existing NPPF.</p>
Chapter 6 – Delivering affordable, well-designed homes and places		
47	Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?	Warwick District Council already considers the need for social rent housing in its housing need assessments and includes a requirement for social rent in its affordable housing tenure split. As such this change would not alter our approach. However, we welcome the prioritisation of social rent providing we retain the flexibility to set our own affordable housing tenure split.

Question Number	Question	Response
48	Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	<p>Yes. The priority should be for local authorities to set their own affordable housing tenure split and therefore we support the removal of this requirement where evidence shows that level of affordable home ownership is not required.</p> <p>The current requirement has the effect of frustrating the delivery of affordable housing overall. Affordable housing delivery should reflect locally identified needs.</p>
49	Do you agree with removing the minimum 25% First Homes requirement?	<p>Yes. In our view First Homes are of limited benefit compared to other affordable home ownership tenures for several reasons:</p> <ul style="list-style-type: none"> - First Homes require a higher initial deposit than shared ownership which means there is a high financial barrier to entry. - First Homes lack the flexibility of shared ownership where the initial equity can be varied to suit the financial circumstances of the buyer and then more shares purchased by the resident as their circumstances allow. - There is an administrative burden on local authorities to manage the eligibility process for First Homes - First Homes are only available to first time buyers which limits who can purchase one. This limits the pool of buyers and may make it harder to sell a First Home. It also prevents existing homeowners with a genuine need for a low cost home ownership home to access them. <p>Given these issues, we do not consider there is any benefit to prioritising First Homes over other low cost home ownership options therefore we support the removal of the 25% requirement.</p> <p>However, we consider low cost home ownership options are important in the overall affordable housing tenure mix. It would be misguided to focus on only social rent homes as this would leave a large group of households who are unable to afford open market homes but ineligible for social rent homes without access to housing. It would also frustrate the aim to deliver mixed and balanced communities.</p> <p>Affordable housing delivery should always reflect <i>locally</i> identified needs. In some areas First Homes may be required but in other areas they are unaffordable and are not what is required.</p>

Question Number	Question	Response
50	Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	<p>One option to improve the flexibility of First Homes is to remove the requirement for buyers to be first time buyers, thereby converting all existing First Homes to discounted market sale. All other eligibility requirements would remain the same. This option would increase the pool of households who could benefit from the model and may make the tenure more deliverable.</p> <p>If First Homes are to be retained, the percentage required within a mix of affordable homes should be determined by the Local Authority and not be a matter of national policy.</p> <p>Warwick District Council has not received any planning applications for First Homes Exception Sites and given the lower priority First Homes take in the draft NPPF, it seems even less likely proposals will come forward in the future without changes to the policy. As well as the change suggested above, this could include clearer guidance on the appropriate size for a First Home Exception Site and the acceptable mix that can be included (i.e. how many market or other affordable homes could be included).</p>
51	Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	<p>We believe the delivery of mixed tenure schemes that include social and affordable rented, low cost home ownership and open market homes is important to forming sustainable communities. We therefore support a policy that promotes mixed tenure developments, however the tenure split should meet identified local housing needs and be set by local authorities.</p> <p>We are however concerned with the 'affordable private rent' tenure on build to rent schemes as this doesn't require a Registered Provider to manage the housing.</p>
52	What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	<p>We would support promoting a higher level of social rent over affordable rent as social rent is the most affordable tenure. However, in respect of promoting developments with a high percentage of social rent/affordable housing developments, flexibility is required in the affordable housing tenure mix compared to a normal market housing led scheme (where the affordable homes are secured by planning obligation).</p> <p>For example, Warwick District Council currently seeks 40% affordable housing on residential schemes and 70% of those homes are to be social/affordable rent. However, applying this mix to a development with over 40%</p>

Question Number	Question	Response
		<p>affordable housing would lead to a very high level of rented homes which would not create a mixed and balanced community and therefore a different tenure mix may be required.</p> <p>There should also be a need for proposals with a high percentage of social/affordable rent homes to justify their tenure split against the principles of forming mixed and balanced communities.</p>
53	<p>What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?</p>	<p>To avoid unintended consequences of schemes with high levels of affordable housing, discretion should be given to local authorities to determine whether a scheme is appropriate for the locality. Given the range of schemes and sites that could come forward, local authorities are best placed to determine whether a proposal is appropriate.</p> <p>This Authority does not consider that there is any maximum size (or indeed for that matter, minimum size) of development where a high proportion of Social Rented housing should be provided. The proportion of social rent should reflect local needs.</p> <p>However, to ensure successful and socially cohesive development, policies need to be put in place to ensure that all affordable and market housing is properly integrated physically and visually. Ensuring schemes with high levels of affordable housing are tenure blind would also be important to avoiding any unintended consequences.</p>
54	<p>What measures should we consider to better support and increase rural affordable housing?</p>	<p>The recognition of the particular need to better support and increase rural affordable housing is most welcome, although we note that no changes are proposed to the relevant paragraphs of the NPPF dealing with this issue.</p> <p>However, this Authority is disappointed to note that no change is proposed to NPPF para. 65 to lower the threshold below which affordable housing may not be sought outside designated rural areas.</p> <p>The above issues are especially relevant to this Authority, which is for the most part very rural in character with a highly dispersed population and settlement structure.</p> <p>This Authority would highlight that has a successful track record in delivering rural housing schemes over many years. But we would also draw attention to the lessons learnt from this. Successful delivery requires:</p>

Question Number	Question	Response
		<p>(1) Community engagement and support.</p> <p>(2) A ready supply of suitable land at economically viable values.</p> <p>(3) The right infrastructure, either in place of whose delivery can be secured – which can be a particular issue in rural areas – for example, public transport may be limited or non-existent.</p> <p>(4) Often, public subsidy.</p> <p>To achieve (1) above requires not just the backing of local communities for particular schemes but also their active engagement. Neighbourhood planning is one tool to this end, but to be effective requires extensive advice and support. This Authority has since 2003 engaged and benefitted from the services of a full-time Rural Housing Enabler, and their role has proved invaluable.</p> <p>To achieve (2) above requires avoiding inflated land values, particularly that arising from ‘hope’ value attributable to the prospect of being able to develop open market housing. It is vital that changes elsewhere to the NPPF, intended to boost overall housing supply, do not inadvertently have the effect of undermining policies intended to boost the supply of rural housing.</p> <p>Annex 2 glossary and the definition of community-led</p> <ol style="list-style-type: none"> 1. We support the revised text and the deletion of “set-up and” as these words only confuse matters. 2. If possible, we would also prefer “not for profit RP” or “housing association” to appear in the list of various “legal forms” as some communities mistakenly think that they can only bring forward a scheme if they set up a CLT. <p>To boost rural affordable housing the following would help:</p> <ul style="list-style-type: none"> - Funding for rural Housing Need Surveys - Stating that market homes can be included on rural exception sites subject to 2 conditions: First that they are necessary for the viability of the scheme (which must be proven) and second that they meet an identified local need shown by the Housing Need Survey.

Question Number	Question	Response
		See also the response to Q56 below.
55	Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	<p>Yes. The context of para. 63 is itself the expectation set out in paras. 61 & 62 that the identified housing needs of local authorities should be met in full. For the reasons set out in our response to Q52 above, we welcome the explicit inclusion of a reference to the need for Social Rent housing. This is the affordable housing tenure product for which the most pressing need exists, and for this reason it is right that the NPPF should make explicit reference to it.</p> <p>This Authority has no objection in principle to the inclusion of ‘looked after children’ (and associated footnote) in the list of groups whose needs should be assessed. However, we would point out that in the areas covered by two-tier authorities, responsibility for determining some needs rests with county rather than district councils. As such we would be reliant on data being provided by the County Council.</p>
56	Do you agree with these changes?	<p>For clarity, the changes consulted on relate to two specific measures to enable local planning authorities to better support community-led housing.</p> <p>Change 13a provides additional flexibility and is supported, although it should be recognised that:</p> <ul style="list-style-type: none"> (1) Some local communities may prefer to continue to deliver new housing schemes via existing established networks of specialist Registered Providers (as distinct from entities specially established for this purpose) on account of the savings in costs and time; so this <i>option</i> should remain open, and; (2) In practice, the formation of community-led bodies, whilst welcome, does require considerable up-front investment in terms of expertise and capital, which may not be readily available. <p>Consequently, despite considerable efforts, no homes have been delivered via CLTs in our District. Locally communities prefer to (very successfully) deliver many rural homes by working in partnership with a specialist rural housing association.</p>
57	Do you have views on whether the definition of ‘affordable housing for rent’ in the Framework glossary should be	<p>The current definition of ‘affordable housing for rent’ includes ‘affordable private rent’ and excludes this tenure from requiring management by a Registered Provider.</p> <p>We believe it is important for affordable homes for rent to be managed by Registered Providers. Affordable housing for rent accommodates some of the most vulnerable people in society and is rightly subject to strict</p>

Question Number	Question	Response
	amended? If so, what changes would you recommend?	<p>regulation. Ensuring all affordable housing for rent is provided by Registered Providers ensures tenants are protected by the same controls and providers operate on a level playing field.</p> <p>Furthermore, as 'affordable private rent' homes do not need to be provided by a Registered Provider it is unclear how this tenure is intended to operate. It would typically sit outside a Council's normal Housing Allocation Policy and therefore potentially subject to a separate nominations process which as an administrative burden on local authorities.</p> <p>Separately, it would be helpful to qualify that affordable rent should not exceed the Local Housing Allowance.</p>
58	Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?	<p>The difficulty in allocating enough small sites to meet the NPPF 10% requirement is probably because most local authorities utilise a 'call for sites' methodology to identify a sufficient supply of land to meet allocative requirements. Local Authorities assess the suitability of sites (of all sizes) through this exercise with confidence on the understanding that land / sites are being put forward by willing landowners who are very likely to agree to the allocation of their land for housing development.</p> <p>Alternatively (if the time and resources were available) Local Authorities could be more proactive in identifying small parcels of land from a desk- based analysis of local ordnance survey maps, however the time and effort of this exercise and then establishing the ownership of the land only to discover it may not be 'available' would have serious resource implications. Most land or property owners understand the value of their assets and potential gains to be made through development and pursue windfall developments in the event they ever miss the opportunity to take part in the formal allocative process and call for site's opportunities.</p> <p>It is considered impractical to impose the 10% small allocation in all cases as it is simply implausible that all Local Authority areas will all have access to a sufficient supply of such sites on brownfield sites or otherwise.</p> <p>Further clarity on what constitutes a small and medium site would be beneficial. Currently paragraph 70 of the Framework specifies a requirement to identify small sites and stipulates that these sites should be no larger than 1 Ha.</p>
59	Do you agree with the proposals to retain references	Yes- the representations made on our Issues and Options Consultation frequently mentioned when referring to density and design options, that the word 'beauty' is very subjective and means different things to different

Question Number	Question	Response
	to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?	people. When it comes to design coding, 'well-designed' is easier to define criteria for what this may encompass (functional, climate adaptive and resilient, NbS, practical layout for modern day living etc), making reference to the National Model Design Code, whereas for the word 'beauty', it is much harder to establish parameters.
60	Do you agree with proposed changes to policy for upwards extensions?	It is important to be able to deliver new homes, and for Local Planning Authorities to be able to meet their housing need. As the proposed changes do consider external appearances and character of the existing area- the changes are considered to be appropriate. An authority-wide design code can be used to evidence where significant uplifts in the average density of residential development could be inappropriate if the resulting built form would become out of character for the area- meaning that there is some flexibility to this.
61	Do you have any other suggestions relating to the proposals in this chapter?	No.
Chapter 7 – Building infrastructure to grow the economy		
62	Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	It is considered important for the economy (nationally and locally) for the planning system to be able to react quickly and positively to the demands of the identified key industries. Therefore, it is agreed that the changes intended to paragraph 86(b) and 87 of the existing NPPF should be delivered.
63	Are there other sectors you think need particular support via these changes? What are they and why?	We cannot readily identify any other sectors that require support via these changes.
64	Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being	Need to define the parameters for scale of business/commercial development to be considered by NSIP Potentially there is value in using the NSIP regime for nationally important infrastructure to streamline the process and speed up delivery of nationally/internationally critical projects. Decisions still need to be timely so PINS would need to be adequately resourced if the projects capable of being determined under the NSIP regime are to be expanded. Meaningful community engagement in such projects would also be a necessity.

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	directed into the NSIP consenting regime?	
65	If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?	No comments on this question
66	Do you have any other suggestions relating to the proposals in this chapter?	No further comments
Chapter 8 – Delivering community needs		
67	Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Paragraph 100 is primarily about encouraging local planning authorities to work proactively and positively with promoters and others before planning applications to deliver other public service infrastructure are submitted. In this context, the additional sentence looks out of place. Suggesting that significant weight be given to new, expanded or upgraded public service infrastructure may make it harder to ensure that impacts on other important planning considerations set out in the NPPF, e.g. climate change mitigation, biodiversity net gain, heritage and transport are addressed.
68	Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	We agree with the changes made to this paragraph.
69	Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	We agree with the changes made to these paragraphs.
70	How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	<p>In terms of promoting healthy communities, planning plays a key part in contributing towards this objective as it has been established that design and operation of built environment has an impact on health and wellbeing of people. A new requirement for major builds to include Health Impact Assessment can be introduced.</p> <p>We do not consider that the current requirements in the NPPF encouraging planners to achieve healthy, safe and inclusive places is working. We would suggest that addressing health inequalities and promoting healthy communities should be made a statutory duty.</p>

Question Number	Question	Response
		<p>We do not consider that LA planning departments are adequately funded or have the right tools and power to tackle childhood obesity. One tool local authorities had under the previous use class order was to restrict the number of hot food takeaways in a certain location as they were classed as A5 use. However, it is difficult to restrict the proliferation of hot food takeaways due to changes in the Use Class Order. The Government can give more powers to local authorities to impose restrictions on the food establishments that sell unhealthy food. Or a new requirement in form of a fourth bullet point could be added in Paragraph 94 which restricts new hot food take away establishments within 400m of the Secondary school and other establishments for young adults. In absence of robust guidance, it is quite difficult for planning authorities to enforce such restrictions. There needs to be more onus on the parents through educating them and making public paths safer to encourage children to walk or cycle. LA's can only provide cycle paths and land for allotments, but we do not consider this to be the function of a local authority to enforce how people take their children to school or how efficiently they use the allotments. We consider that it will be helpful to reinforce a better link between planning and public health.</p>
71	Do you have any other suggestions relating to the proposals in this chapter?	<p>Removing the 35% uplift from the housing target from the 20 most populous urban local planning authorities is sensible, however that will put additional pressure on other local authorities. The revisions to the NPPF, including those relating to public infrastructure, will need to be supported by measures that fall outside of the planning system to ensure that public infrastructure can not only address existing shortfalls but also accommodate future growth. The country needs a rural renaissance to ensure that public infrastructure is future ready. This will include the provision of additional funding for infrastructure that cannot be delivered and sustained solely by contributions from planned development.</p>
Chapter 9 – Supporting green energy and the environment		
72	Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?	<p>Yes, provided there is strategic planning on national scale for energy infrastructure and where communities are impacted there is genuine community engagement and benefit.</p>
73	Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	<p>Yes, particularly noting the proposed amendments to para 164 and the removal of a requirement to demonstrate a need for renewable energy.</p>

Question Number	Question	Response
74	Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?	Greater clarity and guidance should be provided on the balance of considering renewable energy site suitability of climate resilient assets, such as sites for high potential for carbon sequestration.
75	Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?	No specific comment, other than to note it is unclear why the threshold shouldn't be the same for all generating renewable technologies.
76	Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?	No specific comment, other than to note it is unclear why the threshold shouldn't be the same for all generating renewable technologies.
77	If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	No specific comment, other than to note it is unclear why the threshold shouldn't be the same for all generating renewable technologies.

Question Number	Question	Response
78	In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	<p>There are various ways in which national guidance can help address climate change mitigation and adaptation. Few suggestions include:</p> <ul style="list-style-type: none"> • The new NPPF could make it mandatory for all new homes to be net zero in operation. • A new test of soundness to include local plans to contribute to the legal requirements set out in Climate Change Act. • Local authorities should be allowed to set their own energy efficiency and climate change targets without need for onerous justification. • Local authorities should be encouraged through Government funding to retrofit the existing housing stock to be more energy efficient and resilient to climate. This will also help have a positive impact on people's overall health and well-being. • Climate change adaptation and mitigation should be given higher weight in determining planning applications. • A clear policy direction along with a clear pathway to achieving net zero by 2050. • 20 minute neighbourhoods could be encouraged/required through the NPPF as they represent a sustainable pattern of development. • Include greater clarity on matters relating to energy conservation and generation in listed buildings.
79	What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?	<p>There are different types of tools and technologies available to local authorities which help to calculate the baseline figure, amount of CO2 reductions needed etc. The issue is that different local authorities are using different technologies and use different time horizons. There needs to be clear default position which all local authorities should adhere to. Also, each local authority should be required to reduce their share of emissions. There also needs to be a nationally recognised carbon assessment regime to enable local authorities calculate their share of emissions. Following on from that a nationally recognises tool to enable local authorities calculate their emissions and reductions on year-by-year basis. A nationally devised carbon assessment method should be applied to all new buildings, and this should link to the reporting regulation. There needs to be greater resources made available to local authorities to deliver climate change agenda.</p>
80	Are any changes needed to policy for managing flood risk to improve its effectiveness?	<p>It will be helpful to include the climate impacts of flooding as it is a known fact that climate change is making flooding more frequent and intense. An additional bullet point can be added to paragraph 170 to consider the lifetime impact of flooding in light of the climate change scenarios.</p>
81	Do you have any other comments on actions that can	<p>Reiterate food security is related to climate resilience.</p>

Question Number	Question	Response
	be taken through planning to address climate change?	
82	Do you agree with removal of this text from the footnote?	We agree with the deletion of the proposed text from the footnote.
83	Are there other ways in which we can ensure that development supports and does not compromise food production?	We consider that agricultural land should be given explicit reference, and stronger protection should be given to the best and most versatile agricultural land. At present agricultural land is only mentioned a couple of times in the NPPF. If the Government is serious about food security and want to reduce reliance on imports, we think stronger protection should be provided to the most fertile land.
84	Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?	Agree.
85	Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?	There should be a provision for the existing infrastructure to be updated.
86	Do you have any other suggestions relating to the proposals in this chapter?	No.
Chapter 10 – Changes to local plan intervention criteria		
87	Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	Yes, but more detail should be provided on what the different interventions could be and on the three sets of considerations. As currently proposed it is too vague and allows for inconsistent approaches to occur.

Question Number	Question	Response
88	Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?	No, consider that a set of criteria should be used along the lines of those proposed within the consultation but with further detail added for clarity and consistency.
Chapter 11- Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects		
89	Do you agree with the proposal to increase householder application fees to meet cost recovery?	Yes. Planning application fees from householder applications currently fall notably short of the actual costs of processing the applications. To ascertain whether the indicative fee of £528 is appropriate, it will be important to understand the methodology for setting the fee to ensure that all appropriate costs are accounted for.
90	<p>If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.</p> <p>If Yes, please explain in the text box what you consider an appropriate fee increase would be.</p>	Not applicable.

Question Number	Question	Response
91	<p>If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?</p> <p>Yes No – it should be higher than £528 No – it should be lower than £528 no - there should be no fee increase Don't know</p> <p>If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.</p>	<p>It is likely that the costs of determining householder planning applications will vary by authority depending on a number of factors. We have not been able to undertake a detailed assessment of the typical cost of assessing a householder planning application. Our initial thoughts are that the fees should at the very least be increased to £528, if not more.</p> <p>Local Planning Authorities should be empowered to set their own fee level, providing it can be justified.</p>
92	<p>Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.</p>	<p>Yes. Fees across a range of application types do not reflect the actual cost of processing the applications.</p> <p>If fee levels are to be amended for householder planning applications at the central government level, then there should be a similar review of all types of planning applications with similar uplifts to ensure full cost recovery. Without a comprehensive review of fees, there could be an imbalance with seemingly more significant development proposals having a lower fee associated with them.</p>

Question Number	Question	Response
		<p>Whilst we believe that fees should be reviewed for all types of applications, we have also sought to provide some specific examples to demonstrate that fees should be reviewed across a range of application types:</p> <p><u>S.73 Removal or Variation of Conditions</u></p> <p>These applications currently attract a flat rate fee of £293. This fee doesn't reflect the extensive work involved in reviewing the planning permission, in order to assess the implications of the changes on the development and how they affect existing conditions - which may or may not have already been approved. Whether the permission has been implemented lawfully is often a further area of assessment, which has to be taken into account.</p> <p>In the light of this, we would recommend that this type of application attracts a fee which is 50% of the original application fee.</p> <p><u>Householder and Change of Use Prior Approvals</u></p> <p>Despite the rhetoric that these applications have simplified the planning system, in practice, the opposite has proved to be the case. The number of material considerations in play is only slightly less than on an equivalent planning application and in addition to this, it is necessary for the case officer to consider a wide range of permitted development points, limitations and conditions. A further area of work which is generated by Prior Approval applications is supporting local stakeholders and consultees in explaining and helping them to understand the limits of what can and can't be considered. It is also relevant that these applications can result in appeals, which again, are not covered by the fee.</p> <p>There is little, if any, difference in the time taken to consider a Prior Approval as opposed to a Full application for the same development. For these reasons we recommend that the fee is brought in line with the equivalent Planning application</p> <p><u>Agricultural Prior Approvals</u></p> <p>Whilst these are rarely as complex as the approvals discussed above, they do take up a considerable amount of time for the case officer to consider the permitted development points, limitations and visual considerations.</p>

Question Number	Question	Response
		<p>In the interests of supporting the rural economy, we wouldn't recommend bringing these in line with the equivalent planning application, but a fee of £500 would better reflect the time and work involved.</p> <p><u>Discharge of Conditions</u></p> <p>These currently attract a flat rate of £145 (£43 Householders) irrespective of how many conditions the submission seeks to discharge. This doesn't reflect the fact that consideration must be made of each individual condition, both in itself and how it might impact on other material elements of the development. For this reason, we would recommend that the fee is multiplied by the number of conditions which are sought to be discharged.</p> <p><u>Retrospective Applications</u></p> <p>A 'double-fee' for these has previously been proposed on a number of occasions but not taken up. Retrospective applications are usually more controversial and complex than other ones and can sometimes generate more opposition. This would also act as a deterrent to those who unlawfully go ahead and carry out development without permission. Such a move would also help improve public confidence in the planning system. We would therefore recommend a double-fee for all retrospective or part-retrospective applications.</p> <p>If fees for some types of proposals (particularly at the lower end of the scale) increase too much, there could be a risk of increased levels of unauthorised development.</p>
93	Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.	<p>Yes, the following application types should be subject to a fee:</p> <p><u>Works to TPO trees and trees in Conservation Areas</u></p> <p>The cost of considering these applications is currently met entirely from Local Authority budgets. Whilst the issues are more limited than on a planning application, these applications require a high level of expertise. Therefore, a fee of around £200 would likely cover the cost of processing these applications. They may, however, have an unintended consequence of encouraging property owners to undertake works to trees</p>

Question Number	Question	Response
		<p>without consent. Good maintenance of trees is important to ensure trees don't become a safety risk or impact upon the amenities of residents and again we wouldn't wish to inadvertently place a barrier on such maintenance.</p> <p><u>Plan-Making</u></p> <p>In addition to these, the plan-making function of LPAs could recover some costs through the 'Call for Sites' part of the process. The administration and consideration of these sites would justify a fee of anything between £500-1,000 per site and could be tiered by size of site.</p>
94	<p>Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?</p> <p>Please give your reasons in the text box below.</p>	<p>Yes. Whilst there will be a resource implication to the local planning authority to set and justify its own fees, we consider it appropriate to allow authorities to set their own fees to enable full cost recovery. This will allow for an appropriately resourced service that can be based on a stable financial footing.</p> <p>Local planning authorities should be able to charge for full cost recovery. This should not only include work directly undertaken by the planning teams but other services within the authority that are required to commit resource to the assessment of the application, such as conservation, planning policy, green spaces and environmental protection.</p>
95	<p>What would be your preferred model for localisation of planning fees?</p> <p>Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.</p> <p>Local Variation – Maintain a nationally-set default fee and</p>	<p>We would be happy with a Local Variation model. This provides a degree of consistency around typical fee levels nationally but crucially would give individual local planning authorities the opportunity to set alternative fees providing they can be justified.</p>

Question Number	Question	Response
	<p>giving local planning authorities the option to set all or some fees locally.</p> <p>Neither</p> <p>Don't Know</p> <p>Please give your reasons in the text box below</p>	
96	<p>Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?</p> <p>If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?</p>	<p>Yes. For example, the current NPPF and proposed changes to the NPPF emphasise the importance of plan-making. Yet, Councils struggle to appropriately fund planning policy teams to enable them to consider the ever-increasing matters that planning has to take into consideration. By allowing planning fees to go beyond cost recovery this could support the often costly work of planning policy, including conservation work.</p> <p>If councils are permitted to fund wider planning services through fee increases, this would be most appropriately targeted at major applications. This is in part because the government evidence shows that it is smaller householder applications where there is the greatest discrepancy between the current fee level and any "full cost" of processing these applications. Therefore, smaller applications are likely to be proportionately more impacted already by any fee increase that covers only the cost of processing the application.</p>
97	<p>What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?</p>	<p>A wide range of wider planning services including: Planning policy; conservation; costs related to internal and external consultees responding to planning applications; planning enforcement; housing strategy work relevant to planning.</p>
98	<p>Do you consider that cost recovery for relevant services provided by local authorities in</p>	<p>No response to this question.</p>

Question Number	Question	Response
	relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?	
99	If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.	No response to this question.
100	What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?	No response to this question.
101	Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work	No response to this question.

Question Number	Question	Response
	undertaken by local authorities in relation to applications for development consent.	
102	Do you have any other suggestions relating to the proposals in this chapter?	No response to this question.
Chapter 12 – The future of planning policy and plan making		
103	Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?	<p>Local Authorities, local communities and other relevant stakeholders would benefit from as much certainty as possible with regards to plan making. There is a risk that plans are prepared and consulted on based, for example, on one set of housing need figures and then at a later more advanced stage of the plan, the local authority may be required to change them significantly because of changes at the national level. This could result in costs associated with abortive work and the need for additional work to be undertaken and could cause significant delays to plan-making and in turn the delivery of the Government's aspirations for significantly increasing housing delivery. Therefore, it is important that Government update the NPPF at the earliest opportunity to provide this clarity, having fully considered responses to this consultation.</p> <p>It would also be helpful if clarity is given on what elements of the LURA that relate to plan making, that require secondary legislation, are to be brought forward and a proposed timetable for their delivery.</p>
104	Do you agree with the proposed transitional arrangements?	Yes. However, see comments in response to Q103.
105	Do you have any other suggestions relating to the proposals in this chapter?	No.
Chapter 13 – Public Sector Equality Duty		
106	Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so,	We would like to see a minimum person capacity specified for new build social/affordable rented housing to align their design with the bedroom entitlement rules. For example, 1 bed homes should be for 2 people, 2 bed homes for 4 people and 3 bed houses for 5 people. The minimum bedroom sizes should be taken from the Nationally Described Space Standards.

Question Number	Question	Response
	<p>please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?</p>	<p>We would also welcome mandatory M4(2) compliance for all new homes and a proportion of homes to M4(3) standards to help address the challenges of an ageing population.</p>

Title: University of Warwick Campus Framework Masterplan
Supplementary Planning Document (SPD) – consultation update and
proposed adoption

Lead Officer: Adam James, Site Delivery Officer / Andrew Cornfoot,
Planning Policy and Major Sites Delivery Manager

Portfolio Holder: Councillor Chris King (Place)

Wards of the District directly affected: Kenilworth Abbey and Arden

Approvals required	Date	Name
Portfolio Holder	30.09.24	Cllr King (Place)
Finance	30.09.24	Andrew Rollins
Legal Services	13.09.24	Nigel Bell
Chief Executive	20.09.24	Chris Elliott
Director of Climate Change	24.09.24	Dave Barber
Head of Service(s)	13.09.24	Philip Clarke
Section 151 Officer	30.09.24	Andrew Rollins
Monitoring Officer	16.09.24	Graham Leach
Leadership Co-ordination Group	30.09.24	
Final decision by this Committee or rec to another Cttee / Council?	Yes	
Contrary to Policy / Budget framework?	No	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No, Forward Plan item Ref 1,485 – scheduled for 17 October 2024	
Accessibility Checked?	Yes	

Summary

The purpose of the Supplementary Planning Document (SPD) is to provide a framework for guiding the level and broad location of growth on the main University of Warwick campus as well as design principles to be considered when assessing planning applications on the campus. The SPD provides supplementary guidance to Policy MS1 – University of Warwick - of the adopted Warwick District Local Plan and is intended to assist with the determination of future planning applications. The SPD can only be adopted as Council guidance following statutory public consultation and then subsequent formal adoption at Cabinet. Following initial Cabinet approval in March 2024, a public consultation was held from Friday 24th May to 5th July 2024. It is intended that the SPD is now adopted so that it can be used to help assist with decision making on planning applications.

Recommendation(s)

- (1) That Cabinet notes the Statement of Consultation report at Appendix A and the Schedule of Proposed Amendments at Appendix B.
 - (2) That Cabinet agrees to the adoption of the amended University of Warwick Campus Framework Masterplan Supplementary Planning Document at Appendix C.
-

1 Reasons for the Recommendation

- 1.1 The SPD would provide supplementary planning guidance to policy MS1 of the adopted Warwick District Local Plan 2011-2029. Policy MS1 states that “development of the University of Warwick will be permitted in line with an approved Masterplan or Development Brief”. There is currently no such up-to-date Masterplan and Development Brief in place for the area. The SPD can therefore provide a more detailed masterplan framework and supplementary guidance to assist with the determination of future planning applications.
- 1.2 The University’s main campus straddles the administrative boundaries of Coventry and Warwick District, with the majority of the academic faculty buildings being located in Coventry and residential accommodation and sports facilities being largely located within Warwick District. It is important therefore that the SPD is also consistent with Coventry’s relevant Local Plan policy. Furthermore, it should be noted that Coventry are also proposing to adopt the SPD.

Background/Information

Purpose of the SPD

- 1.3 Policy MS1 states that the Masterplan should “set out how proposals will contribute to the University delivering a world-class education campus” with four key purposes:
 - a) to identify the physical and economic context;
 - b) to identify the development principles to underpin future development proposals;

c) to identify the location of developments, demonstrating how proposals will mitigate any potential adverse impacts; and

d) to identify how the proposals support the vitality of the local and/or sub-regional economy.

- 1.4 The Local Plan acknowledges the important role of the University in supporting the local economy and the need for the University to be able to grow within its existing boundaries and develop as a Higher Education facility of international importance.
- 1.5 As the document seeks to clarify the University's plans for future development on campus and their proposed location, planning consultants Turleys were appointed by the University to lead on the drafting of the document and there has also been input from a range of other consultants. However, officers representing Warwick District Council, Coventry City Council and Warwickshire County Council reviewed various drafts of the SPD via a Steering Group. Specific sub-groups were also used to progress certain matters such as ecology and heritage and there was engagement with external bodies including National Highways. The comments shaped the consultation version of the Framework Masterplan SPD.

Scope and content of the SPD consulted upon

- 1.6 The SPD addresses the planning policy context (both existing and emerging) and then the current campus context by explaining existing land uses and assets. The SPD covers the entirety of the main University campus, and so addresses land in both Warwick District and Coventry City Council areas.
- 1.7 The document explains that the long-term vision of the University is based on five strategic priorities: innovation; inclusion; regional leadership; internationalisation; and sustainability. The SPD seeks to give an indication of the longer-term delivery vision up to 2050, however the SPD specifies the detailed capital projects likely to be delivered by 2033.
- 1.8 A number of key proposals are identified up to 2033:
- a) A new Social Sciences Quarter including the new Business School (within the Warwick District area – outline application W/23/0195 already approved)
 - b) The Science Precinct – redevelopment and refurbishment of Science, Technology Engineering and Mathematics (STEM) facilities on central campus and creation of a new University Green (within the Coventry City area – hybrid application PL/2023/0002402/OUTM approved 9th July 2024)
 - c) A new Energy Innovation Centre (within the Coventry City area)
 - d) Extension of Scarman House, Post Experience Centre, including additional bedspaces (within the Warwick District area)
 - e) 'Solar arrays' – two separate large scale photovoltaic installations to generate renewable energy (within the Warwick District area).
- 1.9 The SPD also proposes the potential creation of an Eco-Park combining ecological, recreational and energy generation initiatives. However, this is dependent on the return of land from HS2 Ltd, the extent of which is currently unknown.
- 1.10 The SPD states that the University anticipates providing 1,200 net additional student bedspaces on or immediately adjoining the campus.

- 1.11 A number of other possible proposals are identified up to 2033. Within Warwick District, possible redevelopment of Radcliffe House is identified to create a MBA Training Centre. Other possible proposals are also identified on land within the Coventry administrative area.
- 1.12 In consultation with the highway authorities, the University modelled the traffic generation from 31,000m² of new development on campus over and above the recent approval of the Social Sciences Quarter (outline application W/23/0195), as well as previous planning applications including the Capital Plan Hybrid application (OUT/2018/2115) within the Coventry area. Accounting for known projects to be pursued up to 2033, this leaves a capacity of 13,000m² of floorspace to allow for other projects to come forward over the period to 2033. If any projects come forward resulting in additional floorspace to the 31,000m² gross/13,000m² further net floorspace, additional modelling work would be required.
- 1.13 Alongside the specific proposals identified, there are a number of strategic design principles to guide future development on campus focusing on delivering higher density development in the Campus Core, providing pedestrian-focused development and active public spaces, delivering landmark design to aid wayfinding and integrating nature by connecting habitats and corridors.
- 1.14 The SPD breaks the campus down into 6 distinct character areas – Campus Core, Residential Fringe, Gibbet Hill, Science Park, Westwood and Green Fringe. In recognising the distinct characteristics of those areas, design principles are included to provide a framework for development proposals within those locations.
- 1.15 The main transport and movement strategy of the SPD focuses on reducing single occupancy trips to and from campus, maintaining accessibility through and around campus for all users (especially sustainable, non-car modes) and offering choice to incentivise behavioural change and enhance the environmental sustainability of the campus. The University has been successful in recent years in achieving a modal shift of travel movement by implementing a number of measures to encourage walking and cycling as well as use of rail and bus and is pursuing further measures in this regard (including Demand Responsive Transport for 'last mile' journeys). The strategy also addresses the more strategic and longer-term possibilities including the potential for the campus to be served by Very Light Rail in future.
- 1.16 The trip generation and traffic modelling informed the proposed Framework Section 106 and associated 'Monitor and Manage' approach. The 'Monitor and Manage' approach is an alternative to the traditional 'predict and provide' approach of using past trends to determine future need (it is noted that the traditional 'predict and provide' approach is criticized in the government's recent consultation¹ on reforms to the planning system). Instead, the 'Monitor and Manage' approach allows travel behaviour to be monitored, allowing identification of necessary, and more targeted, mitigation measures to address the specific impacts from particular proposals. This was addressed in the SPD and the Framework s106 Obligations tables appended. Where development comes forward outside of the floorspace limits or for uses not assessed through the SPD, a separate Transport Assessment would be required.

¹ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

- 1.17 The SPD also addresses other transport considerations including the A46 Strategic Link Road project, which is not considered necessary to support the quantum of growth specified within the SPD. The potential new railway station and transport interchange to serve the University and south Coventry is also addressed and whilst is currently unfunded, it remains an aspiration and a project for further investigation.

Consultation update

- 1.18 Appendix A provides the Statement of Consultation, including the consultation process, methods of engagement and summary of issues raised.
- 1.19 A total of 42 responses were received from a range of stakeholders including statutory consultees, local residents and planning agents. Specifically, responses were received from 19 local residents, 5 planning agents/developers, The Coventry Society, the Coal Authority, the Environment Agency, Guide Dogs, Historic England, Kenilworth Town Council, Natural England, the NHS Coventry and Warwickshire Integrated Care Board, Transport for West Midlands, a Warwick District councillor, Warwickshire County Council (Strategic Planning & Infrastructure and Archaeology Services), Warwickshire Fire and Rescue, Wellesbourne and Walton Parish Council, and West Midlands Police.
- 1.20 A number of Leamington residents raised concerns regarding higher concentrations of student houses in multiple occupation (HMOs), and associated issues of antisocial behaviour, noise and litter. It should be noted that there is an Article 4 Direction in place for parts of Leamington which has removed permitted development rights for changes of use of a house or flat to a small HMO. For any developments requiring planning permission, Policy H6 of the adopted Warwick District Local Plan (2017) provides the starting point for determining applications for HMO proposals and student accommodation. This includes certain restrictions such as HMOs not exceeding 10% of total dwelling units within a 100m radius of the proposal, and no continuous frontage of 3 or more HMOs. As of 19th January 2024, it is a requirement that HMOs are licensable. As part of the licensing process, a number of compliance requirements are in place and this includes Landlord Guides on managing anti-social behaviour and refuse. The University predicts that 1,200 additional bedspaces are required to support the level of growth proposed up to 2033 and the SPD states that these are intended to be provided on, or immediately adjacent to, the campus. The SPD also states that there has been a downward trend in terms of the number of students residing in Leamington and this is expected to continue. No amendments are therefore proposed to the SPD however any issues relating to noise, anti-social behaviour or refuse should be reported to the relevant authority for further investigation.
- 1.21 The Warwickshire County Council Strategic Planning & Infrastructure team have requested further detail in relation to the quantum and types of additional floorspace and numbers of expected staff and students that were accounted for in the modelling. They also raised some concerns in relation to the Framework s106 and 'Monitor and Manage' approach. Further discussions have taken place with WCC to better understand the concerns and they have requested additional clarity in relation to the Monitor and Manage approach. Further still, they have sought confirmation that monies will be index linked from the date of SPD adoption, and requested that the 'Framework s106' references are removed, but confirmation provided that the 'Monitor and Manage' approach is legally binding and to be progressed by a Monitor and Manage Transport Sub

Board. Terms of Reference have been drafted for the Monitor and Manage Transport Sub Board, with representation from Warwickshire County Council, Coventry City Council and the University of Warwick. The purpose of the group is to monitor, co-ordinate and implement the 'monitor and manage' principles and to propose recommendations as to how the s106 monies are to be spent. These recommendations are then considered by the University of Warwick Transport Board comprising senior representatives from the University, Warwickshire County Council and Coventry City Council for formal consideration and decision making. Corrective or preventative action at trigger points is therefore determined by the Transport Board following recommendations from the Monitor and Manage Transport Sub Board. This includes monitoring and expediting the obligations and requirements set out in any s106 agreements. These amendments have been carried forward into the final version of the SPD.

- 1.22 One area considered to be of utmost importance to WCC is bus provision, and the requirement for additional services on the Leamington-Kenilworth-University of Warwick-Coventry corridor. In particular, capacity issues have been raised specifically relating to the Parish Church stop on Parade, Leamington. This is considered to be an area of particular focus for the Monitor and Manage Transport Board.
- 1.23 In terms of other transport issues raised, there was widespread support for measures to promote sustainable transport and the principle of a new railway station and transport interchange to serve the university over the longer term, albeit the delivery and funding challenges were noted.
- 1.24 A number of respondents requested additional clarity in relation to the Eco-park proposal and there was a specific request that the Eco-park supports, and helps extend, reconnected areas of ancient woodland like Black Waste Wood, Broadwell Wood, Whitefield Coppice, Roughknowles Wood and Crackley Wood. Whilst the University are aware of the interest in the Eco-park and are committed to its delivery, the project will be contingent on the return of land from HS2. The University note the aspirations and will give further consideration to the proposal, issuing additional detail in due course. If planning approval is required, there would of course be the option of inputting at that stage.
- 1.25 The Guide Dogs charity also raised concerns with the principle of shared surfaces and shared pedestrian and cycle lanes, owing to difficulties and potential dangers faced by the blind community. The concerns have been raised with the University. All parties are committed to ensure that the campus is safe and navigable by all students, staff and visitors. If shared surfaces or shared cycle lanes are proposed, they will be subject to detailed assessment and audit and all efforts will be taken to ensure that any schemes are designed and engineered in a way that does not pose risks to members of the blind community. Planning permission is likely to be required for such schemes and there would be an opportunity to input further, and suggest amendments, at that stage.
- 1.26 Kenilworth Town Council also raised a number of responses (some of which are addressed above) and whilst largely supportive, they raised a specific query as to whether the University could lead by example by delivering Passivhaus or Passivhaus Plus development.
- 1.27 A number of technical consultees requested the addition of references to particular studies and these have been added where necessary.

- 1.28 A number of planning consultants submitted representations in support of 'call for sites' submissions as part of Local Plan processes, all of which were beyond the confines of the SPD area but were within broad proximity of the campus. The site allocation process is clearly outside the scope of the SPD and so those submissions would be considered as part of the South Warwickshire Local Plan or Coventry Local Plan Review processes.
- 1.29 A more detailed list of issues raised and responses is set out in Appendix A. A schedule of proposed amendments is set out in Appendix B and the final version of the SPD is included as Appendix C.

Next steps

- 1.30 Recommendation 2 of the report seeks Cabinet approval to adopt the SPD. In order to adopt an SPD, the Council is legally required to publish an Adoption Statement. Legislation allows a 3 month window for parties to apply to the High Court for a judicial review of the decision to adopt. Subsequently, copies of the SPD and Adoption Statement would be available for public inspection following the decision to adopt.
- 1.31 As the SPD has been produced jointly with Coventry City Council, it is intended that the formal SPD adoption date begins once the City Council have secured approval to adopt. It is understood that their adoption decision is expected in November 2024. If Coventry City Council do not choose to adopt the SPD, a further update will be reported to Cabinet in due course.

2 Alternative Options

- 2.1 An alternative option is to not adopt the SPD. If major amendments are required, a revised version of the SPD could be presented to Cabinet in future, subject to further engagement with the University, Coventry City Council and Warwickshire County Council. Non-adoption is not recommended as there would remain a lack of planning guidance to assist with the determination of planning applications and it would also prevent decision making on how s106 monies are spent via the Monitor and Manage Transport Sub Board and University of Warwick Transport Board.

3 Legal Implications

- 3.1 The legislation relevant to the production of SPDs is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 3.2 As stated in the Government's Planning Practice Guidance, SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making.
- 3.3 The Guidance also states that SPDs should not add unnecessarily to the financial burdens on development. It is intended that the Monitor and Manage approach is legally binding as a basis for determining how monies are spent, with decision making via the Monitor and Manage Transport Sub Board and University of Warwick Transport Board. The SPD therefore does not increase financial burdens, but it will formalise the Monitor and Manage approach and act as a legally binding mechanism for future decision making.

- 3.4 As set out above, any person aggrieved by the SPD may apply to the High Court for a judicial review of the decision to adopt the SPD. Such an application must be made promptly and in any event not later than 3 months after the date on which the SPD was adopted.

4 Financial Services

- 4.1 Costs of implementing and applying the SPD are expected to be minimal. Any such costs are expected to be met through existing budgets.

5 Corporate Strategy

- 5.1 Warwick District Council has adopted a Corporate Strategy which sets three strategic aims for the organisation. The proposed SPD can contribute to the delivery of some of these strategic aims:
- 5.2 Delivering valued, sustainable services – not applicable.
- 5.3 Low cost, low carbon energy across the district – proposals set out within the SPD include the 'solar arrays' project, two separate large scale photovoltaic installations to generate renewable energy. An Energy Innovation Centre is also proposed which can help with the development of new, low/zero carbon technologies. The SPD proposals also seek to encourage zero and low carbon travel to, and around, the site to reduce reliance on private car. Any development proposals on campus would also be required to adhere to adopted sustainability policies in the Warwick District or Coventry Local Plan (as applicable to the site location).
- 5.4 Creating vibrant, safe and healthy communities of the future – the proposals set out within the SPD seek to sustain the University as a world class education facility, but also to 'open up' the campus to the wider community as an asset within the district for the public to visit and enjoy.

6 Environmental/Climate Change Implications

- 6.1 The proposals set out within the SPD seek to deliver environmental enhancement and mitigate the impacts of climate change. Any future development on site would be required to comply with Development Plan Policies that address the natural environment and climate change. The SPD therefore aligns with the Council's policies and Climate Emergency Action Plan. As part of the consultation, a Strategic Environmental Assessment (SEA) Scoping Report was published for the three statutory consultation bodies to review and comment on. All comments have helped inform the final version of the SPD.

7 Analysis of the effects on Equality

- 7.1 The consultation was conducted in line with the Council's adopted Statement of Community Involvement. An Equality Impact Assessment was produced as part of the consultation and this has been reviewed in light of responses that were submitted – for example, in light of the comments from Guide Dogs, further consideration will be given to the issue of shared spaces, shared pedestrian cycle routes and street furniture.

8 Data Protection

- 8.1 The statutory consultation on the SPD was undertaken in accordance with the General Data Protection Regulation (GDPR) requirements. The responses have been processed accordingly.

9 Health and Wellbeing

- 9.1 A number of the proposals set out within the SPD are likely to deliver health and wellbeing benefits to staff, students and visitors to the campus. This includes promoting active travel to and around campus, encouraging more public use for people to enjoy the facilities and surroundings, and by delivering environmental enhancements.

10 Risk Assessment

- 10.1 By not producing supplementary guidance to policy MS1 of the Local Plan, there is considered to be a lack of guidance to assist planning officers with the determination of planning applications. This may cause unnecessary delays and hamper delivery of the University's capital growth programme. An adopted SPD will also help to communicate the vision for future growth to local communities and set the expectation for any forthcoming planning applications. Adoption of the Framework s106 will also help ensure that highway and transport impacts from new development are appropriately mitigated.

11 Consultation

- 11.1 The SPD has been subject to statutory public consultation and complies with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 11.2 Prior to the public consultation, an all member briefing was arranged for District Council members to hear from the University and their consultants about the proposed content of the SPD. The University has also undertaken further targeted consultation.

Background papers:

Warwick District Local Plan 2011-2029

The consultation version of the SPD, and supporting material, is available at https://www.warwickdc.gov.uk/info/20794/supplementary_planning_documents_and_other_guidance/1962/university_of_warwick_supplementary_planning_document

Supporting documents:

None

University of Warwick Campus Framework Masterplan SPD: Consultation Statement

September 2024

Introduction

1. The Campus Framework Masterplan Supplementary Planning Document (SPD) has been prepared jointly by Coventry City Council, Warwick District Council and the University of Warwick with support from Warwickshire County Council.
2. It gives effect to local plan policies which guide how the campus should develop and sets out a series of capital projects likely to be delivered by 2033 within the context of a longer-term vision to 2050.
3. The University works closely with the three local authorities and engages with local communities to ensure its operations, including new development on campus, are managed to avoid or minimise potential impacts on neighbouring areas and that they contribute positively to the local economy and the environment.
4. This statement sets out the process and outcomes from the public consultation carried out for the SPD during 2024.

Town and Country Planning Regulations

5. The draft SPD was produced jointly by Coventry City and Warwick District Councils in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The relevant regulations relating to the consultation process are set out below.
 - **Regulation 12: (a)** requires the Council(s) to produce a consultation statement before adoption of the SPD. This must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD. **(b)** requires the Council(s) to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
 - **Regulation 35:** requires the Council(s) to make documents available by taking the following steps; make the document available at the principal offices and other places within the area that the Council(s) consider appropriate; publish the document on the Councils' websites.

The Consultation Process

6. The draft SPD was prepared between October 2023 and March 2024. This involved a steering group chaired by Council officers and serviced by the University.
7. Warwick District approved the draft SPD for consultation in March 2024 and Coventry City Council approved the consultation in April 2024.
8. The consultation period was for 6 weeks, starting on 24 May 2024 and closing on 5 July 2024.

9. The Councils complied with the legislative requirements for consulting on an SPD, as well as the requirements set out in the Councils' own adopted Statements of Community Involvement.
10. This included:
- Notification being sent to statutory consultees.
 - Hard copies of the SPD being available at:
 - Coventry City Council- all libraries within the Council's area
 - Warwick District council- Council Customer Services at the Royal Pump Rooms, One Stop shops/libraries around the district and Brunswick Healthy Living Centre.
 - An online version of the SPD being available on both the Coventry and Warwick District Council websites and signposted from the University of Warwick website.
 - Details of the consultation being available on the Councils' websites.
11. The Councils' websites invited comments via email. The Warwick District consultation portal allowed comments to be submitted online.
12. On 4 June 2024, a public consultation event was held at the University of Warwick Main Campus for local community stakeholders.
13. Attendees were encouraged to provide written responses to the Consultation via the website.
14. In addition, councillor briefings were held with portfolio holders and ward members from Coventry City and Warwick District Councils, and portfolio holders from Warwickshire County Council.
15. A total of 42 responses were received to the consultation.

Issues Raised

16. A summary schedule of changes to the SPD text is set out at **Appendix B**.
17. Many respondents made similar points during the consultation and all the main ones are summarised in the table below, along with the responses.

Issue	Response
Net-zero aspirations	<p>Noted that the Net Zero Carbon DPD is now adopted. The draft text of the SPD was written in accordance with the emerging DPD.</p> <p>The SPD text has been amended to refer to the adoption of the Net Zero Carbon DPD and SPD in May 2024.</p> <p>Reference to Passivhaus standard has been added to the text.</p>

Biodiversity	Reference will be made to Warwick District Council's Ecology and Biodiversity Strategy which is considered a model for good practice for the restoration of nature.
References for the economic benefit of the University Campus	A reference to the economic benefit of the Campus has been included in the SPD text to provide context to the £1bn figure.
Highways including - impacts on the highways network - reference to existing Transport Plans - references to the A46 link road - references to peak time queuing on the Stoneleigh Road/Kenilworth Road/Gibbet Hill roundabout; - query as to whether potential future development at Westwood/Science Park has been modelled in relation to traffic - query regarding Arts Centre access; - query from TfWM regarding how routes and associated junctions can facilitate mitigation to accommodate additional trips; - query from TfWM in terms of presenting road safety statistics	<p>Traffic modelling has been completed in accordance with a methodology agreed with Coventry City Council, Warwickshire County Council and National Highways. There is a commitment to monitor and manage transport impacts over the lifetime of the SPD, with a transport fund available to implement mitigation if required.</p> <p>A number of text alterations have been made to ensure references to the A46 link road are clear.</p> <p>Reference will be made to the Campus Travel Plan, West Midlands Local Transport Plan, and the Coventry Area Strategy.</p> <p>Detailed assessment of the traffic impacts of the SPD has been completed using WCC's Kenilworth and Stoneleigh Wide Area (KSWA) model, a microsimulation model developed in Paramics (computer software) by SLR on behalf of WCC. A number of scenarios have been tested in accordance with WCC's Model Use Protocol (MUP). The Gibbet Hill Road/Kenilworth Road/Stoneleigh Road Island is referenced in the modelling. The SPD's additional vehicle trips - less than two additional vehicle movements per minute - are comfortably within the typical daily variation of link flows across the local highway network.</p> <p>Traffic modelling has been completed in accordance with a methodology agreed with Coventry City Council, Warwickshire County Council and National Highways. There is a commitment to monitor and manage transport impacts over the lifetime of the SPD, with a transport fund available to implement mitigation if required.</p> <p>A number of text alterations have been made to ensure references to the A46 link road are clear.</p> <p>Reference will be made to the Campus Travel Plan, West Midlands Local Transport Plan, and the Coventry Area Strategy.</p> <p>Detailed assessment of the traffic impacts of the SPD has been completed using WCC's Kenilworth and Stoneleigh Wide Area (KSWA) model, a microsimulation model developed in Paramics (computer software) by SLR on behalf of WCC. A number of scenarios have been tested in accordance with WCC's Model Use Protocol (MUP). The Gibbet Hill Road/Kenilworth Road/Stoneleigh Road Island is referenced</p>

in the modelling. The SPD's additional vehicle trips - less than two additional vehicle movements per minute - are comfortably within the typical daily variation of link flows across the local highway network.

As reported in the SPD and presented in the supporting Trip Generation and Modelling Assessment Technical Note, a robust approach to highway modelling has been completed, assessing the impact of the SPD on both the strategic and local road network. Agreement on the assessment methodology and conclusions of the modelling has been reached by all highway authorities.

Without the SPD, queueing at the Stoneleigh Road/Gibbet Hill Road/Kenilworth Road roundabout (Junction 50 within WCC's KSWA model) is anticipated to slightly worsen in the future years as a result of background traffic growth.

The SPD trip generation demonstrates that it will generate less than two additional vehicle trips per minute during the busiest peak hours. Given the limited impacts of the SPD, no highway mitigation is required, and the SPD would not have an unacceptable safety impact or severe residual cumulative impact on the local highway network or strategic road network. There is an ongoing commitment to monitoring and managing transport impacts over the lifetime of the SPD, with a transport fund available to implement mitigation measures should trigger points be met. Further detail on this is provided with the SPD.

The SPD trip generation and modelling is based on an additional 31,000 sqm floorspace. Any additional floorspace above this figure would be subject to further modelling. Both the Science Park and Westwood Campus are identified as "two further areas of wider change which sit outside of the SPD proposals". Consequently, they have not been included within the trip generation assessment or strategic modelling undertaken as part of the SPD.

Full details on accessing the Warwick Arts Centre are available online: <https://www.warwickartscentre.co.uk/visit-us/getting-here/>. This includes access by car, bus, train and cycle. It also provides information on parking and a link to pre-book parking.

Extensive and robust traffic modelling has been completed in accordance with a scope agreed by WCC and National Highways. The distribution of University vehicle trips is based on turning count data and mobile network data (MND), reflecting the locations of car parking across the Campus.

Para. 4.14 of the 'Trip Generation and Modelling Assessment' details the assumptions that have been applied to reassigning displaced car parking demand.

The models are highly dynamic and complex, particularly given that there are areas of congestion across nearby parts of the modelled network in the 2029 and 2037 scenarios. Therefore, in the future the distribution of traffic around the University may alter to avoid delay elsewhere on the network.

WCC, CCC and NH all agree that no highways mitigation is necessary to facilitate the SPD. Consequently, there is consensus that the local highway network can accommodate forecast additional trips. That said, funding from the Monitor and Manage Transport Fund could be made available, subject to agreement between all parties, towards highways mitigation if absolutely necessary.

The University takes safety across the Campus very seriously and is constantly seeking ways to improve safety by all modes. Monitoring of collisions is an evolving and continuous process and taking a snapshot of collisions for inclusion with a 10-year SPD is not considered appropriate. Detailed collision analysis was provided within the recent Transport Assessments that supported the WSS and STEM applications. Ensuring improvements in safety will be a key consideration of the Monitor and Manage Transport Sub Board.

Delivery of a new railway station

Delivery of the station is subject to a number of engineering and financial challenges being overcome, including providing significant rail capacity upgrades between Coventry and Kenilworth.

Whilst the station is referenced in the SPD as an ambition, ultimately delivery will be contingent on the South Warwickshire Local Plan and a delivery programme that is facilitated by the DfT, Network Rail, rail operators, Warwickshire County Council's Transport team and any other key stakeholders. The elements referenced in the representation are therefore considered to be beyond the scope of the SPD.

Public transport – buses and pollution caused by buses; potential impact of Wellesbourne shuttle bus

The University contribute financially towards two early morning bus services with National Express which serve the campus.

Monitoring of student addresses demonstrates that there has been a reduction in the number of students who live in and travel to the campus from Leamington Spa. Notwithstanding this, Warwickshire County Council have recently secured funding from the Department for Transport to roll out zero emissions buses across the County. In addition, the University are committed to monitoring and managing transport

	<p>impacts, including public transport over the lifetime of the SPD.</p> <p>Students make up only a proportion of total bus users. It is not the role of the SPD to address wider transport/public transport issues in Leamington. No text changes to the SPD are proposed in this regard.</p> <p>The proposed shuttle service forming part of the Transport Obligations for the Main Campus SPD is not intended to replace existing public bus services.</p>
Archaeological potential	<p>Plan 21 and the supporting text has been changed to align with the assessment of Warwickshire's County Archaeologist. This is in relation to the area around Cryfield House Farm and Cryfield Grange Farm which is now identified as high potential.</p> <p>Until the South Warwickshire Local Plan is adopted, policies HE1-HE4 of the adopted Local Plan provide the policy basis for considering archaeology and heritage matters as part of the assessment of a planning application.</p> <p>Heritage and conservation officers have contributed to the document and comments received will be duly considered.</p>
Heritage significance	<p>Minor edits to the text in response to Historic England's comments on the assessment of the impact on the significance of a heritage asset in line with local and national policy and guidance.</p>
Future Eco Park	<p>As noted within the draft SPD, any land use (including energy generating uses) would be assessed against the relevant green belt policy. Plans for the Eco Park are at a very early stage. The potential for how the Eco Park could assist in the reconnection of ancient woodlands will be considered as plans develop.</p>
Flood Risk	<p>Hydraulic Modelling has been undertaken to assess the surface water flood risk. This has concluded that although surface water flooding is still present across part of the Campus, it is not as severe or frequent than identified on the Environmental Agency's online map.</p> <p>Future development on the Campus should therefore refer to the Hydraulic Modelling as a baseline model for the assessment of surface water flooding across the Campus.</p> <p>Additional text has been added to the SPD following the update to the Hydraulic Model.</p>
Projected student population growth and student	<p>The SPD notes that the current ratio of on/immediately adjacent to campus student accommodation to students is</p>

<p>accommodation (on and off campus)</p>	<p>expected to be maintained. Any planning applications for purpose built student accommodation by the University or third parties would be assessed against relevant national and local adopted policy at the time of submission. The University will monitor the provision of student accommodation by third parties immediately adjacent to campus.</p> <p>Coventry City Council are in the process of undertaking a study of student accommodation across their jurisdiction. This will feed in to policies in the revised Coventry Local Plan and help inform the South Warwickshire Local Plan.</p>
<p>Impacts of students to residents of Leamington Spa and Kenilworth</p>	<p>The University of Warwick is committed to working closely with its neighbours for the wider benefit of the community. In liaison with Warwick District Council, the University part funds a Student Housing Officer in Leamington Spa to manage any issues arising regarding students in the town. A financial contribution is also made by the University to Warwick District Council related to waste management.</p> <p>Warwick District Council currently has an Article 4 Direction in place for parts of Leamington which has removed permitted development rights for changes of use from a house or flat to a small HMO.</p> <p>Since 2017, Policy H6 provides the current policy basis for determining applications for housing in multiple occupation and student accommodation. This includes certain restrictions (e.g. HMOs not exceeding 10% of total dwelling units within a 100m radius of the proposal, no continuous frontage of 3 or more HMOs etc). The policy will be reconsidered as part of the Local Plan Review/South Warwickshire Local Plan process. The SPD is supplementing policy MS1 of the Local Plan. As of 18th January 2024, Houses in Multiple Occupation became licensable. Further information is available at https://www.warwickdc.gov.uk/info/20163/private_housing/179/houses_in_multiple_occupation.</p> <p>Furthermore, HMO standards regarding noise and antisocial behaviour are set out in the Council's HMO Landlords Guide. Any concerns in relation to the management and protection of listed buildings should be reported to the Council's Conservation Officer for further investigation in the first instance. Listed buildings are designated by Historic England but locally listed buildings and designated by Councils.</p> <p>Noise and any other environmental health complaints should be reported to the Council's Environmental Health team for further investigation. Serious incidents should be reported to the police if people feel threatened or where people are breaking the law.</p>

Contributions from the University towards policing in Leamington are not considered to meet the legal tests for planning obligations as set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (i.e. necessary, directly related to the development and fairly and reasonably related in scale and kind to the development). However, the suggestion has been passed on to the University for further consideration.

No amendments are proposed to the text of the draft SPD.

Shared spaces and street furniture – implications for the those with visual impairments	Edits made to Design Principle 3 and Pedestrian and Cycle Strategy text with regards to public realm and accessibility.
NHS Integrated Care Board – request for commitment to delivery of health centre, or potential s106 contributions	The University remain in discussions with the NHS regarding the potential for a new health centre on campus to serve the student population, to replace the existing Health Centre on Health Centre Road.
Pedestrian access from Charter Avenue	There are no current proposals to implement a pedestrian access from Charter Avenue, however, this is something which the University will review, through liaison with the local community.

UoW SPD proposed amendments to text – September 2024.

1. This note sets out the proposed amendments to the draft SPD text following receipt of comments made through the public consultation process.

Location in document/page/plan number	Details of changes proposed	Comments	Proposed text amendments (amended text in italics)
Page 3	Amend text to refer to consultation process and adoption	Text updated for review	<p><i>A public consultation on the draft SPD was launched by both local authorities between Friday 24 May 2024 and Friday 5 July 2024.</i></p> <p><i>All feedback has been reviewed and where appropriate, amendments to the SPD have been made.</i></p>
Page 5	Amend text to refer to Net Zero Carbon DPD as adopted	Text updated for review	<p><i>Warwick District Council declared a climate emergency in 2019 and has since produced a Net-zero Carbon DPD which has been through Examination in Public, the DPD was adopted on 24th May 2024. The objectives of the DPD are to minimise carbon emissions from new buildings and to support national and local carbon reduction targets. Alongside the DPD sits the Net Zero Carbon SPD which sets out further advice and guidance to applicants and relevant stakeholders on how to comply with the DPD policies. The SPD was also</i></p>

			<i>adopted by the Council on 24th May 2024.</i>
Page 7	Footnote to be added to provide context to £1 billion economic impact figure	Requested from Andrew Todd. Footnote to be added if publicly available document.	Footnote added referencing the following University website- Our impact (warwick.ac.uk)
Page 8	Amend text for SP4 to refer to safe and secure environment	Text updated for review	<i>To create an accessible, inclusive, safe, secure and people focused environment.</i>
Page 9	Amend text to refer to Net Zero Carbon DPD as adopted	Text updated for review	<i>This is in line with national and local policies including the adopted Net Zero Carbon DPD and SPD.</i>
Page 11	Amend text to refer to all users of shared spaces	Text updated	<i>Where opportunities arise as part of new development and can safely accommodate all users, the pedestrian environment will be further enhanced through consideration of shared surfaces, downgrading of road space, environmental improvements, including sensitively designed and located street furniture and potential closures (refer to Plan 16)</i>
Page 13	Amend text to state that any proposals for energy generating uses in the Eco Park would be assessed against Green Belt policy at the time of submission	Text updated for review	<i>Potentially energy generating uses (proposals for any such uses to be addressed against relevant Green Belt policy at the time of submission).</i>

Page 14	Amend text so it states 11 projects not 10 for consistency with list of projects.	Text updated for review	There are a further 11 potential projects...
Page 17	Green Fringe – EA have requested that text be added to refer to any development in the Green Fringe be a minimum of 8m from the top of the bank of watercourses.	BDP have advised this is acceptable	Green Fringe text to be amended to state that <i>“Any proposals within the Green Fringe should be set a minimum distance of 8m from the top bank of any watercourse”</i>
Page 18	<p>Add in reference to the Local Transport Plan and Coventry Area Strategy.</p> <p>Amend ‘moves’ to ‘modes’ in two locations</p>	Text updated for review	<p>New section called ‘<i>Other Considerations</i>’ to be added with the following additional text</p> <p><i>West Midlands Local Transport Plan 5</i> <i>The University endorses TfWM’s Local Transport Plan (LTP) 5 which sets out policies to promote safe, integrated, efficient and economic transport to, from and within the region. The statutory policy has a vision “for creating safe, reliable and affordable connections for everyone that are healthy, sustainable and efficient to create great places where generations will thrive”. This is to be achieved through implementing a range of plans and strategies with the overarching aims to reduce single occupancy car</i></p>

			<p><i>usage and promote public transport and active travel.</i></p> <p>Coventry Area Strategy <i>As set out in TfWM’s LTP Core Strategy, an Area Strategy for Coventry is being developed in partnership between TfWM and CCC to apply and tailor principles and policies from the LTP to the local area. The University will work with TfWM and CCC to identify transport interventions for neighbourhoods around the campus and along key transport corridors to support the transport and movement objectives of this SPD.</i></p> <p>Campus Travel Plan – the following text to be added on page 18 after <i>“...viable non-car alternatives for campus users to consider.”</i> <i>“This is embedded within the University’s Travel Plan which was subject to a comprehensive review and refresh in 2024, supported by extensive surveys and to be monitored biennially against ambitious targets.”</i></p> <p>Future Transport Zone - page 18 text to be amended so that it reads as follows: <i>“A close collaboration with local and regional authorities has seen the</i></p>
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			<p><i>campus as a testbed for new and emerging transport technologies. For example, the Future Transport Zone partnership between the University and TfWM brought showcase project to campus such as e-scooters, car clubs and demand-responsive services which has brought about significant progress in transport innovation.”</i></p> <p>Links to these documents to be added at bottom of page.</p>
Page 19	University of Warwick Station – add text to refer to financial challenges which need to be overcome before the station can be developed	Text updated for review	<i>Delivery of the station would be subject to a number of engineering and financial challenges being overcome, including providing significant rail capacity upgrades between Coventry and Kenilworth.</i>
Page 19	Add in reference to Campus travel plan	Reference added to Page 18	
Page 20	<p>Amend text to consideration of the needs of all users in the design of enhanced pedestrian and cycle routes.</p> <p>Amend text to refer to new cycle parking being appropriately designed</p>	Text amended	<i>New and enhanced pedestrian and cycle routes will be designed in accordance with local guidance and the Government’s National Design Guide, ‘Local Transport Note 1/20 – Cycle Infrastructure Design’ (LTN 1/20) and ‘Active Design Guidance, taking into consideration the needs of all users.</i>

			<i>To accommodate the expected uplift in active travel up to 2033 and beyond, adequate, appropriately designed cycle parking....</i>
Page 21	Add in reference to Future Transport Zone	Reference added to Page 18	No need to add additional reference to FTZ on page 19 as covered on Page 18.
Page 21	Add in reference to Park Mark for car parks.	Text updated for review	<p><i>The University will endorse the principles of 'Park Mark' which sets out guidance to achieve safe, legible parking environments.</i></p> <p>Suggested note to add link to Park Mark Guidance at bottom of page.</p>
Page 23	Additional concluding paragraph added at the end of the Trip Generation and Traffic Modelling section	Additional text added	<p><i>The conclusions of the traffic modelling demonstrate that additional University vehicle trips are less than two vehicles per minute during the busiest peak hours, which is not a material change. The modelled highway network in WCC's KSWA model is highly sensitive and there are high growth assumptions up to 2037 without the SPD. Consequently, with the addition of a small number of University vehicle trips as a result of the SPD, there is some additional queueing and longer journey times in some locations. Given the limited impacts of the SPD, it is agreed</i></p>

			<i>with CCC, WCC and NH that no highway mitigation is required and the SPD would not have an unacceptable safety impact or severe residual cumulative impact on the local highway network or strategic road network.</i>
Page 23	Amendments to text to change terminology used in reference to Section 106. Additional text added	Additional text added	<p><i>A legal mechanism to support this SPD with 'Monitor and Manage' elements which set out a framework of agreed mitigations in response to changes in travel behaviour will be progressed, binding members of the Monitor and Manage Board.</i></p> <p><i>This will allow individual planning applications to come forward within the parameters set by the SPD, without the need for these to be subject to standalone traffic modelling and detailed assessments.</i></p> <p><i>The proposed content of the legal mechanism is provided at Appendix 1</i></p>
Page 25	Add in reference to EV charging on campus	Proposed text amendments included in accompanying draft SPD. Parvez / George to confirm agreement.	<i>Continue to lead on the conception and development of future transport infrastructure (including provision of EV charging facilities where appropriate), so that...</i>

Page 26	Add in reference to Passivhaus	Text amended	Additional bullet point added as follows: <i>Aspire to Passivhaus standard where possible and appropriate.</i>
Page 26	Additional text suggested by EA to be added	BDP have reviewed and agree with proposed text changes by EA	Under 'Water', add text in italics to the following bullet point <i>"undertake comprehensive flood risk assessments to ensure our future buildings are not at risk of flooding and do not exacerbate flood risks elsewhere, and explore and implements opportunities to reduce flood risk where possible"</i>
Page 27	Add in reference to Biodiversity Action Programme	Footnote added	Footnote added to refer to WDC Biodiversity Action Programme and Warwickshire, Coventry and Solihull Biodiversity Action Plan. Hyperlinks provided.
Page 32	Potentially add in any reference to updated hydraulic model which BDP advise; also any text changes they advise are required in response to EA comments	Amended /additional text agreed with BDP.	Amend third para of last column to read <i>" The Westwood Brook Hydraulic model has been updated to reflect modern modelling standards and current climatic conditions to inform the flood extents within the campus in line with</i>

			<p><i>Environment Agency and Lead Local Flood Authority requirements. The new hydraulic model includes local enhancements of watercourse connectivity within the campus and updated hydraulic rainfall estimates to generate a revised set of flood risk outlines. The updated model demonstrates that surface water flooding has reduced compared to national mapping due to the representation of culvert connectivity through the campus.</i></p> <p><i>Any future development within the campus should refer to the updated hydraulic model report as the baseline for the assessment of surface water flooding across the campus.</i></p>
Page 33	Add in additional text as recommended by EA in relation to SuDs	BDP have reviewed EA text and advised it is appropriate to be added	<p>After 'engineering requirements' add in the following text</p> <p><i>"Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:</i></p>

			<ul style="list-style-type: none"> • <i>be suitably designed</i> • <i>meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance</i> • <i>use a SuDS management treatment train –use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater</i> <p><i>The design of infiltration SuDS schemes and of their treatment stages needs to be appropriate to the sensitivity of the location and subject to a relevant risk assessment, considering the types of pollutants likely to be discharged, design volumes and the dilution and attenuation properties of the aquifer.</i></p>
Page 35	Slight amendment to text to refer to significance	Updated text from Turley heritage.	<p><i>Where development is proposed which may impact on the significance of the heritage assets, including any contribution made by their setting,</i></p>

			<i>proposals should seek to preserve the significance of the heritage asset in line with adopted national and local policy and guidance.</i>
Page 35	Amendment to plan 21 to amend archaeological potential around Cryfield Grange to be high rather than medium		Plan updated.
Page 36	Add in text here re appropriate level of field investigation to be undertaken	Text updated for review	<i>The extent of assessment will depend upon the level of potential of the site under consideration and appropriate level of field investigation,</i>
Page 37	Add in text here to refer to the fact that referencing the transport contributions do not preclude other potential s106 contributions being sought from future development.	Text updated for review	<i>This does not preclude other non-transport obligations being sought from future development where consistent with the guidance in this SPD.</i>
Page 38	Text changes in relation to terminology used. Updates made to Section 1 and 2 to reflect Planning Permission now granted and Section 106 Agreements signed for Social Sciences and STEM applications.	Text updated for review	Text now corresponds with confirmed contributions in STEM Section 106 Agreement.

Page 39	Terminology amended ; additional information regarding Monitor and Manage sub board added to footnote	Text amended for review	
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Supplementary Planning Document

Draft Campus Framework Masterplan



UNIVERSITY OF WARWICK

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Introduction

University of Warwick location

The University of Warwick main campus is situated on the edge of Coventry, partly within the city boundary and partly within Warwick District and the county of Warwickshire.

The University works closely with the three local authorities and engages with local communities to ensure its operations, including new development on campus, are managed to avoid or minimise potential impacts on neighbouring areas and that they contribute positively to the local economy and the environment.

This Supplementary Planning Document (SPD) has been prepared by Coventry City Council and Warwick District Council in conjunction with the University of Warwick and Warwickshire County Council to give effect to their local plan policies which guide how the campus should develop. It is a Framework Masterplan setting out a series of capital projects likely to be delivered by 2033 within the context of a longer-term vision to 2050.

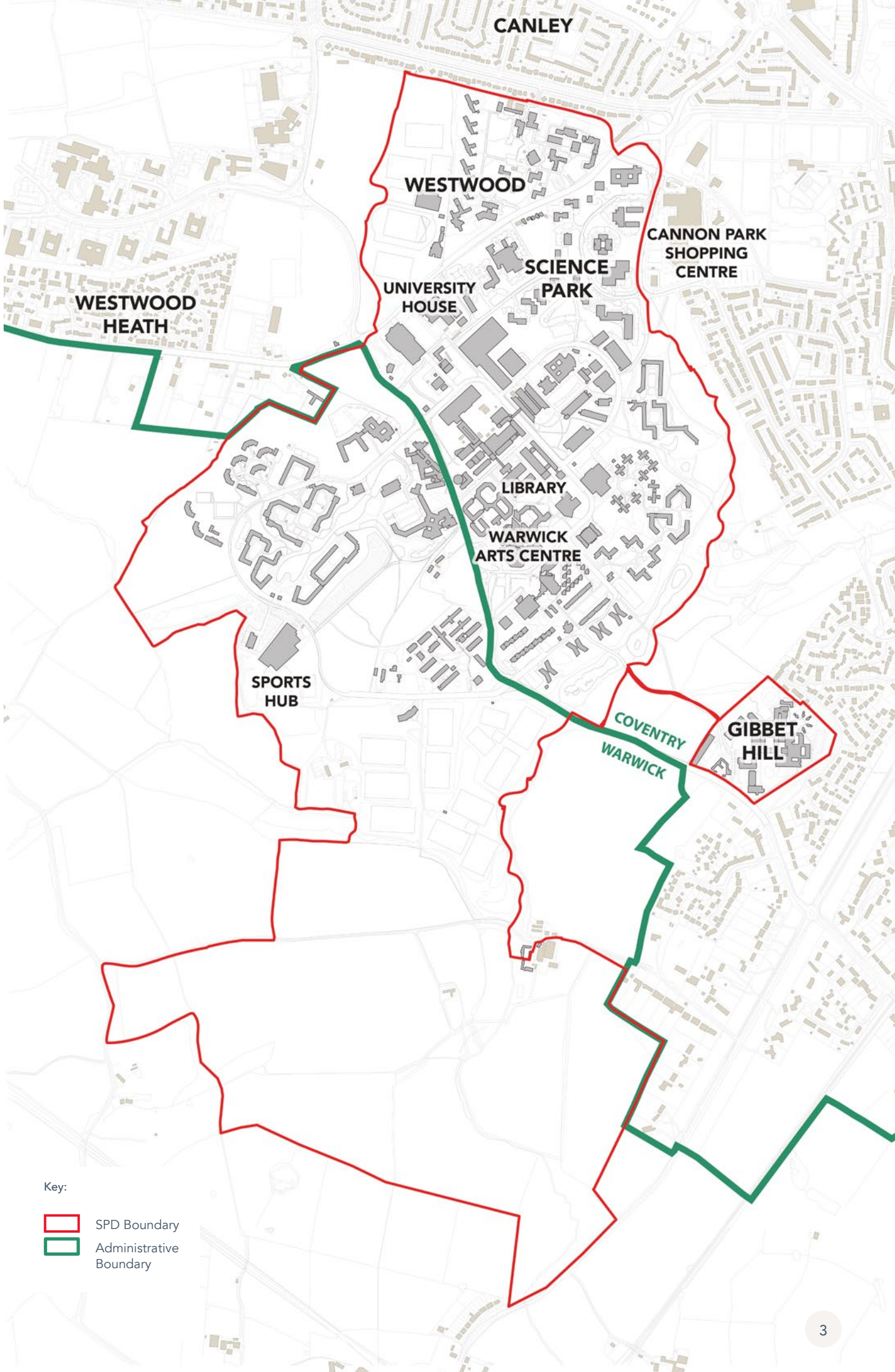
It incorporates several campus-wide strategies including a new Transport and Movement Strategy, which provides an agreed methodology for assessing the impact of new development. A legal mechanism will be agreed between relevant parties to commit to potential mitigations that can be drawn down should the 'monitor and manage' approach require them as projects come forward.

The SPD covers the University's landholdings on the edge of Coventry, including the main campus and its sports fields to the south as far as the line of HS2. This includes the University of Warwick Science Park, which is operated by a separate management company. Not all of this land is active University campus.

The SPD covers a ten-year period to 2033 and reflects the local plan policies in the adopted Coventry Local Plan 2011-2031 and the Warwick District Local Plan 2011-2029. When these plans are reviewed, the SPD may need to be reviewed in the context of any new or updated Local Plans.

A public consultation on the draft SPD was launched by both local authorities between Friday 24 May 2024 and Friday 5 July 2024.

All feedback has been reviewed and where appropriate, amendments to the SPD have been made.



Planning Context

From 1965 to now

The University of Warwick was founded in 1965 and has had approved masterplans throughout its history, most recently the 2009 Masterplan Outline Planning Permission and the 2018 Capital Plan Hybrid Permission, which have guided recent developments on campus such as the Lord Bhattacharyya Building, Oculus, the Slate, the Sports Hub, Cryfield Village, the IBRB at Gibbet Hill, the Warwick Arts Centre extension, the new Faculty of Arts Building, along with two new multi-storey car parks at Lynchgate and Kirby Corner.

These permissions were accompanied by a Section 106 Agreement which ensured appropriate mitigation of traffic impacts, support for public transport and management of car parking on campus.

The next phase of development is now underway, with plans for a new Social Sciences Quarter including new buildings for the Business School and Economics, and a multi-phase refresh of science, technology, engineering and mathematics (STEM) facilities around a new Science and Engineering Precinct in the heart of campus. There is also greater focus on energy efficiency as the University moves towards Net Zero and a less car-dependent movement strategy is being implemented. Recent events have accelerated changes to the way the staff and student body use the campus, with more flexible working and blended learning. These changes are reflected in the University's current thinking about how it develops the campus.



PHOTO 01: Lord Bhattacharyya Building



PHOTO 02: Oculus



PHOTO 03: The Slate



PHOTO 04: The Sports Hub



PHOTO 05: Cryfield Village



PHOTO 06: The IBRB at Gibbet Hill

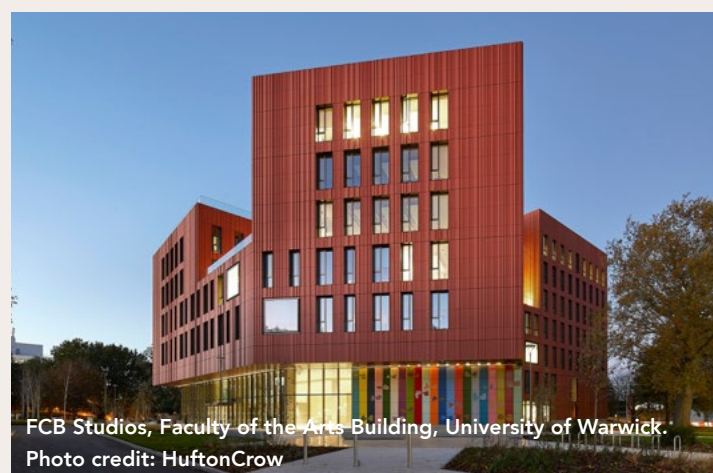


PHOTO 07: The new Faculty of Arts Building



PHOTO 08: New multi-storey car park at Lynchgate



PHOTO 09: Warwick Arts Centre extension

Planning Policy

The campus sits across two local authority areas – Coventry and Warwick District, with the main academic part of campus in Coventry and the more residential and recreational areas within Warwickshire.

All of the built part of campus was removed from the Green Belt in 2017 but the sports fields and countryside to the south remains in Green Belt.

The adopted local plans for the campus are:

- The Coventry Local Plan 2011-31, adopted in 2017¹
- The Warwick District Local Plan 2011-2029, adopted in 2017²

Coventry Local Plan

The planning policy context for the north eastern extent of the campus is established in the Coventry Local Plan, adopted in December 2017.

The key policy within the Coventry Local Plan of relevance to this SPD is **JE1 Overall Economy and Employment Strategy**. This policy confirms that the council will work in partnership with the City's universities to promote and support innovation. The policy objective being to maximise the economic development and community benefits associated with the continued growth of the universities.

This masterplan has therefore, in part, been produced in the context of Policy JE1 of the Coventry Local Plan.

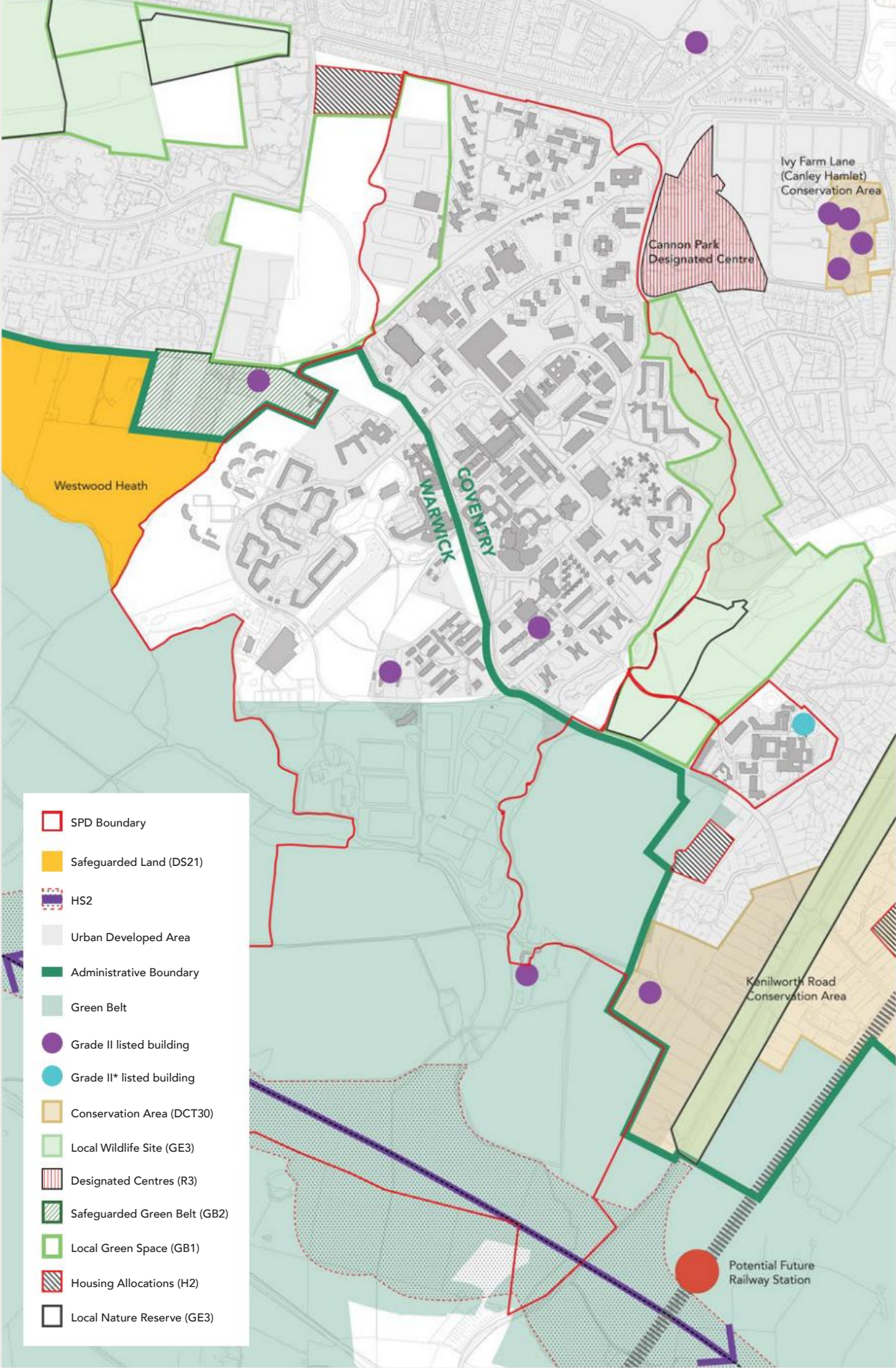
Other relevant policies within the Coventry Local Plan include:

- **DS3 Sustainable Development Policy** which confirms the Council will take a positive approach to development that reflects the presumption of sustainable development contained within the NPPF.
- **CO1 New or Improved social community and leisure premises** states in part 3 that proposals that are in accordance with the approved masterplan will normally be approved subject to high quality design proposals.

¹ Coventry Local Plan 2011-2031: <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>

² Warwick District Local Plan 2011-2029: https://www.warwickdc.gov.uk/info/20410/local_plan

PLAN 02: PLANNING POLICY



Warwick District Local Plan

The planning policy context for the south western extent of the campus is established in the Warwick District Local Plan, adopted September 2017.

The main policy within the Warwick District Local Plan of relevance to this SPD is **Policy MS1 University of Warwick**. The policy states that development at the University will be permitted in line with an approved Masterplan or Development Brief as agreed with the relevant LPAs. The masterplan should set out how proposals will contribute to the University delivering a world-class education campus including the range of uses associated with that. Furthermore, the policy sets out the objectives which any Masterplan should incorporate. These include:

- Identifying the physical and economic context for development;
- Identifying the development principles that will underpin future development proposals;
- Identifying the location of developments, and demonstrating the mitigation of any potential adverse impacts; and
- Identifying how the proposals support the vitality of the local and/or sub-regional economy.

Other relevant policies within the Warwick District Local Plan include:

- **DS5 Presumption in Favour of Sustainable Development** which states the Council will take a positive approach towards development proposals that reflect the presumption in favour of sustainable development as set out in the NPPF.

Warwick District Council declared a climate emergency in 2019 and has since produced a Net-zero Carbon DPD which has been through Examination in Public. Following the Main Modifications consultation in July 2023, the DPD was adopted on 15th May 2024. The objectives of the DPD are to minimise carbon emissions from new buildings and to support national and local carbon reduction targets. Alongside the DPD sits the Net Zero Carbon SPD which sets out further advice and guidance to applicants and relevant stakeholders on how to comply with the DPD policies. The SPD was also adopted by the Council as of 15th May 2024.

The campus is not covered by any Neighbourhood Plans, however the Burton Green Neighbourhood Plan (made March 2022) abuts the campus on the west.³

Other relevant planning policies and SPDs are incorporated throughout the several strategies forming this SPD.

³ https://www.warwickdc.gov.uk/downloads/file/7254/burton_green_ndp_made_version_march_2022

Emerging policy

South Warwickshire Local Plan

In January 2021, Warwick District Council commenced a review of its Local Plan in collaboration with Stratford-on-Avon District Council for the South Warwickshire area. The Plan will set out the long-term spatial strategy on issues such as housing, employment, infrastructure and climate change for both districts up to 2050. Both councils recently undertook an Issues and Options Consultation as well as a Call for Sites from January to March 2023 and previous to this a Scoping and Call for Sites consultation in May-June 2021. The South Warwickshire Local Plan is anticipated to be adopted in 2027, therefore it holds limited to no weight in the development of this SPD as there are no draft policies to assess against. As part of the review, Warwick District Council is working with the City and County Councils as well as the University of Warwick on a masterplanning study of the North of Kenilworth South of Coventry area.

Coventry Local Plan Review

Coventry City Council is currently in the process of producing an updated Local Plan and recently undertook an Issues and Options Consultation between July and September 2023. As there are no draft policies to assess against, and the Council anticipates adopting the updated plan in late 2025/early 2026, the Local Plan Review holds limited to no weight in the development of this SPD.

When this SPD is reviewed, this will be done in the context of any updated Local Plans for both Coventry and Warwick Districts.

Warwickshire County Council

Warwickshire County Council (WCC) act as the Highways and Lead Local Flood Authority for Warwickshire and are statutory consultees on all planning applications within Warwick District. Officers representing Warwickshire County Council have been involved in the preparation of this SPD.



The Campus

A UK top 10 institution

The University of Warwick is a world leading and UK top 10 institution with over 25,000 students and 5,500 members of staff, generating an economic impact of in excess of £1bn¹ with significant benefits for the West Midlands region and its economy. It occupies a main campus set in nearly 300 hectares on the edge of Coventry and the Warwickshire countryside.

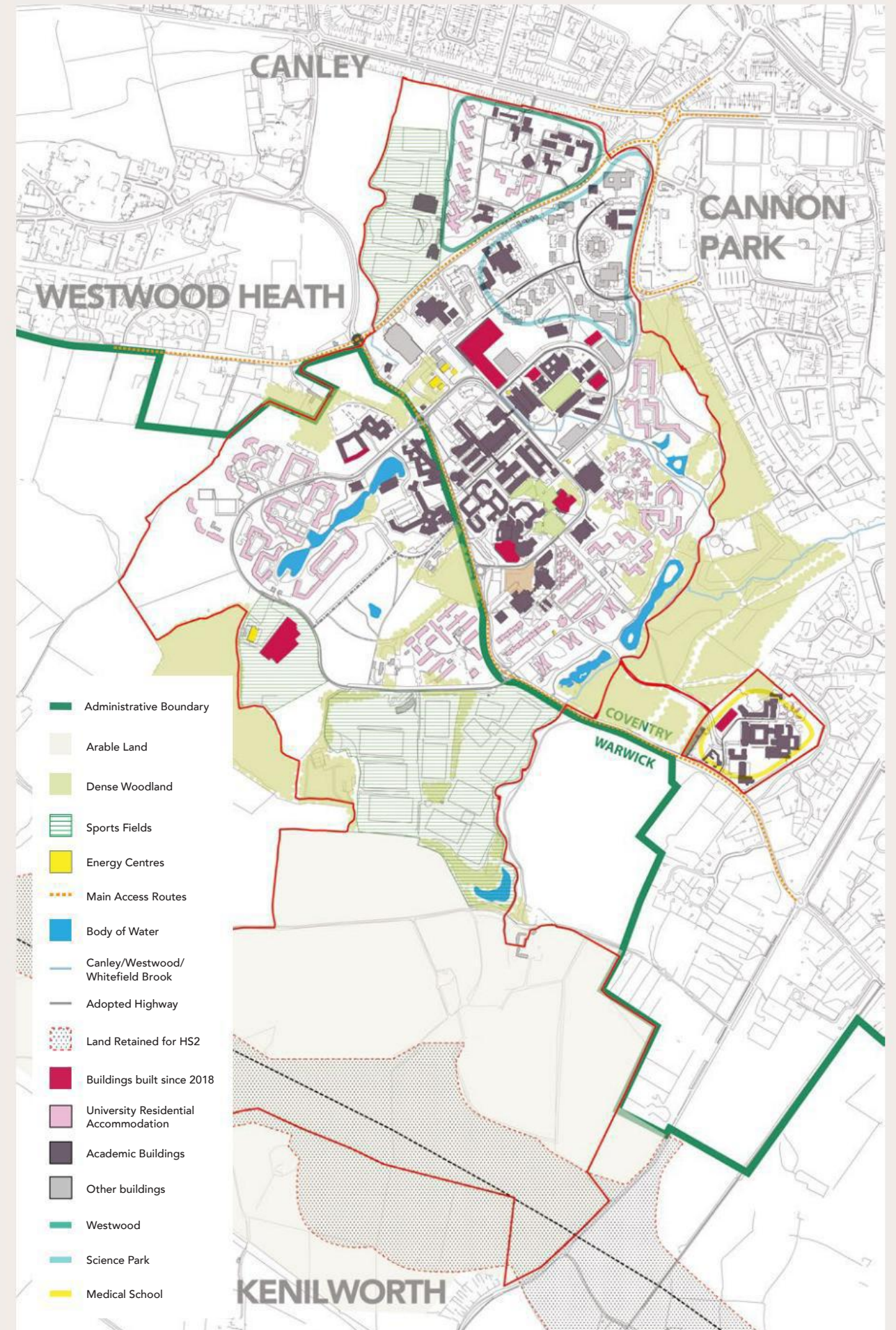
The campus plays a significant role in south-west Coventry, with the renowned Arts Centre and recently completed Sports and Wellness Hub providing community benefits. The campus is accessible to local people and there are routes which cross the area including the Sustrans cycle route to Kenilworth providing connections to the countryside.

In previous masterplans the campus has been divided into a series of 'character areas' including Central Campus East and West (either side of Gibbet Hill Road), Westwood (north of Kirby Corner Road) and Gibbet Hill (close to Kenilworth Road). The University has refreshed its internal masterplan during 2023, based on their emerging Vision for the campus by 2050. The internal masterplan takes a slightly different approach which the SPD reflects:

1. Core Campus: The masterplan seeks to concentrate new academic development within the core of the campus (defined in DP1 on page 12). Over time, the aim is to change the character of the public realm in this area so it is less dominated by cars and more pedestrian-focussed.
 - This includes Gibbet Hill which is home to Warwick's Medical School and Life Sciences faculty and sits slightly apart from main campus separated by Tocil Woods.
2. Periphery: around the core campus, to the south and east, are areas of primarily student residential housing which are different in character, less dense and set in most part within a mature landscape setting.
 - To the north is the Westwood campus which comprises a mix of academic, conference, sports and residential accommodation that is likely to see change in the medium to long term; and the Science Park, which is wholly owned by the University and is operated by a separate management company.
3. Green Fringe: The area to the south of the campus sits within designated Green Belt and is characterised by sports pitches and agricultural land, part of which is affected by the construction of HS2.

Beyond the campus, the surrounding neighbourhoods include residential suburbs on the edge of Coventry - Cannon Park, including the shopping centre which also serves the University community, Canley and Westwood Heath, the area around Moreall Meadows and Kenilworth Road, and Burton Green, which is predominately in Warwick District. To the south, beyond the HS2 route, is the town of Kenilworth.

PLAN 03: EXISTING CAMPUS



¹ <https://warwick.ac.uk/about/regional/ourimpact/>

The University's Vision

Strategic principles

The University has five strategic priorities as an institution:

- Innovation
- Inclusion
- Regional Leadership
- Internationalisation
- Sustainability

See: <https://warwick.ac.uk/about/strategy>

Strategic Principles

Translating these into a set of strategic principles for the development of the campus, the University's long-term ambitions are:

SP1:

To transform regional connectivity to campus.

SP2:

To create a flexible framework for innovation and other development opportunities within the campus and beyond.

SP3:

To form a vibrant learning, working, and living community.

SP4:

To create an accessible, inclusive, safe, secure and people focused environment.

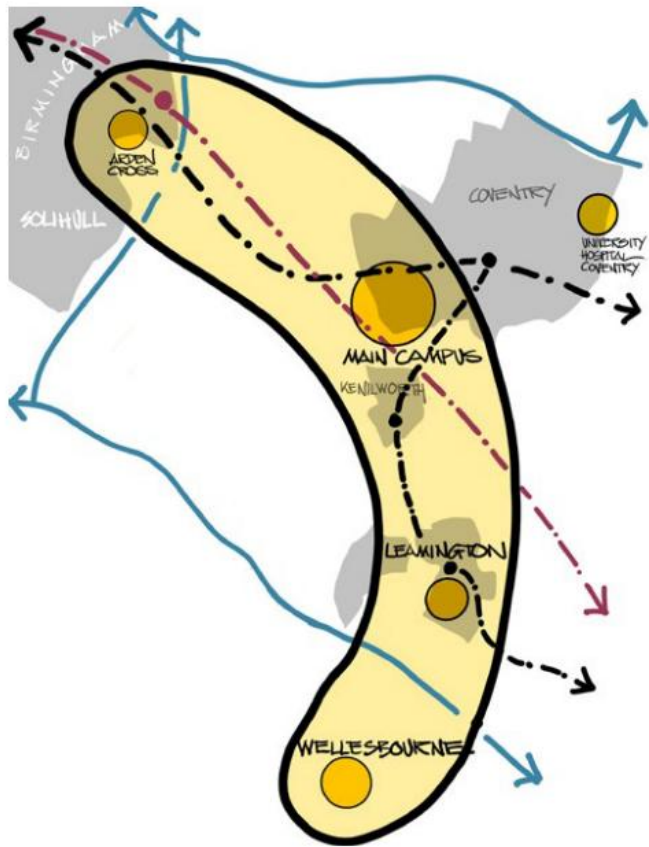
SP5:

To shape a distinctive University of Warwick identity that has a 'cosmopolitan in the countryside' feel.

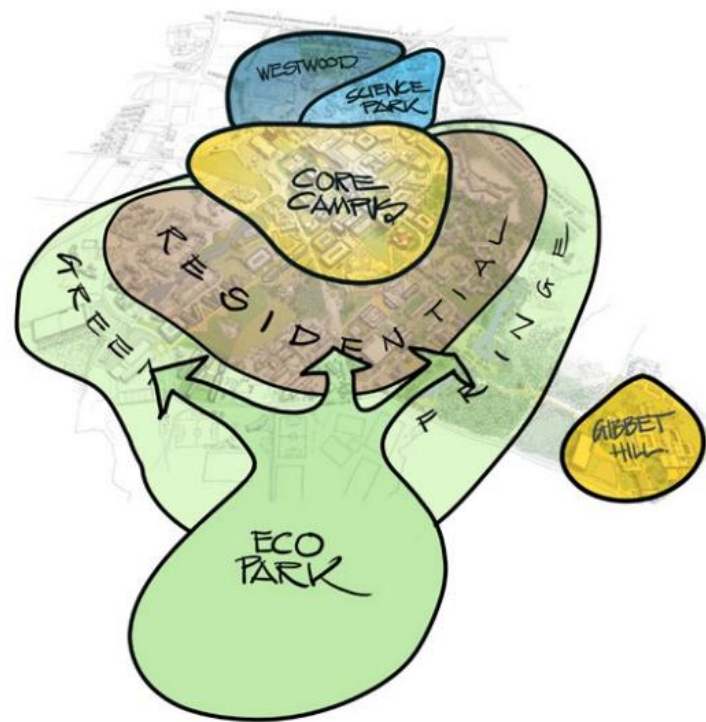
SP6:

To deliver a SMART¹, sustainable and low energy campus.

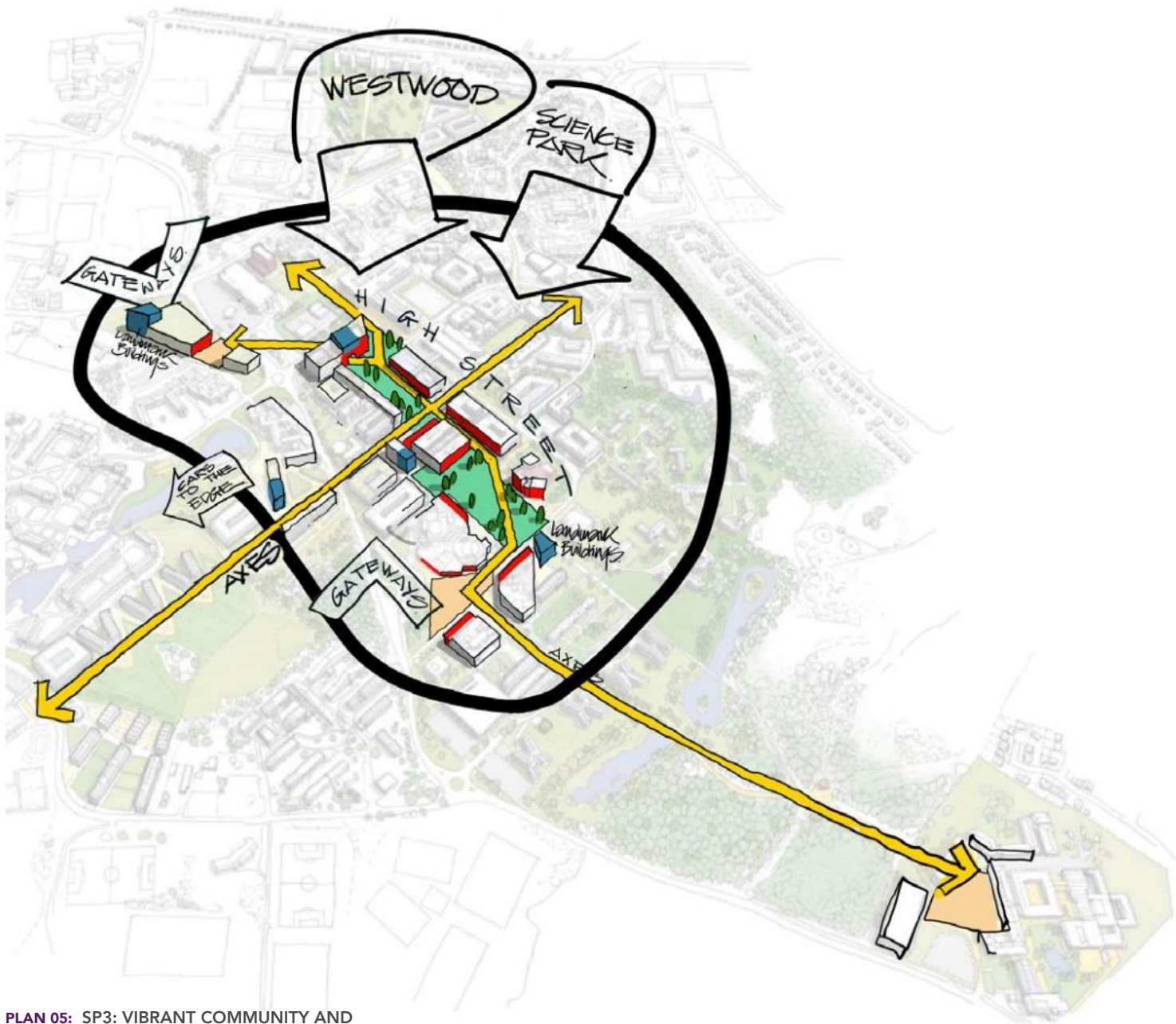
¹ The University aims to create a digitally connected campus for more efficient operations and a better user experience by integrating technology and data at the heart of campus design.



PLAN 04: SP1: REGIONAL CONNECTIVITY AND
SP2: INNOVATION AND OTHER DEVELOPMENT OPPORTUNITIES



PLAN 06: SP5: COSMOPOLITAN IN THE COUNTRYSIDE AND
SP6: SMART AND SUSTAINABLE CAMPUS



PLAN 05: SP3: VIBRANT COMMUNITY AND
SP4: ACCESSIBILITY AND INCLUSIVITY

The University's main campus on the south-west edge of Coventry is the focus for its activities in the region, which also extend to the Stratford-upon-Avon Innovation Campus at Wellesbourne in Stratford, University Hospital Coventry, and potentially a new healthcare presence at Arden Cross in Solihull. To support continued innovation and effective working across its locations, the University will work with partners to secure improved regional connectivity including new transport investment in the long term, seeking to enhance local accessibility and mitigate any impacts on surrounding communities.

The University's vision for the main campus is to be 'cosmopolitan in the countryside'. This refers to the academic life of the University, and both the scale and quality of design of new buildings within the context of the natural greenspaces and wider countryside setting of the campus. These are important contributors to the character of campus and, through concentrating new development in the core with new landmark buildings, the creation of new vistas and public spaces, it will foster a more distinctive sense of place and better legibility for those visiting campus.

Development in the short to medium term (to 2033) will in the main be within the core campus, creating the first of two new University Greens and developing a 'high street' supported by two strong axes linking to the periphery of campus and surrounding communities to the west and north. This is to be part of an extensive pedestrian and cycle network, the aim being to bring the activity of the University out into the open rather than hidden within buildings, with more active ground floor uses and active public spaces.

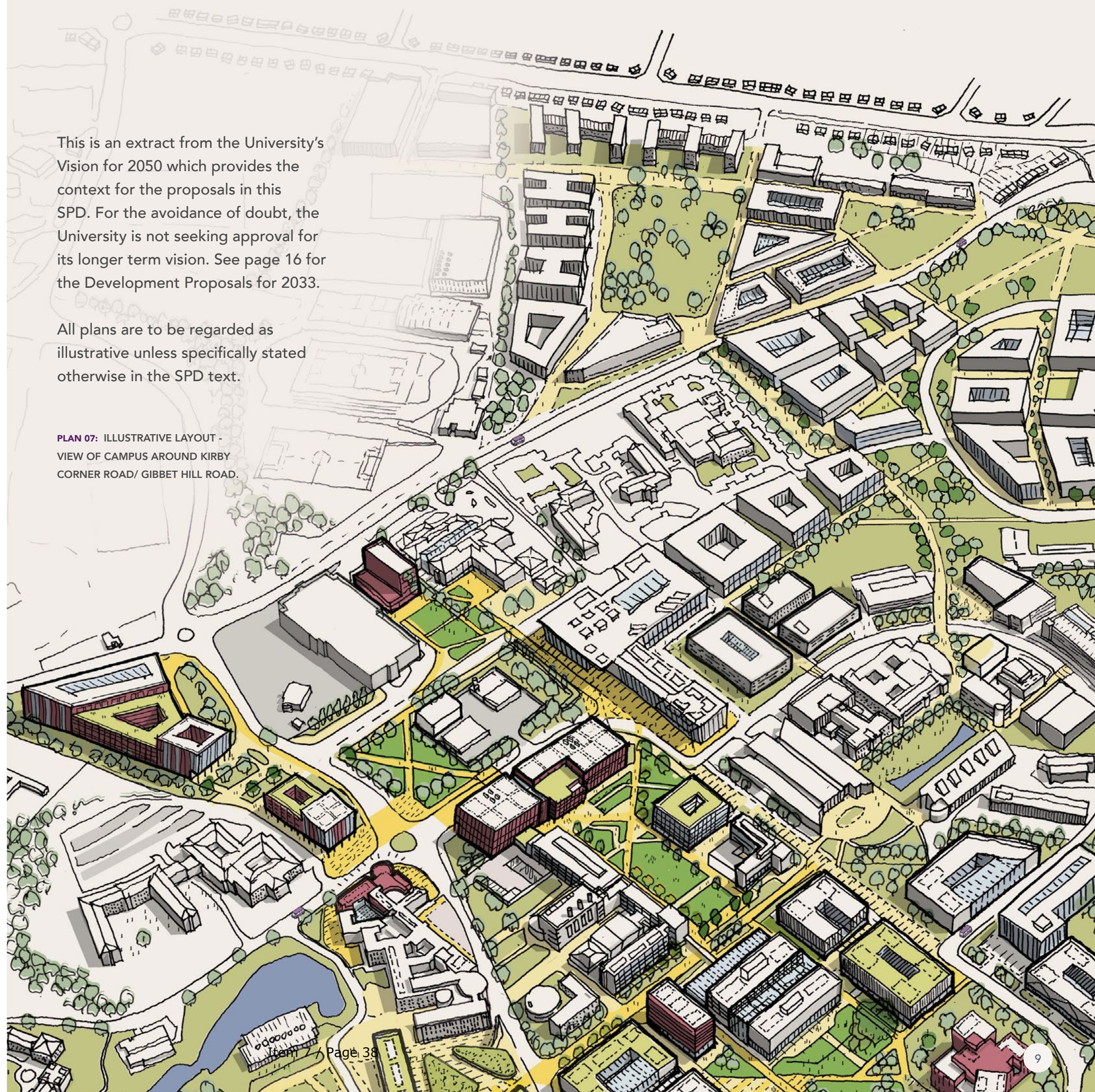
The University is already implementing a new transport and movement strategy which has seen some car parking removed from the centre of campus and provided around the edge – at Kirby Corner and Lynchgate. This process will continue with further changes to parking when opportunities arise (within the existing maximum cap) and the provision of mobility hubs around campus to further support active travel.

The overarching ambition is to achieve Net Zero carbon from direct emissions and energy by 2030 and through indirect emissions by 2050. This is in line with national and local policies including the adopted Net Zero Carbon DPD and SPD. It will include radical change to energy efficiency and on-site generation, designing in sustainability to new buildings and retrofits, delivering biodiversity net gain on campus, and developing our climate change resilience.

This is an extract from the University's Vision for 2050 which provides the context for the proposals in this SPD. For the avoidance of doubt, the University is not seeking approval for its longer term vision. See page 16 for the Development Proposals for 2033.

All plans are to be regarded as illustrative unless specifically stated otherwise in the SPD text.

PLAN 07: ILLUSTRATIVE LAYOUT -
VIEW OF CAMPUS AROUND KIRBY
CORNER ROAD/ GIBBET HILL ROAD.



Design Principles

Guiding future development

To deliver on these strategic principles, the University has developed six key Design Principles to guide future development on campus. These are:

DP1:

Campus Core and Periphery

DP2:

Axes and Hubs

DP3:

Pedestrian-Focussed

DP4:

Active Public Spaces

DP5:

Landmark Design

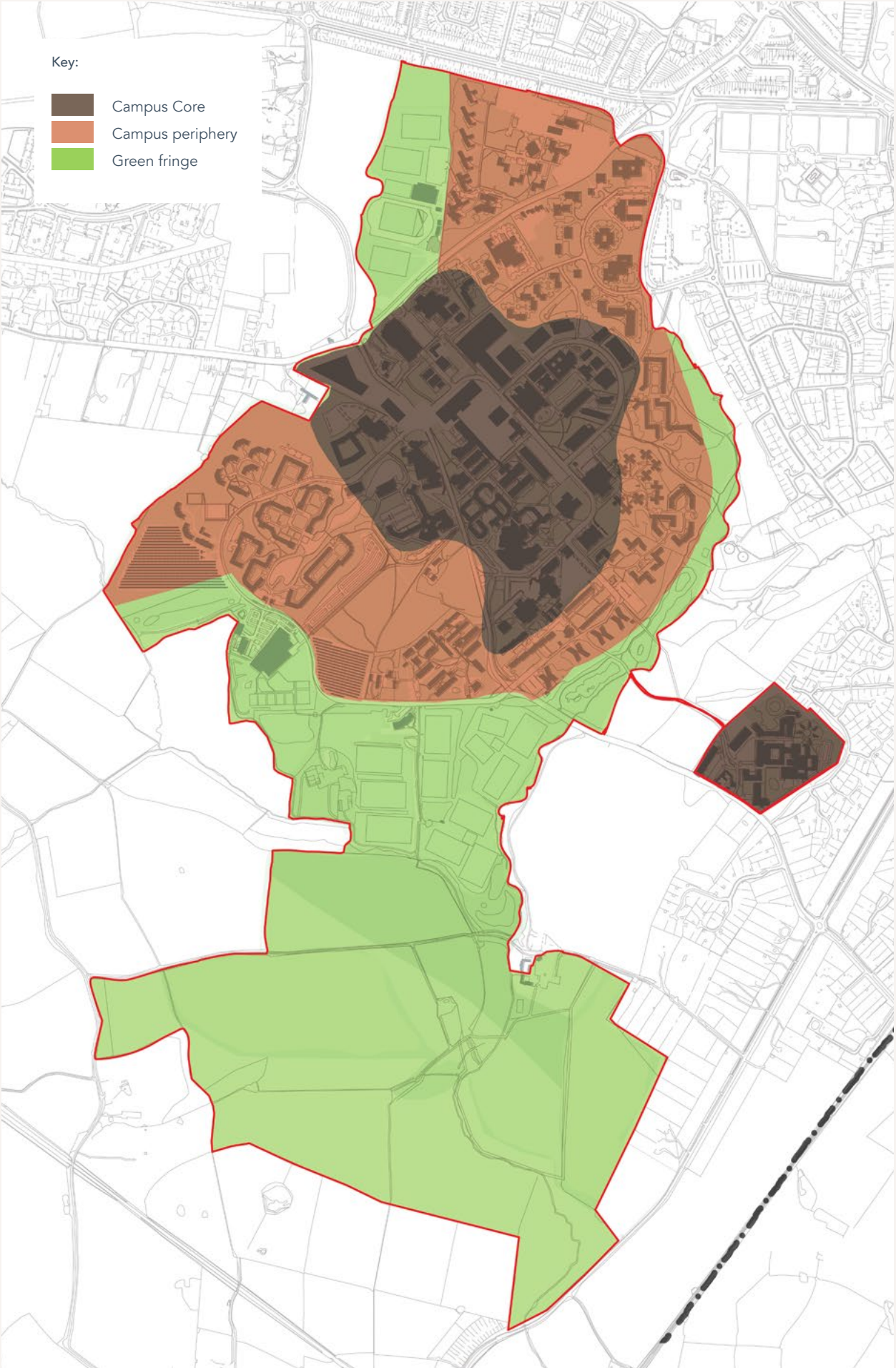
DP6:

Integrating Nature

DP1: Campus Core and Periphery

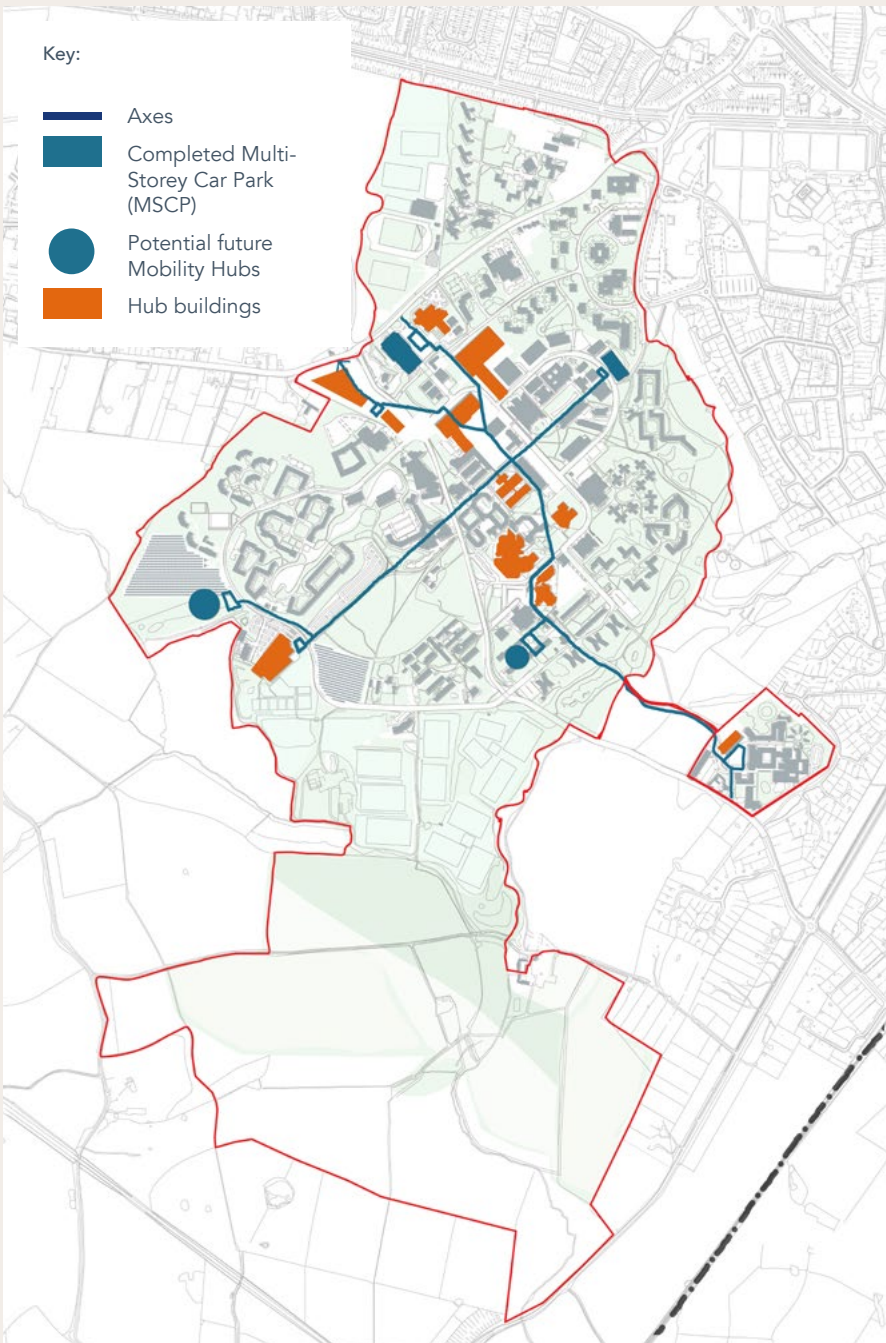
- A. Primarily academic uses will be concentrated within the core campus as defined on Plan 08, including Gibbet Hill.
- B. Higher density development and taller buildings will be permitted in the Core Campus, subject to the application of other design principles (and relevant local policies) to ensure high quality.
- C. The Campus Periphery will generally not be appropriate for higher density development, particularly in close proximity to sensitive greenspace or neighbouring residential areas.

PLAN 08: CAMPUS CORE AND PERIPHERY



DP2: Axes and Hubs

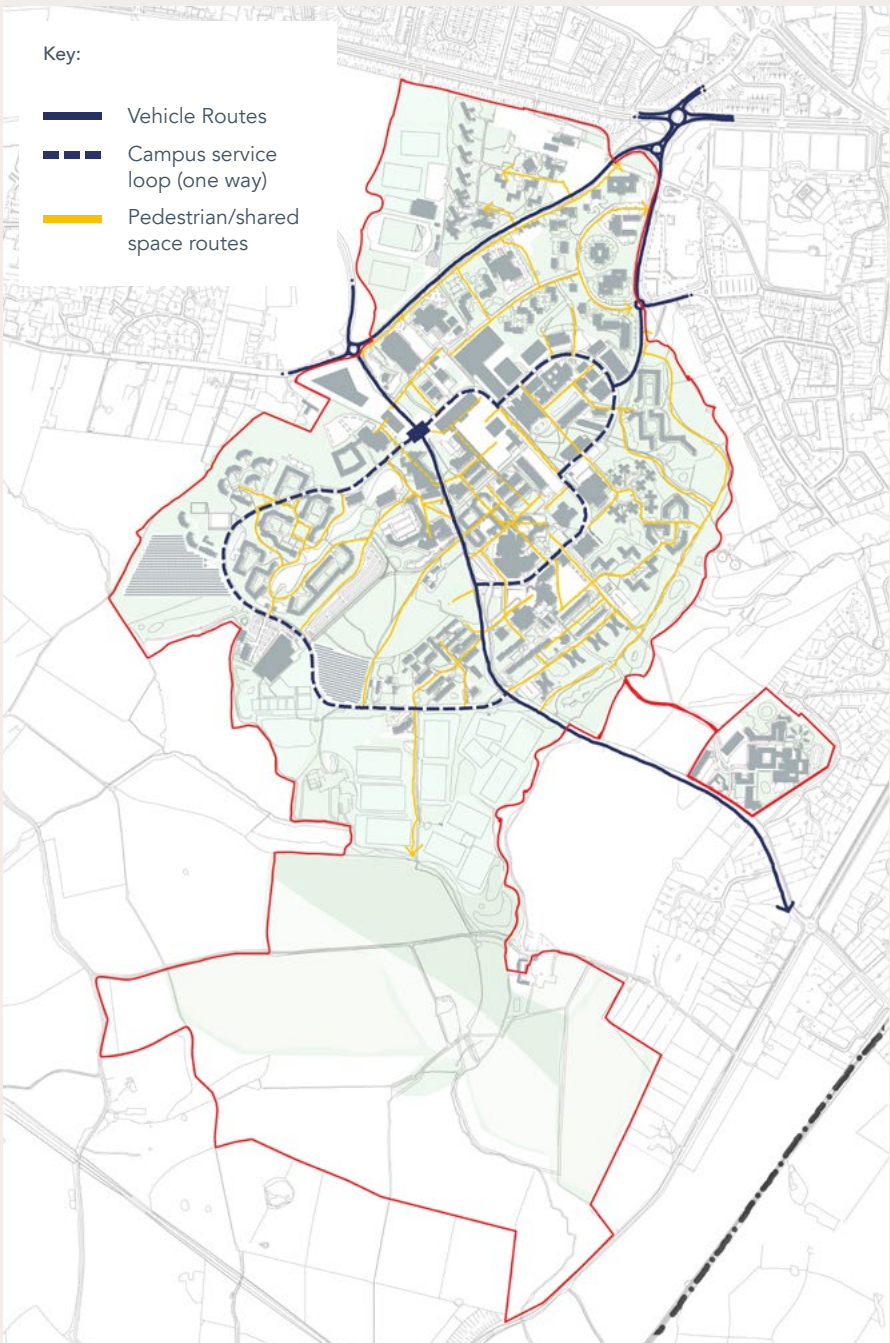
- A. The focus of activity and movement around campus will be on two primary axes – one from University House to Gibbet Hill and the other from Academic Square to the Sports Hub.
- B. These will connect a series of buildings, active public spaces and future mobility hubs (refer to page 22). where key University activities are based, and which provide access to a variety of travel options.
- C. Car parking will be progressively removed from the core campus and, if replaced, this will be around the periphery (refer to Plan 15 on Transport and Movement).



PLAN 09: AXES AND HUBS

DP3: Pedestrian-Focussed

- A. To transform the campus with a more pedestrian-focussed public realm, the University will create a one-way circulatory route to minimise traffic within the core campus whilst maintaining access to service yards, for blue badge parking and emergency services.
- B. This will be supported by an extensive pedestrian and cycle network which will be expanded over time, supplemented by effective wayfinding additional detail on cycling measures is provided at page 20.
- C. Where opportunities arise as part of new development, and can safely accommodate all users, the pedestrian environment will be further enhanced through consideration of the use of shared surfaces, downgrading of road space, environmental improvements including sensitively designed and located street furniture and potential closures (refer to Plan 16).



PLAN 10: PEDESTRIAN FOCUSED

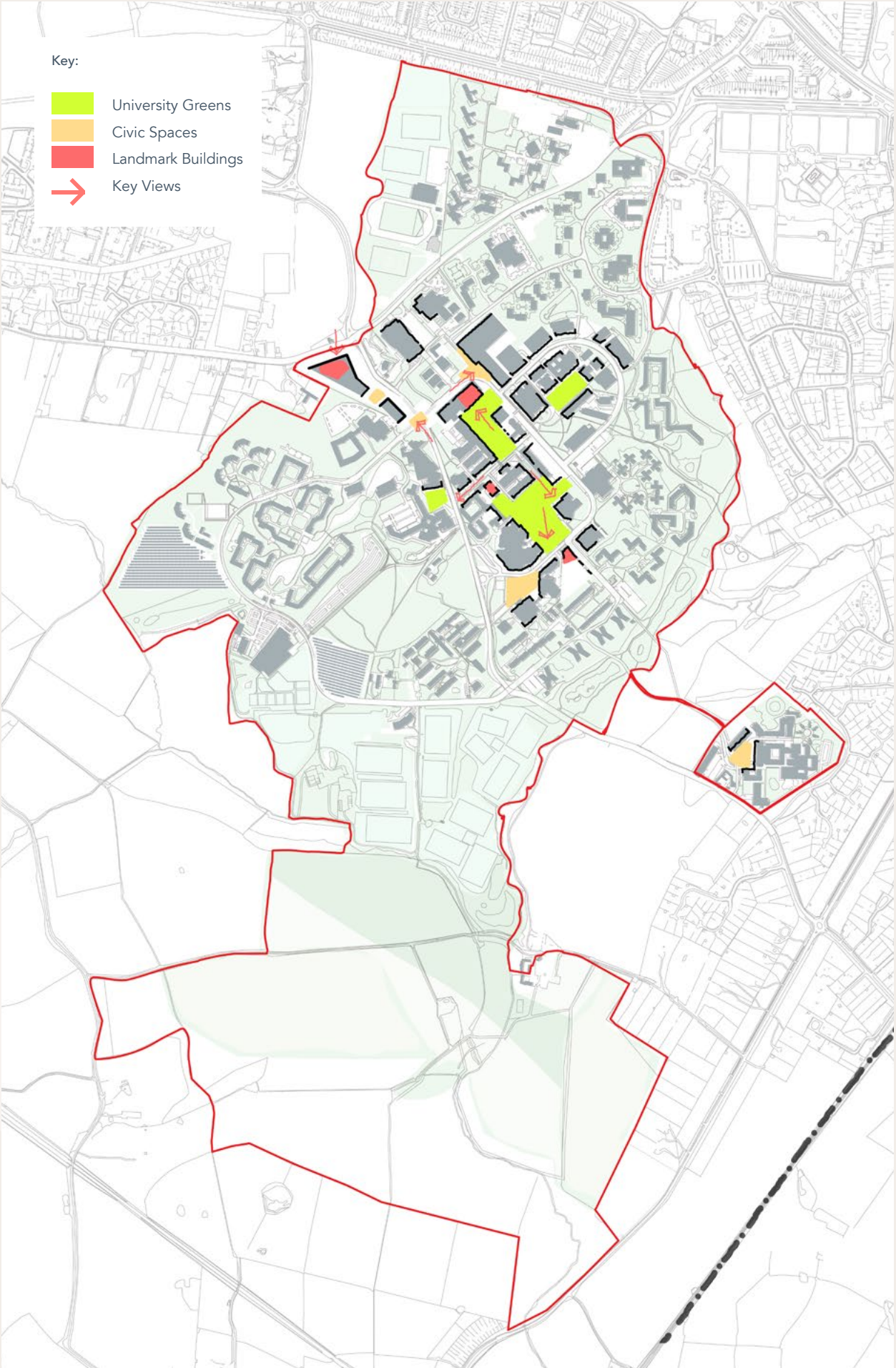
DP4: Active Public Spaces

- A. To support a more pedestrian-focussed campus around the primary axes and hubs, the University will create more active public spaces for users of campus to enjoy a greater sense of community, including formal squares and greenspaces.
- B. New developments will incorporate and/or support active public spaces including, where suitable, active frontages within buildings for small scale ancillary retail, study areas, informal meeting space or other community uses.
- C. As part of the Science and Engineering Precinct development, a new University Green will be created between University Road and Library Road at the junction of the two primary axes.

DP5: Landmark Design

- A. The design of new and refurbished buildings will reflect the character and modern vernacular of the University campus, differentiating scale and design between the Core and Periphery
- B. Buildings in locations indicated on Plan 11 will be designed to provide landmarks and visual markers at the end of views within the campus to contribute to a sense of place and clear identity.
- C. Materials will be selected to provide the right balance between coherence and contrast so that buildings fit harmoniously with their surroundings, but also have emphasis and interest where necessary.

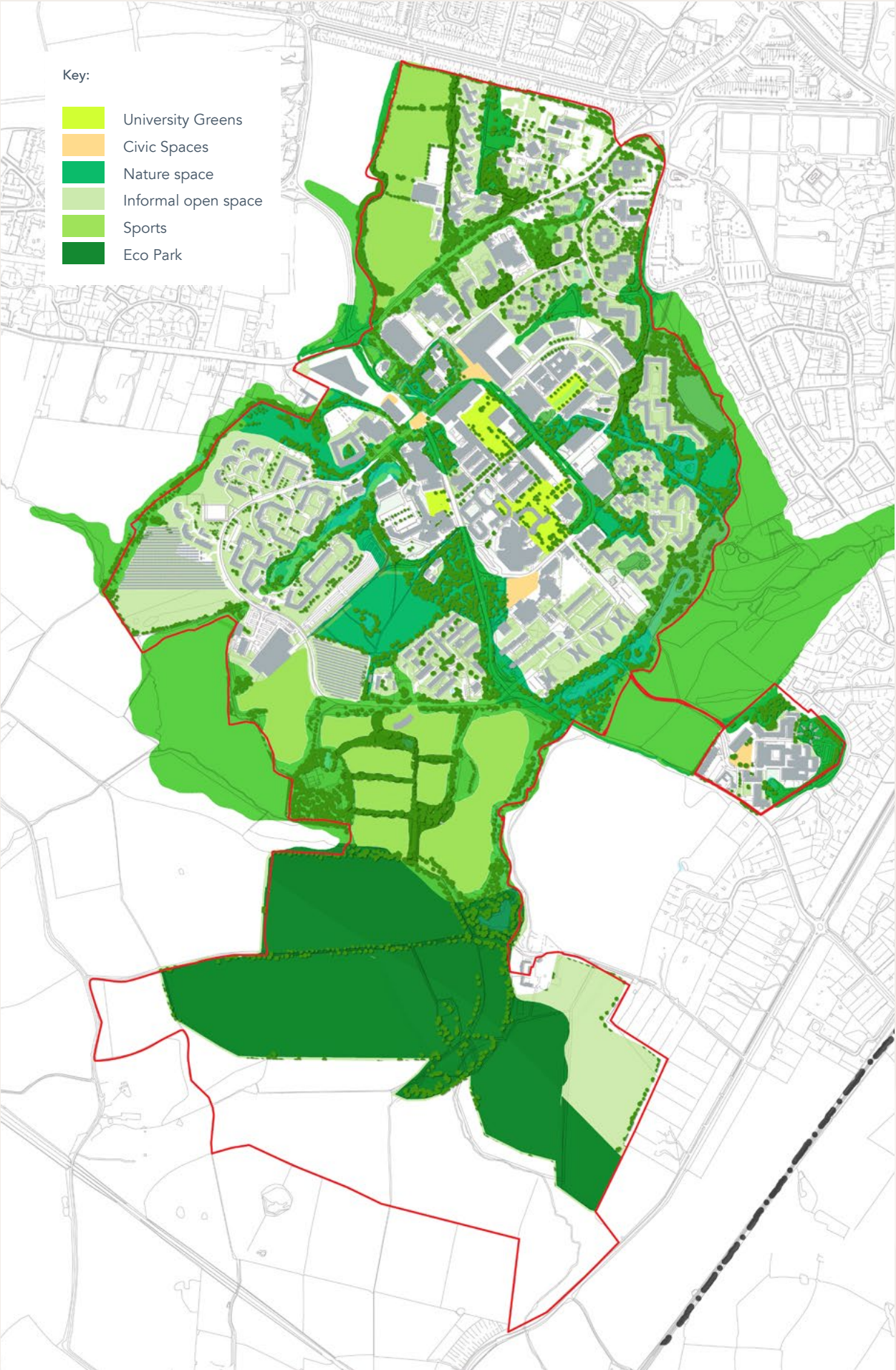
PLAN 11: ACTIVE PUBLIC SPACES



DP6: Integrating Nature

- A. The formal and informal landscapes of the campus contribute to its character and should, wherever possible, be incorporated into and enhanced by new development.
- B. This will include a 'layered'¹ approach to green and blue infrastructure to ensure the integration of nature and the creation of connected habitats and ecological corridors such as green roofs, green walls and rain gardens.
- C. Outside of the core campus, this will take a more informal and naturalistic approach to enhance biodiversity (see section on Ecology and Biodiversity).
- D. Tree planting will be designed to add structure to the public realm and contribute to the identity and character of spaces and routes.
- E. Subject to the return of land from HS2 and decisions about future infrastructure, the University will create an 'Eco-Park' in the south of campus comprising ecological, recreational and potentially energy generating uses (proposals for any such uses to be addressed against relevant Green Belt policy at the time of submission).

¹ A 'layered' approach to landscape means a 3-dimensional combination of planting types and habitat features, such as an upper layer of roof gardens, green walls and trees, alongside a middle layer of hedgerows and shrubs, and a lower layer which may include a diverse mix of species and planting types, for example perennial planting, raingardens, meadow grassland and bulb planting within grass. The intent being to create species diversity and a more connected environment for wildlife.



Development Proposals to 2033

Areas of Change

This SPD covers the next ten years to 2033, reflecting the University’s Capital Plan for future investment in new buildings and infrastructure. These arise from the longer term vision to 2050 set out earlier. There are five specific projects, two of which are already in the planning process. These are:

- 1. The Social Science Quarter including new Business School and repurposing of existing Social Sciences buildings
- 2. The Science and Engineering Precinct - redevelopment and refurbishment of STEM facilities in central campus and creation of a new University Green
- 3. New Energy Innovation Centre
- 4. Extension of Scarman House, Post Experience Centre, including additional bedspaces
- 5. Solar arrays – large-scale photovoltaic installations to generate renewable energy.

In addition, the University anticipates providing 1,200 net additional student bedspaces on or close to campus, either through direct development or in conjunction with private developers (what is known as Purpose Built Student Accommodation).

In conjunction with the highway authorities, the University has modelled the traffic generation from 31,000 sq.m. of new academic development over and above the recent approval of the social sciences quarter, which used up floorspace previously approved in 2018. This includes the above projects and makes an allowance for a further net 13,000 sq.m. of academic floorspace to allow for other projects to come forward over the period to 2033.

There are a further 11 potential projects which may come forward before 2033. The University has yet to make final decisions and therefore the SPD identifies these as areas of likely future development. They could be for academic, residential or other purposes related to the University. Should one or more of these projects come forward, they would be considered against the remaining capacity in floorspace terms and the Design Principles set out above.

The areas of likely future development are:

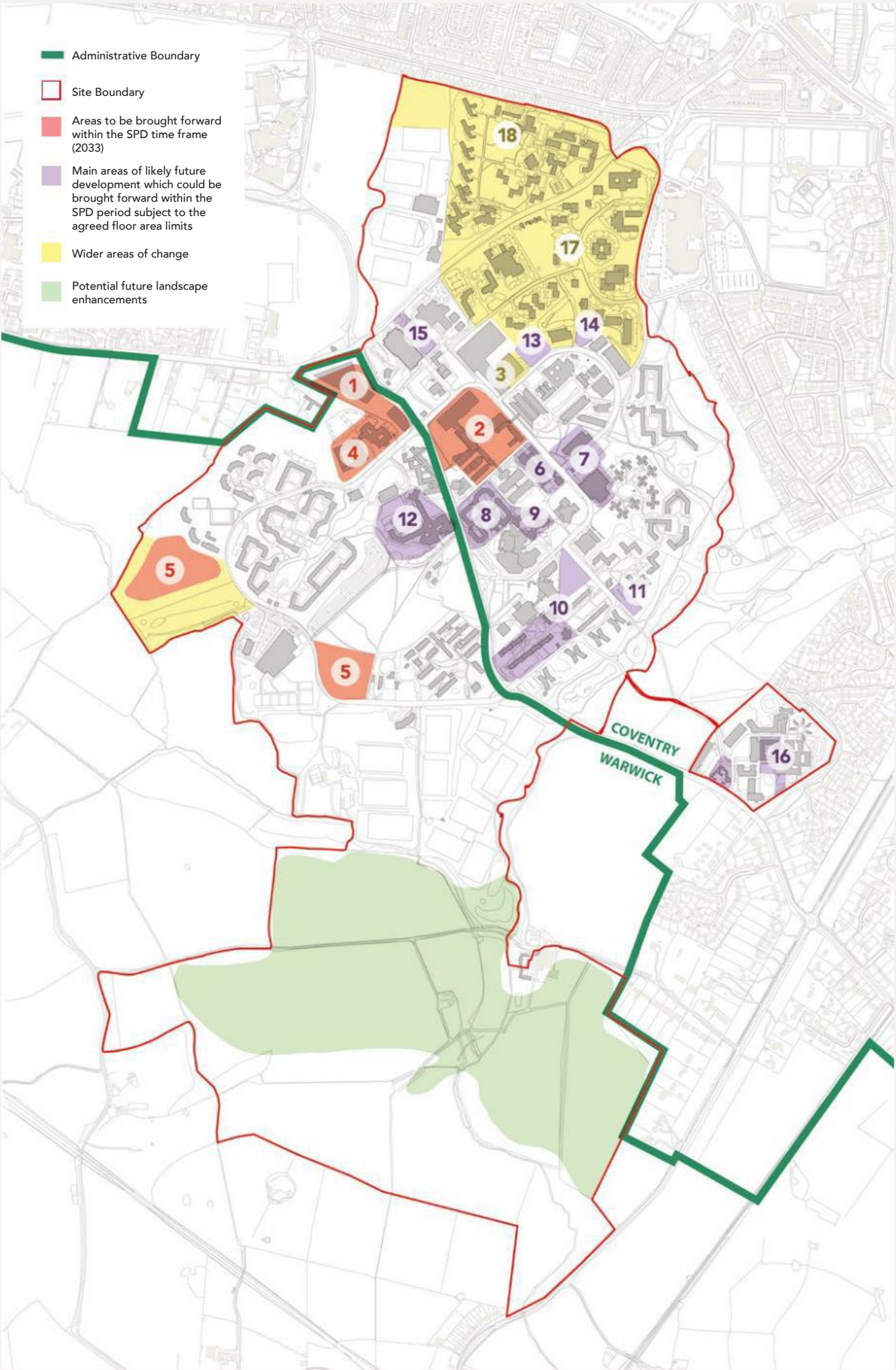
- 6. Humanities Building – part vacated since completion of the new Faculty of Arts
- 7. Sports Centre – in temporary use for examinations since completion of the new Sports Hub
- 8. Social Sciences block off Library Road – to be replaced by new Social Sciences Quarter
- 9. Senate House – may become surplus to requirements as administrative needs change
- 10. Whitefields and Rootes residences potential for redevelopment
- 11. Health Centre – dependent upon replacement elsewhere on campus
- 12. Radcliffe House – potential for redevelopment of MBA Training Centre
- 13. Land to rear of Lord Bhattacharya Building
- 14. Site adjoining Degree Apprenticeship Centre
- 15. Surface car park between Kirby Corner car park and University House
- 16. Gibbet Hill – older buildings in central block, retaining the farmhouse

There are two further areas of wider change which sit outside of the SPD proposals.

- 17. University of Warwick Science Park – consideration may be given to selective redevelopment at higher density which will need to be considered on its merits.
- 18. Westwood campus – over the medium to long term, there will be further change at Westwood campus and consideration will be given to a comprehensive masterplan for potentially mixed use development which again would need to be considered on its merits.

In the south-west corner of campus, land will be retained to accommodate a new route from the potential transport corridor and which would create a new gateway into campus.

PLAN 13: AREAS OF POTENTIAL CHANGE



Ecopark

To the south of campus, within the area designated as Green Belt, the University will continue to explore the creation of an Eco-Park dependent on the return of land from HS2 Ltd and any other infrastructure requirements. The Ecopark concept foresees landscape enhancement to create an accessible resource for the University and local communities including ecological assets, open recreational areas and renewable energy generation, consistent with Green Belt policy whilst remaining compliant with local and national planning policy.

Sports

The provision of open space and facilities for outdoor sport and recreation helps underpin people’s quality of life and a sense of belonging within a community. The University’s ongoing desire is for the campus to have modern, equitable, well-maintained and accessible open spaces, sports, leisure, and recreational facilities, to enable the University to enrich lives through active living and enable students to fulfil their potential through sport. This will be particularly important in circumstances where new campus developments or services are creating demand for additional or enhanced facilities.

The University currently has a mix of sports facilities on campus ranging from older buildings and amenities through to sector leading sports facilities.

The University attracts a growing population of dual-career and performance sports student athletes, which means there is a need to consider the quality and longevity of the campus’s specialist sports facilities. In addition, the University aspires to create a campus where physical activity is the norm and consider that there is opportunity to create accessible routes through and around campus which are safe for cycling, running and walking all year round.

Residential Accommodation

The University of Warwick currently provides accommodation for c7500 students on campus (as of February 2024). The University’s aspiration is to continue to investigate the increase of its stock of student accommodation and renew existing accommodation, with a view to ensuring that at least the current ratio of on/ immediately adjacent to campus accommodation to students is maintained.

The number of students attending the University is expected to grow by the year 2033. The University’s aspiration is to increase the number of student bed spaces serving the University by c1200 by 2033, either within or immediately adjoining the campus.

There are a number of locations within the SPD boundary where student residences could be considered, creating accommodation which is of high-quality set within the University campus. However, the exact amount and locations are not yet determined. Any proposals for new student accommodation would be guided by the design principles and other criteria as set out in this SPD and in the adopted Local Plans.

Students attending the University also live in a variety of other accommodation, including purpose-built student housing (PBSA) provided by private developers. Should the private sector deliver student bedspaces adjacent to the campus, in line with Local Plan policies, the University will likely reflect this in its ambitions for its own provision on the campus itself.

The provision of student accommodation either within or immediately adjacent to the campus supports students to walk and cycle to and within the campus, consistent with the University’s mobility strategy, which is explained further in the Transport and Movement section of this SPD.

All first-year students are able to live on campus if they desire. Beyond the first year, students typically move off-site, except those in accessible units who can stay throughout their studies.

From data compiled in February 2023, the spread of term-time student residences in Coventry and Warwick District is roughly as follows:

• On Campus	7,500
• PBSAs on the collar of campus	2,300
• Coventry (excluding PBSAs on the collar of campus)	10,000
• Kenilworth	400
• Leamington Spa	4,300
• Warwick	200

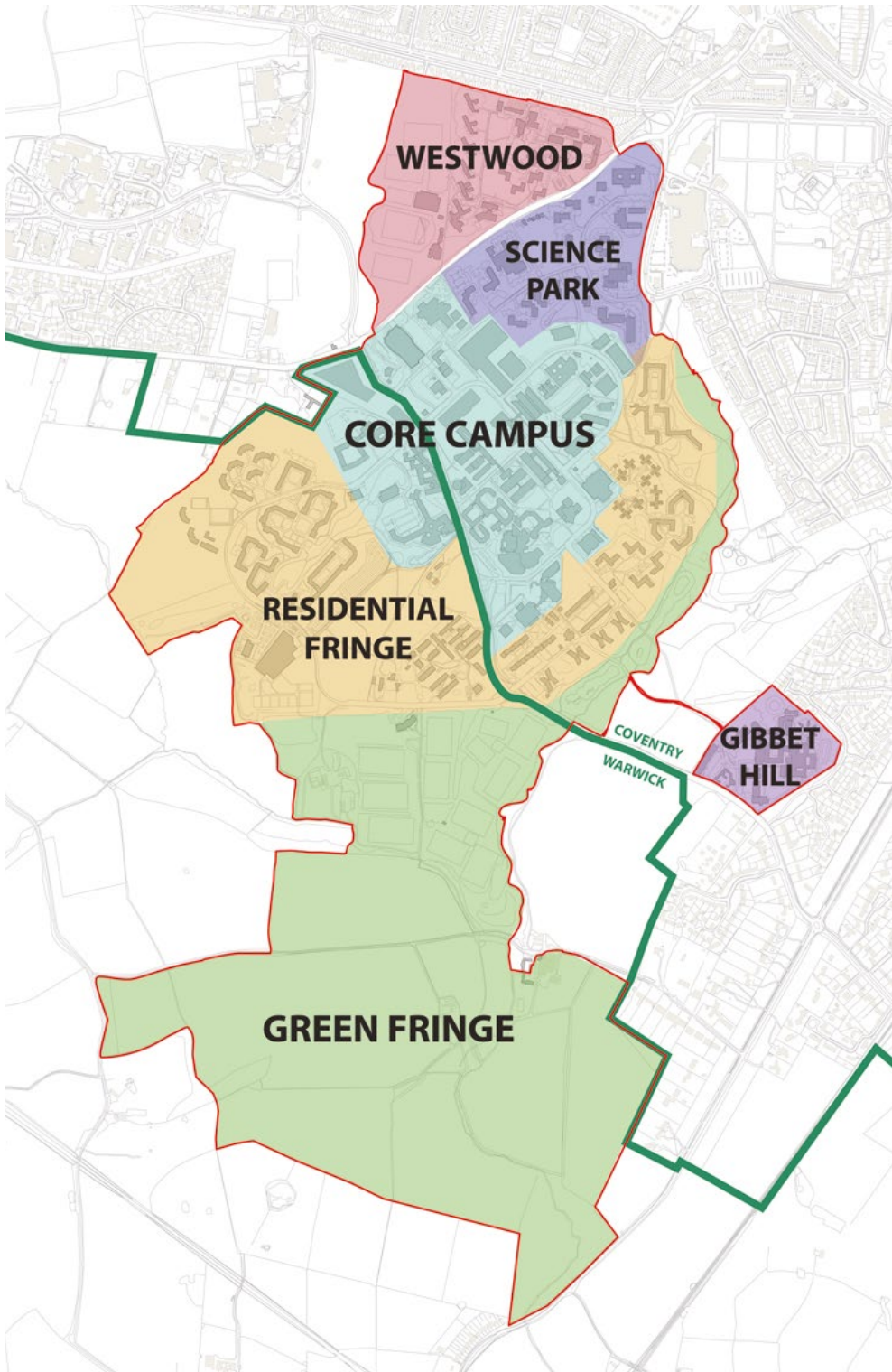
These figures are approximate, reflecting a snapshot of enrolment data.

Recent enrolment and bus usage data shows a notable decrease in students living in Leamington Spa compared to previous years and an increase in Coventry city centre and in PBSAs on the collar of campus. This reflects the availability of PBSA and students’ evolving accommodation preferences.

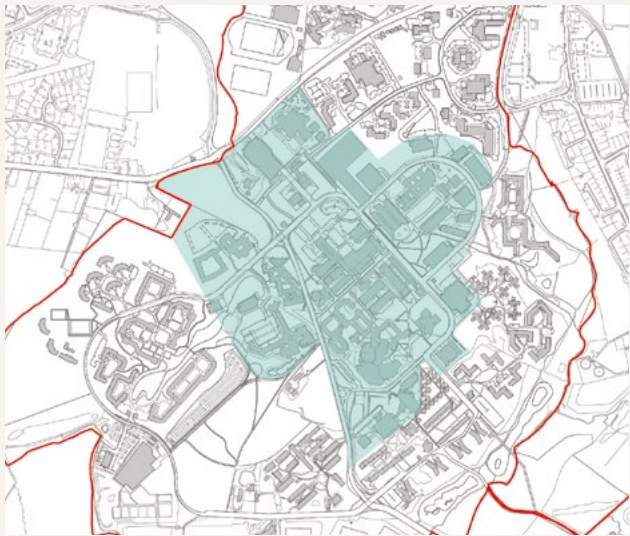
Character Areas

Strategic and design principles

To assist in applying the strategic and design principles across campus, this SPD describes the character of six areas shown on Plan 14 and provides guidance on the future development of each should other proposals come forward within the period to 2033. These reflect the long term vision for the campus to ensure consistency of approach.



PLAN 14: CHARACTER AREAS



Campus Core

As set out in DP1, the majority of academic and teaching buildings are located in the campus core identified on plan 11. There have been some significant developments within this area over recent years including the Faculty of Arts Building which was shortlisted for the Stirling Prize in 2023. Over the period to 2033, two major new building clusters will be completed – the Science Precinct and Social Sciences Quarter – alongside the formation of a new University Green. This is part of a strategy to increase the density of the campus core whilst not compromising the quality of public spaces.

The aim is for the campus core to become more pedestrian friendly with one of the primary axes diverted through the heart of campus to create a pedestrian 'High Street' with active ground floors overlooking lively public spaces (see DP2 and DP4). In addition, vehicle traffic will be minimised through the campus core with improved opportunities for active travel and more shared-space environments (see DP3).

The mix of uses in the campus core will include primarily academic and teaching space, with student facilities and some student residential accommodation, more food and drink facilities, places for public engagement, innovation and what are called 'collision' and dwell spaces to help to maintain a sense of vibrancy at different times of the day. There is scope for higher-density and taller buildings within the campus core with locations for a number of landmark buildings to assist in legibility (see DP5).



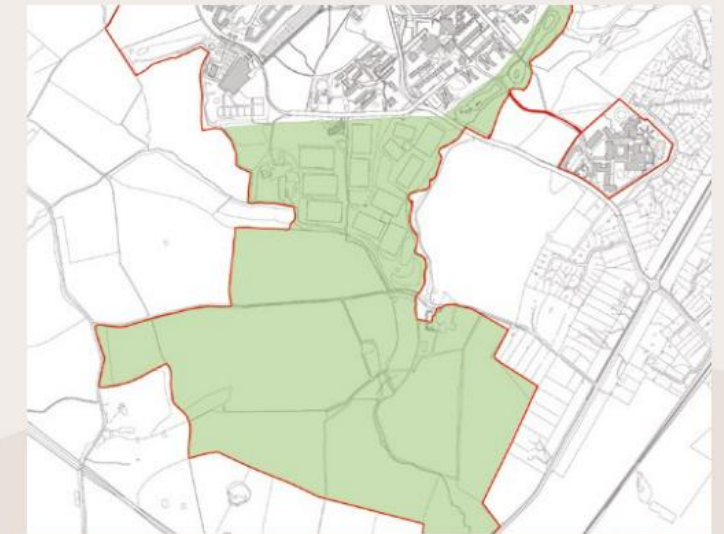
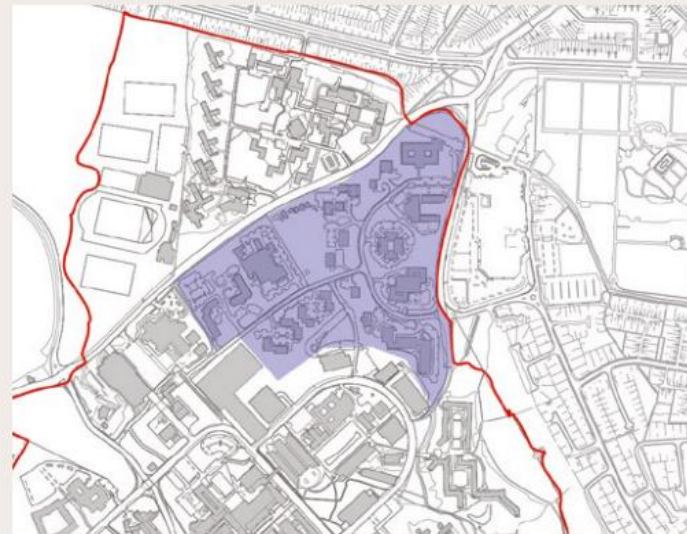
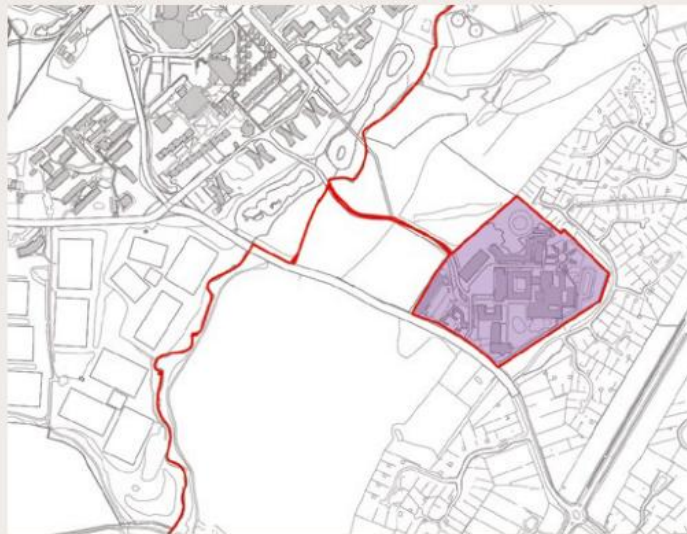
Residential Fringe

The residential fringe describes the south and east of the built-up area of campus which has a very different character. They are lower density, more domestic in scale and set within a mature landscape, in most cases bordering greenspace. Any new development will respect and enhance this character.

Development will be landscape-led, with buildings sitting within a preserved and enhanced mature landscape. However, a contemporary approach to architecture will be encouraged. The character and scale of any new buildings can vary between locations close to the campus core and the edges of campus. For example, the recent Cryfield development is sensitively designed across a range of heights to suit the landscape setting and respect mature trees.

The existing landscape character across this area will be maintained and existing trees protected. New and existing landscape will be managed to increase biodiversity (see DP6) and any new development will incorporate natural drainage features to achieve a greenfield runoff rate.

New residential accommodation will be designed to minimise car access and will include no new parking other than blue badge. Access will be via the one-way circulatory route around the campus (see DP3) to allow servicing, access to blue badge parking and emergency services. This may be accompanied by Very Light Transport (VLT) to service residents and pedestrian and cycle routes will be enhanced where possible.



Gibbet Hill

Gibbet Hill is part of the campus core because it houses Warwick's Medical School, Biomedical and Life Sciences Buildings although it sits slightly apart from main campus, separated by Tocil Wood. It includes the recently completed Interdisciplinary Biomedical Research Building.

The vision for Gibbet Hill is to enhance the connection to main campus and consolidate the existing building stock, with better connectivity between buildings and public realm, the opportunity to provide new amenity space for students and potential opportunities to incorporate SUDs into the hard landscaping. A gateway feature such as a sculpture or a green entrance could mark the access from the road.

Any development at Gibbet Hill will be in the spirit of the contemporary architecture on campus whilst sensitively responding to heritage assets, namely the Grade II* Listed Houses for Visiting Mathematicians, and the pre-existing Gibbet Hill Farmhouse. Any new buildings will be more modest in scale than the rest of the Campus Core and will respect surrounding residential neighbourhoods.

Science Park

The Science Park is owned by the University and operated by a separate company. It is situated on the northern edge of campus adjoining Cannon Park District Centre. It is characterised by low density buildings in landscaped grounds providing accommodation for research and development businesses. It is one of the earliest Science Parks in the country.

There is scope for modernisation and intensification at the Science Park in future which may include development on surface level car parks and some redevelopment. It will continue to be focussed on business and research activities related to the University, not primarily academic or residential use.

Given the difference in uses, car parking at the Science Park is treated separately from the rest of campus and would be subject to separate traffic assessment.

Westwood

The Westwood Campus was formerly the Coventry College of Education on a site across Kirby Corner Road, adjoining the residential suburb of Canley. It has had a mix of academic, conference, residential and sports uses, including the University Tennis Centre and running track.

As some of these uses are rationalised, the University is considering options for the future of the built-up part of Westwood and some redevelopment may come forward within the period to 2033. Uses are likely to include student accommodation, general housing and business/research uses linked to the Science Park but there are no firm plans.

Any development at Westwood will be more domestic in scale than the campus core, particularly around the edges of the site, to respond appropriately to neighbouring residential areas. Development will respect the landscape features and setting of the site.

Green Fringe

The green fringe includes all those parts of the University's landholdings where no significant built development is anticipated, including the Tocil Wood Nature Reserve which wraps around the eastern side of main campus. The bulk of this area lies south of Leighfield Road, which sits within the Green Belt as defined in the Warwick District Local Plan and is characterised by sports pitches to the north of Cryfield Grange Road and agricultural land to the south. A significant strip of land is impacted by HS2.

The University has an ambition to create an Eco Park in this area, providing recreational opportunities for the campus and local communities by increasing accessibility for walking and cycling, improving biodiversity (see DP6) and potentially generating renewable energy to support the Net Zero Carbon strategy. Existing trees and habitats will be retained and enhanced.

Any proposals within the Green Fringe should be set a minimum distance of 8m from the top bank of any watercourse.

Supporting Strategies

One of the main reasons for producing an SPD is to ensure that future developments come forward within the scope of campus wide strategies on:

- Transport and Movement
- Sustainability and Energy
- Ecology and Biodiversity
- Flood Risk and Drainage
- Heritage and Archaeology

Transport and Movement

Key relevant planning policy:

The NPPF notes that Transport issues should be considered from the earliest stage of plan making and development proposals so that

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Coventry Local Plan

AC1- Accessible Transport Network

states that development proposals which generate additional trips on the transport network should promote a choice of transport modes, consider the accessibility needs of all residents and visitors, support the delivery of new and improved high quality public transport, and actively support the integration of future intelligent mobility infrastructure.

AC2- Road Network

aims to mitigate and manage any traffic growth generated by proposed development. The primary focus of the policy is on demand management measures including promoting sustainable modes of transport, and secondly on the delivery of appropriate highway capacity interventions.

AC3- Demand Management

sets out the Council’s expectations for assessments, reports and parking standards for the validation of proposed development applications.

AC4- Walking and Cycling

states that development proposals should incorporate safe and convenient access to walking and cycling routes.

AC5- Bus and Rapid Transit

sets out the expectation for major development proposals to incorporate safe and convenient access to the existing bus network.

The **Air Quality SPD** adopted by Coventry City Council in 2019, provides guidance for development proposals and is relevant to Transport. The SPD states that consideration must be given to the air quality impacts associated with proposed development and that mitigation should be incorporated from an early design stage.

Warwick District Local Plan

TR1- Access and Choice

states that the Council will only permit development where it provides safe, suitable and attractive access routes for pedestrians, cyclists, public transport users, emergency vehicles, delivery vehicles, refuse vehicles and other users of motor vehicles.

TR2- Traffic Generation

sets out development Council’s expectation that all large-scale development that will result in significant traffic movements will be supported by a Transport Assessment and Travel Plan where relevant.

TR3- Parking

aims to control and manage the expectations of parking provision of proposed developments.

TR4- Safeguarding for Transport Infrastructure

sets out land within the District safeguarded from development. These include the land required for High Speed Rail 2 and areas of search for park and ride.

The **Air Quality and Planning SPD** adopted by Warwick District Council in 2019 is broadly similar to the Coventry Air Quality SPD and provides guidance on local air quality, and the level of proposed mitigation required to make any scheme acceptable.

The **Warwick District Council Parking Standards** sets out the expected amount of vehicle and cycle parking to be provided for all types of development, and guidance and design principles for its integration into development proposals.

Other Considerations

West Midlands Local Transport Plan 5

The University endorses TfWM’s Local Transport Plan (LTP) 5 which sets out policies to promote safe, integrated, efficient and economic transport to, from and within the region. The statutory policy has a vision “for creating safe, reliable and affordable connections for everyone that are healthy, sustainable and efficient to create great places where generations will thrive”. This is to be achieved through implementing a range of plans and strategies with the overarching aims to reduce single occupancy car usage and promote public transport and active travel.

Coventry Area Strategy

As set out in TfWM’s LTP Core Strategy, an Area Strategy for Coventry is being developed in partnership between TfWM and CCC to apply and tailor principles and policies from the LTP to the local area. The University will work with TfWM and CCC to identify transport interventions for neighbourhoods around the campus and along key transport corridors to support the transport and movement objectives of this SPD.



Transport and Movement Strategy

The University's goal is to reduce indirect carbon emissions generated through all forms of transport and mobility to achieve net zero by 2050. To achieve this, the University will continue to work closely with its communities as it introduces, tests and champions greener, cleaner forms of transport.

The University identified transport and mobility as a key strategic workstream in 2018 and have been taking positive steps since then to tackle the way its community collectively chooses to travel and move goods. A close collaboration with local and regional authorities has seen the campus as a testbed for new and emerging transport technologies. For example, the Future Transport Zone partnership between the University and TfWM brought showcase project to campus such as e-scooters, car clubs, demand-responsive services which has brought about significant progress in transport innovation.

The overarching aim has been, and will continue to be, to reduce the single occupancy private vehicle usage whilst providing viable non-car alternatives for campus users to consider. This is embedded within the University's Travel Plan which was subject to a comprehensive review and refresh in 2024, supported by extensive surveys and to be monitored biennially against ambitious targets.

When originally conceived, one of the major benefits of the campus' semi-rural location was its accessibility by car, away from the congestion and transport issues of many cities. But nearly 60 years on, the growth of the University and of car ownership has resulted in peak hour congestion on local roads, which not only impacts on campus users who travel by car but also those traveling by bus; resulting in travel delays and capacity constraints.

Over the last five years the University has taken extensive steps to reduce car dependency and promote sustainable travel options for campus users. These targeted sustainable transport interventions have been further complimented and supported by the notable changes to travel behaviours since Covid-19.

In response to Covid-19 lockdowns the University successfully implemented blended learning (for students) and remote working (for staff). This, alongside the implementation of sustainable transport measures, new mobility trials, an updated parking policy and increased parking charges, has resulted in the following as evidenced by the 2022 and 2023 travel survey and other monitoring data collected by the University:

- Significantly fewer staff and students travelling to campus on a regular basis
- Greater proportion of staff and students travelling to/from campus outside of the peak periods
- More staff and students travelling by non-car modes when visiting the campus

There are significant long-term (post 2033) regional and sub-regional transport investments which will actively influence movement surrounding the campus on both macro and micro scales including:

HS2 and UK Central Developments

The proposed High Speed 2 (HS2) rail route will run to the south-west of the campus, providing connections between Birmingham International and London. As a result of this investment, the West Coast Main Line (WCML) will be upgraded and is expected to provide benefits to the campus through enhanced services at Tile Hill and Canley stations. HS2 is expected to be operational between 2029 and 2033 and the WCML upgrade will be undertaken in parallel. A new HS2 station along with Birmingham International Airport, National Exhibition Centre, Birmingham Business Park, and Jaguar Land Rover are the core components of UK Central. UK Central is being promoted by Solihull MBC and WMCA as a major development opportunity with the potential to deliver 4,000 homes and 77,500 new jobs.

University of Warwick Station¹

Kenilworth station, located between Coventry and Leamington Spa, was opened in May 2018 and provides improved connectivity to Coventry city centre for local residents. The Coventry Local Plan includes an aspiration to provide a second (University of Warwick) station north of Kenilworth and closer to the University near the King's Hill development site. Delivery of the station would be subject to a number of engineering and financial challenges being overcome, including providing significant rail capacity upgrades between Coventry and Kenilworth.

¹ WCC's Warwickshire Rail Strategy (2019): https://ask.warwickshire.gov.uk/communities/draft-warwickshire-rail-strategy-2019-2034/supporting_documents/WRIS%20DRAFT%20for%20consultation%20201934%20FINAL.pdf

WMRE Rail Investment Strategy (2022): <https://wmre.org.uk/our-strategies/west-midlands-rail-investment-strategy/>

Very Light Rail (VLR)

Very Light Rail (VLR) is a research and development project delivering an affordable light rail system in Coventry. CCC has developed an outline business case for a preferred north-east route linking the city to Walsgrave Hospital. This has enabled CCC to secure funding to support a demonstration track in Dudley to facilitate the necessary legislative sign off on use of the new technology and progress the project through to implementation and operation.

A46 Link Road

Warwickshire County Council developed a proposal for an A46 Link Road as part of a multimodal transport corridor that passed to the south of campus but was unable to demonstrate a viable case. Nonetheless, despite changes in travel behaviour, there are still critical local road congestion issues and insufficient provision for alternative modes of transport (active and public transport infrastructure) in the wider area. Consequently, there may still be a need for this to be addressed in the future both to support the University's continued success and, subject to the Local Plan Review, other development in the surrounding area. In line with our plan to be net zero on scope 3 emissions (p24), the travel hierarchy (Appendix 1, Section 4), and delivery of our eco park (page 15), our preference would be that active and public transport infrastructure would be strongly prioritised. However, this will be a matter for the Local Plan Reviews to consider and determine and the University's plans would respond accordingly.

The transport movement and connectivity strategy of this SPD is in accordance with the following themes:

- Reduce single occupancy vehicle trips to and from campus
- Maintain accessibility through and around campus for all users especially sustainable, non-car modes
- Support more efficient, legible and comfortable movement on campus
- Engage and incentivise behavioural change to support mobility transformation
- Offer choice and variety to all users in order to replace dependency on the private car
- Support the development of innovative and integrated future mobility solutions
- Develop sustainable transport to enhance the environmental sustainability of the campus

These major themes will continue to incorporate two key areas in order to achieve measurable and tangible modal shift:

- “*Here and Now*” – what the University can, within its control, proactively initiate to help make key evolution in the mobility and connectivity infrastructure across all transport modes in and around campus
- The “*Strategic Regional Infrastructure*” investments – working closely with transport authorities to help and support the strategic value of the Transport Corridor to the University and the region, VLR connecting Coventry to the campus area and future mobility corridors such as the cycleway connecting Leamington to Kenilworth.

Pedestrian and Cycle Strategy

Traffic congestion, vehicle speeds, parked vehicles, and vehicle-centric spaces currently create hostile and severed streets for people walking, cycling, scooting and wheeling. This undermines the campus experience through unsafe, poor quality, disconnected and non-inclusive spaces.

The approach of this SPD is to aim to reduce non-essential vehicle use on roads within the heart of the campus and the relocation of car parks to the periphery over time will free up

more space for pedestrians and cyclists. The campus will offer a much better environment with more cohesive, permeable, legible, direct, safe and accessible pedestrian and cycle routes across the campus that are guided by distinctive and inclusive wayfinding and placemaking principles.

New and enhanced pedestrian and cycle routes will be designed in accordance with local guidance and the Government’s National Design Guide, ‘Local Transport Note 1/20 – Cycle Infrastructure Design’ (LTN 1/20) and ‘Active Design Guidance’, taking into consideration the needs of all users. Opportunities to downgrade Gibbet Hill Road and reduce vehicle dominance will be a priority should alternative access solutions emerge as part of the Local Plan Review.

Interactive online maps and apps will work alongside printed signage across the campus to help with accessibility. Arrival will be better announced at campus entrances with strong gateway buildings, landscaping and artwork.

Enhanced pedestrian routes and green spaces will encourage more people to walk around campus and engage with their surroundings, leading to casual encounters and interactions, and better occupation and animation of space. Nature will be embedded into the heart of the campus and noise pollution will decrease with less vehicular activity, creating a calmer, healthier environment to improve wellbeing.

The University will continue to regularly monitor utilisation of the more than 3,500 cycle parking space across the campus to ensure sufficient provision is located where it is in highest demand.

To accommodate the expected uplift in active travel up to 2033 and beyond, adequate secure, appropriately designed cycle parking and supporting facilities (e.g., showers, lockers, changing rooms, drying rooms) will be provided as part of new developments at least in accordance with adopted local policy.

As part of delivering the SPD, the University is developing a wayfinding strategy that will enhance both on campus movements and connections to key destinations such as transport hubs and nearby urban centres. This will be achieved with intelligent positioning of buildings, creation of “landmark” developments and markers, and immersive technology. Consideration of lighting provision and CCTV form part of this programme to improve both legibility and personal safety through campus.

The University will explore, alongside Warwickshire County Council and Warwick District Council, how an equivalent scheme to the West Midlands Cycle Hire scheme might be delivered in Kenilworth and Leamington to offer the benefits of such a scheme to staff and students living in these areas.

The University will expand and adapt its softer measures to support cycling such as mechanisms to resell and maintain cycles, safety and proficiency training. It will evolve its Cycle to Work scheme to help eligible staff purchase e-bikes and mobility assisted cycles.

Promoting Wider Pedestrian and Cycle Connections

The University in recent years has contributed toward cycleway improvement schemes at both Lynchgate Road and Kirby Corner Road as well the implementation of traffic calming measures at Cannon Hill to improve road safety. The University will continue to work with CCC, WCC, TfWM and their partners such as Sustrans, to deliver new and improved active travel connections to Coventry city centre, Kenilworth, Leamington, Canley and Tile Hill stations.

To support this the University has completed a ‘Cycling Improvement Study’ and ‘Pedestrian Improvement Study’ as required by Section 106 Obligations attached to the planning permission for the Social Sciences Quarter. As well as including comprehensive reviews of the walking and cycling networks within the campus, the Cycling Study will focus on gaps and missing links between the campus and student/staff residential locations, public transport interchanges and existing/proposed cycleways. Of particular focus is the consideration of improving connections to Kenilworth Road and Kings Hill to support active travel movement linking to areas of identified growth and key cycle corridors. The Pedestrian Study has adopted a tighter geographical focus on infrastructure gaps on, and in the immediate vicinity of, campus (e.g., missing footways/dropped kerbs/tactile paving, poor lighting).



Public Transport and Shared Mobility

Public transport and shared mobility will be crucial mechanisms in driving modal shift and creating a more sustainable, pleasant campus. Removing non-essential vehicle trips from the heart of the campus will enable priority access along University-owned roads to the benefit of those using sustainable modes such as electric buses, scooting and cycling. Re-allocation of road space, where appropriate to better support bus access will make bus journeys more reliable and attractive to users, whilst continued collaboration with TfWM to support sustainable journeys through incentives, discounts and advice will help drive travel behaviour change further.

The University supports the ongoing replacement of diesel buses with electric buses across the region. Furthermore, it will continue to work with local bus operators and authorities to help make public transport more desirable to those accessing the campus from key connections such as Coventry rail station. This will be based on the following themes:

- dynamically adapting capacity to accommodate changing demand
- aligning bus and rail timetables to provide efficient onward travel
- making public transport travel cost effective for staff and students
- creating University-based bus services that connect staff and students better, also supporting the wider community
- evolving the University service to create a service that is on-demand and complement fixed services
- create a simple, low-cost and seamless environment for all users with one mode of payment for these services

Demand Responsive Transit (DRT) combines the cost effectiveness of bus travel with the convenience of personal mobility services such as private hire and taxis. The University will continue to support TfWM’s West Midlands Bus On Demand service and consider how similar services might enable last-mile transport across the campus and connect with local areas in the future.

Such services will:

- Complements fixed network services to reach areas where other options are limited
- Complements fixed network services in terms of seamless connectivity when using multiple modes to travel
- Support the campus’s mobility hubs by connecting these to the heart of the campus where private vehicle access will be restricted
- Support special events when demand for transport services increases to help support existing provision

The University will continue to support the delivery of a VLR route between Coventry city centre to the University, which could also connect with existing and proposed mobility hubs and peripheral parking. The University will work closely with CCC to promote a dedicated VLR link to the main campus and will continue to collaborate with TFWM on new innovative transport solutions for the region.

A shift in modal share towards shared mobility will require a wholesale review of the University Interchange to establish whether it can accommodate the anticipated increase in public transport demand. Working with local authorities, and within the design parameters set out in this SPD, the University Interchange will become an expanded gateway to the campus and visually highlight the area as the most convenient method to get to the centre of the University.

The University currently has four car club vehicles (two electric, two hybrid), operated and maintained by Enterprise Car Club, which are available free of charge for business travel only. The University will explore how this scheme could be expanded to reduce business and other private car travel and ownership by staff and students.

Car Parking Strategy

Through previous masterplans, planning applications and associated Section 106 Agreements, a ‘cap’ on the number of parking spaces to be provided on campus has been agreed, assessed and mitigated.

Pre-Covid, parking utilisation was typically above 90% during term-time weekdays. However, parking surveys show that utilisation since the lifting of pandemic restrictions and the University’s implementation of blending learning/remote working has consistently been around 40%. During the busiest term-time weekday periods there are over 3,000 parking spaces vacant across the campus.

The University has implemented significant changes to the parking tariffs by moving to daily charging to reduce vehicle traffic on campus to enable measures to encourage active travel.

Furthermore, all car parks have become “cashless” and automatic number plate recognition (ANPR) has been introduced to all car parks to create a systems-based permitting/charging structure.

The SPD proposes no change to the parking cap, and over time the University will continue to move car parking towards the periphery of the campus, whilst ensuring essential accessible parking supports existing buildings and new developments. The University will endorse the principles of ‘Park Mark’ which sets out guidance to achieve safe, legible parking environments. <https://parkmark.co.uk/>

The University regularly monitors utilisation of its electric vehicle charging infrastructure and, in light of high utilisation, is currently expanding provision across existing car parks. New car parks will ensure adequate provision of electric vehicle charging.

Delivery, Servicing and Waste Strategy

Servicing and deliveries are a large generator of vehicle movements on campus. They also contribute to the large number of vehicles parked across the campus, particularly within the core while specialist University or independent tradespeople undertake their work.

The STEM application proposes to consolidate delivery and servicing activity primarily in a new servicing area accessed from Gibbet Hill Road, with activity relocated from existing piecemeal servicing areas across the STEM site.

The University will continue to apply principles of remodelling, reducing, rerouting and retiming of delivery and servicing activity across the campus. This will serve to reduce road danger, noise and emissions from such activity.

The University’s aspiration is to deliver this strategy through implementation of a hub and spoke servicing network with a new consolidation centre on the campus periphery which would allow for a large proportion of campus deliveries to be processed the ‘last mile’ being completed by smaller electric vehicles or cargo bikes to reduce the number of large motor vehicle movements in the heart of the campus. There will be exceptions to this approach for, for example, time sensitive or servicing of critical or highly sensitive scientific instruments and manufacturing equipment.

Mobility Hubs

The University has a number of mobility hubs around the campus providing access to shared, publicly accessible transport such as e-scooters and e-bikes, alongside cycle parking and other sustainable transport provision. In the future, these hubs will act as designated stops for campus micro transit to provide for longer trips and connections to local destinations.

Mobility hubs will continue to provide interchange and integration between existing and emerging modes across the campus, alongside real-time travel information and, for examples, parcel lockers.

Beyond 2033, as campus car parking is moved towards the periphery of the campus, the new car parks will act as mobility hubs to provide convenient access for onward travel around the campus. A series of smaller mobility hubs will be dispersed around campus and no more than five minutes' walk from any building.

Approach to traffic modelling

The approach to trip generation and traffic modelling, which has been completed using WCC's Kenilworth and Stoneleigh Wide Area (KSWA) model, has been subject to extensive scoping discussions with the transport authorities.

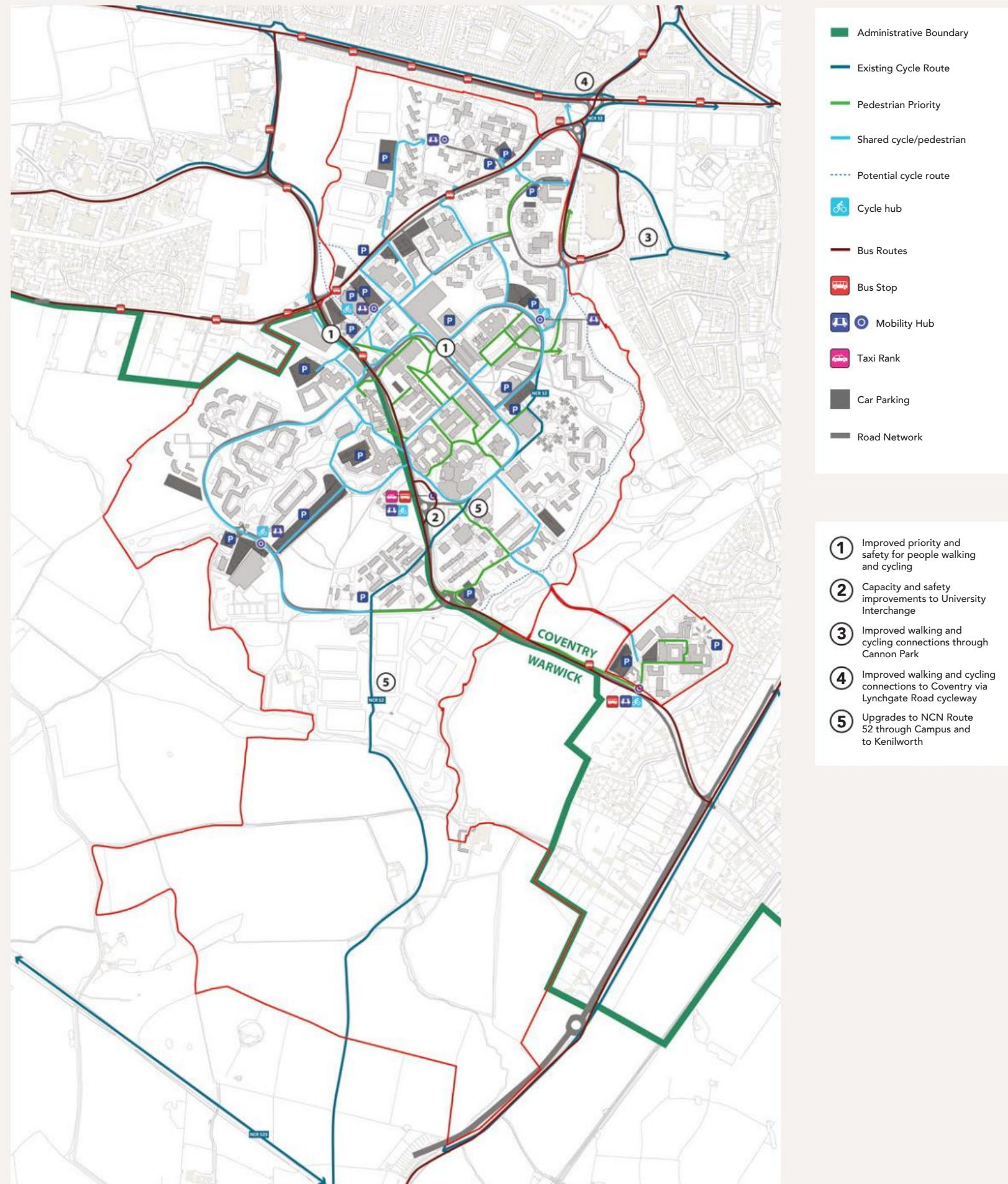
The detailed methodology and modelling results are summarised on the following page. The full modelling assessment report is available to review as supporting information on the consultation website.

Trip Generation and Traffic Modelling

The proposed development comprising the SPD is summarised in Table 1. These include the:

- Outline permission for Warwick Social Sciences (WSS) for up to 32,000 sqm GIA Use Class F1(a). As agreed with the local authorities, this utilised 19,457 sqm residual floorspace from the Capital Plan Hybrid (CPH) permission (ref: OUT/2018/2115 alongside a commitment by the University in the associated section 106 Agreement, to vacate 12,600 sqm within an Existing Social Sciences Building elsewhere on Main Campus.
- The hybrid application for the Science and Engineering Precinct (STEM) (ref: PL/2023/0002402/OUTM pending determination) for up to a net additional 17,946 sqm GIA Use Class F1(a)

PLAN 15: TRANSPORT ROUTES AND CONNECTIONS



To provide additional robustness and flexibility above the expected maximum floorspace, the SPD trip generation and modelling is based on an additional 31,000 sqm GIA Use Class F1(a) floorspace, 7,196 sqm above the actual expected additional floorspace of 23,804 sqm.

Table 1: SPD additional floorspace (sqm) calculation

Proposed Works	Use Class F1(a) GIA sqm
Demolition / Vacant	38,093
New Build / Refurbish	81,354
Net Additional SPD	+43,261
CPH Residual	-19,457
Actual Additional SPD	23,804

Trip generation for the academic floorspace is based on a first principles approach considering maximum building occupancies for the proposed new and refurbished buildings including WSS and the Science and Engineering Precinct. These buildings will comprise a blend of general teaching, specialist teaching, research labs and workplaces. Bespoke trip rates for undergraduates, postgraduates and staff have been derived and mode shares are based on the University’s 2023 travel survey. The methodology has been agreed in principle by CCC, WCC and NH as part of detailed stakeholder engagement.

Alongside academic floorspace, the SPD proposes up to 1,200 student bedspaces – a 16% increase from the existing 7,487 bedspaces. Additional bedspaces enable students to walk or cycle across the campus rather than make external trips from outside the campus on the local transport networks, which provides significant benefits to capacity and congestion.

In order to consider a robust worst-case scenario, as part of the traffic modelling additional bedspaces (which will reduce external trips due to internalisation) will not be incorporated. Several scenarios have been modelled and assessed. The worst-case scenario assesses the SPD’s additional trips in a 2037 future year with associated committed development and background traffic growth. The local highway network has areas of congestion and delay prior to inclusion of the SPD, with modest increases in traffic having disproportionate impacts. However, the SPD would not materially alter queueing or delay across the local or strategic road networks. The full ‘SPD Trip Generation and Modelling Assessment’ report is available to review as supporting information on the consultation website.

The quantum of development provides an upper limit of 31,000 sqm GIA for academic floorspace against which future applications can be considered. Where applications fall within the floorspace limit, there should be no need for additional traffic impact assessment. Furthermore, consideration should be given to the quantum of additional bedspaces that have been constructed to offset any additional floorspace above 31,000 sqm GIA.

The Monitor and Manage approach² and legal mechanism will provide the basis for identifying any mitigation measures considered necessary to address the specific impacts of any proposal being considered by the local planning and highway authorities. Where development comes forward outside of these floorspace limits or for uses not assessed through the SPD (for instance, proposals on the Science Park), a separate Transport Assessment should be scoped and submitted with any planning application following the principles set out in the Monitor and Manage approach.

The conclusions of the traffic modelling demonstrate that additional University vehicle trips are less than two vehicles per minute during the busiest peak hours, which is not a material change. The modelled highway network in WCC’s KSWA model is highly sensitive and there are high growth assumptions up to 2037 without the SPD. Consequently, with the addition of a small number of University vehicle trips as a result of the SPD, there is some additional queueing and longer journey times in some locations. Given the limited impacts of the SPD, it is agreed with CCC, WCC and NH that no highway mitigation is required and the SPD would not have an unacceptable safety impact or severe residual cumulative impact on the local highway network or strategic road network.

² A Monitor and Manage approach builds on a change in attitude to the issue of travel and movement. It seeks to stop using past traffic trends to determine the future need for infrastructure, as this maintains the status quo by perpetuating dependence on cars. This enables more positive transport planning and helps implement a hierarchy of users by considering walking, cycling and public transport upfront and supporting net zero ambitions. A fundamental part of this approach is the need to monitor travel behaviour over time and manage the implementation of targeted transport interventions to support sustainable travel.

Monitor and Manage Approach

Over recent years, planning permissions on the University campus have been subject to Section 106 Legal Agreements which have obligated the University to either undertake physical works or make considerable financial contributions relative to transport works. These are summarised below:

- Travel survey of staff and students on a biennial basis for a five-year period with mode share targets for staff and students
- Regular traffic surveys to monitor whether vehicle trips to/from the University during peak periods exceed 16% growth from a 2018 baseline, with a £300,000 remedial payment required to be paid if this is exceeded – surveys in 2022 showed that morning peak period (07:00-10:00) trips reduced by 17% and evening peak period (16:00-19:00) trips reduced by 2%
- Traffic Regulation Order Contribution: £50,000 utilised by CCC for the traffic calming scheme on Cannon Hill Road
- Cycleway Contribution: £100,000 for Lynchgate Road and £50,000 for Kirby Corner Road, with the former paid and implemented by CCC
- Traffic Calming Contribution: £100,000 was paid to CCC in July 2021 for the traffic calming scheme at Cannon Hill Road which was implemented in 2023
- Highways Contribution: £650,000 was paid to WDC in July 2021 towards the Stoneleigh Road/A46 junction improvement
- Shuttle Bus: Bus service 14, subsidised by the University for two years from September 2020, was implemented in partnership with National Express Buses and now operates as a commercially viable service without subsidy from the University.

A ‘Monitor and Manage Transport Sub Board’ has been set up comprising representatives from the University, CCC, WCC, WDC, TfWM and NH. This group will monitor, review, co-ordinate and implement the monitor and manage set of principles in relation to all future University development activities, the SPD and associated S106 obligations. The sub board also discusses and manages transport issues and takes opportunities to foster collaboration and sharing of information to improve transport and travel within the local vicinity and encourage positive sustainable transport shifts.

A legal mechanism to support this SPD with ‘Monitor and Manage’ elements which set out a framework of agreed mitigations in response to changes in travel behavior will be progressed, binding members of the Monitor and Manage Board.

This will allow individual planning applications to come forward within the parameters set by the SPD, without the need for these to be subject to standalone traffic modelling and detailed assessments.

The proposed content of the legal mechanism is provided at Appendix 1

Sustainability and Energy Strategy

Key relevant planning policy:

The NPPF notes that the planning system should support the transition to a low carbon future in tackling climate change and it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Coventry Local plan

EM1 Planning for Climate Change Adaption

states that the Council will require all development to be designed to be resilient to, and adapt to the future impact of climate change. Adaptation measures include mitigation against rising temperatures, maximising water efficiency, and minimising risk to flooding.

EM3 Renewable Energy Generation

supports development proposals for renewable and low carbon energy generation technologies, and their incorporation within development proposals.

The Energy SPD aims to support the implementation of Policy EM2 Building Standards which states that development should be designed and constructed to the relevant building standards and meet the carbon reduction targets.

Warwick District Local Plan:

CC1 Planning for Climate Change Adaption

states development proposals will need to be designed to be resilient and adaptive to the future impacts of climate change.

CC2 Planning for Renewable Energy and Low Carbon Generation

states that new low carbon and renewable energy technologies will be supported in principle subject to set criteria including being designed to minimise the impact on adjacent land uses and local residential amenity.

CC3 Building Standards and other Sustainability Requirements

states that all non-residential development over 1000 sq.m are required to achieve a minimum BREEAM standard 'very good' unless it can be demonstrated that it is financially unviable.

Warwick District Council declared a climate emergency in 2019 and has since adopted (May 2024) a **Net-zero Carbon DPD**. The Council concluded the Main Modifications consultation in July 2023. The objectives of the DPD are to minimise carbon emissions from new buildings and to support national and local carbon reduction targets. The DPD aims to achieve net zero operational regulated carbon emissions by sequentially implementing an energy hierarchy. This hierarchy seeks to firstly reduce energy demand (by improving the building fabric); then incorporating or utilising zero or low carbon energy sources; and as a last resort, where there are residual operational carbon emissions, there will be carbon offsetting requirements.

Alongside the DPD sits the Net Zero Carbon SPD which sets out further advice and guidance to applicants and relevant stakeholders on how to comply with the DPD policies. The SPD has recently been subject to a statutory consultation in October - November 2023.

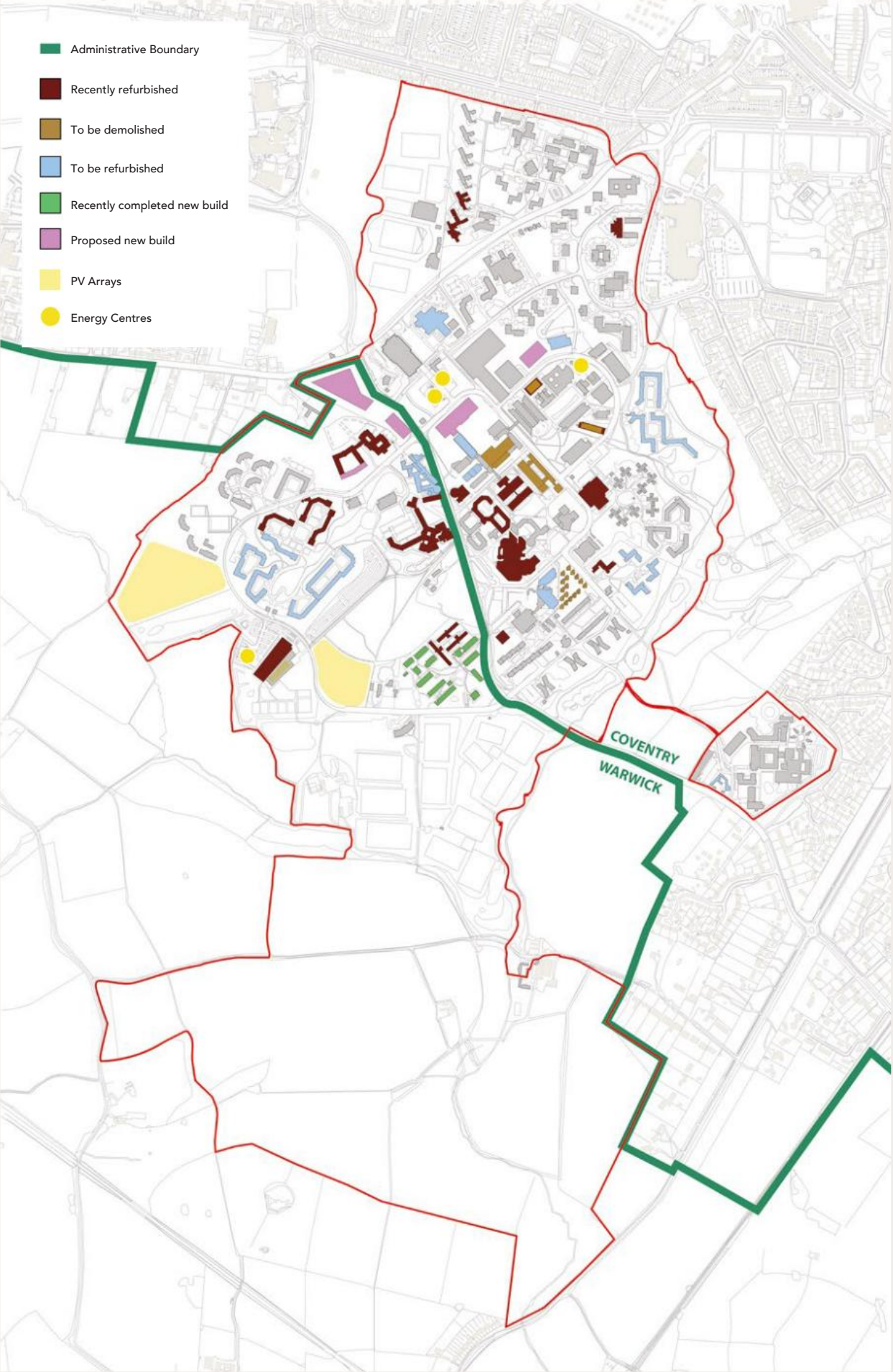
Overarching University ambition – Net Zero targets

The UN Sustainable Development Goals (UN SDGs) are fundamental to the University's vision to build a better world while addressing the urgent challenges posed by the Climate Emergency. Therefore, the University is committed to reframing the thinking behind decision making, strategic goals and organisation to set a clear pathway to a more sustainable future. The University's current approach **"the Way to Sustainable"** reflects the collective journey of continuous improvement and the important elements of curiosity, learning, engagement, collaborative planning, and action needed to achieve the most effective outcomes.

The University seeks to ensure that every member of the Warwick community, partners, and networks work together to find ways to be more sustainable through achieving the right balance between providing clear leadership, enabling cooperation, and listening to others. The University seeks to inspire and be inspired, take a practical approach to problem-solving, be prepared to be always listen and learn, be willing to tackle the wicked problems together, and to continuously evolve by doing so.

As part of the University's Climate Emergency Declaration, a commitment has been made to reach net zero carbon from direct emissions, and the energy purchased, by 2030 (Scope 1 and 2 emissions). To achieve this, carbon efficiency needs to be increased drastically in order to change to a reduction pathway. The University commits to achieving net zero for all direct and indirect emissions (Scope 1, 2 and 3) by 2050, and the success of this will mean acting differently now.

PLAN 16: SUSTAINABILITY PARAMETER PLANS





Reuse/refurbishment

In line with the University’s goals on net zero carbon, the University has a hierarchy of decision making and will look to prioritise the re use and refurbishment of existing buildings first, with buildings only being considered for demolition if they are in poor condition or not viable for reuse and demolition or if partial demolition opens up further strategic opportunities.

The University has developed a set of standards which apply to all new construction projects on the Campus, reflecting the University’s ‘low energy, low maintenance’ strategy. This is known as ‘The Warwick Standard’. The Warwick Standard provides clear leadership and sets the benchmark for how development is constructed at the University, setting out mandatory design standards which align with the masterplan for the campus. This ensures that all projects are developed and built with uniformly high standards of design which align to the University’s strategic goals.

Approach to achieving Net Zero Carbon Emissions

The University is embedding sustainability into all operations to ensure that they can operate resiliently at net zero, or beyond, by 2050 from direct and indirect emissions. In doing so, the University seeks to inspire its community, increasing collaboration with stakeholders and supply chain partners to inform and improve operations.



As such, number of Sustainable Operations have been identified in respect of Transport and Mobility, Energy, Campus construction, maintenance, and repair, ecology and Biodiversity Net Gain, reducing waste and water.



Transport and Mobility

Goal:

Reduce indirect carbon emissions generated through all forms of transport and mobility to achieve net zero by 2050. If we are going to achieve this, we need to work closely with our communities as we introduce, test, learn and champion greener, cleaner forms of transport.

Actions:

- continue to use our campus as a real-time living lab that enables us to better understand and address the needs of commuters
- accelerate plans to transform the campus transport infrastructure by improving our services, offering more greener, cleaner transport options, whilst continuing to provide better connectivity across our region
- change our policies to emphasise the need to use cleaner, greener forms of travel when travelling on University business
- continue to lead on the conception and development of future transport infrastructure (including provision of EV charging facilities where appropriate), so that we are well placed to enable and accommodate the predicted growth of the University, and our region, whilst also achieving our sustainability target.

Energy

Goal:

Our overall goal is to get to net zero carbon from the energy we use by 2030

Actions:

- transition away from fossil fuel gas supplies for on campus operations by 2030
- continue to source green electricity from the National Grid which we have done since 2020
- reduce our reliance on the grid, by selfgenerating renewable energy on campus where viable
- lead the way in creating low carbon energy networks on campus, utilising the existing energy infrastructure combined with viable emerging technologies to create an exemplar future energy network
- improve the utilisation of space across campus, where appropriate and realistically possible, through the adoption of technology and hybrid styles of working developed during the pandemic
- actively seek partnerships with organisations to assist in this transition.



Campus Construction, Maintenance and Repair

Goal:

We have aspired to high levels of building quality and performance since 2015, targeting BREEAM ‘Excellent’ and EPC A standards, well exceeding regulatory building standards. Our mission is to ensure that our new construction projects across our campuses are net zero carbon developments, and to build and refurbish our stock in an environmentally responsible manner, considering the whole life cycle carbon emissions from our real estate.

Actions:

- continue to ensure that all of our new construction projects are net zero carbon developments; we have already implemented a policy to assess the embodied carbon of our new buildings, enabling informed investment decisions to be made
- aspire to Passivhaus standard where possible and appropriate
- evaluate our options to provide new space and facilities on a whole life carbon basis, including opportunities to repurpose existing building where appropriate
- refurbish and improve our pre-2015 real estate, where we need to maintain rather than rebuild, via viable thermal improvements, green energy generation and intelligent operational controls
- improve building controls and space management systems to heat and cool spaces that we use in an efficient way
- implement sector-leading environmental building performance standards for new builds and refurbishments.



Ecology and Biodiversity Net Gain

Goal:

Our goal is to enhance campus biodiversity, targeting the mandatory requirement for 10% net gain compared with pre-development.

Actions:

- allocate a large proportion of our land holding (over 120 acres) on the main campus to re-wilding and parkland for amenity, education and, to assist our transition to renewable energy
- safeguard and enhance existing ecological assets
- encourage people (staff, students, and our local community) to engage with the natural environment through education and research.



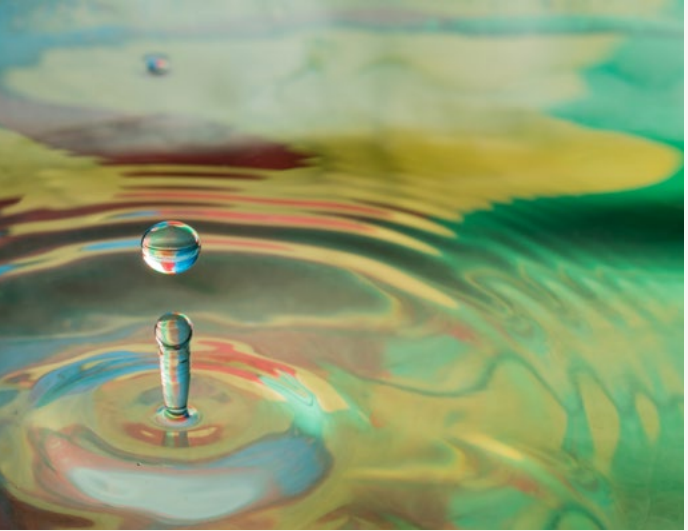
Reducing Waste

Goal:

To reduce the total volume of waste produced by Warwick and, if that’s not possible, reuse and recycle.

Actions:

- reduce waste being produced in the first place. We will support initiatives that stop waste being created - for example the Warwick Cup scheme, the second-hand bike shop pop-up and the arrivals pop-up shops
- reuse waste that is produced. For example, we will continue to donate a significant amount of ‘clean waste’ left at the end of the academic year to charity, working with both the compliance and community engagement teams
- recycle as much waste as possible. We are already conducting an infrastructure review (containers, accessibility, collection), and a communications review to encourage more recycling behaviours. We will also improve our processes to segregate new waste streams (cardboard, cables, duvets and bedlinen, and coffee grounds), and we will build on our existing food waste collection activities
- recover waste. We will secure access to a waste to energy plant to dispose of our waste, so that we continue to ensure we send 0% to landfill. We will divert waste from landfill using dedicated material recycling facilities for large items that are not accepted at incinerator resulting in zero waste to landfill.



Water

Goal:

Reduce total campus water consumption, in the interest of reducing carbon associated with water treatment but also to ensure that we preserve this valuable resource.

Actions:

- undertake continual monitoring and targeting to support our water usage plans
- assess a suitable and alternative targeting mechanism based on possible future campus populations
- continue to evaluate the effectiveness of our drainage systems through our ISO14001 Environmental Standard
- undertake comprehensive flood risk assessments to ensure our future buildings are not at risk of flooding and do not exacerbate flood risks elsewhere, and explore and implements opportunities to reduce flood risk where possible.

Ecology and Biodiversity Strategy

Key relevant planning policy:

The NPPF describes how planning policies and decisions should contribute to and enhance the natural and local environment including by protecting and enhancing valued landscapes and sites of biodiversity value and minimising impacts on and providing net gains for biodiversity.

Coventry Local Plan

GE1 Green Infrastructure

states that existing GI will be protected and used as a way of adapting to climate change. New development would be expected to make provision of GI and maintain the quality and quantity of existing GI.

GE3 Biodiversity, Geological, Landscape and Archaeological Conservation

aims to protect and enhance SSSIs, LNRs, ancient woodlands and local wildlife and geological sites. This includes the expectation that development proposals will lead to a net BNG, protect or enhance biodiversity assets and secure long term management, avoid negative impacts on existing biodiversity and preserve species that are legally protected.

GE4 Tree Protection

states that development proposals will be positively considered where there is no unacceptable loss of or damage to existing trees or woodlands. The policy also expects removed trees to be replaced with new trees, and for retained trees to be sympathetically incorporated into the overall design. Furthermore, trees that are subject to ‘protection’ will not be removed without justification.

EM1 Planning for Climate Change Adaption

states that all development will be required to be designed to be resilient to climate change through adaptation measures. For ecology these include optimising the use of multi-functional GI and where appropriate BI.

The **Biodiversity Net Gain SPD** provides additional guidance on the objectives of Policy GE3, which include facilitating a net BNG, protection and enhancement of biodiversity assets and their long term management, and preserving species which are legally protected, in decline or rare within Coventry.

The **Trees and Developer Guidance SPD** establishes the Council’s expected standards for development proposals with regards to existing trees. This includes retaining and incorporating high quality existing trees within proposed development schemes which will be adhered where possible and appropriate across the SPD area.

Warwick District Local Plan

CC1 Planning for Climate Change Adaption

states that all development is required to be designed to be resilient to, and adapt to the future impacts of climate change. This will include optimising the use of multi-functional GI for urban cooling.

NE1 Green Infrastructure

aims to protect, enhance and restore the district’s GI assets on a sub-regional to a local and neighbourhood scale.

NE2 Protecting designated biodiversity and geodiversity assets

confirms that the Council will protect designated areas and species of national and local importance for biodiversity and geodiversity. The policy goes on to states that all proposals likely to impact these sites/ species will be subject to an ecological assessment.

NE3 Biodiversity

sets out the Council’s expectation that development proposals will protect, enhance and/or restore habitat biodiversity.

Ecology and Biodiversity Strategy

The Ecology and Biodiversity Strategy is based upon the following objectives:

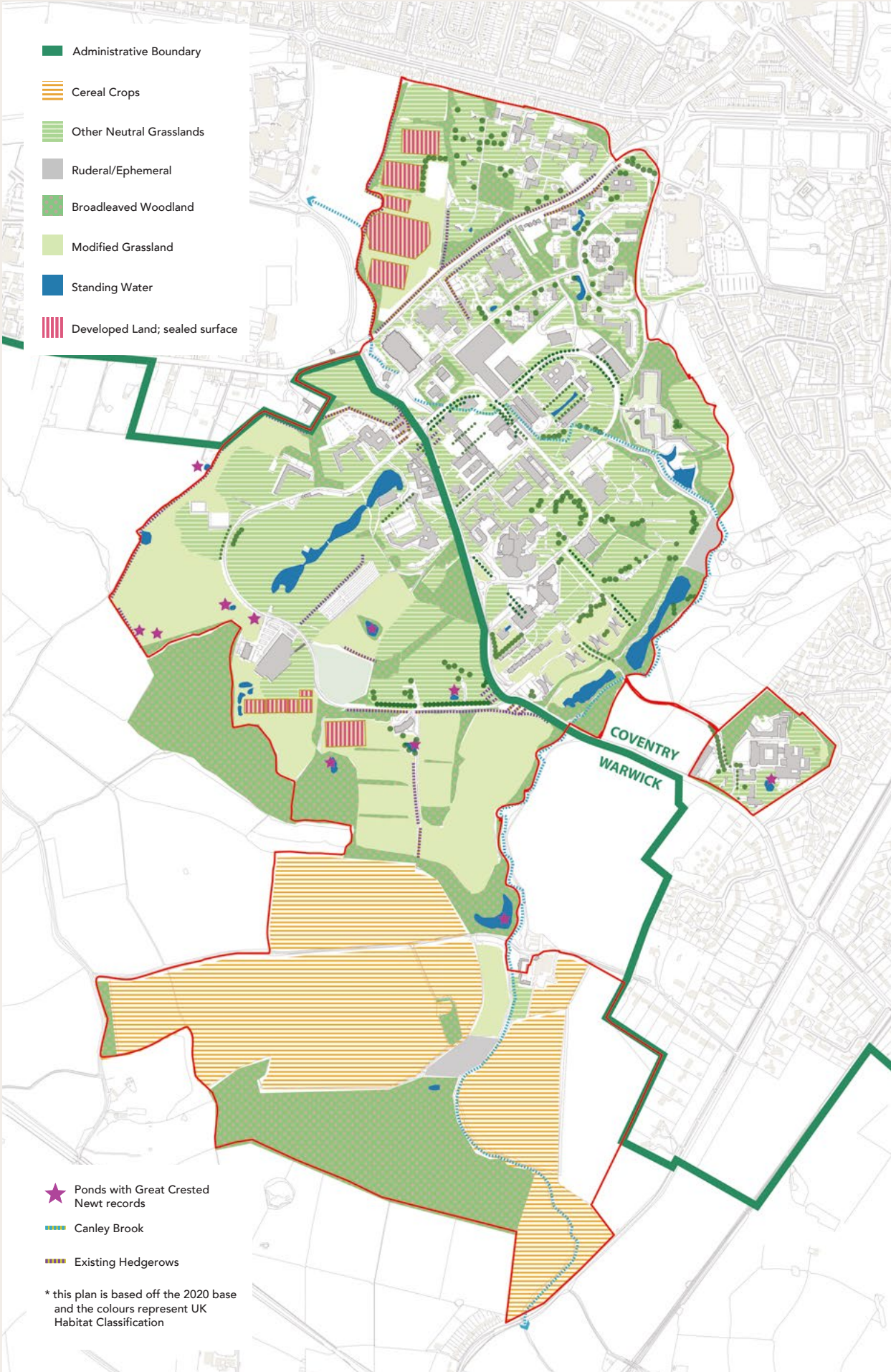
- Safeguard existing ecological sites
- Enhance campus biodiversity
- Sustain and enhance the Great Crested Newt (GCN) population
- Encourage site users to engage with the natural environment

It is based upon an understanding of the Baseline ecological conditions within the SPD boundary. These are identified on Plan 17.

The University is committed to conserving and improving the habitats and species which form the campus’s natural assets, and to developing campus biodiversity holistically and not as isolated resources. The SPD boundary contains a wealth of habitats including woodland, mature trees, hedgerows, lakes, ponds, brooks, meadows and open farmland. The University acknowledges the multiple benefits of the environment for health, well-being, food production, climate change mitigation and carbon sequestration.

Other relevant documents and strategies to be considered in relation to biodiversity on campus are: WDC Biodiversity Action Programme www.warwickdc.gov.uk/biodiversity Warwickshire, Coventry and Solihull Local Biodiversity Action Plan www.warwickshirewildlifetrust.org.uk/LBAP Warwickshire, Coventry & Solihull Local Biodiversity Action Plan (LBAP) | Warwickshire Wildlife Trust

PLAN 17: BASELINE ECOLOGY PLAN



The University is committed to maximising the ecological value of its estate.

Its commitment to enhancing biodiversity is demonstrated by the numerous habitat creation and management projects that have taken place in recent years including:

- Restoring a large pond through desilting, revetment creation and marginal planting
- Taking part in No Mow May with areas left unmown throughout the summer months
- Wildflower area creation within residences as well as recently laid wildflower turf
- Hedgerow planting to create wildlife corridors; and
- Planting of 900 whips from the Queen’s Green Canopy initiative.

Biodiversity enhancements which have taken place on campus between 2020 and 2023 are shown on Plan 19. This plan also identifies locations where enhancements have been undertaken as part of planning permission approvals.

In addition to these projects, we have also started a programme of species monitoring and mapping data on GIS. For example, as part of the Hedgehog Friendly Campus initiative, for which we have achieved the silver award and are working towards gold, we have undertaken hedgehog surveys for the past two years and the surveys have been initiated this year with support from local groups and staff for small mammals, moths, pond health, and birds.

Principle of ‘banking’

The approach to habitat creation and enhancement has the potential to create an opportunity for biodiversity gains to be accounted and used to compensate for unavoidable residual impacts of a particular project. Prior to any habitat creation and / or enhancement work outside a built project boundary, a detailed ecological assessment will be undertaken to determine the necessary baseline information and a site-specific ecological management plan produced so that the creation and/ or enhancement can be calculated and used to off-set onsite biodiversity losses. A baseline biodiversity assessment will be undertaken to establish the Biodiversity Net Gain measurement following the proposed interventions.

Great Crested Newts

Great Crested Newts are protected under European and UK Law, a species of principal importance in England and a Warwickshire, Coventry and Solihull Local Biodiversity Action Plan species. A desktop study undertaken by the University show records of 9 ponds within the SPD boundary in which Great Crested Newt have been identified. These are shown on Plan 18.

The ponds which between them support a regionally significant great crested newt population, are all situated along a horizontal belt as shown on Plan 18 surrounded by grassland, hedgerow and woodland habitats which provide cover, food and dispersal routes for the species.

To safeguard the University’s GCN population, future development on campus should be focussed away from known GCN ponds and valuable GCN habitat. If impact on GCN habitat is unavoidable, appropriate mitigation measures to be agreed with the relevant Local Authority will be provided.

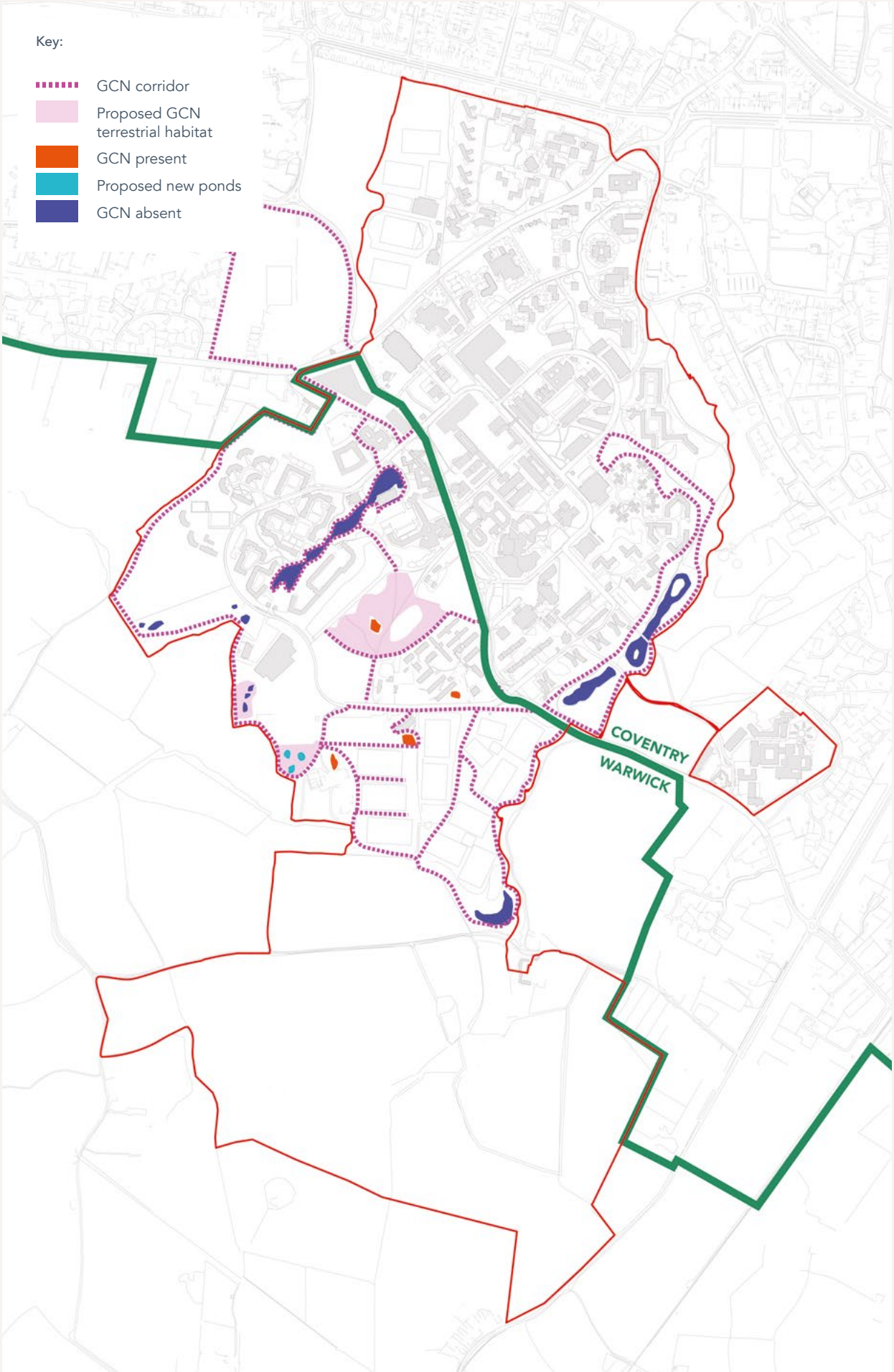
The campus provides opportunities for the GCN habitat to be enhanced. In line with the enhancement strategy, the University will continue to monitor GCN’s across the campus to measure the success of the GCN site conservation and enhancement measures and to inform future development.

Biodiversity Net Gain – principle of campus wide approach

It is noted that Biodiversity Net gain is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

The University’s Way to Sustainable Strategy commits to achieving a 10% biodiversity net gain on campus with an overarching aim that the delivery of projects will result in biodiversity being in a better state than before. We will work to ensure a minimum of 10% is achieved for all projects regardless of their size. When identifying and implementing projects to enhance the campus for biodiversity we will be informed by the Local Nature Recovery Strategy and in its absence, the Warwickshire, Coventry and Solihull Local Biodiversity Action Plan (BAP). The University will work with partners to develop the campus to support priority habitats and species where possible, and in turn to support nature’s recovery.

PLAN 18: BIODIVERSITY - GREAT CRESTED NEWTS PLAN





The University will prioritise the following habitats from the Local Biodiversity Action Plan

- @ [Built Environment \(revision in progress 2021\)](#)
- @ [Field Margins \(updated November 2021\)](#)
- @ [Hedgerows \(updated November 2021\)](#)
- @ [Lakes and Reservoirs \(updated 2021\)](#)
- @ [Ponds \(revised March 2022\)](#)
- @ [Reed beds \(updated March 2022\)](#)
- @ [Rivers and Streams \(updated February 2018\)](#)
- @ [Roadside Verges \(updated August 2021\)](#)
- @ [Traditional Orchards \(updated November 2021\)](#)
- @ [Woodland \(updated November 2021\)](#)

The University will prioritise the following species from the Local Biodiversity Action Plan

- @ [Barn owl \(updated April 2022\)](#)
- @ [Bats \(revised March 2022\)](#)
- @ [Farmland Birds \(updated August 2021\)](#)
- @ [Great Crested Newt \(revised March 2022\)](#)
- @ [Hedgehog \(updated 2021\)](#)
- @ [Rare Bumblebees \(updated December 2021\)](#)
- @ [Song Thrush \(updated 2021\)](#)
- @ [Scarce Arable Plants \(updated December 2021\)](#)
- @ [Water Vole \(updated December 2021\)](#)

Approach to delivery of Biodiversity Net Gain

The University is in a unique position in that they have extensive landholdings making up the wider campus as included within the SPD boundary. It is therefore appropriate that a hierarchy approach is created in this SPD to manage the appropriate delivery of Biodiversity Net Gain.

The approach is set out below:

1. Utilisation of enhancements already banked subject to satisfactory justification that such enhancement have not been double counted
2. Provision of mitigation to achieve 10% net gain within the application site
3. If (1) and (2) are not possible, or can only be partly achieved, provision of mitigation to achieve 10% net gain within the administrative area in which the application is located
4. If (1), (2) and (3) are not possible, provision of mitigation to achieve 10% net gain elsewhere within the SPD boundary
5. If no suitable land is available within the SPD boundary, provision of mitigation will be made on other University landholdings.
6. Off site mitigation by way of financial contributions to BNG initiatives locally within the administrative areas of Coventry City Council or Warwick District Council (to be agreed by both local authorities).

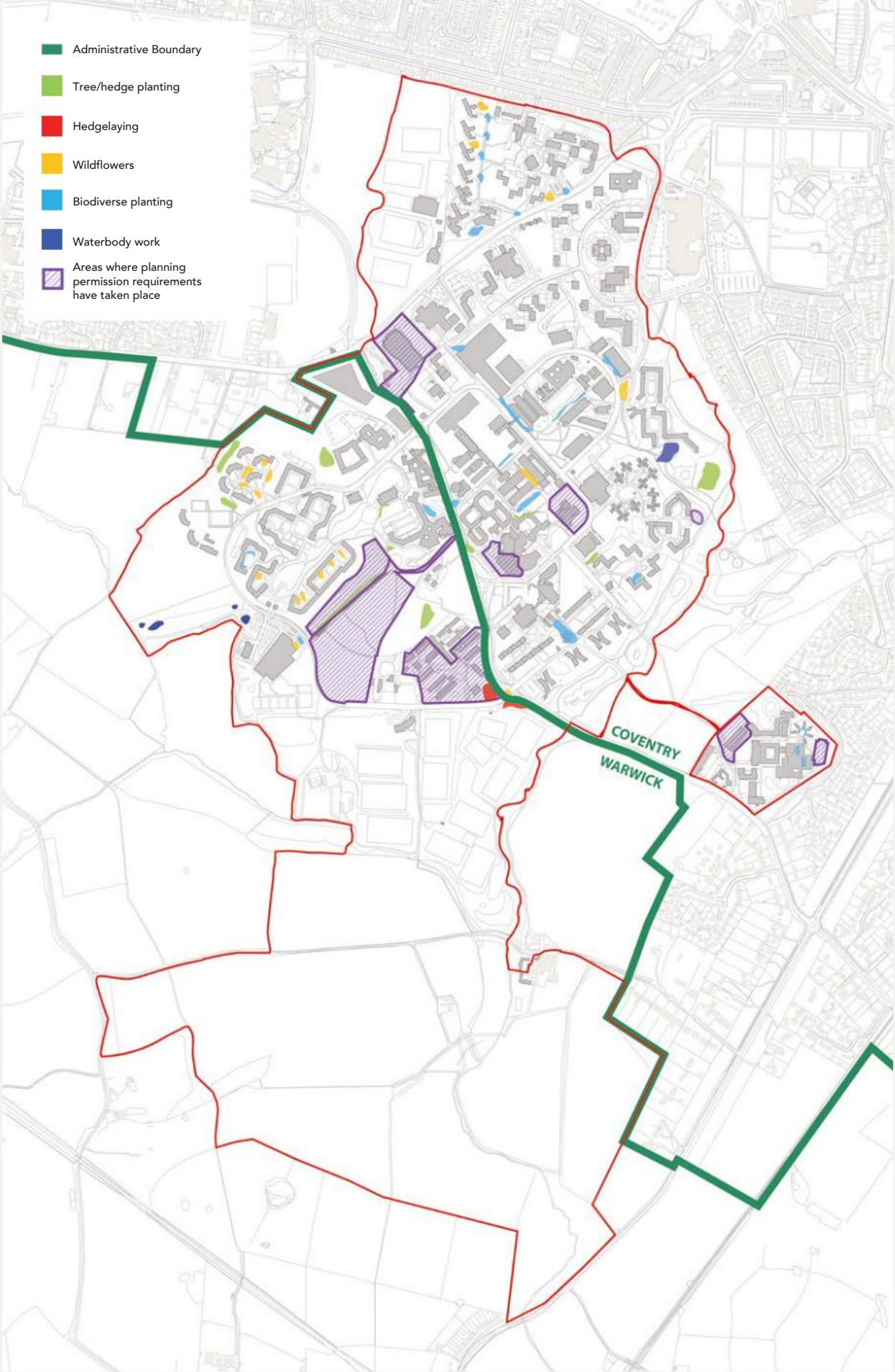
Future Campus Ecology and Biodiversity Enhancements

Introduction

Future enhancements for ecology and biodiversity will be addressed through the creation of an ‘ecopark’ to the south of the campus; proposed habitat creation and wildlife enriched interventions within existing areas of the campus; and proposed biodiverse planting alongside new developments. The ecology and biodiversity enhancements should be chosen to support species noted within the Warwickshire, Coventry & Solihull Local Biodiversity Action Plan (LBAP), including farmland birds, hedgehog, great crested newt, bats, small mammals, amphibians and invertebrates. Specific ecological interventions will be guided the LBAP, and the Local Nature Recovery Strategies once they are published.

The key habitats and biodiverse features which will be considered for future enhancements comprise of the following:

PLAN 19: ECOLOGY AND BIODIVERSITY ENHANCEMENTS



Broadleaf Woodland:

Native woodland tree saplings of local provenance will be planted in groups to strengthen existing woodland belts and copses, in order to strengthen ecological corridors and provide refuge for wildlife. Proposed new pockets and linear plantations of woodland tree species will be located in quieter areas and boundaries of the site where they can establish as mature trees, and connect with existing woodland features, strengthening existing habitat present within and adjacent to the campus. Native understory planting should be introduced beneath larger copses of new tree planting. Saplings will be spaced a approximately 2.5m, and species will include both canopy and understory varieties.

Proposed individual trees:

Individual specimen trees, groups of trees and linear street tree planting will enhance the public realm and amenity areas of the campus. Species will include flowering and fruiting varieties to provide a food source for wildlife, and a diversity of species to enhance visual amenity.

Hedgerows:

New hedges will provide a habitat for a variety of species as the dense branches and foliage provide cover and refuge, and berries will provide a food supply for a variety of wildlife. The hedgerows create sheltered movement corridors for wildlife across the site and into the wider landscape. New hedgerow planting will comprise a variety of woody species with herb-rich hedge margins to maximise the variety of wildlife they will support, such as hedgehogs. The new hedgerows will be positioned to provide new migratory routes and strengthen those that already exist, both along the boundary and within the campus.

Wildflower meadow (semi-improved grassland / neutral grassland):

New native wildflower meadows will be created within the site to benefit invertebrates, small mammals and birds. Areas of existing enriched grassland which support low floral diversity will be managed to remediate the enrichment through annual mowing and supplementary seeding to accelerate the creation of a diverse flora akin to a more neutral sward. Floral meadows containing a combination of native and non-native nectar-rich flowers will be used to enhance the central campus amenity spaces and green space margins. Fields margins will be managed to enhance their biodiversity value, sown with native species to provide seed for wild birds or with wildflowers or agricultural legumes to provide pollen and nectar resources for invertebrates. The current species poor roadside verges will be managed to provide a more diverse flora. The management will involve annual cutting with supplementary wildflower seeding and plug planting. ‘No-mow’ grass verges will increase species diversity. Care will be taken to avoid invasive species and those which are susceptible to diseases such as Phytophthora, Acute Oak decline, and bleeding canker. Plants will be UK grown where possible, and will be sourced from nurseries that are part of the ‘Plant Healthy’ scheme.

Water course / water bodies:

In order to improve the diversity of water bodies / wildlife ponds, the marginal habitats will be enhanced with a mix of plant species which will provide cover and sources of nectar. The marginal habitat and species diversity will be enhanced using seeding supplemented with plug planting or through the installation of pre-planted coir mats to provide instant vegetation to the margins. Further naturalisation of the Canley brook would create more permeability for species which depend on linear water features. Planting to reinforce the existing bankside vegetation and create more structure and diversity would also provide benefits for other small mammals, birds and invertebrates within the site.

Biodiverse swales and rain gardens:

New developments are to prioritise the use of surface water attenuation / surface water attenuation (SuDS), to create vegetated swales and rain gardens. Planted swales will promote infiltration and reduce run off rates and volumes. A variety of plant species, both native and non-native, will be introduced for visual interest and to provide a valuable wildlife habitat.

Biodiverse Planting:

New biodiverse planting within residential areas central campus will support wildlife, boost biodiversity and create seasonal longevity. Plant selection will prioritise a rich source of nectar for beneficial insects, birds and small mammals, including species with spring blossom and berries. British native species will be supported by nectar-rich ornamental species, to extend the flowering season and create a planting matrix which will be easily manageable, with seed heads retained during winter. Spring flowering bulbs will enhance areas of amenity grass. Within residential areas of the site will include the introduction of bio-diverse edibles / herb beds.

Building biodiversity into Architecture:

The provision of green roofs and walls, biodiverse landscapes and nesting / roosting boxes will provide refuge and foraging habitats for a range of species, whilst creating stepping stones for wildlife to migrate across the site. Architectural green infrastructure including green and blue roofs, green walls, bird and bat boxes in building infrastructure will furthermore enhance the built environment. These features will be considered retrofitted to existing buildings where appropriate, and for new builds.

Artificial Refugia:

Strategic positioning of bird and bat boxes and hibernaculars within existing trees, semi-improved grassland, woodland, field and water margins, will increase the diversity of fauna within the site. Types of hibernacular could include, but not limited to, insect ‘hotels’, hedgehog homes, artificial bat roosts and bird boxes.

Flood Risk and Drainage Strategy

Key relevant planning policy:

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Coventry Local Plan

EM1 Planning for climate change adaption

states that all development will be required to be designed to be resilient to climate change through adaptation measures. For flood risk and drainage, this means optimising the use of multi-functional GI for local flood risk management, minimising vulnerability to flood risk by location of development in low flood risk areas and including mitigation measures.

EM4 Flood Risk Management

states that all development proposals will be assessed in respect of the level of flood risk from all sources. Development will need to provide a minimum standard to flood defence and resilience and not increase flood risk on site or elsewhere to reduce overall flood risk.

EM5 Sustainable Drainage Systems

aims to ensure all development apply SuDS to ensure surface water runoff is managed as close to its source as possible.

Warwick District Local Plan

CC1 Planning for Climate Change Adaption

states that all development is required to be designed to be resilient to, and adapt to the future impacts of climate change. This will include optimising the use of multi-functional GI for local flood risk management and minimising the vulnerability to flood risk by locating development in areas of low flood risk.

FW1 Reducing Flood Risk

aims to ensure development is located in areas of low flood risk, and ensuring all new development is resilient to surface water, fluvial and pluvial flooding.

FW2 Sustainable Drainage

states that all major developments must incorporate SuDS that provide biodiversity, water quality and amenity benefits. The policy also states that all new development sites will discharge at QBAR greenfield run-off rate, including an allowance for climate change.

Baseline conditions / drainage model

The majority of the SPD boundary is identified as falling within Flood Zone 1 of the Environment Agency's Flood Risk Map for Planning. This is recognised as the area with the lowest risk of flooding. Part of the southern area, at Tocil Wood, lies within Flood Zone 3 – the Canley Brook floodplain. Notably the existing flood risk map for planning only includes large catchments as such water courses are not modelled and separate modelling is being undertaken by the University.

The campus benefits from its rural location with a relatively large amount of green space and differing ecological habitats. A large number of the ecological features on site are also provided as part of the water management strategy.

Sustainable Drainage Systems (SuDS) are the main flood mitigation strategy in use within the campus. There are many existing SuDS features on site including ponds, swales and filter trenches. These features can be re-used and improved to accommodate additional surface water runoff, with additional SuDS features added to the campus.

Water and Surface Water Network

The surface water network can be split into two main sub-catchments:

- Westwood Brook Sub-Catchment
- Whitefield Coppice Sub-Catchment

Both sub-catchments ultimately drain to the south of the University and into the Canley Brook. The Canley Brook flows between the Central Campus and Gibbet Hill Campus in a south westerly direction before discharging further downstream into the Finham Brook. Canley Brook is a designated main river by the Environment Agency. There is also a smaller sub-catchment located on Gibbet Hill.

Westwood Brook Sub-Catchment

The Westwood Brook flows from the north to the southeast through the sub-catchment either through a series of culverts or via open channel flow.

The majority of the University's built environment is in this sub-catchment, therefore there are a number of outfalls that discharge directly into the Westwood Brook. Further north at the Westwood Campus, surface water is discharged via the Severn Trent public network into a tributary of Westwood

Brook. More recent buildings have individual attenuation structures to control the volume and rates of discharge.

The existing surface water network draining into the Lakeside and Heronbank ponds flow across to the Westwood Brook sub-catchment and discharges into the Westwood Brook via a surface water pumping station located in front of the Engineering Block on University Road.

There are ponds located adjacent to Tocil Wood. It is noted that these are aesthetic and not considered to be used for surface water attenuation as they are located within the Canley Brook floodplain.

Whitefield Coppice Sub-Catchment

This sub-catchment is mostly drained by a small watercourse to the east of Whitefield Coppice, which as previously noted drains into the Canley Brook.

The Lakeside and Heronbank ponds are only partly used for the attenuation of surface water runoff from some of the Lakeside residences. The remainder of the Lakeside residences and Heronbank are attenuated in four below ground detention tanks, with two of these being pumped into the ponds. As previously noted, all flows from the ponds eventually drain to the surface water pumping station in the Westwood Brook sub-catchment before discharging into the Westwood Brook.

There is a small natural pond behind the Heronbank buildings on the Hill Top site. It is not used for attenuating surface water runoff. The location of the pond suggests there is a potential flood risk for the Heronbank buildings during extreme storm events resulting from surface water shedding from the elevated Hill Top site.

Flood Risk

A study of the EA's online flood map, 'Risk of Flooding from Surface Water', suggests that the majority of the SPD boundary lies in a very low risk area with some medium and high-risk areas across the campus.

The majority of the University's built environment is located in the Westwood Brook sub-catchment and therefore it is important to understand the potential flood risk from the Westwood Brook. A detailed hydraulic analysis was undertaken in 2007 and updated in 2013 so that the 1 in 100-year floodplain for the Westwood Brook could be determined. The results of the analysis confirmed that no buildings were impacted by Westwood Brook up to the 1 in 100 year plus 20% climate change event.

The Westwood Brook Hydraulic model has been updated to reflect modern modelling standards and current climatic conditions to inform the flood extents within the campus in line with Environment Agency and Lead Local Flood Authority requirements.

The Westwood Brook Hydraulic model has been updated to reflect modern modelling standards and current climatic conditions to inform the flood extents within the campus in line with Environment Agency and Lead Local Flood Authority requirements. The new hydraulic model includes local enhancements of watercourse connectivity within the campus and updated hydraulic rainfall estimates to generate a revised set of flood risk outlines. The updated model demonstrates that surface water flooding has reduced compared to national mapping due to the representation of culvert connectivity through the campus.

Any future development within the campus should refer to the updated hydraulic model report as the baseline for the assessment of surface water flooding across the campus.

There are no concerns about floodplain encroachment for the Whitefield Coppice sub-catchment, as the sub-catchment is topographically elevated above any such constraint.

The discharge of surface water from a new development will take into consideration the drainage hierarchy with infiltration being the preferred option and discharge to a combined sewer being the least favourable.

SUDS should be incorporated into the design of new development to manage and control runoff unless there are practical reasons for not doing so. Consideration should be given to the use of source control features as part of a treatment train to improve water quality prior to disposal off-site. A Flood route exceedance plan should also be provided to show how flooding could be managed in the event of a blockage or a storm that exceeds the design event of the infrastructure.

Sequential/Exception test

New developments should be located in areas at low risk of surface water and fluvial flooding. In areas where this cannot be achieved, suitable evidence will need to be provided to demonstrate that there are no other alternative sites within the University of Warwick campus that are suitable for the development. Any residential development to be located in a high-risk flood area will also need to pass an Exceptions Test. If required, both a Sequential Test and Exceptions Test will need to be submitted at the planning stage to support the FRA.

Sustainable Drainage Systems (SuDs)

Future development within the SPD campus will prioritise the use of SuDs. The overarching aim is to reduce run off rates and where possible deal with surface water as close to its source and incorporate biodiversity into schemes. The landscape context of the SuDs will be taken into account as well as the engineering requirements.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance

- use a SuDS management treatment train –use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

The design of infiltration SuDS schemes and of their treatment stages needs to be appropriate to the sensitivity of the location and subject to a relevant risk assessment, considering the types of pollutants likely to be discharged, design volumes and the dilution and attenuation properties of the aquifer.

When considering the use of SuDs, development within the SPD boundary will use the following list of potential options in order of priority, depending on the appropriateness of each feature for the specific development.

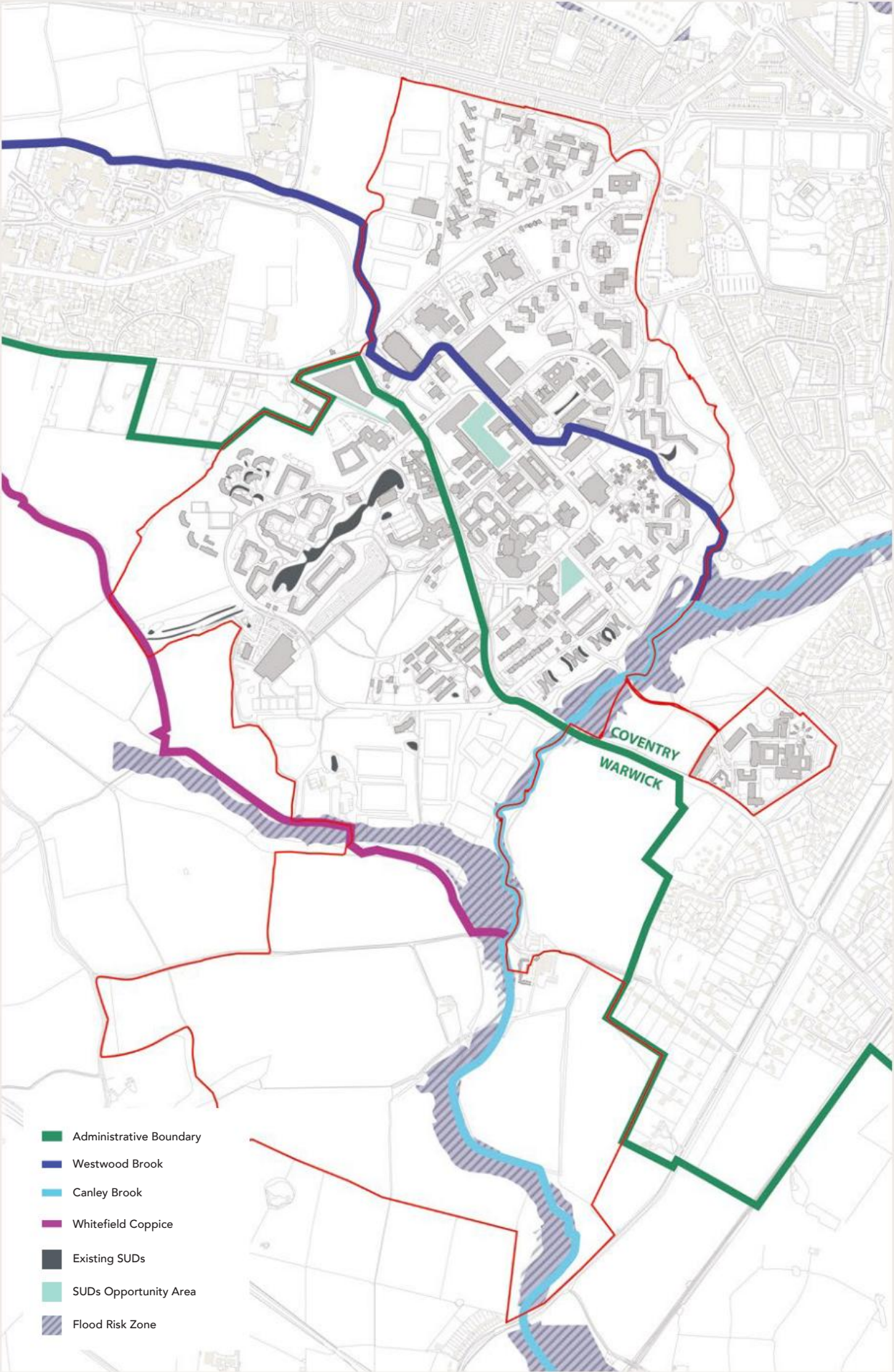
Suds Method	Description	Potential Locations
Green & Blue Roof	Vegetated or hardstanding roof designed to store water, which can be used for irrigation, cooling water or non-potable use within the building.	Proposed flat roofs could be designed with this feature if structural capacity, extra loadings and waterproofing are taken into consideration within the design.
Rainwater Harvesting	Rainwater from roofs and hard surfaces can be stored and reused.	Rainwater storage tanks can be located either underground, indoors on roofs or adjacent to buildings, depending on site size and access requirements.
Permeable Paving	Surfaces can be either porous or permeable. Rainwater infiltrates through the surface and into underlying layers where it is temporarily stored before either infiltrating into the ground or discharge through the drainage system.	Permeable paving can be located within proposed hard landscaping areas, especially in public realm areas.
Swales	Shallow, broad and vegetated channels designed to store and/or convey runoff and remove pollutants. Check dams and berms can also be installed along the flow path to promote settling and infiltration.	Swales may be utilised within the narrow, landscaped areas of the proposed plan to slow down and convey rainwater runoff.
Filter Drains/strips	Shallow excavations filled with gravel to create temporary storage of runoff used to filter and convey rainwater.	Due to ifs linear feature, filter drains are well suited to manage runoff from roads, car parks and other impermeable areas in verges or within landscaped areas in public realm areas.
Infiltration Basin	Vegetated depressions designed to store runoff on the surface and infiltrate it gradually into the ground.	Can be incorporated into large open areas of soft landscaping.
Rain Garden	Relatively small depressions in the ground that act as infiltration points for roof water and other ‘clean’ surface water runoff (low contamination levels).	Can be implemented in private curtilage for managing runoff from single properties, in small shared public spaces, on car park islands, roundabouts, footpaths, traffic calming and pedestrian zones.
Detention Basin	Surface storage basins are normally dry and provide flow control through attenuation of stormwater runoff.	Can be incorporated into large open areas of soft landscaping.
Retention Pond	Retention ponds provide stormwater attenuation and treatment.	Can be incorporated into large open areas of soft landscaping.
Geocellular Storage Systems	Geocellular systems can be used to control and manage surface water runoff.	The modular systems mean that they can be tailored to suit specification requirements of any site.

Management and Maintenance

The University monitors and manages its current drainage system, working to the aim of ensuring it is robust, resilient and sustainable. In addition to several existing SuDs intervention across the campus, through the development of the Eco Park project there are emerging ideas exploring the opportunity to utilise land parcels to both support wetland habitat creation and natural

management of water. Also, the University has an experienced grounds and gardens maintenance team for whom the monitoring, management and maintenance of our existing SuDs features is a key task that they undertake, as these features are an active part of the University landscape. The team are supplemented by specialist external contract support, where required.

PLAN 20: DRAINAGE PLAN



Heritage and Archaeology Strategy

Key National and Local legislation and Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the following duties for the decision maker in determining applications for listed building consent and planning permission affecting statutory listed buildings and/or their setting:

“S.66 (1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

The NPPF requires that planning should “conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.” with Chapter 16 outlining guidance regarding conserving and enhancing the historic environment.

Local Plan Policy

Warwick District Local Plan

Policy HE1: Designated Heritage Assets and their setting

Development will not be permitted if it would lead to substantial harm to or total loss of the significance of a designated heritage asset, unless it is demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or it is demonstrated that all of the following apply:

- a) The nature of the heritage asset prevents all reasonable uses of the site; and
- b) No viable use of the heritage asset itself can be found that will enable its conservation; and
- c) Conservation by grant funding or charitable or public ownership is not possible; and
- d) The harm or loss is outweighed by the benefit of bringing the site back into use.

Where development would lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.

- Experience of the asset;
- An asset’s associative relationships with other heritage assets. It is identified that views which contribute more to understanding the significance of a heritage asset include the following:
- Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- Those where town- or village-scape reveals views with unplanned or unintended beauty
- Those with historic or cultural associations.

Coventry Local Plan

Policy HE2: Conservation and Heritage Assets

1. In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. These Heritage Assets include:
 - a. Listed Buildings and Locally Listed buildings;
 - b. Conservation Areas;
 - c. Scheduled Ancient Monuments and Archaeological sites;
 - d. Registered Parks and Gardens; and
 - e. Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry’s heritage and are positively identified on the Coventry Historic Environment Record.
2. Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.
3. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.
4. The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.
5. The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.
6. Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.

7. All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:
 - a. The surviving buildings, defences and street plan of the medieval city centre and its suburbs;
 - b. The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);
 - c. The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;
 - d. Buildings associated with the city’s industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;
 - e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;
 - f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;
 - g. The significant elements of Coventry’s ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and
 - h. Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.
8. Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset’s archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset’s significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.

Baseline heritage conditions

There are a number of built heritage assets within or immediately adjacent to the SPD boundary. These are identified on the Heritage Asset Plan and are summarised below:



Houses For Visiting Mathematicians



3B Series 1 Sculpture

Within the SPD boundary

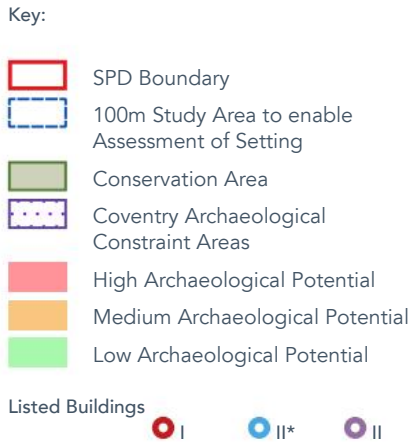
- Houses For Visiting Mathematicians. Grade II*. North East of the Warwick Medical School, Gibbet Hill. (1)
- 3B Series 1 Sculpture. Grade II. Located within the courtyard of the Rootes Residential Building (4)
- Cryfield Farmhouse, Gibbet Hill Road. Grade II. (3)

Adjacent to the SPD boundary

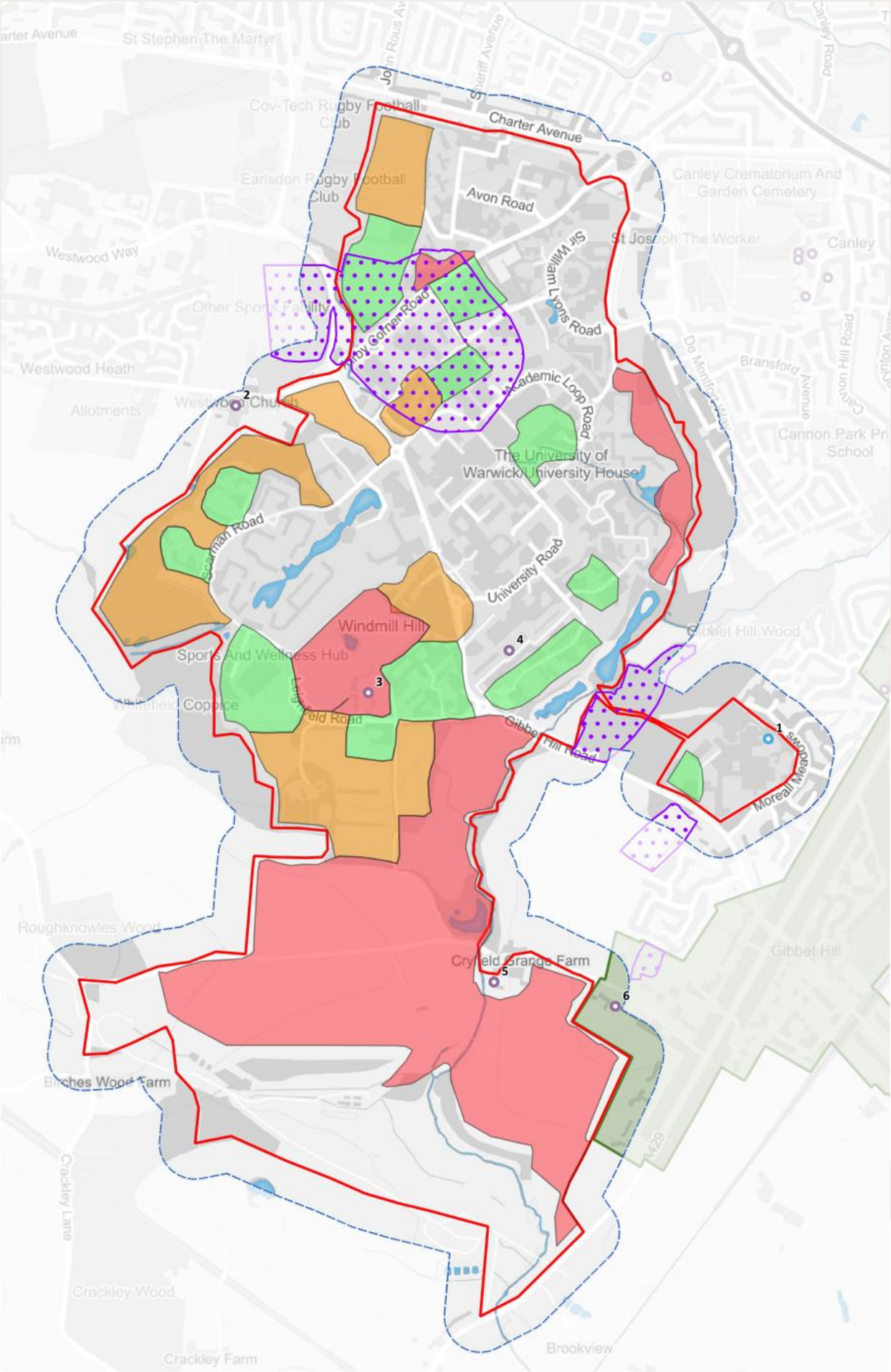
- Cryfield Grange Farmhouse, Cryfield Grange Road. Grade II (5)
- Church of St John the Baptist, Westwood Heath Road. Grade II (2)
- South Winds, Cryfield Grange Road. Grade II (6)
- Kenilworth Road Conservation Area

The information about heritage assets and the desk based assessments have been used in the considerations which have led to the development proposals and design guidelines set out in this SPD. In accordance with heritage best practice, additional heritage surveys relative to specific planning applications may be required to inform future decision making.

Where development is proposed which may impact on the significance of Heritage Assets, including any contribution made by their setting, proposals should seek to preserve the significance of the heritage asset, in line with adopted national and local policy and guidance.



PLAN 21: HERITAGE ASSETS PLAN



Archaeology

The Campus has been subject to a considerable amount of archaeological fieldwork connected with planning applications and construction activity over recent years. To inform this SPD, a comprehensive Archaeological Desk Based Assessment has been undertaken. Information from this Assessment is included on the Heritage Asset Plan (Plan 21)

The DBA has identified a number of archaeological 'events' and non designated assets across the site. These attest to a wide range of evidence of human activity and settlement of the land within the site from the prehistoric period onwards. There is also a legacy of previous archaeological investigations which have been prompted by previous development and work undertaken by Dr Stephen Hill, former University Archaeologist.

The Archaeological DBA has established that the archaeological potential of the campus varies by period and location. The Heritage Asset Plan identifies areas within the SPD boundary with high, medium and low archaeological potential. This information has been used to inform the development principles as set out in this SPD and will be used to guide future development within the SPD boundary.

National planning policies and planning guidance contained within the National Planning Policy Framework (DLUHC 2023) and its accompanying Planning Practice Guide (MCHLG 2016, updated November 2023, historic environment section published 2014, updated July 2019), as well as relevant local planning policies, require a mitigation response that is designed to take cognisance of the possible impacts upon heritage assets by a Proposed Development and avoid, minimise or offset any such impacts as appropriate

Future development will be required to assess the potential for construction works to directly or indirectly impact on below ground remains. The extent of assessment and appropriate level of field investigation will depend upon the level of potential of the site under consideration with engagement with the Local Planning Authority Archaeological advisers informing the assessment strategy. The level of mitigation proposed will be informed by the results of the investigations and in consultation with the relevant advisers.



Delivery and Implementation

This SPD covers the period to 2033 which reflects the University's ten year Capital Plan. This is informed by a longer term vision to 2050 although this is not for approval as it extends well into the next plan period. However, this sets the direction of travel for the University in seeking to consolidate the campus within its existing boundaries, reinvigorate and transform the core of campus into a more pedestrian friendly and vibrant place, whilst celebrating and enhancing the wonderful landscape setting of the University on the edge of the Warwickshire countryside.

The SPD provides guidance on the location and design principles to be applied to a series of development proposals in the period to 2033, including known projects like the Social Sciences Quarter and Science and Engineering Precinct, as well as other areas of likely future development.

The Strategic Principles (SP1-6) and Design Principles (DP1-6) will be applied to each development which comes forward for planning approval in either Coventry City or Warwick District areas.

The quantum of development assessed in traffic generation terms provides an upper limit for academic floorspace against which future applications can be considered. Where it falls within these floorspace limits, there should be no need for additional traffic impact assessment. The Monitor and Manage approach and associated legal mechanism will provide the basis for identifying any mitigation measures considered necessary to address the specific impacts of any proposal being considered by the local planning and highway authorities. Where development comes forward outside of these floorspace limits or for uses not assessed through the SPD (for instance, proposals on the Science Park), a separate Transport Assessment should be scoped and submitted with any planning application following the principles set out in the Monitor and Manage approach. This does not preclude other non-transport obligations being sought from future development where consistent with the guidance in this SPD.

Each development brought forward in accordance with this SPD should also deliver a proportionate level of provision or mitigation in respect of the relevant supporting strategies.

The University is unable to commit to specific phasing, other than its current intentions to bring forward the first phases of the Social Science Quarter and Science Precinct over the next five years. Given that all anticipated development is effectively infill and/or intensification of uses within the existing built campus, it is not considered that any phasing or triggers are necessary other than those in respect of transport mitigations as set out at Appendix 1.



Appendix 1

Transport Obligations

University of Warwick Transport Obligations – Committed, Proposed and SPD Framework

Section 1

Committed Social Sciences Quarter Transport S106 Obligations

Committed transport S106 obligations related to the Social Sciences Quarter planning permission ref. W23/0195 that forms part of the University’s SPD 2033 and was granted permission in August 2024.

Committed Obligation	Details	Implementation
Gibbet Hill Road	Sum of £50,000 towards the extension of the low-speed zone on Gibbet Hill Road through Kirby Corner to the junction of Mitchell Avenue with Westwood Way	Contribution to be paid prior to first occupation of the Development
Cannon Park Road	Sum of £25,000 to be applied towards speed reduction measures on Canon Park Road	Contribution to be paid prior to the commencement of the Development
Digital Demand Responsive Transport (DDRT)	Sum of £200,000 to be applied towards supporting Digital Demand Responsive Transport for two years and exploring extending the DRT zone to cover the student population	£100,000 prior to first occupation of the Development and £100,000 within one year of the date of first occupation of the Development
Bus Service Contribution: Leamington Spa	Sum of £50,000 to be applied towards the enhancement of the bus service passenger environment in Leamington Spa which shall include design fees for the provision of the Leamington Transport Hub where the bus service serving the University terminates in Leamington town centre	Contribution to be paid prior to the commencement of the Development
Walking Improvement Study	Area study defined by existing pedestrian movement patterns which will review and consider current pedestrian infrastructure at the University of Warwick main campus and its integration with the surrounding local highway network in order to identify potential pedestrian improvement opportunities	Prior to submission of a Reserved Matters Application Note: Study commenced by the University
Cycling Improvement Study	Area study defined by existing cycle movement patterns which will review and consider current cycle infrastructure at the University of Warwick main campus and its integration with the surrounding local highway network in order to identify potential cycle improvement opportunities	Prior to submission of a Reserved Matters Application Note: Study commenced by the University

Section 2

Science & Engineering Precinct (STEM) Transport S106 Obligations

Transport S106 obligations related to the Science & Engineering Precinct (STEM) planning permission ref. PL/2023/0002402/OUTM that was granted permission in July 2024 and that forms part of the University’s SPD 2033.

Draft Obligation	Details	Implementation
Westwwod Way Cycle Way Scheme	Sum of £171,000 towards the delivery of and works relating to the Westwood Way Cycleway Scheme	Contribution to be paid prior to the commencement of the Enabling Works.
Coventry-Kenilworth Cycleway study	Sum of £20,000 towards the study by CCC into a segregated cycleway from Coventry city centre to Kenilworth via the A429	Study commenced by CCC
Shared Mobility Network Study	Shared Mobility Network Study to include preliminary review of University of Warwick bus interchange layout	Study to be commenced by the University prior to commencement of the Enabling Works
Lord Bhattacharyya Way/ Academic Loop Road junction	Creation of a pedestrian and cycling priority raised table/crossing	To be commenced by the University prior to first occupation of the Development
Academic Loop Road	Extension of the segregated mobility lane from University Road along Academic Loop Road to its junction with Lord Bhattacharyya Way	To be commenced by the University prior to commencement of the Enabling Works
Milburn Hill Road	Introduction of traffic calming measures on Sir William Lyons Road through to Kirby Corner Road, via Milburn Hill Road	To be commenced by the University with permission from CCC prior to first occupation of the Development

Section 3

Non-Mitigation Sustainable Transport Contributions

The University is committed to working collaboratively with both CCC and WCC to make positive contributions to improving sustainable travel to/from and within the University.

Separate to any required mitigation associated with the Social Sciences Quarter, Science & Engineering Precinct (STEM) and the Monitor and Manage commitments, the University will provide the following financial support to enhance sustainable transport in the region.

Sustainable Transport Intervention	Details	Implementation
Annual Travel Survey	Staff and student travel surveys conducted on an annual basis by the University	To be completed by the University
Biennial Traffic Survey	Traffic surveys on surrounding local highway network every two years	To be completed by the University
Support pedestrian and cycle improvements at Gibbet Hill Road / Scarman Road / Lord Bhattacharyya Way Roundabout	Following opening of both Social Sciences Quarter and STEM, review operation of Gibbet Hill Road / Scarman Road / Lord Bhattacharyya Way Roundabout	Sum of up to £100,000 towards a design study and modelling to improved pedestrian and cycle infrastructure at the Gibbet Hill Road / Scarman Road / Lord Bhattacharyya Way Roundabout and a sum of up to £1,000,000 towards implementation
Support improvements to local cycle network (Coventry-Kenilworth Cycleway design and implementation)	To increase cycle use to/from the campus, by monitoring cycle mode share and postcode catchment data	Sum of up to £1,000,000 towards the implementation by CCC of a cycleway from Coventry city centre to Kenilworth
Support improvements to walking, cycling and shared mobility (public transport, digital demand responsive transit, taxi, etc.) in the vicinity of main campus and associated transport corridors/hubs	Support the implementation of improvements identified within the Walking Improvement Study, Cycling Improvement Study and Shared Mobility Network Study (the Studies)	Sum of up to £1,000,000 towards the implementation of walking, cycling and shared mobility improvements as defined by the University and the Studies
Support improved bus, coach and taxi access to the campus	Optimise bus interchange layout to improve capacity and access	Sum of up to £500,000 towards a design study, modelling and implementation of bus interchange enhancements at main campus
Reduce vehicle traffic on Gibbet Hill Road	Review and comment on business case updates for A46 Link Road	Sum of up to £10,000 to support business case review for A46 Link Road in the vicinity of the University as well as sharing of data
Promote delivery of Very Light Rail scheme to main campus	Support implementation of Very Light Rail preferred route and promote dedicated University route from Coventry city centre	Sum of up to £10,000 towards the business case and implementation by CCC of a Very Light Rail route from Coventry city centre to the University

Section 4

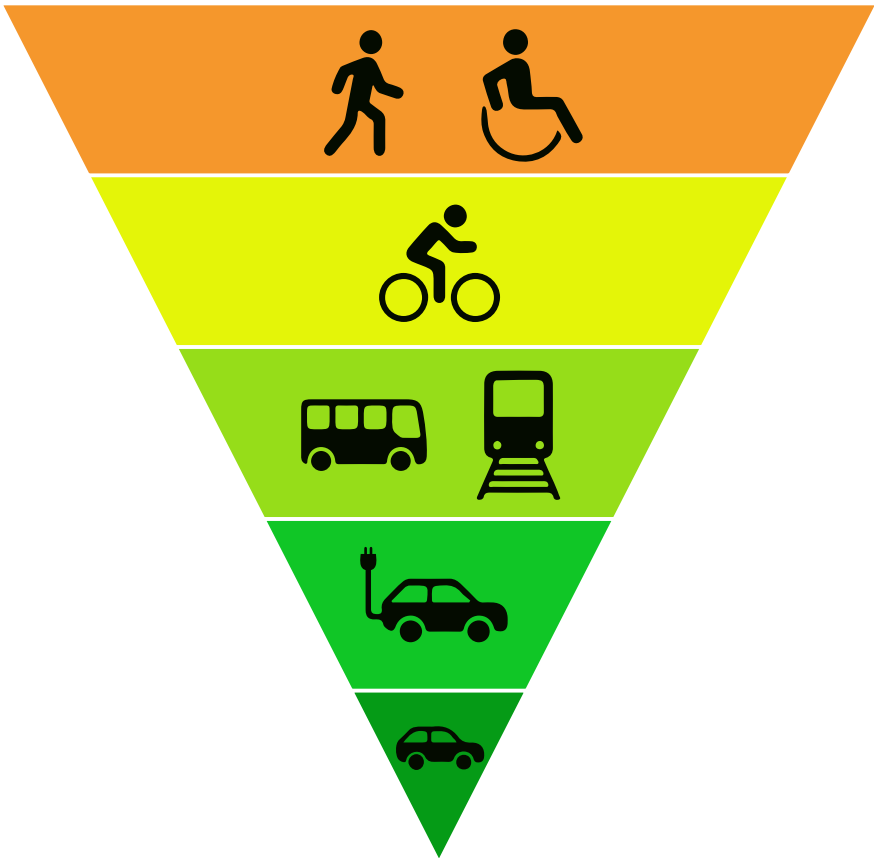
Monitor and Manage Approach and Governance

A series of transport-related monitor and manage obligations have been agreed with and will be reviewed by the Monitor and Manage Transport Sub Board ¹.

The University has committed a sum of up to £2,000,000 (index linked) to a Monitor and Manage Transport Fund for the duration of the SPD to 2033. This can be drawn down from should trigger points be met and mitigation required. This will be determined on a case-by-case basis and in agreement with all parties at the Monitor and Manage Transport Sub Board.

An option to utilise the Monitor and Manage Transport Fund to support improving sustainable transport opportunities as a proactive and flexible approach, separately from the trigger point obligations, will be at the discretion of the Monitor and Manage Transport Sub Board.

The Monitor and Manage Transport Fund should be prioritised based on the transport modal hierarchy with mitigation focused towards the most sustainable and lowest carbon travel modes.



As and when new proposals come forward as part of the SPD, the Monitor and Management Obligations can be used as the basis for determining appropriate S106 mitigation to support the planning process.

¹ The Monitor and Manage Transport Sub Board to include representatives from CCC, WDC, WCC, UoW, TfWM and NH, will monitor, review, co-ordinate and implement the agreed monitor and manage set of principles in relation to all future University development activities, the SPD and any associated s106 obligations. The Sub Board will be tied to a legally binding governance process to allocate appropriate funding agreed by all parties. The Sub Board will also discuss and manage transport issues and take opportunities to foster collaboration and sharing of information to improve transport and travel within the local vicinity of the university campus and encourage positive sustainable transport shifts.

Highways

Monitor and Manage Obligation	Monitoring and Trigger	Manage
Car parking utilisation monitoring	Monitor car park usage and occupancy for five years, from first occupation off Social Sciences Quarter or STEM, using ANPR data on a monthly basis	Use Monitor and Manage Transport Fund for mitigation to include package of measures: <ul style="list-style-type: none">• Overspill parking monitoring in defined locations• Financial contribution towards review and consultation of amendments or introduction of parking controls on public highway• Implement further sustainable travel initiatives and incentives• Disincentivise car usage
	If utilisation exceeds 90% occupancy at peak periods for three consecutive months, further mitigation is required	
Review University-related traffic to/from Campus at peak periods for duration of the SPD on a biennial basis to ensure 16% peak period uplift from 2018 baseline is not reached	Biennial traffic surveys (Oct/Nov) at fixed locations to monitor University-related traffic over time, to be supplemented with evidence base from annual travel survey and Vivacity sensors	If 16% peak period University-generated traffic growth is exceeded, use Monitor and Manage Transport Fund for mitigation to include sustainable transport measures

Active Travel – Walking

Monitor and Manage Obligation	Monitoring and Trigger	Manage
Support and promote increased walking by students and staff	Use results from the Walking Improvement Study to prioritise opportunities for improvements to the walking environment to, from and within the Campus	Use Monitor and Manage Transport Fund to implement walking-related improvements to be agreed by the Monitor and Manage Transport Sub Board
Review University-related traffic to/from Campus at peak periods for duration of the SPD on a biennial basis to ensure 16% peak period uplift from 2018 baseline is not reached	Biennial traffic surveys (Oct/Nov) at fixed locations to monitor University-related traffic over time, to be supplemented with evidence base from annual travel survey and Vivacity sensors	<div>If walking mode share drops below target, use Monitor and Manage Transport Fund for mitigation to include optional package of measures to be considered as one-off interventions or through a series of consequential actions:<ul style="list-style-type: none">• Implement further active travel initiatives and/or incentives• Consider further implementation of improvements as part of the Walking Improvement Study</div>

Active Travel – Cycling

Monitor and Manage Obligation	Monitoring and Trigger	Manage
Support and promote increased cycling by students and staff	Use results from the Cycle Improvement Study to prioritise opportunities for improvements to the walking environment to, from and within the Campus	Use Monitor and Manage Transport Fund to implement cycling-related improvements to be agreed by the Monitor and Manage Transport Sub Board
	Cycle training support for staff and students in partnership with local authority partners and engagement programmes	Use Monitor and Manage Transport Fund to implement a structured programme of cycle training for staff and students of all abilities – repeated annually
	Monitor cycle parking utilisation across the Campus	Use Monitor and Manage Transport Fund to provide more cycle parking at popular locations
Ensure cycle mode share for staff and students increases and does not fall below 8% for staff, 5% for undergraduates and 7% for postgraduates	Monitor cycle mode share through annual travel survey and Vivacity sensors	<div>If cycle mode share drops below target, use Monitor and Manage Transport Fund for mitigation to include optional package of measures to be considered as one-off interventions or a series of consequential actions:<ul style="list-style-type: none">• Implement further active travel initiatives and/or incentives• Provide more cycle parking and/or supporting facilities in response to feedback from annual travel survey• Consider further implementation of improvements recommended within the Cycling Improvement Study</div>

Sustainable Travel – Bus Services

Monitor and Manage Obligation	Monitoring and Trigger	Manage
Review existing bus service patronage and occupancy levels and customer experience on services to/from the Campus based on where staff and student demand is highest. Consideration of off campus public transport infrastructure specifically where it is connected to the University	Work with local authority partners and operators to determine service gaps and support delivery of enhanced services and customer experience in areas of high demand	Use Monitor and Manage Transport Fund to support bus routes serving the University, with KPIs and monitoring of any funded improvements
Promote bus use and ensure bus mode share for staff and students does not fall below 10% for staff, 35% for undergraduates and 35% for postgraduates (subject to a consistent level of bus service availability, reliability and affordability)	Monitor bus mode share through annual travel survey	<div>If bus mode share drops below target, use Monitor and Manage Transport Fund for mitigation to include optional package of measures to be considered as one-off interventions or a series of consequential actions:<ul style="list-style-type: none">• Enhanced performance agreement from operators• Discounted ticketing for staff and students• Funding to support delivery of enhanced services</div>

Title: Compliance Policies (Asbestos, Building Safety, Electrical Safety, Gas and Heating, Lift Safety and Water Hygiene)

Lead Officer: Jen Morrison – Project Manager

Portfolio Holder: Councillor Helen Adkins

Wards of the District directly affected: All

Approvals required	Date	Name
Portfolio Holder		Councillor Helen Adkins
Finance		Andrew Rollins
Legal Services		
Chief Executive		Chris Elliott
Director of Climate Change		Dave Barber
Head of Service(s)		Lisa Baker
Section 151 Officer		Andrew Rollins
Monitoring Officer		Graham Leach
Leadership Co-ordination Group		Cllrs Davison, Harrison, Boad, Day and Falp
Final decision by this Committee or rec to another Cttee / Council?	No	
Contrary to Policy / Budget framework?	No	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No	
Accessibility Checked?	No	

Summary

This report seeks to provide an overview of the policies that have been developed and approved relating to the Asset Compliance project (Pennington Report)

Recommendation(s)

- (1)** That Cabinet approves the policies relating to six Asset Compliance areas: Asbestos, Building Safety, Electrical Safety, Gas and Heating, Lift Safety, and Water Hygiene.
-

1 Reasons for the Recommendation

- 1.1 Through the work being completed on the Compliance Project (Pennington Report) it was clear that there was a need for a concise set of policies relating to the safety of the Council's Assets and Housing Stock. These policies are a regulatory requirement and in line with current legislation, best practice, and guidance.
- 1.2 In April 2024, members of the Compliance Project Team met with Pennington Choices to establish the principles of the Compliance policies. Pennington Choices subsequently drafted the policies to ensure that the specific criteria was met and that there was alignment to the operational requirements of the Council.
- 1.3 The draft reports were received and discussed in Compliance Programme Board and Asset Compliance Committee. There were a few minor modifications made (formatting issues and the change of Head of Neighbourhood and Assets to the Deputy Chief Executive). No other comments were received and the policies were put forward for final consideration by the Portfolio Holder and the Deputy Chief Executive.

2 Alternative Options

- 2.1 The policies are a regulatory requirement and therefore there are no Alternative Options arising from this report.

3 Legal Implications

- 3.1 There are no Legal Implications arising directly from this report.

4 Financial Services

- 4.1 There are no direct financial implications of policies.

5 Corporate Strategy

- 5.1 Warwick District Council has adopted a Corporate Strategy which sets three strategic aims for the organisation. Each proposed decision should set out how the report contributes to the delivery of these strategic aims. If it does not contribute to these aims or has a negative effect on them the report should explain why that is the case.
- 5.2 Delivering valued, sustainable services – The policies support service delivery, including regulatory assessments of performance.
- 5.3 Low cost, low carbon energy across the district – No direct implications.
- 5.4 Creating vibrant, safe and healthy communities of the future – These policies show that the Council is compliant with the regulatory requirements and that

they will ensure the safety of the residents.

6 Environmental/Climate Change Implications

- 6.1 There are no Environmental / Climate Change implications arising from this report.

7 Analysis of the effects on Equality

- 7.1 An Analysis of the effects on Equality is not required for this report.

8 Data Protection

- 8.1 There are no Data Protection implications arising from this report.

9 Health and Wellbeing

- 9.1 There are no Health and Wellbeing implications arising from this report.

10 Risk Assessment

- 10.1 There are no additional Risk Assessment implications arising from this report.

11 Consultation

- 11.1 The Compliance Programme Board and Asset Compliance Committee approved the policies initially. The policies were also provided to RIG for information. They were then considered by the Deputy Chief Executive and the Portfolio Holder for Housing.

Background papers:

Please find the six Compliance policies attached.

Supporting documents:

No other supporting documents.

Asbestos Policy



Name	Asbestos Policy
Owner	Compliance Manager
Version	Final V1.0
Last Review	June 2024
Next Review	June 2026
Resident Influencing Group	Consulted June 2024
Board Approval	July 2024

Strategic Lead	Deputy Chief Executive Officer
Sign	<div></div>
Date	August 6, 2024
Chair of Board	Paul Wightman
Sign	<div></div>
Date	06-Aug-2024

Document Version Control

Version	Date	Author	Changes	Approved by

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1.0 Introduction and Objectives

- 1.1 As a landlord, Warwick District Council is responsible for maintenance and repairs to our homes, communal blocks and other properties we own and manage, many of which will have been constructed using asbestos containing materials. As such, we have a legal duty to manage asbestos in these buildings.
- 1.2 Homes or buildings built or refurbished before the year 2000 may contain asbestos. If an asbestos containing material is disturbed or damaged it can release asbestos fibres into the air which are a danger to health if inhaled. Workers who carry out repairs and maintenance work are at particular risk, however, building occupants could also be put at risk.
- 1.3 The key objective of this policy is to ensure our Cabinet, Management, employees, partners and residents are clear on our legal and regulatory asbestos safety obligations. This policy provides the framework our staff and partners will operate within to meet these obligations.
- 1.4 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our Document Management System (DMS) and distributed to all relevant members of staff.

2.0 Scope

- 2.1 This policy applies to the following property types:
 - Domestic properties (houses, flats bungalows, and so on).
 - Communal blocks.
 - Sheltered / independent living schemes.
- 2.2 Some aspects of this policy also apply to individual domestic properties (houses, flats bungalows, and so on). Applicable items will be clearly referenced.
- 2.3 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. Adherence to this policy is mandatory.

3.0 Roles and Responsibilities

- 3.1 The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).

- 3.2 The Management Team will receive fortnightly performance reports in respect of asbestos safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.3 The Deputy Chief Executive Officer has strategic responsibility for the management of asbestos safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.
- 3.4 Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed the Deputy Chief Executive Officer as our Health and Safety Lead.
- 3.5 The Compliance Manager has overall operational responsibility for asbestos management. The Contract Administrator has day-to-day operational responsibility for managing asbestos safety and will be responsible for overseeing the delivery of these programmes. The Contract Administrator will fulfil the role of the Appointed Person on behalf of Warwick District Council.
- 3.6 The Compliance Team Leader is the Deputy Appointed Person who will provide cover to the Contract Administrator (Appointed Person) in their absence.
- 3.7 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.

4.0 Legislation, Guidance and Regulatory Standards

- 4.1 **Legislation** - The principal legislation applicable to this policy is:
- The Control of Asbestos Regulations 2012.
 - This policy also operates within the context of additional legislation (see Appendix 1).
- 4.2 **Approved Code of Practice (ACoP)** - The principal ACoP applicable to this policy is:
- ACoP L143 - Managing and working with Asbestos (Second edition, 2013).
- 4.3 **Guidance** – The principal guidance documents applicable to this policy are:
- HSG227 - A comprehensive guide to managing asbestos in premises (First edition, 2002).
 - HSG247 - Asbestos: The licensed contractors' guide (First edition, 2006).
 - HSG264 - Asbestos: The survey guide (Second edition, 2012).
 - INDG223 - Managing asbestos in buildings: a brief guide (Revision 5, April 2012).
 - HSG210 - Asbestos Essentials: A task manual for building, maintenance and allied trades and non-licensed asbestos work (Fourth edition, 2018).

- HSG248 – Asbestos: The Analysts’ Guide (Second edition, 2021).

- 4.4 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

- 4.5 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution under the Control of Asbestos Regulations; and via a regulatory judgement from the Regulator of Social Housing.

5.0 Obligations

- 5.1 Under The Control of Asbestos Regulations 2012 (CAR 2012) Warwick District Council has a legal obligation under Part 2, Section 4 ‘Duty to manage asbestos in non-domestic properties’ and is the ‘Duty Holder’ for the purposes of the legislation. We are required to:

- Find out if asbestos containing materials (ACMs) are present, where we have an obligation to do so, presuming that materials contain asbestos unless we have strong evidence that they do not.
- Identify the location and condition of any ACMs.
- Assume asbestos is present if the property was built prior to the year 2000.
- Keep an up-to-date record (an asbestos register) of the location and condition of ACMs or presumed ACMs.
- Assess the risk from any ACMs found.
- Prepare an Asbestos Management Plan that sets out how we will manage the risk from ACMs, and review and monitor its implementation.
- Set up a system to provide information on the location and condition of ACMs to anyone who is liable to work on or disturb them.
- Assess the reliability of information we receive relating to asbestos within the properties we own and manage. Anyone who has information on the whereabouts of asbestos within these properties is required to make this available to us.

6.0 Statement of Intent

- 6.1 We acknowledge and accept our responsibilities under CAR 2012 as outlined in Section 5, and we recognise that the main hazard in relation to asbestos is the non-identification of ACMs. As such, we will protect those persons potentially exposed to asbestos as far as is reasonably practical, through the use of appropriate control measures and working methods.
- 6.2 We will have an Asbestos Management Plan and will maintain an asbestos register.
- 6.3 We will ensure that information about ACMs (known or presumed) is provided to every person liable to disturb it, accidentally or during the course of their work. This includes employees, contractors and residents. Following the approval of this policy we will consider developing and providing resident friendly information about ACMs to our residents.
- 6.4 We will generally not use asbestos labelling in domestic premises or non-domestic premises and common areas of domestic blocks. However, should we decide to use asbestos labelling within the lifecycle of this policy, we will update the policy accordingly.
- 6.5 We will provide appropriate personal protective equipment to our in-house delivery team where required.
- 6.6 We will ensure that there is a robust process in place to manage immediately dangerous situations identified during asbestos related works.
- 6.7 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 6.8 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.
- 6.9 We will establish and maintain a risk assessment for asbestos management and operations, setting out our key risks from asbestos and appropriate mitigations.
- 6.10 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place for all repairs to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement works and refurbishment projects.

7.0 Programmes

- 7.1 **Non-domestic properties** – All non-domestic properties (communal blocks/supported schemes) that we own or manage, built prior to the year 2000, will have an asbestos

management survey that is compliant with CAR 2012 (dated after 6 April 2012 when this legislation came into effect).

- 7.2 We are in the process of establishing a programme of asbestos re-inspections for all properties that contain ACMs (known or presumed). Currently re-inspections are carried out annually, however, we will work towards a more risk-based approach with items identified by the previous survey. We will not re-inspect any properties where the initial asbestos management survey confirms that there are no ACMs.
- 7.3 **Domestic properties** – Following approval of this policy we will endeavour to hold asbestos survey data on our domestic properties. Within the lifecycle of this policy, we will consider a risk-based approach to carrying out surveys within domestic properties.
- 7.4 **Garages** – We have conducted management surveys on approximately 70 garages, many of which may contain ACMs. We will continue to carry out a risk-based programme of sample inspections to assess the location and condition of ACMs within these garages and implement a programme of remedial works as necessary.
- 7.5 **Repairs / planned maintenance** - We will endeavour to review existing asbestos survey information prior to carrying out any intrusive void work, day-to-day repairs, planned maintenance or refurbishment work. Where there is no asbestos information, prior to the work taking place, we will commission a refurbishment/demolition survey to the areas of the property that are likely to be disturbed as part of the proposed works. We will also undertake a management survey to the remainder of the property as part of the same refurbishment/demolition survey. Once completed, survey details will be provided to the relevant operatives or contractors.

8.0 Follow-up Work

- 8.1 Where asbestos is positively identified and removal, sealing or encapsulation is recommended by the competent person, this will be carried out as follows:
- **Non-licensed works** (as defined in regulation 2 of CAR 2012) – will be undertaken by a Licensed Asbestos Removal Contractor (LARC) licensed by the Health and Safety Executive in compliance with CAR 2012.
 - **Notifiable non-licensed works** (as defined in regulation 2 of the CAR 2012) – will be undertaken by a LARC.
 - **Licensed works** (as defined in regulation 2 of CAR 2012) – will be undertaken by a LARC.

9.0 Data and Records

- 9.1 We will maintain a core asset register of all properties we own or manage, setting out which properties are and are not required to be included on the asbestos re-inspection programme.
- 9.2 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from asbestos programmes and the programme remains up to date.
- 9.3 We will keep an asbestos register in the nominated surveying contractors web portal, accessible by WDC staff and approved contractors, and duplicate records are held in the DMS which is interfaced with Active H. The asbestos register will include details of ACMs in the properties we own or manage, with information on the type, address, location and condition. We will hold inspection dates, asbestos surveys, details of remediation works and evidence of completion of these works in the Active H system.
- 9.4 We will keep all these records indefinitely unless specified otherwise in the Records Management Policy and have robust processes and controls in place to maintain appropriate levels of security for all asbestos related data.
- 9.5 We will keep air monitoring and health surveillance records for at least 40 years.

10.0 Resident Engagement

- 10.1 We consider good communication essential in the effective delivery of asbestos safety, therefore we will establish a resident engagement strategy and communication programme. This will support residents in their understanding of asbestos, advise them of how they can manage any risk if there is asbestos within their property, and encourage them to report any asbestos safety concerns.
- 10.2 We also aim to successfully engage with vulnerable and hard to reach residents. We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.

11.0 Competent Persons

- 11.1 The operational lead will hold a P405, P402, P407 or W504 qualification (or equivalent). If they do not have one of these, they will obtain this within 12 months of the approval of this policy.
- 11.2 Only competent contractors (as per HSG264) will carry out asbestos management surveys.

- 11.3 Only competent Licensed Asbestos Removal Contractors will carry out all work on asbestos, including non-notifiable non-licensed work, notifiable non-licensed work or licensed works.
- 11.4 Suitably competent persons will undertake asbestos re-inspections and the removal of non-licensed asbestos, under the supervision of persons who are suitably trained and competent to manage this work.
- 11.5 Only suitably competent asbestos consultants and contractors will provide third party technical quality assurance checks.
- 11.6 We will check that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor’s certification appropriately.

12.0 Training

- 12.1 We will establish training on this policy and the procedures that support it, through appropriate methods including team briefings; basic asbestos awareness training; and on the job training for those delivering the asbestos programme, planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.

13.0 Performance Reporting

- 13.1 We will report key performance indicator (KPI) measures for asbestos safety that follow the requirements set out in the Tenant Satisfaction Measures (TSMs) which came in to force on 1 April 2023 and must be reported to the Regulator on an annual basis.
- 13.2 We will report the following asbestos safety performance:

Report recipient	Frequency
Regulator of Social Housing	Annual
Management Team	Fortnightly
Board	Monthly
Asset and Compliance Committee	Bi-monthly
Resident Involvement Group	Bi-annually

- 13.3 We will also report the following:

Data – the total number of:

- Properties split by category (communal blocks/schemes, commercial/other).
- Properties with a post 2012 management survey.

- Properties without a post 2012 management survey.
- Properties on the re-inspection programme.
- Properties not on the re-inspection programme.
- Properties with a valid and in date re-inspection.
- Properties without a valid and in date re-inspection.
- Properties due to be re-inspected within the next 30 days.
- Completed, in-time and overdue follow-up actions arising from the surveys.

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

In addition:

- The percentage of domestic properties with full asbestos data.
- The number of RIDDOR notifications to the HSE with regards to asbestos safety.

14.0 Quality Assurance

- 14.1 Following approval of this policy we will begin to require external contractors to provide the results of their own five per cent quality assurance audit checks, on a monthly basis as required by UKAS.
- 14.2 We will endeavour to undertake ten per cent third party audits of asbestos removals and air monitoring.
- 14.3 We undertake internal desktop audits to one hundred per cent of all records.
- 14.4 We will procure an independent audit of asbestos management within six months of the approval of this policy. We will endeavour to carry out audits at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues for correction.

15.0 Significant Non-Compliance and Escalation

- 15.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.
- 15.2 All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Warwick District Council employee becoming aware of it.

- 15.3 Any non-compliance issue identified at an operational level will be formally reported to the Compliance Manager in the first instance, who will agree an appropriate course of corrective action with the Deputy Chief Executive Officer and report details of the same to the Management.
- 15.4 In cases of serious non-compliance, Management Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 15.5 We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to asbestos safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

16.0 Glossary

16.1 This glossary defines key terms used throughout this policy:

- **Duty Holder:** The owner of the non-domestic premises or the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises, for example through an explicit agreement such as a tenancy agreement or contract.
- **Management survey:** A survey to enable the management of asbestos-containing materials during the normal occupation and use of premises.
- **Refurbishment/demolition survey:** A refurbishment/demolition survey is a survey which is necessary prior to any works which may affect the fabric of a building, and which is used to locate (as far as reasonably practicable) asbestos-containing materials. The survey may be within a localised area or cover the whole building.
- **UKAS:** The appointed national accreditation body for asbestos surveyors. Accreditation is a means of assessing, in the public interest, the technical competence and integrity of organisations offering evaluation services.

Appendix 1 - Additional Legislation

This policy also operates within the context of the following legislation:

- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- The Occupiers' Liability Act 1984

- The Workplace (Health Safety and Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- The Asbestos (Licensing) (Amendment) Regulations 1998
- The Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations (as amended) 2002 (COSHH)
- Hazardous Waste (England and Wales) Regulations 2005 (Amendment 2009)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Social Housing (Regulation) Act 2023

Building Safety Policy



Owner	Deputy Chief Executive Officer
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1.0 Introduction and objectives

- 1.1 The Building Safety Act 2022 (the Act) received Royal Assent on 28 April 2022. The Act includes fundamental changes to improve building, fire and structural safety: its ultimate objective is that people will be, and will feel, safer in their homes.
- 1.2 As a landlord and building owner, Warwick District Council must take action to identify, manage and mitigate risks associated with structural and fire safety for buildings that we own and manage to protect our residents, buildings and anyone else affected by our business.
- 1.3 The objective of this policy is to ensure that our Board, Management Team, employees, partners and residents understand our legal building safety obligations, and the framework everyone should operate within to meet these obligations.
- 1.4 This policy forms part of our wider organisational commitment to a positive safety culture and should be read in conjunction with our overarching Compliance Strategy, Corporate Health and Safety Policy, and Fire Safety Policy. It will be saved on our Intranet and external website and distributed to all relevant members of staff.

2.0 Scope

- 2.1 This policy applies to higher-risk buildings as defined within Part 4 of the Act, which are buildings with at least seven storeys or at least 18 metres in height and have at least two residential units.
- 2.2 The scope of this policy focuses on the obligations set out for occupied, higher-risk buildings under Part 4 of the Act.
- 2.3 Warwick District Councils owns and manages six higher-risk buildings as detailed below:

Building
(1-89) Eden Court
(2-92) Southorn Court
(2-92) Ashton Court
(1-54) Radcliffe Gardens
(29-74) Stamford Gardens
(1-64) Westbrook House

- 2.4 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. Adherence to this policy is mandatory.

3.0 Roles and responsibilities

- 3.1 Under the Act, when the building is occupied Warwick District Council is the **Accountable Person**. An **Accountable Person** is an organisation or individual who owns or has a legal obligation to repair any common parts of the buildings.

We have confirmed that there are no other organisations or individuals who have Accountable Person responsibilities for any of the six higher-risk buildings.

- 3.2 To fulfil the duties under the Act, Warwick District Council will delegate responsibilities to the wider team, who will implement and oversee the arrangements and delivery of building safety in our occupied higher-risk buildings (see Sections 3.8 - 3.10 below).
- 3.3 The Board has overall governance responsibility for ensuring this policy is implemented to ensure compliance with legislation and regulatory standards. The Board will approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).
- 3.4 The Management Team will receive fortnightly performance reports in respect of building safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue.
- 3.5 The Deputy Chief Executive Officer has strategic responsibility for the management of building safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy and will be the named person required for registering the buildings and submitting mandatory occurrences to the building safety.
- 3.6 Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed the Deputy Chief Executive Officer as our Health and Safety Lead.
- 3.7 The Building Safety Lead and Fire Safety Lead have overall operational responsibility for the management of building safety and the six higher-risk buildings.
- 3.8 The Building Safety Lead and Fire Safety Lead will be supported by the Housing Health and Communities Team, Compliance Team and Media Team to deliver day-to-day management of our higher-risk buildings and maintain communication with residents to ensure safety standards are adhered to.

4.0 Legislation, guidance and regulatory standards

- 4.1 **Legislation** - The principal legislation applicable to this policy is:
- The Building Safety Act 2022 – the main provisions of the Act came into force from April 2023. Full implementation of the Act was in October 2023.
 - This policy also operates within the context of secondary and additional legislation (see Appendix 1).

- 4.2 **Regulatory** standards – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

- 4.3 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including:

- Compliance notices, urgent action notices, fines or imprisonment from the Building Safety Regulator.
- Prosecution or fines by the Health and Safety Executive (HSE) or Fire and Rescue Service.
- Prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007, which could result in unlimited fines, remedial orders and publicity orders.
- Compensation claims under the Defective Premises Act 1972 or Section 38 of the Building Act 1984.
- A regulatory judgement or other sanction from the Regulator of Social Housing.

5.0 Obligations

- 5.1 Under the Act, as an **Accountable Person** for occupied higher-risk buildings we must take reasonable steps to:

1. Assess and manage building safety risks.
2. Prevent the spread of fire and structural failure.
3. Reduce the seriousness of an incident if one happens

- 5.2 As we are also the **Principal Accountable Person**, we have the following additional duties to:

- Register occupied higher-risk buildings with the Building Safety Regulator (BSR).
- Prepare safety cases and safety case reports for higher-risk buildings.
- Apply for a building assessment certificate when directed to do so by the BSR.
- Undertake building safety risk assessments.
- Implement processes to ensure the golden thread of information.
- Introduce a building safety management system.
- Implement a mandatory occurrence reporting system.
- Produce residents’ engagement strategies.
- Establish a complaints procedure for residents.

6.0 Statement of intent

- 6.1 We acknowledge and accept our responsibilities under the Building Safety Act 2022 as outlined in Section 5 and set out what we will do to meet these duties in Section 7.
- 6.2 We will comply with the Regulatory Reform (Fire Safety Order) 2005, Fire Safety Act 2021 and Fire Safety (England) Regulations, to ensure our higher-risk meet all legal requirements (refer to our Fire Safety Policy for details).
- 6.3 We will ensure all higher-risk buildings receive all applicable property compliance inspections, surveys and checks that impact building safety, including periodic electrical inspections, gas safety checks, fire door checks, emergency lighting tests, and so on.
- 6.4 When letting properties within higher-risk buildings, we will consider the suitability of the accommodation for the prospective resident in respect of building and fire safety.
- 6.5 We will work with Warwickshire Fire and Rescue Service to receive advice and training and share relevant information about our higher-risk buildings.
- 6.6 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary, if access has been attempted at least twice, the appropriate procedures have been followed and approval has been given by the appropriate Manager. Where resident vulnerability issues are known or identified, we will ensure we safeguard the wellbeing of the resident.
- 6.7 We will operate a robust process to manage resident vulnerability and tenancy management issues (including hoarding) whilst ensuring we safeguard the wellbeing of the resident.
- 6.8 We will operate effective contract management arrangements with the contractors responsible for delivering building and fire safety related works, including ensuring contract agreements are in place, conducting client-led performance meetings, and annually checking that contractors' employee and public liability insurance is in date.
- 6.9 We will comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM), including where the roles of Client, Principal Designer, Designer, Principal Contractor and Contractor have additional duties under the Building Safety Act. A construction phase plan will be in place for all repairs, component replacements and refurbishment work.
- 6.10 We will operate effective arrangements to ensure that routine and planned repairs, maintenance and improvement works to our higher-risk buildings are carried out safely and do not create any risks.
- 6.11 We will require our tenants and leaseholders to request and receive approval for carrying out building work within their properties, including DIY and work which will be

undertaken by a contractor or other third party on their behalf. We will consider all such requests and will only grant approval where we are satisfied that the work will be carried out safely; we will then post inspect the work to ensure it complies with the approval we have given.

- 6.12 We will develop and implement documented emergency procedures within the organisation, setting out the actions we will take in the event of a major incident or emergency to keep the buildings and residents safe, and minimise the risk and impact from the event. This will be documented within our safety case reports.

7.0 Principal Accountable Person duties

We will ensure we meet the below duties which are requirements under Part 4 of the Building Safety Act and apply to all our six higher-risk buildings.

7.1 Building registration

All our existing occupied higher-risk buildings were registered with the BSR before October 2023. We will register any newly developed or acquired higher-risk buildings with the BSR before they become occupied.

7.2 Building assessment certificates

We will apply for a building assessment certificate for each building when instructed to do so by the BSR, within 28 days of the instruction. The application will include uploading the safety case report, mandatory occurrence reporting system and residents' engagement strategy.

Once we receive a building assessment certificate from the BSR, we will display this in each higher-risk building where it can be seen by residents to demonstrate to residents that the BSR has confirmed we are managing the building safely.

7.3 Safety cases

A safety case is all the information, and basket of evidence, we use to manage the risk of fire spread and the structural safety of our buildings. We will establish safety cases for all higher-risk buildings which will be recorded digitally in the Document Management System and Active H to support the golden thread of information.

7.4 Safety case reports

Safety case reports summarise our safety cases and will show the steps we have taken to identify, assess, remove, reduce, and manage any major fire and structural risks in each of our higher-risk buildings. We will develop a safety case report for each higher risk building and will establish a suitable frequency to reviewing the reports. The policy will be updated accordingly once established.

7.5 Building safety risk assessment

We will undertake a building safety risk assessment for each building, which will be included within our safety case report. The risk assessment will identify how safety incidents can happen and the measures in place to prevent them or reduce their severity.

7.6 **Safety Management System (SMS)**

An SMS is a formal framework that can help us to manage building safety risks. We will develop and implement a building SMS in line with *BS 9997 Fire risk management systems* that will provide assurance that all the measures we have implemented for managing fire and building safety are working together effectively. Our SMS includes organisational structure, responsibilities, procedures and performance management.

7.7 **Golden thread of information**

We will ensure we meet the golden thread of information requirements for each building by adhering to the ten golden thread principles as set out in the Building Regulations Advisory Committee report¹. The golden thread is:

- Digital information about a building that allows someone to understand the building and the steps needed to keep both the building and people safe, now and in the future.
- Information management that ensures this information is accurate, easily understandable, can be accessed by those who need it and is up to date.

We will formally consider our approach to meeting the golden thread requirements.

We will officially document our approach to meeting golden thread requirements within the lifecycle of this policy.

7.8 **Mandatory occurrence reporting system**

A mandatory occurrence reporting system is required to ensure we capture and report certain fire and structural safety issues, called safety occurrences, to the BSR with ten calendar days of the event.

We will formally consider and develop a documented mandatory occurrence reporting system that enables contractors, residents, employees, or any other person in the building to report safety occurrences to the Deputy Chief Executive Officer. The Deputy Chief Executive Officer will then report these to the BSR within ten calendar days. We will also ensure an internal investigation is conducted.

7.9 **Residents' engagement strategy**

We will produce residents' engagement strategies for each higher-risk building by the end of May 2024, all six strategies will explain how residents will be involved in making

¹ <https://www.gov.uk/government/publications/building-regulations-advisory-committee-golden-thread-report/building-regulations-advisory-committee-golden-thread-report>

decisions about the management of their building in relation to the risks of fire and structural failure.

The strategies will have regard to the requirements of vulnerable and hard to reach residents and how we will share information clearly and transparently and ensure that information is available to residents through various channels.

7.10 Complaints procedure

Our Information and Governance Team will develop and establish a complaints system that ensures residents' safety concerns are heard and dealt with. We will implement a procedure to investigate complaints relating to building safety risks and ensure root cause analysis is undertaken to learn any lessons and reduce the risk of a repeat occurrence.

8.0 Data and records

- 8.1 We will maintain a core asset register of all properties we own or manage held within Active H. Our higher-risk buildings will be clearly identified and categorised within this system.
- 8.2 We will ensure all applicable property compliance inspection and check dates are recorded and saved on our Document Management System.
- 8.3 We will robustly manage all changes to stock, including property acquisitions and disposals, to ensure that our asset register remains up to date and higher-risk buildings are not omitted from compliance programmes.
- 8.4 We will keep all records and data for higher-risk buildings for the duration that we own and manage the property/in line with our document retention policy and will have robust processes and controls in place to maintain appropriate levels of security for all building and fire safety related data.
- 8.5 The above measures will help us to meet the golden thread of information requirements and the related procedural elements will be documented in our Document Management System.

9.0 Competent persons

- 9.1 We will review and adopt the PAS 8673:2022 competence requirements specification to set our standards for employing suitably competent internal staff. We will establish a building safety training matrix to capture this information.
- 9.2 The Building Safety Lead and Fire Safety Lead will obtain the CIOB Level 6 Diploma in Building Safety Management (or equivalent) within the lifecycle of this policy.

9.3 We will endeavour to undertake a documented check of contractors and consultants involved in fire and building safety delivery to ensure they hold the relevant qualifications and accreditations upon procurement.

10.0 Training

10.1 We will establish training on this policy and the procedures that support it, including team briefings, building safety awareness training and on the job training for those delivering building safety work, planned maintenance and repair work as part of their daily job. All training undertaken will be formally recorded within the building safety training matrix.

11.0 Performance reporting

11.1 We will report the following building safety key performance indicators:

- ✓ The number of higher-risk buildings being developed as part of new build schemes.
- ✓ The number of occupied higher-risk buildings we own and manage.
- ✓ Safety occurrences, including actual fires and near misses (as part of our mandatory occurrence reporting system).
- ✓ Compliance with each of our Principal Accountable Person duties.
- ✓ Compliance with the ‘big six’ safety areas (gas, electric, fire, asbestos, water and lifts).
- ✓ Details of any compliance or enforcement notices from the Building Safety Regulator, Fire and Rescue Service or other enforcement body; this will include any formal requests for information made as part of any investigation to ascertain whether there has been a potential breach of our obligations.
- ✓ RIDDOR notifications to the Health and Safety Executive with regards to fire and building safety, where these do not fall within scope of mandatory occurrence reporting requirements.

11.2 These will be provided to the below groups at frequencies set out in the table below:

Report recipient	Frequency
Management Team	Quarterly
Board	Quarterly
Resident Involvement Group	Quarterly

11.3 We will also develop a series of building safety management indicators which will be monitored and reported. Indicators will include measuring that key documents remain

in date (such as safety case reports and residents’ engagement strategies) and that checks and inspections are delivered on time.

- 11.4 Management indicators will also monitor the outcomes of the daily block inspections the Estates Team undertake.

12.0 Quality assurance

- 12.1 We will ensure there is a programme of internal quality assurance audits of building safety activity including fieldwork inspections and desktop exercises. This will be done using sample percentages or based on the type of work or activity undertaken and associated risk.
- 12.2 We will procure independent internal audit of building safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues for correction.

13.0 Material non-compliance and escalation

- 13.1 Our definition of material non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.
- 13.2 All material non-compliance issues will be reported and escalated as soon as possible and no later than 24 hours after the incident occurred or becoming aware of it.
- 13.3 Any building safety non-compliance issue identified at an operational level will be formally reported to the Building Safety Lead and Fire Safety Lead in the first instance, who will agree an appropriate course of corrective action with the Deputy Chief Executive Officer and report details of the same to Management Team.
- 13.4 In cases of serious non-compliance, Management Team and Board will consider whether it is necessary to disclose the issue to the Building Safety Regulator under the mandatory occurrence reporting framework, Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

14.0 Related policies and procedures

- Corporate health and safety policy
- Compliance strategy
- Fire safety policy
- Residents’ engagement strategies
- Building safety management system
- Mandatory occurrence reporting system
- Golden thread management plan

- New development procedures
- Building safety training matrix
- Residents' complaints procedure
- Property compliance policies
- Safety case reports

Appendix 1 - Glossary

This glossary defines key terms used throughout this policy:

- **BS 9997:2019: Fire risk management systems. Requirements with guidance for use:** BS 9997 is a fire risk management system published on 31 August 2019 by the British Standards Institution. The management of fire risk is a key responsibility for anyone in charge of buildings. A fire risk management system should be considered to protect the lives of people within the buildings as well as to ensure legal compliance.
- **Building Safety Regulator (BSR):** Under the Building Safety Act 2022, the BSR has been created to regulate higher-risk buildings and to oversee the regulatory framework for all residential buildings during the planning, design, construction and occupancy phases and provide a stronger and clearer framework for national oversight of construction products.
- **CIOB Level 6 Diploma in Building Safety Management:** This qualification aims to develop the learner's knowledge and skills to manage the safety of an occupied higher-risk building.
- **CDM:** The Construction (Design and Management) Regulations 2015 (CDM) applies to the whole construction process on all construction projects, from concept to completion, and aims to ensure that no-one is harmed during the work. Under the Building Safety Act 2022 existing dutyholders (Client, Principal Designer, Designers, Principal Contractor and Contractors) under CDM will have additional duties.
- **PAS 8673:2022 Built environment – Competence requirements for the management of safety in residential buildings:** PAS 8673 specifies competence requirements for managing safety in residential buildings and other developments incorporating residential accommodation. It also gives guidance on detailed competencies and the assessment of competence.

Appendix 2 – Additional legislation and policy direction

Secondary legislation

- Higher-Risk Buildings (Keeping and Provision of Information etc.) (England) Regulations 2024.
- Building Safety Act 2022 (Commencement No. 6) Regulations 2024.
- Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023.
- Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023.
- The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023
- The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023

Additional legislation - This policy also operates within the context of the following legislation:

- Building Act 1984
- Building Regulations 2010
- Building Safety (Leaseholder Protections) (England) Regulations 2022
- Building Safety (Leaseholder Protections) (Information etc.) (England) Regulations 2022
- Construction (Design and Management) Regulations 2015
- Construction Products (Amendment) Regulations 2022
- Defective Premises Act 1972
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022
- Health and Safety at Work Act 1974
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Housing Act 2004
- Homes (Fitness for Human Habitation) Act 2018
- Landlord and Tenant Act 1985
- Management of Health and Safety at Work Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Policy direction – The following documents set out direction for landlords, and whilst not statutory guidance or approved legislation, contain recommendations or proposals applicable to this policy:

- *Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report* (May 2018).
- *Building a Safer Future - Proposals for reform of the building safety regulatory system: A consultation* (June 2019).
- *Grenfell Tower Inquiry: phase 1 report. Volume 1 – 4* (October 2019).

Electrical Safety Policy



Name	Electrical Safety Policy
Owner	Compliance Manger
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1.0 Introduction and Objectives

- 1.1 As a landlord, Warwick District Council is responsible for repairs and maintenance to our homes, communal blocks and other properties we own and manage, all of which will contain electrical installations, equipment and portable appliances.
- 1.2 The key objective of this policy is to ensure our Cabinet, Senior Leadership Team (SLT), employees, partners and residents are clear on our legal and regulatory electrical safety obligations. This policy provides the framework our staff and partners will operate within to meet these obligations.
- 1.3 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our Document Management System (DMS) and distributed to all relevant members of staff.

2.0 Scope

- 2.1 This policy applies to the following property types only:
 - Domestic properties (houses, flats bungalows, and so on).
 - Communal blocks.
 - Sheltered / independent living schemes.
- 2.2 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. Adherence to this policy is mandatory.

3.0 Roles and Responsibilities

- 3.1 The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).
- 3.2 The Management Team will receive fortnightly performance reports in respect of electrical safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.3 The Deputy Chief Executive Officer has strategic responsibility for the management of electrical safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.
- 3.4 Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed the Deputy Chief Executive Officer as our Health and Safety Lead.

- 3.5 The Compliance Manager has operational responsibility for the management of electrical safety and will be responsible for overseeing the delivery of these programmes.
- 3.6 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.

4.0 Legislation, Guidance and Regulatory Standards

4.1 **Legislation** – Principal legislation applicable to this policy is:

- Housing Act 2004.
- Landlord and Tenant Act 1985.
- Homes (Fitness for Human Habitation) Act 2018.
- Electricity at Work Regulations 1989.
- Electrical Equipment (Safety) Regulations 2016.

The government consultation into electrical safety within social housing closed on 31 August 2022 and we are awaiting the outcome to be published, which will likely result in future changes to this policy.

This policy also operates within the context of additional legislation (see Appendix 1).

4.2 **Guidance and codes of practice** – The principal guidance and codes of practice applicable to this policy are:

- INDG236 - Maintaining portable electrical equipment in low-risk environments (as amended 2013).
- IET Wiring Regulations British Standard 7671:2018 + A2:2022 (18th edition).
- Code of Practice for the Management of Electrotechnical Care in Social Housing (Electrical Safety Roundtable) January 2019.
- The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (IET) 2020 (5th edition).

4.3 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

4.4 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter

and Corporate Homicide Act 2007; prosecution under any of the principal legislation listed in Section 4.1; and via a regulatory judgement from the Regulator of Social Housing.

5.0 Obligations

- 5.1 The Housing Act 2004 requires that properties are free from Category 1 housing health and safety rating system (HHSRS) hazards; this includes electrical hazards.
- 5.2 The Landlord and Tenant Act 1985 and the Homes (Fitness for Human Habitation) Act 2018 place duties on landlords to ensure that electrical installations in rented properties are:
 - Safe when a tenancy begins.
 - Maintained in a safe condition throughout the tenancy so the property is fit for habitation.
- 5.3 To comply with these duties, electrical installations should be periodically inspected and tested. Although there is no legal requirement setting out the frequency, best practice guidance from the Electrical Safety Council and from BS7671:2018 + A2:2022 recommends intervals of no longer than five years from the previous inspection.
- 5.4 All electrical installations should be inspected and tested prior to the commencement of any new tenancies. This means that tests should be carried out whilst properties are void and when mutual exchanges and transfers take place, and a satisfactory Electrical Installation Condition Report (EICR) must be issued to the resident upon moving in.
- 5.5 The Electricity at Work Regulations 1989 places duties on employers that all electrical installations and appliances within the workplace are safe and that only competent persons work on the electrical installations, systems and equipment.
- 5.6 The Electrical Equipment (Safety) Regulations 2016 requires landlords to ensure that any electrical appliances provided as part of a tenancy are safe when first supplied.

6.0 Statement of Intent

- 6.1 We acknowledge and accept our responsibilities with regards to electrical safety under the legislation and regulations, as outlined in Sections 4 and 5.
- 6.2 Following our catch-up programme, we will deliver an electrical inspection and testing programme as set out in Section 7 within six months of the approval of this policy.
- 6.3 We will ensure all electrical installations are in a satisfactory condition following the completion of an electrical installation inspection and test and will require the production of a condition report or other certificate which confirms that the installation is safe.
- 6.4 Following approval of this policy we will endeavour to ensure that a full electrical installation inspection and test is undertaken at change of occupancy (void properties,

mutual exchanges and transfers), new build properties, and when completing planned works within domestic properties; this will be evidenced through a satisfactory EICR or other report.

- 6.5 We will check, install, test or replace (as required) battery smoke and carbon monoxide alarms as part of the annual gas safety check visit, (or at void stage) or as referral to install or replace with our electrical contractor for hard wired detection.
- 6.6 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.
- 6.7 We will ensure that there is a robust process in place for the management of immediately dangerous situations identified from the electrical safety check.
- 6.8 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 6.9 We will implement and operate measures to identify, manage and/or mitigate risks related to portable electrical appliances in the properties we are responsible for.
- 6.10 We will establish and maintain a risk assessment for electrical safety management and operations, setting out our key electrical safety risks and appropriate mitigations.
- 6.11 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement and refurbishment works.

7.0 Programmes

- 7.1 Electrical installation condition testing and inspections will be programmed on a five-year cycle for domestic properties and three-year cycle for communal blocks and schemes (unless the competent person recommends an earlier next test date). The inspections will include the issuing of a new satisfactory EICR. The date of the inspection and test is driven from the anniversary date of the most recent EICR.
- 7.2 **New builds and rewires** – All new builds, and all properties which have had a rewire, will receive their first electrical installation inspection and test five years after the date of installation.
- 7.3 **Domestic leaseholders** - We will establish an official, best endeavours process to request EICRs from leaseholders for our records.

8.0 Follow-up Work

- 8.1 We will endeavour to repair all Code 1 (C1) and Code 2 (C2) defects identified by an electrical installation inspection and test at the time of the check, to produce a satisfactory EICR. Where this is not possible, we will make the installation safe and return to complete the required remediation works within 30 days to ensure a satisfactory EICR is produced.
- 8.2 Where any C1 and C2 defects have been repaired, they will be recorded on the satisfactory EICR to provide an audit of the work completed.
- 8.3 We will review all Code 3 (C3) and Further Investigation observations in Active H and our contractors will determine and take the most appropriate course of action.

9.0 Data and Records

- 9.1 We will maintain a core asset register of all properties we own or manage, with component/attribute data against each property to show electrical safety testing and inspection requirements.
- 9.2 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from the electrical safety programme and the programme remains up to date.
- 9.3 We will maintain accurate records, against each property we own and/or manage, of the following:
- Inspection dates.
 - EICRs.
 - Minor Electrical Works Certificates and Building Regulation Part P notifications associated with remedial works.
 - Electrical Installation Certificates.
- 9.4 We will hold these in the DMS which is interfaced with Active H.
- 9.5 We will keep all records and data indefinitely unless specified otherwise in our Records Management Policy. We will keep at least the two most recent EICR records or certificates outlined within section 9.3. We will have robust processes and controls in place to maintain appropriate levels of security for all electrical safety related data.

10.0 Resident Engagement

- 10.1 We consider good communication essential in the effective delivery of electrical safety programmes, therefore we will establish a resident engagement strategy and communication programme to support residents in their understanding of electrical safety.

- 10.2 This will assist us in maximising access to carry out electrical inspections, encourage and support residents to report any concerns about electrical safety, and help us to engage with vulnerable and hard to reach residents.
- 10.3 We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.

11.0 Competent Persons

- 11.1 The Compliance Manger will hold the Level 4 VRQ Diploma in Asset and Building Management (or equivalent). If they do not have this already, they will obtain it within an appropriate timeframe following the approval of this policy.
- 11.2 Only suitably competent NICEIC (or equivalent) electrical contractors and operatives will undertake electrical works on our behalf.
- 11.3 Only suitably competent NICEIC (or equivalent) third party technical auditors will undertake quality assurance checks.
- 11.4 We will check that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor’s certification appropriately.

12.0 Training

- 12.1 We will establish training on this policy and the procedures that support it, through appropriate methods including team briefings; basic electrical safety awareness training; and on the job training for those delivering the electrical safety programme, planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.

13.0 Performance Reporting

- 13.1 We will report key performance indicator (KPI) measures for electrical safety that follow the principles set out in the Tenant Satisfaction Measures (TSMs) which came in to force on 1 April 2023. Although electrical safety is not specifically covered by these measures, we will adopt the same approach to ensure consistency with other compliance areas and ensure all dwellings at risk are accounted for.
- 13.2 We will report the following electrical safety performance:

Report recipient	Frequency
Regulator of Social Housing	Annual
Management team	Fortnightly

Board	Monthly
Asset and Compliance Committee	Bi-monthly
Resident Involvement Group	Bi-annually

13.3 We will also report the following:

Data – the total number of:

- Properties split by category (domestic, communal, commercial/others).
- Properties on programme split by category.
- Properties not on programme.
- Properties with a satisfactory and in date EICR.
- Properties without a satisfactory and in date EICR.
- Properties due to be inspected and tested within the next 30 days.
- Follow-up actions arising from the programme (in time and overdue).

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

In addition:

- The number of RIDDOR notifications to the HSE with regards to electrical safety.

14.0 Quality Assurance

14.1 We will ensure there is programme of third-party quality assurance audits of electrical safety checks. This will be:

- 100 per cent of all new installations.
- 100 per cent of all certificates
- Fieldworks percentage to be agreed following approval of this policy.

14.2 We will procure an independent audit of electrical safety within 6 months of the approval of this policy. We will endeavour to carry out audits at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

15.0 Significant Non-Compliance and Escalation

15.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.

- 15.2 All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Warwick District council employee becoming aware of it.
- 15.3 Any non-compliance issue identified at an operational level will be formally reported to the Compliance Manager in the first instance, who will agree an appropriate course of corrective action with the Deputy Chief Executive Officer and report details of the same to the SLT.
- 15.4 In cases of serious non-compliance, Management Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 15.5 We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to electrical safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

16.0 Glossary

- 16.1 This glossary defines key terms used throughout this policy:
 - **EICR:** Electrical Installation Condition Report - a formal document that is produced following an assessment of the electrical installation within a property (domestic or communal). It must be carried out by an experienced qualified electrician or approved contractor.
 - **NICEIC:** National Inspection Council for Electrical Installation Contracting – an organisation which regulates the training and work of electrical contractors in the UK. The NICEIC is one of several providers given Government approval to offer Competent Person Schemes to oversee electrical work within the electrical industry.

Appendix 1 - Additional Legislation

This policy also operates within the context of the following legislation:

- The Defective Premises Act 1972
- Health and Safety at Work Act 1974
- The Occupiers' Liability Act 1984
- Workplace (Health Safety and Welfare) Regulations 1992
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005
- Corporate Manslaughter and Homicide Act 2007
- Building Regulations 2010 (England and Wales) - Part P
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction, Design and Management Regulations 2015
- Data Protection Act 2018
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

Gas and Heating Policy



Name	Gas and Heating Policy
Owner	Compliance Manager
Version	Final V1.0
Last Review	June 2024
Next Review	June 2026
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Strategic Lead	Deputy Chief Executive Officer
Sign	<div></div>
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1.0 Introduction and Objectives

- 1.1 As a landlord, Warwick District Council is responsible for the maintenance and repairs to our homes, communal blocks, and other properties we own and manage, many of which will contain gas installations and appliances.
- 1.2 We are also responsible for maintaining other types of heating systems to ensure that all heating appliances provided for residents are safe. These include air source heat pumps/ oil/ solid fuel/ electrical heating systems.
- 1.3 The key objective of this policy is to ensure our Cabinet, Management Team, employees, partners, and residents are clear on our legal and regulatory gas/heating safety obligations. This policy provides the framework our staff and partners will operate within to meet these obligations.
- 1.4 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our Document Management System (DMS) and distributed to all relevant members of staff.

2.0 Scope

- 2.1 This policy applies to the following property types:
 - Domestic properties (houses, flats bungalows, and so on).
 - Communal blocks.
 - Sheltered / independent living schemes.
- 2.2 This policy is relevant to all our employees, residents, contractors, stakeholders, and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. Adherence to this policy is mandatory.

3.0 Roles and Responsibilities

- 3.1 The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).
- 3.2 The Management Team will receive fortnightly performance reports in respect of gas and heating safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.3 The Deputy Chief Executive Officer has strategic responsibility for the management of gas and heating safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.

- 3.4 Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed the Deputy Chief Executive Officer as our Health and Safety Lead.
- 3.5 The Compliance Manager has operational responsibility for the management of gas and heating safety and will be responsible for overseeing the delivery of these programmes.
- 3.6 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.

4.0 Legislation, Guidance and Regulatory Standards

4.1 **Legislation** - The principal legislation applicable to this policy is:

- The Gas Safety (Installation and Use) Regulations 1998 as amended (hereafter referred to as the Gas Safety Regulations). We have a legal obligation under Part F, Regulation 36 of the legislation (Duties of Landlords) and we are the 'Landlord' for the purposes of the legislation.
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.
- Environmental Protection Act 1990. Schedule 3 of the Act enables WDC to apply for a warrant to enter a property in no access cases
- This policy also operates within the context of additional legislation (see Appendix 1).

4.2 **Approved Code of Practice (ACoP)** - The ACoP applicable to this policy is:

- ACoP L56 - 'Safety in the installation and use of gas systems and appliances' (5th edition 2018).

4.3 **Guidance** – The principal guidance applicable to this policy is:

- INDG285 - 'A guide to landlords' duties: Gas Safety (Installation and Use) Regulations 1998 as amended Approved Code of Practice and guidance (3rd Edition 2018).

4.4 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

4.5 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution under the Gas Safety Regulations; and via a regulatory judgement from the Regulator of Social Housing.

5.0 Obligations

5.1 The **Gas Safety (Installation and Use) Regulations 1998** impose duties on landlords to protect residents in their homes. These obligations apply to both gas heating and liquid petroleum gas heating systems. The main landlord duties are set out in Regulation 36 and require landlords to:

- Ensure gas fittings and flues are maintained in a safe condition. Gas appliances should be serviced in accordance with the manufacturer's instructions. If these are not available it is recommended that they are serviced annually, unless advised otherwise by a Gas Safe registered engineer.
- Ensure the annual safety check is carried out on each gas appliance and flue within 12 months of the previous safety check.
- Have all installation, maintenance and safety checks carried out by a Gas Safe registered engineer.
- Keep a record of each safety check for at least two years (until at least two further gas safety checks have been carried out).
- Issue a copy of the latest safety check record to existing residents within 28 days of the check being completed, or prior to any new resident moving in.
- Display a copy of the latest safety check record in a common area of a building where the gas appliance serves a communal heating system to multiple homes.
- We ensure that no gas fitting of a type that would contravene Regulation 30 (for example, certain gas fires and instantaneous water heaters) is fitted in any room occupied, or to be occupied, as sleeping accommodation after the Regulations came into force. This includes any room converted into such accommodation after that time.

5.2 The **Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022**, came into effect on 1 October 2022, require landlords to:

- Install smoke alarm on every storey with living accommodation.
- Install carbon monoxide alarms in any rooms used as living accommodation with a fixed combustion appliance (excluding gas cookers).
- Repair or replace faulty alarms as soon as reasonably practicable.

5.3 For **other heating types** (as set out in Section 1.2), although there is no legal requirement to do so, we will carry out periodic safety checks to these properties as detailed in Section 7.

6.0 Statement of Intent

- 6.1 We acknowledge and accept our responsibilities under the Gas Safety Regulations, Smoke and Carbon Monoxide Alarm (Amendment) Regulations, and other duties outlined in Section 4 and Section 5.
- 6.2 We will carry out an annual gas safety check to all properties with a gas supply, irrespective of whether the gas is connected or not.
- 6.3 We will ensure that copies of all landlord's gas safety records (LGSRs)/certificates are provided to residents or displayed in a common area within 28 days of completion.
- 6.4 Any open flue gas appliances found in any rooms that are being used as bedrooms or for sleeping will be removed.
- 6.5 We will cap off gas supplies to all properties when the property becomes void, and a new resident is not moving in immediately after. This will be completed by the end of the next working day.
- 6.6 We will cap off gas supplies to all new build properties at handover from the contractor/developer to us if the new tenancy is not commencing immediately at the point of handover. In the case of a WDC tenancy, we will uncap gas supply once the tenant moves in. Uncapping does not apply to shared ownership
- 6.7 We will ensure that gas safety checks are carried out within 24 hours of the commencement of a new tenancy (void or new build properties), and that the resident receives a copy of the LGSR before they move in.
- 6.8 We will ensure a gas safety check is carried out following our installation of any new gas appliance and obtain a gas safety certificate to confirm the necessary checks have been completed.
- 6.9 We will carry out a five-point visual check of resident owned appliances, provided that the resident is able to provide evidence that the appliance has been installed by a Gas Safe engineer. If the resident is unable to provide this evidence, then the appliance will be capped off and we will provide a warning notice until such time it can be evidenced as being safe.
- 6.10 We will endeavour to carry out a safety check on completion of any repair and/or refurbishment works to occupied or void properties where works may have affected any gas fittings, appliances or flues.
- 6.11 We will install, test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide detectors as part of the annual gas safety check (or at void stage).
- 6.12 We will carry out annual gas safety checks to all properties where the gas supply has been capped at the request of the resident, to ensure the supply has not been reconnected by

the resident. At the same time, we will implement a process to check on the resident's wellbeing and assess whether the lack of gas heating is adversely affecting the condition of the property. In addition, we will endeavour to communicate regularly with these residents to ensure the property remains capped and inform the resident of what is required to reinstate gas at the property.

- 6.13 We will endeavour to check properties that are not currently connected to the gas mains network to ensure a gas supply has not been installed without our knowledge.
- 6.14 We will ensure that there is a robust process in place for the management of immediately dangerous situations identified from the gas/heating safety check.
- 6.15 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary, if access has been attempted at least twice, the appropriate procedures have been followed and approval has been given by the appropriate Manager. Where resident vulnerability issues are known or identified, we will ensure we safeguard the wellbeing of the resident.
- 6.16 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 6.17 We will endeavour to ensure that all replacements, modifications and installations of gas appliances and heating systems within our properties will comply with all elements of Building Regulations, Part J Combustion Appliances and Fuel Storage Systems.
- 6.18 We will establish and maintain a risk assessment for gas safety management and operations, setting out our key gas safety risks and appropriate mitigations.
- 6.19 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) we will develop a Construction Phase Plan for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement and refurbishment works.
- 6.20 To comply with the requirements of the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002, we will consider the safety of our workspaces and plant/boiler rooms of our residential blocks that fall within scope of the legislation.

7.0 Programmes

- 7.1 **Domestic properties** – We will carry out a programme of annual gas safety checks to all domestic properties we own and manage; the check will be completed within 12 months from the date of the previous LGSR/certificate.

- 7.2 We will carry out a safety check of electrical heating systems every five years during the periodic electrical inspection and testing programme.
- 7.3 We will carry out an annual safety check to all solid fuel appliances and introduce chimney sweeps at least twice a year when burning wood or house coal, and at least once a year when burning smokeless fuels.
- 7.4 We will carry out an annual safety check to properties with, air source heat pumps/ oil/ solid fuel/ electrical heating systems.
- 7.5 **Domestic leaseholders** - We will establish an official, best endeavours process to request LGSRs from leaseholders for our records.
- 7.6 **Communal blocks and schemes** – We will carry out a programme of annual gas safety checks and services to all communal blocks and other properties (sheltered and supported living), where we have the legal obligation to do so; these will be completed within 12 months from the date of the previous LGSR/certificate.
- 7.7 We will ensure there is a robust process in place for the management of any follow-up works required following the completion of a gas/heating safety check (where the work cannot be completed at the time of the check).

8.0 Data and Records

- 8.1 We will maintain a core asset register of all properties we own and/or manage, with component/attribute data against each property to show gas/heating safety check requirements.
- 8.2 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from gas/heating safety programmes and the programme remains up to date.
- 8.3 We will hold gas/heating safety check dates and safety check records against each property we own or manage. We will hold the dates of the safety checks in Active H and safety check records in DMS which is interfaced with Active H.
- 8.4 We will ensure the Gas Safe registered engineer records the details of all appliances and other equipment which is served by the gas/heating supply in every domestic property, communal block, or other property.
- 8.5 We will keep all completed safety check records, warning notices and remedial work records indefinitely, unless specified otherwise in our Records Management Policy and will have robust processes and controls in place to maintain appropriate levels of security for all gas/heating safety related data and records.

9.0 Resident Engagement

- 9.1 We consider good communication essential in the effective delivery of gas and heating safety programmes, therefore we will establish a resident engagement strategy and communication programme to support residents in their understanding of gas and heating safety.
- 9.2 This will assist us in maximising access to carry out gas safety checks, encourage and support residents to report any concerns about gas and heating safety, and help us engage with vulnerable and hard to reach residents.
- 9.3 We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.

10.0 Competent Persons

- 10.1 The Compliance Manager will hold a Level 4 VRQ Diploma in Asset and Building Management. If they do not have this already, they will obtain it within an appropriate time frame following the approval of this policy.
- 10.2 All operatives/engineers (internal or external) will maintain Gas Safe accreditation for all areas of gas works that they undertake, and we will check that they are on the Nationally Accredited Certification Scheme for Individual Gas Fitting Operatives (ACS).
- 10.3 Only suitably competent Gas Safe accredited contractors will undertake works to gas fittings, appliances, and flues.
- 10.4 We will check that contractors are on the Oil Firing Technical Association (OFTEC) and/or HETAS accredited contractors to undertake works to oil fired and solid fuel fittings, appliances, and flues.
- 10.5 We endeavour to use individuals/organisations with a Microgeneration Certification Scheme accreditation (MCS) to undertake works on air source heat pumps and biomass heating systems.
- 10.6 Only suitably competent NICEIC (or equivalent) electrical contractors and operatives will undertake servicing and repairs to electrical heating systems.
- 10.7 Only suitably competent Gas Safe registered and NICEIC (or equivalent) third party technical auditors will undertake quality assurance checks.
- 10.8 We will check our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.

11.0 Training

- 11.1 We will establish training on this policy and the procedures that support it, through appropriate methods including team briefings; basic gas and heating safety awareness

training; and on the job training for those delivering the programme of gas and heating safety checks, planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.

12.0 Performance Reporting

- 12.1 We will report key performance indicator (KPI) measures for gas/heating safety that follow the requirements set out in the Tenant Satisfaction Measures (TSMs) which came into force on 1 April 2023 and must be reported to the RSH on an annual basis.
- 12.2 We will report the following gas safety performance:

Report recipient	Frequency
Regulator of Social Housing	Annual
Management Team	Fortnightly
Board	Monthly
Asset and Compliance Committee	Bi-monthly
Resident Involvement Group	Bi-annually

- 12.3 We will also report the following:

Data – the total number of:

- Properties split by category (domestic, communal, commercial/others).
- Properties on programme split by category.
- Properties not on programme.
- Properties with a valid and in date LGSR/certificate.
- Properties without a valid and in date record LGSR/certificate.
- Properties due to be serviced within the next 30 days.
- Follow-up actions arising from the programme (in time and overdue, by priority).

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

In addition:

- The number of RIDDOR notifications to the HSE about gas/heating safety.

13.0 Quality Assurance

- 13.1 We will ensure there is an annual programme of third-party quality assurance audits of gas/heating safety checks, gas appliance services and gas appliance repair works. This will be:
- 100 per cent of all new installations.
 - 100 per cent of all certificates.
 - Fieldworks percentage to be agreed following approval of this policy.
- 13.2 We will procure an independent audit of gas/heating safety within six months of the approval of this policy. We will endeavour to carry out audits at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

14.0 Significant Non-Compliance and Escalation

- 14.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.
- 14.2 All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Warwick District Council employee becoming aware of it.
- 14.3 Any non-compliance issue identified at an operational level will be formally reported to the Compliance Manager in the first instance, who will agree an appropriate course of corrective action with the Deputy Chief Executive Officer and report details of the same to the SLT.
- 14.4 In cases of serious non-compliance, SLT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 14.5 Following the approval of this policy we will ensure there is a robust process in place to investigate and manage all RIDDOR notifications submitted to the HSE in relation to gas and heating safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

15.0 Glossary

- 15.1 This glossary defines key terms used throughout this policy:
- **Gas Safe Register:** the official list of gas engineers who are qualified to work legally on gas appliances.
 - **LGSR:** Landlord's Gas Safety Record – a certificate containing the results of the annual safety check carried out on gas appliances and flues.

Appendix 1 - Additional Legislation

This policy also operates within the context of the following legislation:

- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- The Occupiers' Liability Act 1984
- Workplace (Health, Safety and Welfare) Regulations 1992
- Pipelines Safety Regulations 1996
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Gas Safety (Management) Regulations 1996 (as amended)
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Pressure Equipment (Safety) Regulations 2016
- Pressure Systems Safety Regulations 2000
- Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
- Housing Act 2004
- Building Regulations 2010 (England and Wales)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Social Housing (Regulation) Act 2023

Lift Safety Policy



Name	Lift Safety Policy
Owner	Compliance Manager
Version	Final V1.0
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Next Review	June 2026
Resident Influencing Group	Consulted June 2024
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Strategic Lead	Deputy Chief Executive Officer
Sign	<div></div>
Date	August 6, 2024
Chair of Board	Paul Wightman
Sign	<div></div>
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1.0 Introduction and Objectives

- 1.1 As a landlord, Warwick District Council is responsible for maintenance and repairs to our homes, communal blocks, and other properties we own and manage, some of which will contain domestic lifts, passenger lifts and other lifting equipment. We are responsible for maintaining these lifts and carrying out thorough examinations to ensure they continue to operate safely.
- 1.2 The key objective of this policy is to ensure our Cabinet, Management Team, employees, partners and residents are clear on our legal and regulatory lift safety obligations. This policy provides the framework our staff and partners will operate within to meet these obligations.
- 1.3 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our Document Management System (DMS) and distributed to all relevant members of staff.

2.0 Scope

- 2.1 This policy applies to the following property types:
- Domestic properties (houses, flats bungalows, and so on).
 - Communal blocks.
 - Sheltered / independent living schemes.
- 2.2 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. Adherence to this policy is mandatory.
- 2.3 We own and manage domestic properties which have been adapted with living aids such as stair lifts, through floor lifts and hoists to enable residents to continue to live independently. We take responsibility for the lifts which have been installed within our domestic properties which we have been made aware of.

3.0 Roles and Responsibilities

- 3.1 The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).

- 3.2 The Management Team will receive fortnightly performance reports in respect of lift safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.3 The Deputy Chief Executive Officer has strategic responsibility for the management of lift safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.
- 3.4 Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed the Deputy Chief Executive Officer as our Health and Safety Lead.
- 3.5 The Compliance Manager has operational responsibility for the management of lift safety and will be responsible for overseeing the delivery of these programmes.
- 3.6 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.

4.0 Legislation, Guidance and Regulatory Standards

- 4.1 **Legislation** - The principal legislation applicable to this policy is as follows:
 - The Health and Safety at Work Act 1974.
 - The Lifting Operation and Lifting Equipment Regulations 1998 (LOLER).
- 4.2 **Approved Code of Practice (ACoP)**—The principal ACoP applicable to this policy is:
 - ACoP L113 - Safe use of lifting equipment: Lifting Operations and Lifting Equipment Regulations 1998 (2nd edition 2014).
- 4.3 **Guidance** – The principal guidance applicable to this policy is as follows:
 - INDG422 - Thorough examination of lifting equipment: A simple guide for employers (2008).
 - INDG339 - Thorough examination and testing of lifts: Simple guidance for lift owners (2008).
- 4.4 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

- 4.5 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution under LOLER or PUWER; and via a regulatory judgement from the Regulator of Social Housing.

5.0 **Obligations**

5.1 **LOLER**

Passenger lifts in workplaces (for example, offices) which are used by people during their course of work, fall within the scope of LOLER.

LOLER requires landlords to maintain lifts and ensure that they have thorough examinations:

- Before use for the first time.
- After substantial and significant changes have been made.
- At least every six months if the lift is used at any time to carry people or every 12 months if the lift is only carrying loads (or in accordance with an examination scheme).
- Following exceptional circumstances such as damage to, or failure of, the lift, long periods out of use, or a major change in operating conditions which is likely to affect the integrity of the equipment.
- Thorough examination reports must be kept for at least two years.

5.2 **Health and Safety at Work Act 1974**

Section 3 of the Health and Safety at Work Act makes employers, such as landlords, responsible for the health and safety of employees and people using or visiting their premises, so far as reasonably practicable (including residents).

For passenger lifts in communal blocks and for tenanted properties with domestic lifts, duties may be adequately discharged by adopting the same provisions as applies to all other lifting equipment covered by LOLER (carrying out regular maintenance and a six-monthly thorough examination).

5.3 **Provision and Use of Work Equipment Regulations 1998 (PUWER)**

There is some overlap between LOLER and PUWER, which applies to all work equipment, including lifting equipment (such as hoists, lift trucks, elevating work platforms and lifting slings). The scope of this policy includes for lifts which are fixed

within properties owned and managed by Warwick District Council (i.e., passenger/stairlifts/through floor lifts) and not mobile lifting equipment.

5.4 Insurance

The Risk and Insurance Officer will monitor insurance contracts as insurers may impose demands for similar stringent levels of risk management to cover public liability.

6.0 Statement of Intent

- 6.1 We acknowledge and accept our responsibilities under the legislation outlined in Sections 4 and 5.
- 6.2 We will adopt the same principles to the management of lifts within communal blocks and domestic properties as for passenger lifts and any other lifts provided as work equipment. We will therefore carry out a programme of periodic servicing and maintenance and thorough examinations to lifts within domestic properties where these have been installed by us, or where our tenant has installed one and made us aware of it.
- 6.3 All lifts that we install in properties we own or manage will be fully accessible for disabled users, as per the requirements of the Equality Act 2010, and to the specifications outlined in Part M of the Building Regulations 2004.
- 6.4 We will endeavour to ensure that all lifting equipment will always be in full working order. Where we become aware of a breakdown, we will ensure our lift contractor attends within four hours.
- 6.5 We will operate robust processes to deal with entrapment situations. In the event of any persons becoming trapped in a lift we are responsible for we will ensure our lift contractor attends within two hours.
- 6.6 We will operate a robust process to manage and rectify immediately dangerous situations identified during a lift safety check or any other maintenance work.
- 6.7 All passenger lifts will have an intercom that dials directly to a dedicated call centre. Call handlers will contact emergency services if there is an urgent concern for a person's welfare.
- 6.8 We will operate a robust process to gain access to properties to undertake thorough examinations, lift safety/servicing visits and follow-on works. Where resident vulnerability issues are known or identified we will ensure we safeguard the

wellbeing of the resident, whilst ensuring the organisation can gain timely access to any property to be compliant with this policy.

- 6.9 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 6.10 We will establish and maintain a risk assessment for lift safety management and operations, setting out our key lift safety risks and appropriate mitigations.
- 6.11 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM), a Construction Phase Plan will be in place for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement works and refurbishment projects. This plan will detail what is required to reinstate lifts affected by the works, to ensure they are safe to use and continue to comply with relevant legislation.

7.0 Programmes

- 7.1 **Thorough examinations** – all lifts, including domestic lifts, will be subject to a thorough examination:
- Before being commissioned into use for the first time.
 - Every six months if the lift is being used to carry people.
 - Every 12 months if the lift only carries loads.
 - In accordance with an examination scheme (as prepared by a competent person) where there is one in place.
 - In accordance with our insurer's specification.
- 7.2 We will establish a process to ensure all domestic lifts are subject to a thorough examination before a void property is re-let in to ensure it is safe for the next resident. The new tenant will also be shown how to operate the lift safely. We will also consider the suitability of prospective residents to ensure the property is appropriate if lifting equipment has been installed.
- 7.3 **Maintenance** - All lifting equipment will be subject to routine servicing and maintenance in line with manufacturers' recommendations.
- 7.4 We will ensure there is a robust process in place for the management of any follow-up works required following the completion of a thorough examination or servicing

and maintenance inspection (where the work cannot be completed at the time of the examination or servicing/inspection).

8.0 Data and Records

- 8.1 We will maintain a core asset register of all properties we own or manage, setting out which properties have lifts which require a thorough examination. We will also set out which properties have lifts which require ongoing servicing and maintenance. This register will also hold data against each property asset of the type, age and condition of lifting equipment in place.
- 8.2 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from lift safety programmes and the programme remains up to date.
- 8.3 We will hold records of the following against all properties on each programme:
- Thorough examination dates and reports.
 - Servicing and maintenance dates and reports.
 - Any examination schemes in place.
 - Evidence of completed remedial works.
 - Entrapment incidents.
- 8.4 All records and data as outlined above will be stored in DMS which is interfaced with Active H.
- 8.5 Where we install any stairlifts or other lifts to domestic properties or give approval for or become aware of any installation of such lifts, we will add them to the thorough examination and servicing programmes.
- 8.6 We will keep all records indefinitely unless specified otherwise in our Records Management Policy and have robust processes and controls in place to maintain appropriate levels of security for all lift safety related data and records.

9.0 Resident Engagement

- 9.1 We consider good communication essential in the effective delivery of lift safety programmes, therefore we will establish a resident engagement strategy and communication programme to support residents in their understanding of lift safety.

- 9.2 This will assist us in maximising access to carry out periodic servicing and thorough examinations, encourage residents to report any lift safety concerns, and help us to engage with vulnerable and hard to reach residents.
- 9.3 We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.

10.0 Competent Persons

- 10.1 The Compliance Manager will undertake appropriate training, such as the Level 4 VRQ Diploma in Asset and Building Management or equivalent, to ensure lift safety programmes are managed effectively.
- 10.2 Only suitably competent lift consultants and contractors, registered with the Lift and Escalator Industry Association (or equivalent), will be appointed to undertake thorough examinations, risk assessments, prepare examination schemes and undertake lifting equipment works. Lift engineers will have a minimum qualification of EAL QCF NVQ Level 3 Diploma or its equivalent in an appropriate discipline.
- 10.3 We will check that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor’s certification appropriately.

11.0 Training

- 11.1 We will establish training on this policy and the procedures that support it, through appropriate methods including team briefings; basic lift safety awareness training; and on the job training for those delivering the programme of lift inspections, planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.

12.0 Performance Reporting

- 12.1 We will report key performance indicator (KPI) measures for lift safety that follow the requirements set out in the Tenant Satisfaction Measures (TSMs) which came in to force on 1 April 2023 and must be reported to the Regulator on an annual basis.
- 12.2 We will report the following lift safety performance:

Report recipient	Frequency
Regulator of Social Housing	Annual

Senior Leadership Team	Fortnightly
Board	Monthly
Asset and Compliance Committee	Bi-monthly
Resident Involvement Group	Bi-annually

12.3 We will also report the following:

Data – the total number of:

- Properties split by category (domestic, communal blocks/schemes, commercial/other).
- Properties on the thorough examination programme.
- Properties not on the thorough examination.
- Properties with a valid and in date thorough examination.
- Properties without a valid and in date thorough examination.
- Properties due to be examined within the next 30 days.
- Follow-up actions arising from the programme (in time and overdue, by priority).

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

In addition:

- The number of entrapments within lifts (in month and year to date).
- The number of RIDDOR notifications to the HSE with regards to lift safety.
- Lift servicing programme.

13.0 Quality Assurance

- 13.1 We will ensure there is programme of annual third-party quality assurance audits of lifts that are not included on the thorough examination programme.
- 13.2 We will procure an independent audit of lift safety within six months of the approval of this policy. We will endeavour to carry out audits at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

14.0 Significant Non-Compliance and Escalation

- 14.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.
- 14.2 All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Warwick District Council employee becoming aware of it.
- 14.3 Any non-compliance issue identified at an operational level will be formally reported to the Compliance Manager in the first instance, who will agree an appropriate course of corrective action with the Deputy Chief Executive Officer and report details of the same to the SLT.
- 14.4 In cases of serious non-compliance, Management Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by their regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 14.5 Following the approval of this policy we will establish a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to lift safety, and we will take action to ensure any issues identified and lessons we have learned to prevent a similar incident occurring again.

15.0 Glossary

- 15.1 This glossary defines key terms used throughout this policy:
- **IOSH Managing Safely course** - The Institution of Occupational Safety and Health (IOSH) have designed the IOSH Managing Safely course for managers and supervisors of organisations in virtually all industry sectors, in order to give them all they need to know to effectively manage health and safety in the workplace.
 - **LEIA** – The Lift and Escalator Industry Association is the trade association and advisory body for the lift and escalator industry.
 - **Thorough examination** - A systematic and detailed examination of the equipment and safety-critical parts, carried out at specified intervals by a competent person who must then complete a written report.

Appendix 1- Additional Legislation

This policy also operates within the context of the following legislation:

- The Defective Premises Act 1972
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Workplace (Health Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- The Occupiers' Liability Act 1984
- Equality Act 2010
- Building Regulations 2010 – Part M
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Social Housing (Regulation) Act 2023

Water Hygiene Policy



Name	Water Hygiene Policy
Owner	Compliance Manager
Version	Final V1.0
Last Review	June 2024
Next Review	June 2026
Resident Influencing Group	Consulted June 2024
Board Approval	July 2024

Strategic Lead	Deputy Chief Executive Officer
Sign	<div></div>
Date	August 6, 2024
Chair of Board	Paul Wightman
Sign	<div></div>
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1.0 Introduction and Objectives

- 1.1 As a landlord, Warwick District Council must meet the legal obligations which require us to deal with the risks associated with legionella bacteria within the properties we own or manage. Legionella bacteria can cause a potentially fatal form of pneumonia called Legionnaires' disease. People contract Legionnaires' disease by inhaling small droplets of water containing the bacteria.
- 1.2 As far as is reasonably practicable, we must introduce measures to reduce and/or control exposure to legionella bacteria, including managing the conditions that support the growth of the bacteria in water systems.
- 1.3 The key objective of this policy is to ensure that our Cabinet, Senior Leadership Team, employees, partners, and residents are clear on our legal and regulatory water hygiene obligations. This policy provides the framework our staff and partners will operate within to meet these obligations.
- 1.4 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our Document Management System (DMS) and distributed to all relevant members of staff.

2.0 Scope

- 2.1 This policy applies to the following property types:
 - Domestic properties (houses, flats bungalows, and so on).
 - Communal blocks.
 - Sheltered / Supported living schemes.
- 2.2 Some aspects of this policy also apply to individual domestic properties (houses, flats bungalows, and so on). Applicable items will be clearly referenced.
- 2.3 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. Adherence to this policy is mandatory.

3.0 Roles and Responsibilities

- 3.1 The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).

- 3.2 The Management Team will receive fortnightly performance reports in respect of water hygiene safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.3 The Deputy Chief Executive Officer has strategic responsibility for the management of water hygiene safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.
- 3.4 Under the requirements of the Social Housing (Regulation) Act 2023 we have appointed the Deputy Chief Executive Officer as our Health and Safety Lead.
- 3.5 The Compliance Manager has overall operational responsibility for water hygiene. The M&E Energy Officer has day-to-day responsibility for managing water hygiene safety and will be responsible for overseeing the delivery of these programmes. The M&E Energy Officer is the Responsible Person.
- 3.6 The Compliance Team Leader is the Deputy Responsible Person who will provide cover to the M&E Energy officer (Responsible Person) in their absence.
- 3.7 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary.

4.0 Legislation, Guidance and Regulatory Standards

- 4.1 **Legislation** - The principal legislation applicable to this policy is as follows:
 - The Health and Safety at Work Act 1974.
 - The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH).
 - This policy also operates within the context of additional legislation (see Appendix 1).
- 4.2 **Approved Code of Practice (ACoP)** – The principal ACoP applicable to this policy is:
 - ACoP L8 - Legionnaires’ disease: The control of legionella bacteria in water systems (4th edition 2013).
- 4.3 **Guidance** – The principal guidance applicable to this policy is as follows:
 - HSG274 - Legionnaires’ disease: Technical guidance Part 2: The control of legionella bacteria in hot and cold water systems (2014).
 - HSG274 - Legionnaires’ disease: Technical guidance Part 3: The control of legionella bacteria in other risk systems (2013).
 - INDG458 - Legionnaires’ disease: A brief guide for dutyholders (2012).

- BS 8580-1:2019 Water quality, risk assessments for Legionella control – Code of practice.

4.4 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

4.5 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the COSHH Regulations; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; and via a regulatory judgement from the Regulator of Social Housing.

5.0 Obligations

5.1 The Health and Safety at Work Act 1974 places a duty on us, as an employer and landlord, to ensure our employees and others affected by our undertakings (for example, residents), are not exposed to health and safety risks, including the risk from legionella.

5.2 We have a legal obligation under COSHH to prevent or control exposure to biological agents, including legionella.

5.3 Warwick District Council is the ‘Duty Holder’ as defined by ACoP L8 and we must take necessary precautions to prevent, reduce or control the risks of exposure to legionella.

5.4 As the Duty Holder, we must:

- Carry out a risk assessment for all hot and cold-water systems, cooling plant and any other systems that can produce water droplets to identify and assess potential risks.
- Implement measures to either eliminate, reduce or control identified risks.
- Appoint a Responsible Person to take managerial responsibility for:
 - Carrying out risk assessments.
 - Producing written schemes of control (a practical, risk management document used to control the risk from exposure to legionella).
 - Implementing the written scheme of control.
- Appoint a Deputy Responsible Person who will provide cover to the responsible person in their absence.
- Keep associated records for five years.

6.0 Statement of Intent

- 6.1 We acknowledge and accept our responsibilities and obligations under the legislation outlined in Sections 4 and 5.
- 6.2 We are in the process of moving towards a risk-based approach to undertaking legionella risk assessments, where a practical and proportionate approach will be adopted for domestic properties and communal blocks and schemes will be assessed as high, medium or low risk, with supporting risk assessment frequencies.
- 6.3 We will develop written schemes of control for all properties risk assessed as requiring controls to manage the risk of legionella exposure.
- 6.4 When properties become void, we will endeavour to drain and flush the water system, including any shower loop, before undertaking any work. The water system will then be flushed and recommissioned before the property is let, and the shower head replaced or sterilised.
- 6.5 We will carry out checks to identify pipework 'dead legs' and remove them within void properties and any properties where we are carrying out adaptations or planned investment work.
- 6.6 When we acquire properties (existing or new build) we will follow the same process as for void properties, and we will ensure that there are no pipework 'dead legs' present when we take possession of the property.
- 6.7 We will operate a robust process to manage immediately dangerous situations identified from the legionella risk assessment, water testing/monitoring regime or suspected legionella outbreak.
- 6.8 A No Access Policy will be developed so that Housing teams will be able to provide support where gaining access to properties is difficult and therefore will be able to assist and facilitate any legal processes as necessary, if access has been attempted at least twice, the appropriate procedures have been followed and approval has been given by the appropriate Manager. Where resident vulnerability issues are known or identified, we will ensure we safeguard the wellbeing of the resident.
- 6.9 We will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 6.10 We will establish and maintain a risk assessment for water hygiene management and operations, setting out our key water hygiene risks and appropriate mitigations.
- 6.11 To comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be in place for all repair work to

void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement works and refurbishment projects.

7.0 Programmes

- 7.1 **Communal blocks and other properties** – We will ensure all communal blocks and schemes are subject to an initial visit to establish whether a legionella risk assessment (LRA) is required. Thereafter, if an LRA is required, the property will be included on the LRA programme. If an LRA is not required, we will record this on our core asset register.
- 7.2 For all properties on the LRA programme, we will undertake a risk-based approach to renewing the LRAs. This will be supplemented by an annual internal desktop review.
- 7.3 LRAs will also be reviewed in the following circumstances:
- Change in building use.
 - Change in internal layout of water system.
 - Change in building occupation that increases the risk due to health.
 - After a confirmed or suspected outbreak of Legionella.
 - Following a water hygiene audit (if required).
- 7.4 **Domestic properties** – We will develop an annual programme of five per cent sample legionella risk assessments in domestic properties. These will be prioritised according to the perceived level of risk (based on design, size, age and type of water supply).
- 7.5 **Testing and monitoring** - We will endeavour to undertake testing and monitoring (for example, monthly temperature checks) as set out within any written schemes of control.
- 7.6 Following the approval of this policy we will establish a robust process in place for the management of any follow-up works required following the completion of an LRA or ongoing monitoring (where the work cannot be completed at the time of the assessment or check).

8.0 Data and Records

- 8.1 We will maintain a core asset register of all properties we own or manage, setting out which properties require an LRA. We will also set out which properties require ongoing testing and monitoring as prescribed by the written control scheme (for example, monthly temperature checks).
- 8.2 We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from water hygiene programmes and the programmes remain up to date.

- 8.3 We will hold LRA inspection dates, LRAs, and testing and monitoring records against all properties on each programme. These will be held in the DMS which is interfaced with Active H.
- 8.4 We will keep water hygiene logbooks electronically (or securely on site where practical), for all properties on the LRA programme.
- 8.5 We will keep all records indefinitely unless specified otherwise in our Records Management Policy and have robust processes and controls in place to maintain appropriate levels of security for all water hygiene related data.

9.0 Resident Engagement

- 9.1 We consider good communication essential in the effective delivery of water hygiene programmes, therefore we will establish a resident engagement strategy and communication programme. This will support residents in their understanding of water hygiene and legionella risk, advised them of how they can manage the risks within their properties, and to encourage them to report any concerns about water safety.
- 9.2 We also aim to successfully engage with vulnerable and hard to reach residents. We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.
- 9.1 Once written schemes of control are developed, we ensure they are displayed in communal areas of buildings to inform occupants how the risk of exposure to legionella bacteria is being managed and controlled.

10.0 Competent Persons

- 10.1 The Responsible Person (M&E Energy Officer) and a Deputy Responsible Person (Compliance Team Leader) should be trained, instructed, and informed to the same level and should assist in the frequent monitoring of written control schemes. Therefore, they should hold a relevant qualification such as the Level 2 Award in Legionella Awareness (or equivalent), or Level 4 VRQ Diploma in Asset and Building Management. If they do not have these already, they will obtain them within an appropriate time frame following the approval of this policy.
- 10.2 Only suitably competent consultants and contractors, registered with the Legionella Control Association (or equivalent), will undertake LRAs, prepare written schemes of control and undertake works in respect of water hygiene and legionella control.
- 10.3 Only suitably competent consultants and contractors, registered with the Legionella Control Association (or equivalent), will undertake third party technical quality assurance checks.

10.4 We will check that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor’s certification appropriately.

11.0 Training

11.1 We will establish training on this policy and the procedures that support it, through appropriate methods including team briefings; basic water hygiene awareness training; and on the job training for those delivering the programme of LRAs and water hygiene testing and monitoring, as part of their daily job. All training undertaken by staff will be formally recorded.

12.0 Performance Reporting

12.1 We will report key performance indicator (KPI) measures for water hygiene safety that follow the requirements set out in the Tenant Satisfaction Measures (TSMs) which came into force on 1 April 2023 and must be reported to the RSH on an annual basis.

12.2 We will report the following water hygiene performance:

Report recipient	Frequency
Regulator of Social Housing	Annual
Management Team	Fortnightly
Board	Monthly
Asset and compliance Committee	Bi-monthly
Resident Involvement Group	Bi-annually

12.3 We will also report the following:

Data – the total number of:

- Properties split by category (domestic, communal blocks/schemes, commercial/other).
- Properties on the LRA programme.
- Properties not on the LRA programme.
- Properties with a valid and in date LRA.
- Properties without a valid and in date LRA.
- Properties due an LRA within the next 30 days.
- Overdue follow-up works/actions (split by priority).

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

In addition:

- The number of RIDDOR notifications to the HSE with regards to water safety.

13.0 Quality Assurance

- 13.1 We will ensure there is a programme of third-party quality assurance audits to one hundred per cent of LRAs. Annual audits will be undertaken to all systems identified as a high risk.
- 13.2 We will procure an independent audit of water hygiene safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues for correction.

14.0 Significant Non-Compliance and Escalation

- 14.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.
- 14.2 All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Warwick District Council employee becoming aware of it.
- 14.3 Any non-compliance issue identified at an operational level will be formally reported to the Compliance Manager in the first instance, who will agree an appropriate course of corrective action with the Deputy Chief Executive Officer and report details of the same to the Management Team.
- 14.4 In cases of serious non-compliance, Management Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by their regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 14.5 We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to water hygiene safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

15.0 Glossary

15.1 This glossary defines key terms used throughout this policy:

- **BOHS:** British Occupational Hygiene Society.
- **Duty Holder:** the owner of the non-domestic premises or the person or organisation that has clear responsibility for the maintenance or repair of non-domestic premises, for example through an explicit agreement such as a tenancy agreement or contract.
- **Legionellosis:** a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever.
- **LRA:** Legionella Risk Assessment – an assessment which identifies the risks of exposure to legionella in the water systems present in a premises and the necessary control measures required.

Appendix 1 - Additional Legislation

This policy also operates within the context of the following legislation:

- The Defective Premises Act 1972
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- The Occupiers' Liability Act 1984
- Public Health (Infectious Diseases) Regulations 1988
- The Workplace (Health Safety and Welfare) Regulations 1992
- The Management of Health and Safety at Work Regulations 1999 (the Management Regulations).
- Water Supply (Water Fittings) Regulations 1999
- Housing Act 2004
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Water Supply (Water Quality) Regulations 2018
- Data Protection Act 2018
- Social Housing (Regulation) Act 2023

Title: Armed Forces Community Covenant
Lead Officer: Bernadette Allen
Portfolio Holder: Councillor Jim Sinnott
Wards of the District directly affected: All

Approvals required	Date	Name
Portfolio Holder	23/09/24	Cllr Jim Sinnott
Finance	16/09/24	Andrew Rollins
Legal Services		N/A
Chief Executive	16/09/24	Chris Elliott
Director of Climate Change	16/09/24	Dave Barber
Head of Service(s)	12/09/24	Lisa Barker
Section 151 Officer	16/09/24	Andrew Rollins
Monitoring Officer	16/09/24	Graham Leach
Leadership Co-ordination Group	30/09/24	LCG
Final decision by this Committee or rec to another Cttee / Council?	Yes/ No Recommendation to: Cabinet Committee	
Contrary to Policy / Budget framework?	No/Yes	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No/Yes, Paragraphs:	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No/Yes, Forward Plan item 1.052	
Accessibility Checked?	Yes/No	

Summary

The report is seeking approval from Cabinet to re-sign the Armed Forces Community Covenant.

Recommendation(s)

- (1) That Cabinet recommits the Council to the principles and spirit of the Armed Forces Community Covenant and joins Warwickshire County Council and other partners in the Armed Forces signing event (see appendix 1 for detail on the principles)
 - (2) That Cabinet approves £24000 from the Community Projects Reserve to support events relating to the remembering of conflict and the Armed Services to cover the years 2025-6, 2026-7 and 2027-8. A budget of £8000 will be allocated to each of these years
-

1 Reasons for the Recommendation

- 1.1 The Armed Forces Covenant is a promise from the nation ensuring that those who serve or who have served in the Armed Forces, and their families, should be treated with fairness and respect in communities, economy, and society they serve with their lives. Those who serve in the Armed Forces, whether a regular or Reserve, those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public or commercial services. Special consideration is appropriate in some cases, especially those who have given the most such as the injured and the bereaved.
- 1.2 The Covenant was established in its current form in 2011 and since then thousands of different organisations including businesses, local authorities, universities, and charities have chosen to sign a pledge to honor the Covenant and support their Armed Forces Community. In 2012 Local Authorities across Coventry, Warwickshire and Solihull signed the Armed Forces Community Covenant Pledge to their support for the Armed Forces Community. As a result of the Council signing the Covenant an Elected Member Armed Forces Champion was appointed and an Armed Covenant Strategic Partnership and a co-ordination was formed to oversee activity on work to support the Covenant and share good practice.
- 1.3 Building on the good progress of the Covenant, the Armed Forces Act 2021 amended the Armed Forces Act 2006 to create the following legal obligation on specified bodies in all four nations of the UK. This is the Armed Forces Duty which states:

'When a specified body exercises a relevant function, it must have due regard to: (a) the unique obligations of, and sacrifices made by, the Armed Forces; (b) the principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the Armed Forces, and (c) the principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the Armed Forces.'

This legal obligation applies to specified bodies whether or not they have signed the Covenant Pledge.

- 1.4 By signing the Pledge, it provides public recognition of the Council's commitment to its Armed Forces Community and activity to ensure they face no disadvantage compared to other citizens in the provision of public or commercial services. Special consideration is appropriate in some cases, especially those who have given the most such as the injured and the bereaved.
- 1.5 The Council has participated in the National Armed Forces Day for a few years. The Council have worked with local military units to plan and deliver a Community Fun Day. Armed Forces is an opportunity to build awareness of the unique sacrifice that our Armed Forces continue to make or have made to the nation. Also due to issue of pride, many in the Armed Forces Community do not ask for help and struggle in silence. However, it has been proved that not only does Armed Forces Day provide an opportunity to say thank you, but it also builds awareness of the support made available locally for example services that RBL, SSAFA, Help the Heroes, the Veterans Contact Point and other local voluntary and community services aimed at providing support. The 2024-Armed Forces Day was one of the biggest and best in the region where over 2500 people attended, and the Council should build on this success. By the Council agreeing to on-going financial support, this effectively demonstrates commitment to the remembering those that are serving/ have serviced in the Armed Forces.
- 1.6 The signing event, for the Warwickshire Armed Forces Covenant, will take place on Wednesday 6th November at 11.30 and is being held at Shire Hall.

2 Alternative Options

- 2.1 The Cabinet could decide not to sign the pledge and not commit to the spirit of the pledge. However regardless the Council has a legal obligation under the Armed Forces Duty whether or not they have signed the Covenant Pledge.

3 Legal Implications

- 3.1 The Armed Forces Act 2021 introduced a new statutory requirement for some public sector services include NHS (Health provision) and Local Authorities (Housing and Education), to pay due regard to the principles of the Armed Forces Covenant when carrying out specific public functions in the areas of housing, healthcare and education. The new legislation aims to prevent service personnel, veterans and their families from being disadvantaged when accessing essential services.
- 3.2 The Armed Forces Covenant Duty has the following legal obligation. When a specified body exercises a relevant function, it must have due regard to:
- a. the unique obligations of, and sacrifices made by, the armed forces.
 - b. the principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the armed forces and,
 - c. the principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the armed forces.
- 3.3 Sub-paragraphs (a) to (c) are a summary of the Armed Forces Covenant. The Duty builds on – but is distinct from – the pre-existing voluntary Covenant pledge. This legal obligation applies to all specified bodies, when exercising relevant functions, whether or not that body has signed the Covenant pledge.

In relation to the Council, it is linked to the Housing function.

4 Financial Implications

- 4.1 In 2024-25 an allocation of £8,000 was made in the budget to support Armed Forces activity.
- 4.2 This report is seeking to approval for £24000 from the Community Projects Reserve to support events relating to the remembering of conflict and the Armed Services to cover the years 2025-6, 2026-7 and 2027-8. A budget of £8000 will be allocated to each of these years This is to align with other annual events that the Council deliver such as ECO Fest.

5 Corporate Strategy

- 5.1 Warwick District Council has adopted a Corporate Strategy which sets three strategic aims for the organisation. Each proposed decision should set out how the report contributes to the delivery of these strategic aims. If it does not contribute to these aims or has a negative effect on them the report should explain why that is the case.
- 5.2 Delivering valued, sustainable services – the commitment to the Armed Forces Covenant can help to ensure that the Armed Forces Day are aware of the services provided by the Council and ensure that they have access to much needed support services. It will help to ensure the sustainability of resources aimed at supporting the health and wellbeing of the Armed Forces Community.
- 5.3 Low cost, low carbon energy across the district – through the work with the Armed Forces Community, especially for those leaving service. We can work with the community to build awareness of the importance of being able to contribute to the ambition of the Council to become a low cost, low carbon energy district. .
- 5.4 Creating vibrant, safe and healthy communities of the future – the whole ethos of the work with the Armed Forces Community is to ensure that those who are serving, have served and their families, have equal access to services. Due to the unique nature of their service often the Armed Forces Community do not get equal access to services. By committing to work around the Armed Forces Covenant the Council can demonstrate its commitment to supporting the health and wellbeing of the Armed Forces Community,

6 Environmental/Climate Change Implications

- 6.1 There are no implications for environmental or climate change.

7 Analysis of the effects on Equality

- 7.1 An initial Equality Impact Assessment has been completed and the analysis identified a number of equality implications for the Armed Forces Community which include; more likely that older people will be impacted, veterans who have a disability as a result of their service and a number of veterans identified their religion as being other.
- 7.2 In addition, there is evidence that due to unique nature of the Armed Forces that that they are often disadvantaged in accessing both public and commercial services.

8 Data Protection

- 8.1 There are no data protection implications.

9 Health and Wellbeing

- 9.1 The rationale for the Council signing the Armed Forces Covenant is to improve the quality of life of those that are serving, have served and their families. By signposting and linking the Armed Forces Community to financial inclusion services can improve the capacity and resilience of that community and helps to reduce the pressure on other public services provided by the Council and its partners. The investment also helps expand the capacity of VCS organisations and improve the wellbeing and self-reliance of individuals
- 9.2 By providing access to support will also help expand the capacity of this community to improve the wellbeing and self-reliance of individuals

10 Risk Assessment

- 10.1 There is a risk that the Armed Forces Community continue to have unequal access to services and that their needs are not addressed by the service provision.
- 10.2 There is a risk that the reduced support for the Armed Forces Community at this current time would be perceived unfavourably and detrimentally affect the Council's reputation. Care has been taken to ensure that the investment in the voluntary and community sector grants/ service level agreements focus resources where they are most needed, including addressing issues that were increasing in importance.
- 10.3 Service providers, as part of the grants/ service provide evidence of the positive impact they achieve for the Armed Forces Community and as with the review of outcomes the council can be reassured of evidenced positive impacts. If the proposal was not agreed the Council will be unable to impose this requirement on the voluntary and community sector grant/ service level agreements.

11 Consultation

- 11.1 The Warwick District Council Armed Forces Champion (Councillor Redford) has been consulted and is keen that the District Council re-signs the Covenant and commits to the work with the Armed Forces Community.

Background papers: None

Supporting documents: None



Warwick District Council

We, the undersigned, commit to honour the Armed Forces Covenant and the Armed Forces Covenant Duty in order to support the Armed Forces Community. We recognise the value Serving Personnel, both Regular and Reservists, Veterans and military families contribute to our community, our organisation and our country.

Signed on behalf of:
Warwick District Council

Signed on behalf of:
Ministry of Defence

Name: _____
Position: _____
Date: 6 November 2024

Name: _____
Position: _____
Date: _____



Ministry
of Defence

The Armed Forces Covenant

An Enduring Covenant Between

The People of the United Kingdom

His Majesty's Government

and

All those who serve or have served in the Armed Forces of the Crown

And their Families

The first duty of Government is the defence of the realm. Our Armed Forces fulfil that responsibility on behalf of the Government, sacrificing some civilian freedoms, facing danger and, sometimes, suffering serious injury or death as a result of their duty. Families also play a vital role in supporting the operational effectiveness of our Armed Forces. In return, the whole nation has a moral obligation to the members of the Naval Service, the Army and the Royal Air Force, together with their families. They deserve our respect and support, and fair treatment.

Those who serve in the Armed Forces, whether Regular or Reserve, those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public and commercial services. Special provision is justified in some cases, especially for those who have given most such as the injured and the bereaved.

Whilst Cadet Force Adult Volunteers' (CFAV) and Cadets do not come under the Armed Forces Covenant (as they have not served) they are recognised and valued as part of the wider Armed Forces 'family' and the Council recognises their contribution as such.

This obligation involves the whole of society: it includes voluntary and charitable bodies, private organisations, and the actions of individuals in supporting the Armed Forces. Recognising those who have performed military duty unites the country and demonstrates the value of their contribution. This has no greater expression than in upholding this Covenant.

DRAFT

Section 1: Principles of the Armed Forces Covenant

1.1 We **Warwick District Council** will endeavour to uphold the key principles of the Armed Forces Covenant and the Covenant Duty:

- *Recognising the sacrifices and obligations made by the whole of the Armed Forces community*
- *Members of the Armed Forces Community should not face disadvantages arising from their service in the provision of public and commercial services.*
- *In some circumstances special provision may be justified, especially for those who have given the most, such as the injured or bereaved.*

Section 2: Demonstrating our Commitment

2.1 We recognise the contribution that Service personnel, reservists, veterans, and military families make to our community, our organisation and to the country. We also recognise the work of Cadet Force Adult Volunteers as well as the importance of supporting Armed Forces Cadet organisations and cadets themselves.

2.2 We will seek to uphold the principles of the Armed Forces Covenant.

Title: Leamington Town Centre Transformation

Lead Officer: Chris Elliott chris.elliott@warwickdc.gov.uk 01926 456000

Portfolio Holder: Councillor Chris King

Wards of the District directly affected: Leamington Clarendon and Brunswick

Approvals required	Date	Name
Portfolio Holder	4 October 2024	Cllr Chris King
Finance	4 October 2024	Andrew Rollins/Steven Leathley
Legal Services		
Chief Executive	4 October 2024	Chris Elliott
Director of Climate Change	4 October 2024	Dave Barber
Head of Service(s)	4 October 2024	Phillip Clarke
Section 151 Officer	4 October 2024	Andrew Rollins
Monitoring Officer	4 October 2024	Graham Leach
Leadership Co-ordination Group	7 October 2024	
Final decision by this Committee or rec to another Cttee / Council?	Yes Recommendation to: Cabinet	
Contrary to Policy / Budget framework?	No	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No	
Accessibility Checked?	Yes	

Summary

This report seeks to update on progress with the Transformation of Leamington Town Centre focussed principally on the Parade and around the Old Town area and to seek approval for the revised town centre Vision and to progress the next stages of the transformation work.

Recommendation(s)

- (1) That subject to the support of the Leamington Transformation Board (LTB) on 8th October and the similar agreement of Royal Leamington Spa (RLS) Town Council and Warwickshire County Council (WCC), Cabinet endorses the Leamington Town Centre Vision 2024 attached at Appendix A.
- (2) That Cabinet notes that the next stage of work is the preparation of the Parade Masterplan, the brief for which is attached at Appendix B.
- (3) That Cabinet note progress being made on the other co-ordinated Town Centre projects including the Future High Street Fund projects and WCC's various movement projects including buses, cycling and the Bath Street Area Improvements.
- (4) That a review of the allocation of CIL receipts both in the existing CIL schedule and future allocations together with a review of potential Section 106 contributions and other public funding opportunities be brought to the February 2025 Cabinet meeting for to consider whether this would appropriate for the purpose of providing a clear and significant funding source for the town centre's transformation programme and especially that of the works for the Parade and Bath Street.

1 Reasons for the Recommendation

Town Centre Vision (Recommendation 1)

- 1.1 Extensive collaborative and inclusive work with both stakeholders and the public has been undertaken through 2024 on the preparation of a refreshed and updated Vision for Leamington town centre. Nationally renowned consultants LDA Design have been leading this work alongside officer teams from all three local authorities. The resultant Vision document is attached at Appendix A is due to be considered by the LTB on 8th October and if signed off it will then come to each of the 3 Local Authorities to be considered for approval.
- 1.2 This concludes that piece of work which now sets out the high-level strategic context for the town centre which will guide all new development and regeneration activity for many years to come.

Parade Masterplan (Recommendation 2)

- 1.3 As the Vision refresh is now complete the next major task for the LTB is to oversee the preparation of the Parade Masterplan, now underway. This work will look at the town's main street to set out what the options might realistically be to deliver transformative change and improvements in line with the overall Vision. The brief is attached in Appendix B. Collaborative workshops/meetings are planned to be held in the coming months through October and November with the same groups that have fed into the Vision work.

- 1.4 The work on the Vision and the Parade masterplan was overseen by the LTB and was commissioned through WCC's procurement process whereby three quotes for up to £100K could be accepted and the work was awarded to LDA Design. This work was funded jointly by WCC/WDC/RLSTC and this Council's financial contribution was agreed by Cabinet last year.
- 1.5 The LTB has long anticipated that it would need to create a framework that brought together the Vision, the Parade Masterplan and the various other studies that thus far have been carried on an individual basis to create the next level of detail but to also demonstrate how the various strands and projects hang together. This will be the subject of a further report or addendum to this report.

Progress on Existing Project Work (Recommendation 3)

- 1.6 There are several existing projects that are already well underway with some nearing completion. These include the Future High Street Fund (FHSF) projects at the Town Hall Creative Hub and the former Stoneleigh Arms /Old School, WCC's various movement projects including a strategic Area Strategy, buses, cycling and the Bath Street Area Improvements as well as WDC's Covent Garden and Chandos Street car parks.
- 1.7 Both FHSF projects are on-site and moving along on-track to complete at the end of the year / early 2025. These will complement the successful phase 1 project at Spencer Yard which will receive an award at the Leamington Society Awards ceremony on Wednesday 16th October 2024.
- 1.8 WCC's Local Transport Plan 4 (LTP4) is now moving to the next stage and preparing Area Strategies, one of which will be for Warwick District including Leamington town centre. This will be progressed collaboratively and is seeking to conclude in November 2024. This will also be part of setting the context for the new Transformation Framework.
- 1.9 WCC have also commissioned Atkins to undertake a study looking at options for bus routes in the town centre to feed into and support the Parade Masterplan work. This is aiming to report in November 2024.
- 1.10 Planning to improve the cycling infrastructure in the town centre is also continuing and consideration of the most appropriate north south and east west cross town centre routes will feed into the Transformation Framework.
- 1.11 A meeting to discuss the next allocation of CIL/Other funding to WCC from WDC is being programmed to help progress the Bath Street Area Improvements. The intention is to dovetail the Bath Street work with the Parade work to given they are part of the same spine of the town centre's function in a co-ordinated way.

Future Funding Opportunities (Recommendation 4)

- 1.12 The transformation of the town centre will need significant public investment given that a major part of what is needed will be to transport infrastructure and the public realm. Setting out how such improvements may be funded would also then help to attract private sector investment and public sector funding from other sources. Such an approach would also help to counter cynicism that often arises when significant changes are proposed as to how such works are to be funded.
- 1.13 There are a few localized funding opportunities which could be brought together to help address the funding need. These are as follows:

- Local Growth Initiatives Investment Plan - directly or to inject some money into existing CIL schemes and so free up CIL to be used for the town centre (see another report on this agenda).
- The Council could also decide to prioritise the town centre transformation for future year's CIL allocations and so build up a significant sum.
- Section 106 agreements that have generated sums for air quality improvements.
- Other Section 106 opportunities arising from other development schemes – as identified by the proposed Transformation Framework will also generate funding for transport and public realm improvements.
- Capital receipts from the redevelopment of some Council owned sites which could be re invested in other schemes.

1.14 It is proposed therefore that a review be undertaken of the allocation of CIL receipts both in the existing CIL schedule and of future allocations together with a review of the potential for S106 contributions and other public funding opportunities be brought to the February 2025 Cabinet for consideration as to whether it is appropriate for the purpose of funding town centre regeneration and in particular for the Parade and Bath Street.

2 Alternative Options

- 2.1 The Cabinet could choose to decline all the first 3 of these recommendations or vary them but unless there is commitment to provide resources then WDC will not be able to make any headway on the items for which the LTB has agreed are priorities. It is hard to see therefore what other options there are for the Council to consider.
- 2.2 The Cabinet could also decide not to pursue a review as proposed under recommendation 4 but this would leave the funding question open and unanswered and still to be considered.

3 Legal Implications

- 3.1 This report doesn't of itself generate any legal issues, but the outcomes of such work agreed may do.

4 Financial Implications

- 4.1 The work on the Vision and on the Parade Masterplan has already been funded by WCC and WDC jointly.
- 4.2 The implementation of the Parade Masterplan, if agreed, will need to be supported and when these reports are reported back consideration will also need to be given to the project management resource, cost and funding source.

5 Corporate Strategy

- 5.1 This important work on Leamington town centre contributes in part to all three Corporate Strategy strategic aims.
- 5.2 Delivering valued, sustainable services – this work contributes to the success and vibrancy of Leamington town centre, from which, several Council services are delivered and from which revenue is and can be derived e.g. car park income; income from events; planning and building control and licensing application fees; business rates and council tax; capital receipts and rental income from WDC property.

- 5.3 Low cost, low carbon energy across the district – this work considers the sustainability of the town centre across several factors relating to energy use from movement to buildings. The Vision can be used at a high level to help ensure that schemes coming forward involving new buildings or alterations to existing ones are energy efficient and deliver low or no carbon emissions especially where they involve WDC property or funded schemes.
- 5.4 Creating vibrant, safe and healthy communities of the future – the future of Leamington town centre is central to the district’s future and this transformation work is leading the way in ensuring our communities are vibrant, safe and healthy.

6 Environmental/Climate Change Implications

- 6.1 The proposals of themselves will not impact directly on the environment or climate change but the outcome so the work to be commissioned if they can be implemented should have positive implications regarding air pollution and on CO2 commissioned especially from travel arrangements but also from new development. There will also be opportunities to enhance the biodiversity of the town centre in its green spaces.

7 Analysis of the effects on Equality

The aim of the initiative is to be inclusive to all. Equality Impact Assessment implications will need to be considered as part of the next phase of work commissioned where there are further detailed plans for each element.

8 Data Protection

- 8.1 There are no Data Protection implications arising from this report.

9 Health and Wellbeing

- 10 Health and wellbeing implications, central to the new town centre Vision, will need to be considered as part of the outcome of the commissioned work and when recommendations come forward on more precise works.

11 Risk Assessment

- 11.1 Appendix C sets out the initial risk register for this project. It is suggested that this be reviewed by the LTB Board and in a sense owned by it as well as by individual contributing partners.

12 Consultation

- 12.1 Consultation is proposed as one of the recommendations and the proposed commissioned work will involve significant consultation.

Background papers:

No background papers.

Supporting documents:

Appendix A – Vision 2024

Appendix B – Parade Masterplan brief

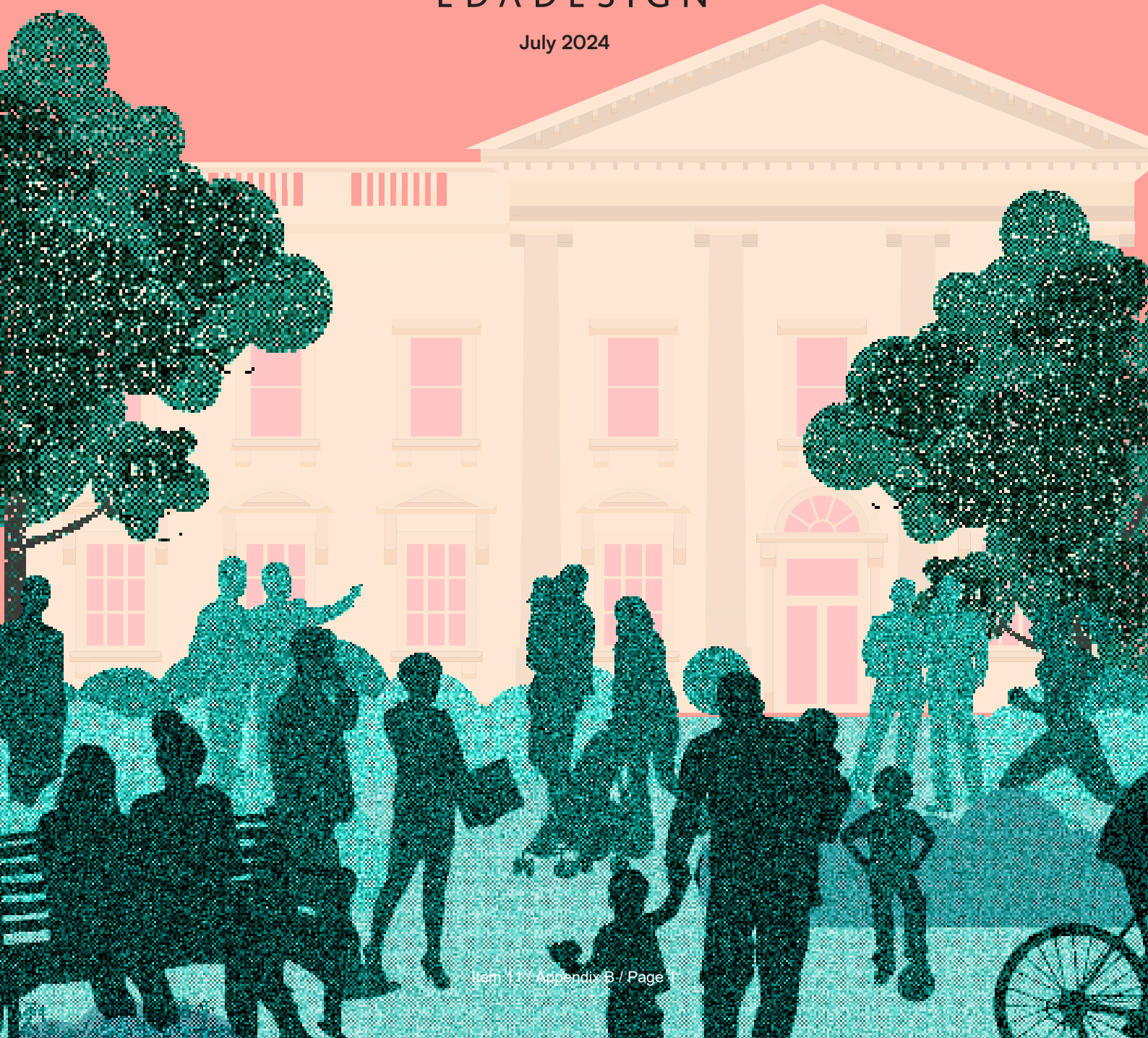
Appendix C – Risk Register

Royal Leamington Spa

July 2024 Workshops and emerging brief for Parade

LD&DESIGN

July 2024





1.0 Introduction

On 15th and 16th July 2024, the project team from Warwickshire County Council Warwick District Council, and Leamington Town Council, LDA Design and Norman Rourke Pryme (NRP) attended and facilitated two workshops at The Royal Pump Rooms to discuss challenges and opportunities for Parade.

The workshops aimed to firstly; develop a comprehensive understanding of how people currently view Parade and what fundamental challenges attendees felt the street space could address. And secondly, to understand what is the level of ambition to deliver against the draft vision? what changes people would like to see? and what magnitude of change is considered acceptable?

← The Town
Centre Area

Aligning with the 2024 draft Vision; which at the time of presenting to the groups was titled “The People’s Spa”, the pillars refer to Healthy People. Key to this is empowering more people to participate in shaping the town centre’s future. Parade forms the town’s spine and is also referred to in the vision as potentially one of England’s greatest streets. It is crucial therefore that we involved a wide spread of individuals and groups to feed into how they see this special street changing in the future.

On Monday 15th July we met with Council and County officers from various departments, and on Tuesday 16th July we met with a broad range of stakeholders representing a diverse cross section of interested individuals and groups. Both groups took part in identical workshop formats.

The ultimate outcome following a discussion around challenges and opportunities is the development of a succinct brief for Parade. This will enable the design team to develop options that align with stakeholder feedback and a preferred strategic approach.

The following provides a summary of each workshop related to the challenges and opportunities. These are broadly listed in the order they were mentioned and is verbatim, as much as possible. After identifying specific challenges on Parade, groups previewed the draft 2024 Vision and reviewed world-class precedents for inspiration. Recognising Royal Leamington Spa’s unique context, and alongside the emerging draft vision of “The People’s Spa,” including its pillars and associated goals, attendees were asked to generate aspirational ideas and opportunities for the masterplan study area.

The findings of the workshops are reported in sections 2.0 and 3.0, and drawing on this feedback, section 4.0 drafts a design brief for Parade.

2 Royal Leamington Spa_Parade Brief



1



2

← 15th July Council and
County Council Officers
Workshop

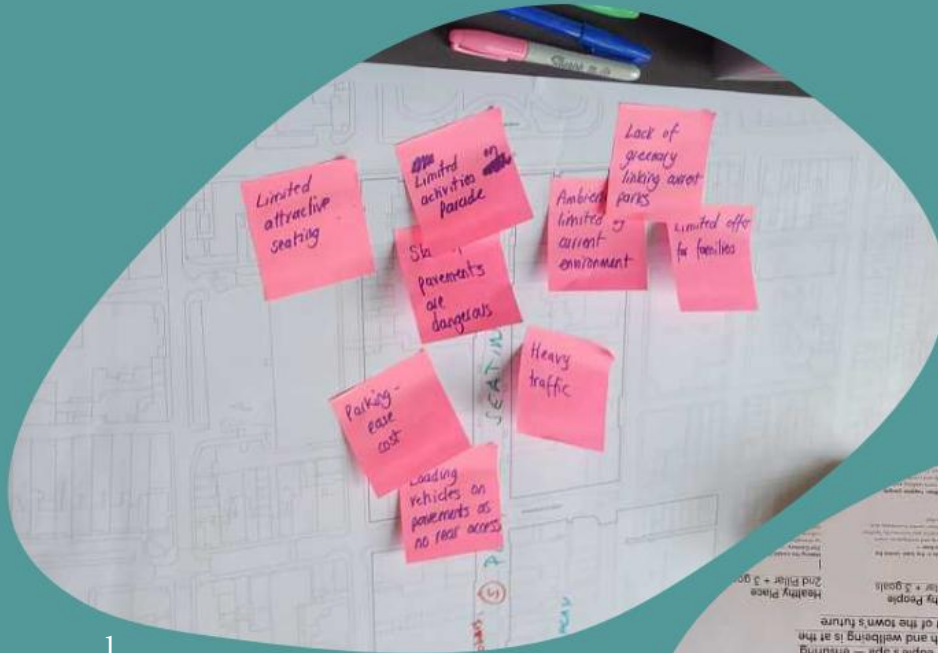
2.0 Identified Challenges

2.1 Monday 15th July 2024 — Council Officer Workshop

The following provides a longlist of specific challenges that were raised in the workshop:

- Fast food delivery bikes cause unsightly obstructions at various points
- Lack of good cycle infrastructure (segregated lanes and cycle stands)
- Vehicular traffic dominates
- Emergency access is essential, currently this is good
- Lack of comfortable seating in good locations with nice things to look at
- Diminished visual amenity
- Noise and air pollution
- Poor seating
- Visual interruptions
- Lack of green infrastructure
- Perceived and actual anti-social behaviour (ASB) / crime
- Vacant shops
- Lack of leisure facilities
- No offer to families
- Lack of events space
- Where is the fun and entertainment?
- Café culture is lacking
- Convenient bus access is important
- Material palette is uncoordinated/poor
- Not very accessible for physically impaired
- Confused wayfinding
- Night-time and day-time uses are not linked
- Struggle to cater for large numbers of people (Lights of Leamington abandoned due to inability to host?)
- Lack of direct routes — grid is useful, but blocks are large and cause obstructions
- Conservation area is a limiting constraint
- The resistance to ‘pedestrianisation’ is halting progress
- What is the actual car parking capacity? Is it enough? Do we need to provide more?
- Delivery/servicing access arrangement currently a problem
- ‘Quit culture’, “we can wait”, seems if it can’t be delivered instantly then we give up (??)
- Nature of road infrastructure encourages Parade as a through route.
- Lots of large vehicles contributing to poor air quality.
- ‘Estate Agent Row’ has become a ‘no-man’s land’.
- Rates limit vibrancy and independents from emerging on Parade
- Too much illegal car parking/stopping
- Independents limited to peripheral streets
- Heavy traffic outside Pump Rooms and at top of Parade
- What happens to Priors? It is not well connected to Parade.
- Covent Garden car park loss is a problem.

4 Royal Leamington Spa_Parade Brief



→ Stakeholder Workshop challenges and sketch ideas



2.2 Tuesday 16th July 2024 — Stakeholder Workshop

The following provides a longlist of specific challenges that were raised in the workshop:

- Conflicts between users
- The changing nature of the town centre
- Buses are essential
- Busy traffic blocks pedestrian movement
- HGVs damage surfaces
- Retain essential domestic goods suppliers (such as Tesco)
- Through Traffic causing negative impact
- Lack of Spa identity
- Parade is lacking as a destination
- Attract more people living and working on Parade
- Retain and protect ease of access
- Lacking mix of commerce
- Creative industries not as visible as they should be
- Not a destination more a place to move through
- Congestion impacts bus journey times
- Convenient access to buses is essential
- If relocating traffic off Parade, consider impact to residents on adjacent streets
- Bus stop locations connected to retail useful. E.g. bus stop immediately outside Tesco.
- Emergency access is critical
- Impact of loading on pedestrians
- Parking pushed away from Parade and impacting wider context
- Loading blocking footpaths
- A weak 'destination'
- Lack of greening
- Seating poorly located
- Not great for families and children
- Consider grandparents with grandchildren (mixed generations)
- Lacking in evening/night time economy
- Maintaining servicing from frontage important
- Poor accessibility
- No play opportunities
- Large bus numbers snarl up north section
- Parade is an important link to rail station but lacks legibility
- Beautiful regency frontage neglected
- Poor quality public buildings
- A retail gap in the centre (House of Frazer, Royal Priors)
- Lacking an events space
- Gardens disconnected (Pump Room Gardens separated from Jephson Gardens by busy road)
- Conflict between vehicle users and pedestrians
- Uncoordinated street furniture – design and arrangement.

2.3 Summary of the Key Challenges

The above long list, along with conversations held at the workshops have been synthesised by the project team and key strands that Parade Masterplan will need to address are as follows:

- A clear recognition that vehicular traffic dominates Parade and detracts from the quality of the place. It is particularly busy at the far north and far south of Parade.
- Loading and delivery conflicts with other users, including fast food deliveries, cab drivers and independent couriers etc.
- Convenient bus access is important and should be maintained with minimal disruption to users.
- Seating and places to rest and pause are severely lacking, current seating is infrequent, uncomfortable and poorly positioned.
- Noise and air pollution is an ongoing issue.
- Lack of green infrastructure and green connective devices to link established parks and gardens together along Parade.
- The area lacks a permanent civic space, square or plaza.
- Parade lacks facilities for families, for example opportunities for play.
- Parade is a challenging environment for parents and carers with young children.
- Parade fails to perform the role of a destination.
- Parade lacks a sense of fun and excitement.
- The night-time economy is lacking and there is a poor transition between day and evening uses and activation.
- The distinct lack of the 'Spa' identity.
- Accessibility concerns, stepped access to shops etc.
- Parade feels like a place to move through rather than spend time, Road infrastructure supports 'through' traffic.

→ Stakeholder Workshop
challenges and sketch
ideas



3.0 Identified Opportunities

3.1 Monday 15th July 2024 — Council Officer Workshop

The following provides a longlist of specific opportunities that were raised in the workshop:

- Remove all motor vehicles from Parade (Warwick and Regent Street included)
- People first!
- Introduce an irregular, informal route to slow cycling and avoid conflicts between pedestrians and cyclists.
- More greening to provide shade and increase comfort levels
- A water feature
- Much more seating both public and private
- Reduce motor vehicular access
- Encourage sustainable modes of transport in particular active travel opportunities
- Increase and support diversity of tenure
- Provide more social and events space, a new square outside the Town Hall
- Define delivery spaces including designated space for fast food bikes/gig economy.
- Allow for essential access (emergency, delivery, maintenance) and buses
- Enforce timed delivery
- Improve the underperforming spaces
- Remove parking on side streets
- Shelter and shade along the length of Parade (big sails?)
- Include feature lighting
- Include drinking fountains — think ‘Spa’
- Make Parade pedestrianised! And make connected side streets pedestrian focussed but motor vehicle accessible
- House Of Frazer ground floor an exciting start up space, makers/doers and food and beverage.
- Be bold with conservation area - not limited or constrained.
- Close section between Regent Street and Warwick Street
- A new events space outside Town Hall
- A better use for Regents Grove, include play here.
- Electric buses or trams to introduce planet conscious movement opportunities.
- Link internal building uses with external spaces.

3.2 Tuesday 16th July 2024 — Stakeholder Workshop

The following provides a longlist of specific opportunities that were raised in the workshop:

- Shut Parade to all vehicles
- Provide pause and relaxation points in safe locations, with good things to look at.
- Animate the space with water

- Retain the elegant, Regency identity, this is Royal Leamington Spa's unique selling point.
- Include interesting feature lighting (Lights of Leamington reference)
- Introduce a Town Hall focal square/space/piazza
- Make the Spa a destination
- Business must thrive
- Reduce speed limit along Parade and time deliveries, no private through traffic
- Provide secure cycle parking
- Remove vehicular demarcation (kerbs)
- Make Parade child/family friendly and playable
- Improve the relationship between Royal Priors and Parade
- Make Parade an attractive place to live
- Introduce shared space
- Maintain bus access
- Time deliveries along Parade
- More spill out space, alfresco dining opportunities, café seating
- Introduce Town Hall Square
- Make it green, more trees along Parade
- Play along Parade
- Fountains
- Greener
- Maintain a formal identity
- Develop in phases and make a public square phase 1
- Play elements on Parade
- Creative arts encouraged on Parade — a space is needed for this
- Improving the top section is a priority
- A new focal space outside Town Hall
- Create a Spa feature
- Improve connection between parks at southern end
- Consider if Parade was one way
- Deliveries critical, timing difficult
- Consider a phased approach
- A new town square cantered around Town Hall
- Consider the role of water
- Lighting is important both functional to create a safe place but also feature to highlight assets
- Make green all the way up
- Build in multifunctionality and flexibility
- Avoid user conflicts between pedestrians and cyclists
- Consider user conflicts between pedestrians and buses (especially a problem when buses go electric and are quiet)

3.3 Summary of the key opportunities

All attendees felt passionate about Parade's evolution into one of England's best streets. Key questions included: How should it perform? What is its role? How do we draw out its unique identity? How should it best serve Royal Leamington Spa? Despite diverse opinions, common themes emerged and workshop attendees feedback can be summarised as follows:

- Reduce motor vehicular dominance along Parade to enable positive transformational change to occur and to deliver the vision. Opinions ranged from complete removal of all traffic without exception, to restricting access to privately owned vehicles only. Most appreciated the need to maintain delivery access to shop frontages and all accepted the need for emergency access along the length of Parade.
- Create a permanent civic space for the town to come together. This should be a place for celebration and a focus for occasional markets, performing arts and events. The area near or immediately outside the Town Hall was universally agreed as the best place for a focal space for the town.
- Maintain bus access because public transport plays a vital role in the town and should be encouraged and supported in any future plan. Convenient positioning of bus stops and avoiding impact to bus journey times are important considerations.
- Formal access for cyclists should be provided, and whilst permissible, cycle access along Parade should be discouraged and interventions introduced to slow potential speeds and reduce conflicts.
- Introduce greening opportunities along Parade, to link the existing assets of Royal Pump Room Gardens, Jephson Gardens and Christchurch Gardens. This will improve air quality, provide much needed shade and improve biodiversity.
- Water should play a role in Parade's future; suggestions ranged from playful fountains, a rill or continuous water feature along its length, alongside creative opportunities for water management following heavy rainfall events.
- The Spa identity needs reinforcing and history and narrative of place should be central to the look and feel of the public realm. It was suggested that the layout should be formal in structure, with flexibility to respond to adjacent building uses.
- Parade should integrate good places to sit, rest and pause with nice things to look at.

4.0 Brief

4.0 Project Brief for Parade Masterplan

Through assimilating feedback from workshops, conversations with the project team and other stakeholders, and in line with the 2024 Vision, we have developed a succinct brief for Parade. This highlights the key parameters for developing the emerging Masterplan.

- To explore options for vehicular traffic to be removed from Parade along its length from Hamilton Terrace to Clarendon Avenue, with access only for essential servicing and delivery, emergency services and ongoing maintenance. Through traffic will be directed along other routes avoiding Parade. The timing of service access will be dictated following the results of the ongoing servicing and access survey.
- For the purpose of this piece of work, bus access is re-routed, however bus stops will be located on side streets, as close to Parade as possible.
- A new Town Square is created outside the Town Hall, extending north to Livery Street and south to Hamilton Terrace, becoming a generous focal point for the town to come together.
- Distinctively Spa! The public realm will reinforce the special character and identity of Royal Leamington Spa, through layout, materials and careful detailing.
- The opportunity for a water feature will be explored, such as a fountain plaza, mirror pool, or equivalent, to create a flexible, engaging, and playful feature.
- Sustainable Drainage Systems (SuDS) will be integrated in the public realm where possible. For example, rainwater will be captured, slowed and directed to planting areas to increase storage capacity and reduce the maintenance burden of watering.
- Parade should be fun and playable. Specific proposals should attract families and a range of ages, extending dwell time.
- Cycle access along Parade should be permitted. However, cycle speeds should be slowed by avoiding straight, quick routes and other cognitive devices. Secure cycle parking should be conveniently provided.
- Direct and segregated cycle links should be prioritised on parallel and side streets, where possible.
- Greening to be maximised along Parade, including more trees and climate-resilient planting. The planting should withstand more extreme temperatures, heavy rainfall, drought and disease, supporting local biodiversity networks.
- Planting should be sensitive to the historic views, layout and character of Parade.
- Improve and connect to existing spaces to create a coordinated and cohesive public realm.
- Provide regular seating opportunities along the length of Parade, carefully considering location to encourage use, providing social settings, as well as more private and intimate seating arrangements.

- Deliver a fully accessible and easy to use environment, ranging from the general street arrangement to the detailing of furniture.
- Parade must both ‘feel’ and ‘be’ safe for all; adhere to ‘Secure by Design’ principles, as well as the latest guidance relating to design for neurodivergence and designing safe spaces for women and girls. For instance, Parade must provide excellent natural surveillance, good quality lighting (both functional and feature), avoid hiding places and allow for choice in routes to move through.
- The masterplan for Parade must allow for a phased delivery and provide opportunities for both cost sensitive ‘quick wins’ as well as grand gestures and more transformational change.
- A baseline ‘minimal change’ option will also be developed to show the extent of improvement possible by upgrading the existing public realm.

The above brief sets key parameters to aid the development of the Masterplan for Parade. It is intended to allow flexibility for optioneering and a framework for participant-backed proposals.

The next step will be for the design team to take this brief and begin to shape masterplan options to share with Officers and Stakeholders for feedback in the Autumn.

Warwick District Council - Project Risk Register - Transformation Framework v1 04.10.24

REF	DATE RAISED TO RISK	RISK OWNER	RISK TITLE	RISK DESCRIPTION	CONFIDENTIAL	RISK EXPOSURE	RAW RISK RATING			RISK CONTROL MEASURES	EFFECTIVENESS OF CONTROL MEASURES	RISK CONTROL ACTION/EE(S)	CURRENT RISK RATING			PROGRESS/COMMENTS	NEGATIVE OR OPPORTUNITY RISK	RISK SOURCE	REVIEW	RISK RESPONSE	RISK STATUS	NOTES
							IMPACT	LIKELIHOOD	OVERALL RISK RATING				IMPACT	LIKELIHOOD	OVERALL RISK RATING							
1	04.10.24	LTB Chair	Leamington Transformation Board (LTB)	Risk that the Leamington Transformation Board (LTB) consisting of all three local authorities under an Independent Chair fails to continue as a body due to disagreement.	No	Reputational	2	4	8	The Independent Chair's role is to monitor and facilitate the three Councils working closely together. Any irrefutable issue should be identified and relevant Senior Lead Officers at each Council alerted to contribute to finding a solution.	Full Effective	LTB Chair	1	3	3	LTB Chair aware of responsibilities and is actively monitoring this.	Opportunity	Political	Every 6 months	Reduce	Open	/
2	04.10.24	LTB Chair	Newly elected members of LTB	Risk that newly elected LTB members wish to change the direction of travel of the LTB's work.	No	Political	3	4	12	Independent Chair's role to facilitate the smooth on-boarding of newly elected members of the Board and to facilitate their views being brought together with the rest of the Board.	Full Effective	LTB Chair	3	3	9	LTB Chair aware of responsibilities and is actively monitoring this.	Opportunity	Political	At election times, next is May 2025 for WCC	Reduce	Open	
3	04.10.24	LTB Chair	LTB not supporting one of its initiatives	Risk that the LTB may not collectively support one of its initiatives such as the Vision, Parade Masterplan or Transformation Framework.	No	Political	3	4	12	Independent Chair's role to keep in close touch with all members of the Board and gauge the overall level of support and mitigate as needed to keep the programme on-track as per the Board's wishes.	Full Effective	LTB Chair	2	3	6	LTB Chair aware of responsibilities and is actively monitoring this.	Opportunity	Legislative	Every 6 months	Reduce	Open	/
4	04.10.24	LTB Chair	Restricted Funding	Future funding is not forthcoming / CL and L106 monies being insufficient or allocated elsewhere meaning earlier pieces of work cannot be implemented.	No	Programme / Finance	4	4	16	Resource across WCC and WDC needs to be sought to be actively seeking the next future funding source after the Future High Streets Fund (FHSF) which ends in March 2025.	Partially Effective	WDC/WCC Senior Officers	3	3	9	Both WCC and WDC are seeking additional human resource in order to have the time inputs to seek the next funding pot.	Opportunity	Capacity	Every 6 months	Reduce	Open	
5	04.10.24	Senior Officers WCC/WDC	Project alignment	Risk that the various pieces of work commissioned by LTB do not align with each other, or with other external programmes such as the Local Plan (WDC) or Transport Plan (WCC).	No	Programme	2	4	8	Senior Officers are very actively involved in the LTB and are very much aware of the various strands of work that need to be co-ordinated in order to deliver the complex work across the town centre.	Full Effective	WDC/WCC Senior Officers	2	3	6	Senior Officers are actively undertaking measures to ensure co-ordination.	Opportunity	Other	Every 6 months	Reduce	Open	/
6	04.10.24	LTB Chair	Three Councils not endorsing LTB projects	Risk that one or other of the three Councils may not choose to endorse one of the LTB projects.	No	Programme	3	4	12	The LTB Chair is again in close contact with leading members of each of the three Councils and takes regular soundings on the Councils views on the projects.	Full Effective	LTB Chair	2	3	6	LTB Chair aware of responsibilities and is actively monitoring this.	Opportunity	Political	Every 6 months	Reduce	Open	
7	04.10.24	LTB Chair	Key stakeholders not supporting LTB or their projects	Risk that key stakeholders in the town centre may choose not to support the LTB or their projects.	No	Reputation/programme	4	4	16	The LTB are all fully aware of the need to involve key stakeholders in all the work on the town centre which aims to ensure all feel involved and have some ownership in the projects to take them forward together.	Partially Effective	LTB Chair	3	4	12	LTB Chair and Board all fully aware of this and actively all working together to mitigate.	Opportunity	Stakeholder	Every 6 months	Reduce	Open	/
8	04.10.24	LTB Chair	Unforeseen catastrophic event	Risk that an unforeseen event, such as Covid, could dramatically change the approach to the LTB's work on the town centre.	No	Programme	3	4	12	No-one could have foreseen the impact of Covid before it happened, but now that has happened, mitigations should be in place should anything similar happen again in the future.	Partially Effective	LTB Chair	3	4	12	LTB Chair and the Board all sensitive to this risk going forward and monitoring any possible future scenarios as they become anticipated.	Negative	Other	Every 6 months	Reduce	Open	

Warwick District Council - Project Risk Register - Transformation Framework v1 04.10.24

REF	DATE RAISED TO RISK	RISK OWNER	RISK TITLE	RISK DESCRIPTION	CONFIDENTIAL	RISK EXPOSURE	RAW RISK RATING			RISK CONTROL MEASURES	EFFECTIVENESS OF CONTROL MEASURES	RISK CONTROL ACTIONEE(S)	CURRENT RISK RATING			PROGRESS/COMMENTS	NEGATIVE OR OPPORTUNITY RISK	RISK SOURCE	REVIEW	RISK RESPONSE	RISK STATUS	NOTES
							INITIAL RISK	IMPACT	OVERALL RISK RATING				INITIAL RISK	IMPACT	OVERALL RISK RATING							
1	04.10.24	Project Manager	Terms & Conditions	Risk that the Terms & Conditions already established through the previous WCC commission are not adequate for this new commission via WDC.	No	Legal	2	3	6	WDC procurement have checked the existing Terms & Conditions are are happy to proceed with these along side a defined scope of work.	Full Effective	Project Manager	1	2	2	The new commission is being prepared and set to commence once the Purade Master plan is complete.	Negative	Legislative	Prior to commission	Reduce	Open	
2	04.10.24	Project Manager	Scope change / budget reallocation	Work on the previous WCC commissions led to overrun on the engagement aspects. Risk is the same could happen on this commission unless adequate measures adopted.	No	Programme/Budget	3	4	12	Lessons have been learned by both the consultant and WCC/WDC. Going forward on this commission, reviews of scope and progress will take place at the end of each project stage and any change identified will in advance by the consultant and discussed and any reallocation agreed with the client before commencing the next stage.	Full Effective	Project Manager	2	3	6	This has been written into the scope and will form the inception meeting and therein at each project stage.	Negative	Contractor	Prior to commission	Reduce	Open	
3	04.10.24	Project Manager	Budget insufficient / costs exceeded	Risk that the scope could change as the project progresses so much so that the original budget is not sufficient and additional budget is required. Costs should not exceed given the scope management above.	No	Programme/Budget	3	4	12	These kind of projects tend to evolve as they progress and therefore careful scope checks are planned in a staged management approach. LTB will be made aware immediately if the scope has extended beyond what the current budget can deliver and additional funds be sought if required.	Full Effective	Project Manager	3	3	9	This has been written into the scope and will form the inception meeting and therein at each project stage.	Negative	Contractor	Prior to commission	Reduce	Open	
4	04.10.24	Project Manager	WDC Procurement team insufficient resources	Risk that the WDC procurement team have insufficient resources to arrange the contract through a direct award.	No	Programme	3	4	12	The procurement team have recently added a new resource to the team but we are aware of new regulations due to come in at counterpart in 2025 which has potential to slow down the teams ability to process procurements.	Partially Effective	Project Manager	3	4	12	Procurement team have been involved throughout and given the consultant is already appointed through WCC, this does reduce the amount of work required to do the WDC procurement.	Negative	Capacity	Prior to commission	Reduce	Open	

Impact	5	Catastrophic	5	10	15	20	25
	4	Major	4	8	12	16	20
	3	Moderate	3	6	9	12	15
	2	Minor	2	4	6	8	10
	1	Negligible	1	2	3	4	5
Score			Rare	Unlikely	Possible	Likely	Very Likely
			1	2	3	4	5
			Likelihood				

Response	Description
Reduce the risk.	This option chooses definite action now to change the probability and/or impact of the risk. The term mitigate is relevant when discussing reduction
Accept the risk.	The Accept option means that WDC 'takes a chance' that the risk will occur, with its full impact if it did
Transfer the risk to a third party.	Transfer the risk is an option that aims to pass part of the responsibility to a third party. Insurance is the classic form of transfer.
Avoid the risk.	Avoid a threat is about making the uncertain situation certain by removing the risk. This can be achieving by removing the cause of a threat.
Prepare a contingent plan.	This option involves preparing contingent plans now, but not taking action now. Accept but make a plan for what we will do if situation changes
Share the risk.	Share is different to transfer as it seeks for multiple partners to share the risk on a pain /gain basis.
Enhance the risk.	Making the opportunity more likely to occur.
Exploit the risk.	Exploit an opportunity to gain positive impacts from the risk.

Confidential	Risk Ratings	Effectiveness	Negative / Opportunity	Risk Source	Risk Response	Risk Status
Yes	1	Fully Effective	Negative	Financial	Accept	Open
No	2	Partially Effective	Opportunity	Capacity	Avoid	Closed
	3	Not That Effective		Skills	Contingent Plan	Now an Issue
	4			Legislative	Reduce	
	5			Technology	Share	
				Environmental	Transfer	
				Contractor	Enhance	
				Stakeholder	Exploit	
				Political		
				Technology		
				Scope Creep		
				Other		

Title: Procurement Exercises over £150,000

Lead Officer: Rebecca Reading, Strategic Procurement & Creditors Manager

Portfolio Holder: Councillors Adkins, Chilvers & Williams

Wards of the District directly affected: All

Approvals required	Date	Name
Portfolio Holder	7/10/2024	Councillor Adkins Councillor Chilvers Councillor Williams
Finance		
Legal Services		
Chief Executive	7/10/2024	Chris Elliott
Director of Climate Change	7/10/2024	Dave Barber
Head of Service(s)	7/10/2024	Andrew Rollins, Graham Leach
Section 151 Officer	7/10/2024	Andrew Rollins
Monitoring Officer	7/10/2024	Graham Leach
Leadership Co-ordination Group		
Final decision by this Committee or rec to another Cttee / Council?	Yes	
Contrary to Policy / Budget framework?	No	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	Yes, Appendix 1 confidential due to Paragraphs 3, as set out of the report.	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	Yes, Forward Plan item exemption.	
Accessibility Checked?	Yes	

Summary

The report seeks approval to begin the procurement exercises identified in this report, in line with the agreed Procurement Code of Practice, with details set out in the Confidential appendix to the report.

Recommendation(s)

- (1) That Cabinet notes the commencement of the procurement exercises of the following and provides Key decision approval where indicated. Please view in conjunction with the Confidential appendix 1 to the report, in respect of Housing Consultancy advice for Housing Repairs and Temperate House Decarbonisation
 - (2) The Cabinet supports the reallocation of Public Sector Decarbonisation 3c grant funding to decarbonisation works at the Temperate House and Restaurant in Jephson Gardens, subject to the formal agreement of the funder.
-

1 Reasons for the Recommendation

- 1.1 The report brings forward all proposed procurement exercises ready to be sourced, some of which form key decisions as they are over £150,000; others are provided for advisory purposes. As explained in the report to Cabinet in March 2024 a gap was identified within procurement governance process at WDC which was clarified by Cabinet and Council to confirm that any proposed procurement activity above £150,000 needs to be considered by Cabinet.
- 1.2 These exercises are set out in the Confidential appendix (due to the values associated and the Council not wanting to declare the anticipated budget) to the report for consideration. These items and the reason for their procurement are set out within the confidential appendix to the report, so as not to disclose the Council's position in respect of the Anticipated cost
- 1.3 In respect of the Housing Consultancy advice for Housing Repairs the property consultants will be working with the Council's asset and housing teams to support the responsive repairs and maintenance procurement exercise. The preferred supplier brings sector experience and market insight that will be essential to ensure we have an approach that is fit for purpose. Their support will include scope, soft market testing, specification, contract management training and general advice. WDC Procurement will also be involved on this procurement project throughout to provide guidance and interpretation on WDC Procurement Policy. Shared Legal team will also be involved as required as well. The funding for this will come from the Council's Housing Revenue Account Responsive Repairs budget.
- 1.4 The Cabinet will recall that Temperate House Decarbonisation features as part of the report on Low Cost Low Carbon Energy that went to Cabinet in July. This set out that Corporate Strategy Strategic Goal 1 - Reduce energy consumption and carbon emissions from the Council's public buildings:
"Priority Action (a)- utilising the Renewable Energy Generation Reserve and other funding sources to deliver rooftop solar / low energy lighting in key WDC assets, alongside other decarbonisation works for WDC assets with the greatest potential to benefit from decarbonisation measures. As part of this we will seek

to develop proposals for assets such as the Glasshouse Restaurant and Temperate House; the Pump Rooms; Jubilee House; and the leisure centres.”

- 1.5 In Spring 2024 the Council received a grant offer from Salix for decarbonisation works at the Spa Centre and Althorpe Street Enterprise Hub. Due to issues in delivering the schemes originally included in the grant offer, it is now proposed that the grant should be switched to the Temperate House and Restaurant which, subject to formal agreement from the funders and subject to some outstanding practical considerations, achieves better value (in terms of tonnes of CO2 saved per £).
- 1.6 The Council will match fund the grant to deliver a new Air Source Heat Pump system for the Temperate House to replace the existing gas boilers. The works will be funded through the PSDS 3c Grant Funding administered by Salix. The remaining contribution will be provided by WDC from the Climate Change Action Fund. Delegated authority is in place to spend the Climate Action Fund on building decarbonisation ([Report Climate Change Action Programme, Cabinet December 2023](#)). However, due to the value being greater than £150k, Cabinet approval to proceed with the procurement is required.
- 1.7 The priority decarbonisation measure at Temperate house, is the removal of the fossil fuel heating system and its replacement with Air Source Heat Pumps (ASHPs). For successful Installation of ASHPs, alterations to the ventilation system, heating distribution, and building management technologies are required. The grant value that Salix is allowing WDC to retain, has not yet been confirmed. If WDC are successful in retaining a larger portion of grant money, the scheme will be expanded to include LED lighting and rooftop Solar PV. These technologies will be fully integrated into the project to optimise performance and further reduce carbon emissions. For this reason, the total value of the works has been included in the appendix to show the potential cost range.
- 1.8 Heart of England Community Energy (HECE) have also agreed to fund Solar Installations on public buildings across the district. Depending on the finalised value of the Salix grant allocation, it may be decided to utilise the HECE soft-loan, to fund the Solar PV installation at Temperate House. This will reduce the match funding required from WDC.
- 1.9 Due to the re-allocation of the funding, timescales for scheme implementation are tight, and detailed designs require completion prior to work beginning onsite. It is necessary to determine the direct award procurement route, considering the limited time frames and the many other project constraints.

2 Alternative Options

- 2.1 In respect of recommendation the Cabinet could decide not approve some or all of the identified procurement activities, however some of these relate to the provision of core or statutory services, and to pause or stop at this stage would significantly delay some of these activities were new contracts are required.

3 Legal Implications

- 3.1 There are legal implications when determining the financially sensitive Appendix to the report to the extent that the discussions on those appendices should be treated as confidential under (paragraph 3 under Local Government Act 1972 - Schedule 12A After the Local Government (Access to Information) (Variation) Order 2006). Following completion of any procurement each of the contracts for these products will be detailed on the Council’s public contracts register.

4 Financial Implications

- 4.1 The anticipated values of the contracts sought for procurement are built into the budget of the Council as agreed in February 2024. Where no budget is in place specific separate Cabinet reports will be brought for consideration.

5 Corporate Strategy

- 5.1 Warwick District Council has adopted a Corporate Strategy which sets three strategic aims for the organisation. The delivery of good procurement is a key aspect in in Delivering valued, sustainable services in order that the Council can continue to focus its efforts and activities on the needs of its residents, communities and businesses.

6 Environmental/Climate Change Implications

- 6.1 The environmental implications of the proposal in relation to the Council's policies and Climate Emergency Action Plan will be considered at early stage of procurement in line with the Council's current procurement code and with appropriate advice from officers.

7 Analysis of the effects on Equality

- 7.1 There are no direct Equality implications of the report and each procurement exercise will be required to complete Equality Impact Assessment as part of the procurement exercise.

8 Data Protection

- 8.1 There are no specific data protection implications of the proposals as set out, but any procurement activity which will result in a change of how the Council handles personal data or security of personal data will be subject to a Data Protection Impact Assessment being approved before the final contract is awarded.

9 Health and Wellbeing

- 9.1 There are no direct health and wellbeing implications of the proposal.

10 Risk Assessment

- 10.1 There are minimal risks associated directly with the report as the report introduces improved equity of speaking at Planning Committee and improved governance for procurement as an interim measure.

Background papers: None

Supporting documents:

Warwick District Council Constitution [Article 13](#) & [Code of Procurement Practice](#)
[Warwick District Council Cabinet March 2023](#)