

## Publication Draft Representation Form 2014

For Official Use Only

Person ID:

Rep ID:

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- **Part A – Personal Details**
- **Part B – Your Representations**

**If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.**

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the plan has been made available (see the table below). You can also respond online using the Council's e-Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by **4.45pm on Friday 27 June 2014**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH**  
or email: [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)

### Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and at the following locations:

**Warwick District Council Offices**, Riverside House, Milverton Hill, Royal Leamington Spa

**Leamington Town Hall**, Parade, Royal Leamington Spa

**Warwickshire Direct Whitnash**, Whitnash Library, Franklin Road, Whitnash

**Leamington Spa Library**, The Pump Rooms, Parade, Royal Leamington Spa

**Warwickshire Direct Warwick**, Shire Hall, Market Square, Warwick

**Warwickshire Direct Kenilworth**, Kenilworth Library, Smalley Place, Kenilworth

**Warwickshire Direct Lillington**, Lillington Library, Valley Road, Royal Leamington Spa

**Brunswick Healthy Living Centre**, 98-100 Shrubland Street, Royal Leamington Spa

**Finham Community Library**, Finham Green Rd, Finham, Coventry

**Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.**

# Part A - Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
Title	MR <del>MR</del> MCGREGOR	MR
First Name	ANDREW	JOHN
Last Name		WALL
Job Title (where relevant)	N/A	Senior Partner
Organisation (where relevant)	N/A	Hawkins Astorian
Address Line 1		7-11 ABERCROFT ST
Address Line 2		LOBBY
Address Line 3		
Address Line 4		
Postcode		CV21 2RX
Telephone number		01788 564670
Email address		john.wall@hawkinsastorian.com.uk

### 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
The adoption of the Local Plan.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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# Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

## 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

LOCAL PLAN

Paragraph Number:

5.59.3

Policy Number:

TR 5 RE PINE AND RISE SEARCH

Policies Map Number:

REF 2 AND 12

## 5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes



No

5.2 Complies with the Duty to Co-operate?

Yes



No

5.3 Sound?

Yes

No

## 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

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7. Please give details of why you consider the Local Plan is not legally compliant or is **unsound** or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

See separate sheet

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or **sound**, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See separate sheet

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that my client's views and his interests are properly represented.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### 11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Date :

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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- 7) The Local Plan is considered unsound on the following grounds where there is either no consistency with national policy or the proposal is not justified in the proposed area at Blackdown being included within the areas of search for a park and ride.
- 7.1) The areas of search for a park and ride are not consistent with, and conflict with, National Planning Policy Framework paragraph 90 as being inappropriate development in the green belt.
- 7.2) The areas of search are not consistent with, and conflict with, National Planning Policy Framework paragraph 80 and the five purposes of green belt, none of which are justified here.
- 7.3) In considering P&R in the Blackdown area, this would be contrary to the strategic approach of the Local Plan which concentrates future housing growth to the south of Leamington. There is no proven justification for P&R to the north of Leamington.
- 7.4) The inclusion of Blackdown in the area of search is not justified under the Warwickshire County Council Warwick Strategic Transport Assessment Phase 3 by Arup which states that the reasons to justify a P&R to the south of Leamington and Warwick are:
- i) The focus of growth is in this area and thus has potential to mitigate a higher proportion of the impact.
  - ii) The site location would be able to serve both town centres.
  - iii) The number of highway mitigation schemes identified in this area which can more easily be adapted to provide bus priority systems would help to provide a viable service.
  - iv) The existing and new bus services that are required for the southern quantum of development would also be able to serve the P&R

None of these reasons are appropriate and justify any consideration of a site to the north of Leamington:

- The area of growth proposed for Leamington is to the south which it states has potential to mitigate the impact which would not be applicable in a site to the north.
- A southern site would serve both town centres whereas Blackdown would not.
- In the south the number of highway mitigation schemes identified in the area can be adapted to provide bus priority systems whereas the report goes on to say, with reference to a site to the north, "however the potential to provide bus priority infrastructure on the A452 corridor is limited".

This is the same as saying that a scheme is not technically deliverable along the A452 corridor.

- 7.5) The policy as stated is not justified because, even if there was a justification for a P&R to the north of Leamington, it is considered the area of search should sensibly be focused on the A46/A452 junction. It is normal to site P&Rs on major road infrastructure junctions and the area of Blackdown is just not suited to this.
- 7.6) Including the area of Blackdown in the area of search is not justified per reference to the Strategic Housing Land Availability Assessment May 2014 which describes this area as one of "high landscape value".
- 7.7) The inclusion of Blackdown is not justified because this area is basically "residential" in nature and the area of search should be nearer the A46/A452 junction.

- 8) The proposals should be modified to show the areas of search as geographically consistent with the areas of residential growth and should not conflict with national planning policy with regard to green belt.

If P&R to the north of Leamington is considered viable and justified then it should be adjacent to the A46/A452 junction and this area should be substituted for Blackdown.