

27 JUN 2014

Leamington Spa



Publication Draft Representation Form 2014

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| For Official Use Only | |
| Person ID: | 1086 |
| 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–YourRepresentations

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

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

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 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

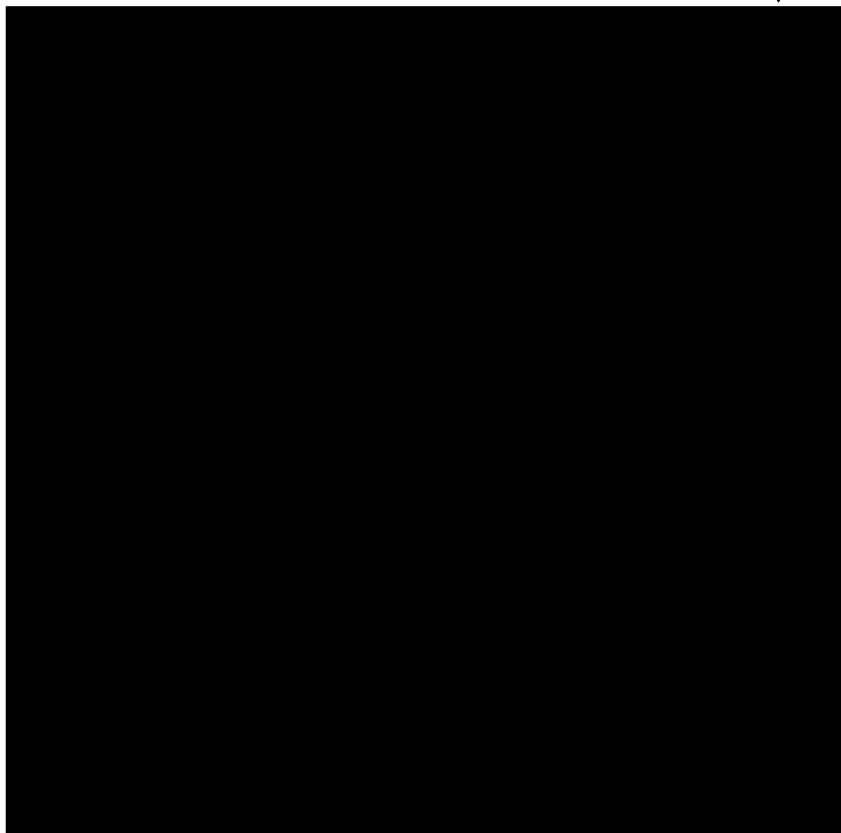
Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.



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 | X | No |
| Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan | Yes | X | No |
| The adoption of the Local Plan. | Yes | X | No |

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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: Processes used in formulating and adopting the plan
paras 5.139 et al

Policy Number:

Policies Map Number:

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: ☒

Representations attached.

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 x

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:

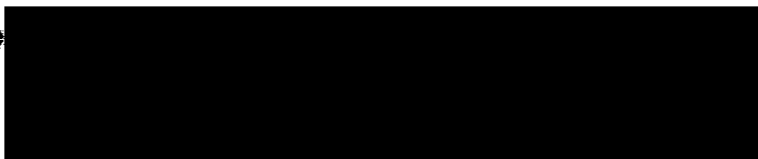
Continue on a separate sheet if necessary

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.

Signature



Date : 26th June 2014

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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Representations to the Inspector on the unsoundness of the Warwick District Council Local Plan 2014

from [REDACTED]

We believe that the Publication Draft Local Plan will be found unsound by the Inspector.

We believe that the current location of which 75% is in the south of the district will require considerable car use to reach employment and schools that do not exist. The NPPF suggests that car use should be kept to a minimum by locating houses close to employment and schools. The opposite is what is happening in the Local Plan.

There is a belief that WDC have motives that are purely financial and are not concerned of the negative affect their decisions will have in the execution of the WDC Local Plan. The plan does not meet the requirements of the National Planning Policy Framework on a number of issues. These are covered in the following:-

The 12,900 Housing Need Forecast is too high and is based on unreliable and unproven information. This figure has been built up by WDC and precedes the new ONS forecast that are some 30% lower. WDC have not agreed to lower their estimates in view of the latest ONS figures. To ensure more houses in their forecast WDC have used a low figure of 1.661 persons per household. The reality is that developers are building more 4 & 5 bedroom houses. Evidence is clear that existing home owners are extending their homes with more bedrooms, suggesting a density more like 2.295 persons per household.

1. The ONS mid 2012 population projections show that Warwick's population projection is now 28.7 less than the consultation draft Local Plan which is now no longer up to date. All the other authorities in the Housing Market area are also showing similar reductions in their population projections, including Coventry after allowing for the temporary student bulge. Overall it is 36.6% lower than the JointSHMA. The publication draft Local Plan uses a household density of 1.661 but the 2011 Census showed WDC household population figures arriving at a density of 2.294 persons per dwelling. This obviously makes a significant difference to the number of houses required. The method by which population is converted by WDC into the number of dwellings required needs better determination by calculation, using the known housing type and size to be included in the plan. The lower housing target will require the list of sites to be included in the plan to be reduced, brownfield sites being put first and only including greenfield where essential, as well as an immediate revision to the 5 year housing land supply calculation. Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.
2. The Local Plan requires a 5 year supply of land. This is already available so there is no need for further development applications that are continuing to be considered by WDC. This has resulted in many applications being approved even though they are part of the Local Plan awaiting inspection.
3. Loss of Greenfield Land in WDC is unsustainable. WDC has only 15% Green Field space that is separating communities from Urban Sprawl. In contrast there is 82% of Green Belt. This is claimed to be a special case for any development to be in Green Belt to protect existing communities. All existing development applications approved as part of the Local Plan is in Green Field sites. The Local Plan is not negotiable. WDC refuse to discuss the challenges to prevent local communities from being joined together by thoughtless development.
4. It is not necessary to develop existing Greenfield sites. To do so will create funding gaps in the massive infrastructure required in attempts to mitigate the problems of high density traffic movements across

existing towns to reach employment and schools. One development that has been given permission has created a need for 3 sets of traffic lights with pedestrian control over a 300 metre stretch of road.

5. The Transport Strategy is ineffective and unsustainable. Since the majority of homes have been allocated to the south of Leamington, Whitnash and Warwick this will increase further pressure on routes that will be used to cross these towns. This requires crossing the River, Canal and Railway. There is no funding available to provide a bypass route or other means of avoiding the centre of these towns by commuters.
6. Impacts on Air Quality and Health have not been assessed satisfactorily. Leamington and Warwick have an unacceptable level of pollution. Both towns have rivers running through them. This infers they are both built on low lying land that attracts pollution that does not clear effectively. Further pollution is inevitable from increased traffic that will be slower moving, resulting in disproportional additional pollution and additional health risk. WDC is unconcerned.
7. Social Infrastructure has not been assessed. There is much evidence in applications of claims of green space and shops and schools, but nothing to back the provision of such. Each development is a patchwork of stand-alone collections of high density housing. This will result in small communities being isolated without coalescence with existing communities that could not provide the necessary support due to shortage of space in their own communities. This has been directly as a result of WDC allowing house building on every possible green space between existing houses. The Local Plan does not have any provision for integrating the various sites.
8. WDC and WCC do not have the finances to fund the required infrastructure. Without the infrastructure the Local Plan is unsound. Developers will not be paying for the considerable cost. If they were forced to do so it would increase the cost of the houses and put them out of reach of many buyers. Inevitably this will result in traffic chaos; inadequate hospital cover; long waiting times to see your GP and more. Local supermarkets have been built to cater for existing local people. With additional 30,000 people it will regularly be impossible to find parking spaces. This is already evident at peak times.
9. The Local Plan will damage the heritage assets. For Whitnash (that is older than Leamington Spa) with links back to the Domesday Book, there are features that have been planned to be preserved in the Neighbourhood Plan. WDC in the Local Plan have chosen to ignore this and build on every remaining Greenfield space that remains.
10. WDC did not consult with Local People when preparing the Local Plan. They have remained unapproachable over every aspect raised in very high numbers of objections. WDC consulted with developers and land owners who own most of the land that is now allocated for the Local Plan. Worse than this fact is that planning applications have already been forced through in spite of valid objections. WDC have no respect or regard for the local people. This has been evident since the Local Plan was made public when they discovered the Local Plan was all decided in private consultation with developers. The decision to recommend the Local Plan to go to inspection was made by a majority of councillors who do not reside in the disputed area south of the three towns of Warwick, Whitnash and Leamington Spa, or the Parish of Bishops Tachbrook. We claim this is NIMBYism at its worst. The Local People who will be affected have not had any input to the Local Plan, and it has been approved by a majority of councillors from areas that have little development. WDC officers responsible for the Local Plan do not live in the disputed areas south of the 3 towns that have 75% of all development allocated. Currently there are large numbers of houses already granted with many more under consideration. These are all in development applications that are contained in the Local Plan. There has

never been any alternative site considered and local people were never consulted before final plans were made by developers.

11. **Late Additional News.** Coventry City Council has submitted an application to build 5,000 houses in the north of the district and close to the Gateway project that if approved would need houses for employees. This is seen as a sensible alternative to the building of most of the house in the south of the district. If this is approved it would be logical to eliminate most or all of the applications in the south that have already been granted. This is an alternative change to the Local Plan that should receive serious consideration. WDC have already condemned this suggestion.

12. **Section CT7 Warwick Castle and Warwick Racecourse/St. Mary's Lands**

I object to CT7 in the Local Plan because firstly I think it is a mistake to link Warwick Castle and Warwick Racecourse into one clause, as they are so different.

Warwick Castle is privately owned and has 800000+ visitors, half from outside the West Midlands and employs more than 250 FT staff, open daily. Whilst Warwick Racecourse only has a short lease on part of a public asset, will in 2014 only have 16 days of racing, has a max of 30000 visitors according to published data (in a good year), all from the West Midlands and only employs about 9 FT staff. There are therefore far more important visitor attractions in WDC area yet they do not warrant a separate clause in the Local Plan?

Perhaps it would be better to have a general clause dealing with publicly owned parks in Warwick District and include within it St Mary Lands? Given the planned for rapid population growth, surely the need for free access to recreation spaces such as parkland is essential for public health , wellbeing and recreation. I suggest all identified in the recent topen space audit carried out by WDC are included and listed as areas of planning restraint where development would only be allowed in exceptional circumstances.

In earlier consultations (Town Centre Plan) the general public was asked if Warwick Racecourse should be treated as a special planning case and this was rejected by an overwhelming majority, so it is bizarre that it has reappeared at a late stage into the local plan? I note this clause does not seem to have been discussed with either the Town Council or Ward Councillors for Warwick West.

More specific objections to CT7: St Mary Lands already has a comprehensive management plan from 2005, there is no explanation why a new "master plan" is required, or why it should be part of the Local Plan, or how it will be constructed, or why a single tenant (whose tenancy runs out before the end of the local plan) is being given a privileged position on input? Or how the obvious conflicts of interest this could create would be mitigated?

In 3.142 should not all users of St Mary Lands be part of the input into a new "master plan" as they were in drafting of the current plan? Why is "visitor accommodation" mentioned there isn't any presently on St Mary Lands and a proposed hotel was rejected by the planning committee as the site was unsuitable, and the applicant did not use their right of appeal? This therefore appears to be a form of predetermination and undermines the Council's own planning committee decision from 2012, without out any justification?

There is no shortage of hotels in Warwick District or in Warwick with a recent large hotel opening within 1 mile of this site and planning permission for 120 bedroom one beside Morrison's which has not yet been built. Further budget hotels would in fact damage the visitor economy, and lead to smaller hotels and guest house closing. (The Jockey Club in objecting to the Premier Inn stated there was no enough demand for more than one large budget hotel in Warwick). Evidence at planning was presented

demonstrating that additional hotels were merely likely to be part of an economic substitution effect. Therefore why is the District Council wishing to favour one private potential operator over existing businesses?

If the council is committed to “economic vitality” of the visitor accommodation sector, surely any master plan for St Mary Lands which includes a controversial hotel should seek to examine the likely economic impact on existing businesses. If not why are the needs of the Jockey Club rather than local independent businesses felt to be of more importance to WDC? Given that many local hotels have closed or might be in economic difficulty, should there not be a clause in the local plan stating that no additional large hotels (more than 50 bedrooms) would be permitted without an economic impact study?

CT7 mentions economic vitality of the racecourse, yet all the published public evidence in the form of a BHA report on Horse Racing and the Jockey Club accounts demonstrates five years of record profits and turnover. What evidence has been presented of pressing economic need to hand over areas of public park to Jockey Club control - given Jockey Club is already making record profits (and does not publish the data or accounts for Warwick Racecourse which does not appear to be managed as a separate unit, but is rather a subsidiary of Cheltenham Racecourse)?

There is no mention of the Warwick District Council Act 1984, half of which specifically deals with St Mary Lands, this omission is bizarre. Some of the proposals in CT7 appear to be in conflict with the Act of Parliament – specifically the requirement to keep 25 hectares undeveloped and available for public access and recreation.

I suggest an additional line that no development or masterplan would be allowed which was in conflict with the Warwick District Council Act 1984, might solve the issue?

Warwick's population projection is now 28.7% less than the consultation draft local plan so is no longer up to date.

I consider that the foregoing is grounds to cause the Local Plan to fail and the Publication Draft Local Plan should be adapted to match the latest ONS figures and modified to remove the majority of houses from the south of the district in order to protect communities and preserve the identity of three existing closely located towns and the Parish of Bishops Tachbrook.