

## Publication Draft Local Plan:

For Official Only	
Person ID	
Rep ID	

This consultation is a formal process and represents an opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) in light of the information published in the "Focussed Consultation" 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 12 December 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

<b>Warwick District Council Offices</b> , Riverside House, Milverton Hill, Royal
<b>Leamington Town Hall</b> , Parade, Royal
<b>Warwickshire Direct Whitnash</b> , Whitnash Library, Franklin
<b>Leamington Spa Library</b> , The Pump Rooms, Parade, Royal
<b>Warwickshire Direct Warwick</b> , Shire Hall, Market
<b>Warwickshire Direct Kenilworth</b> , Kenilworth Library, Smalley
<b>Warwickshire Direct Lillington</b> , Lillington Library, Valley Road, Royal
<b>Brunswick Healthy Living Centre</b> , 98-100 Shrubland Street, Royal
<b>Finham Community Library</b> , Finham Green Rd,

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:

**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	Mrs	
First	Joanna	
Last	Illingworth	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Address Line		
Address Line		
Address Line		
Postcod		
Telephone number		
Email		

### 3. Notification of subsequent stages of the

Please specify whether you wish to be notified of any of

- The submission of the Local Plan for independent examination      Yes  No
- Publication of the recommendations of any person to carry out an independent examination of the Local Plan      Yes  No
- The adoption of the Local Plan.      Yes  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?

Plan (tick one)	<input checked="" type="checkbox"/> Focused Changes <input type="checkbox"/> Sustainability Appraisal
Paragraph	2.69
Number: Policy	DS16 Sub-Regional Employment Site Land near Coventry Airport
Policies Map	Policy Map No. 8

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

5.1 Legally Compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
5.3 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

### 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	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with National	<input checked="" type="checkbox"/>

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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.

The Coventry & Warwickshire Strategic Employment Land Study Final Report (October 2014) does not justify the designation of land near Coventry Airport as an employment site.

In the first place it ignores the site's status as green belt land, even though paragraph 5.22 of the report states that "The most obvious constraint is the Green Belt, which the Government has made clear remains a priority to protect against from built development. This affects a large part of the sub region and places as a premium on those areas or sites that are not protected."

The Report gives excessive weight to the demands of the Coventry and Warwickshire Enterprise Partnership. The CWEP does not have the authority to determine the allocation of employment sites in Warwick District. It is merely one body, along with county and neighbouring authorities, with whom the local planning authority has to work regarding business needs. (NPPF Paragraph 160.) It should be noted that certain members of the CWEP, e.g. Coventry City Council and the previous Chairman, are also owners of the Gateway site.

The Strategic Employment Land Study Final Report says that the Gateway "demonstrates a high degree of strategic policy fit". This ignores national and local restrictions on developments in the green belt. The first Warwick District Draft Local Plan, i.e. the Draft that went out to public consultation, specifically stated that the Gateway site retains its green belt status. Without proper consultation the 2014 Revised Draft Local Plan removed the site from the green belt. The only reason for this breach of due process is the local planning authority's wish to justify an application that is currently being considered by the Planning Inspectorate. In a circular argument the Report also uses the existence of a planning application as a reason for supporting the Gateway as a strategic employment site, as when it says that "Extensive work has already taken place in terms of the planning for the development of the site".

The logic of the Report, and of this section of the Revised Draft Local Plan, is that planning policies are being shaped to meet the needs of the Gateway site and its owner. It ought to be the other way round.

Continue on a separate sheet if necessary

8. **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.**

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 part of the examination?**

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

**Yes**, I wish to participate at the oral

**10. If you wish to participate at the oral part of the examination, please outline this to be**

Continue on a separate sheet if

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. Declaratio**

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

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

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