

Consultation on Proposed Modifications (2016) Response Form

For Official Only	
Person ID	
Rep ID	

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

Part A – Personal Details

Part B – Your Representations

If your comments relate to more than one proposed Modification you will need to complete a separate Part B of this form for each representation.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the Modifications have 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 returned by 4.45pm on Friday 22 April 2016

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 documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and also 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, CV3 6EP

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.	
Title	Mr	
First Name	Duncan	
Last Name	Gowing	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		

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

Part B - Your Representations

Please note: this section will need to be completed for each representation you make

4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?

Modification or SA:	36. King's Hill (Proposed Mod. 2016)
Mod. Number:	36
Paragraph Number	
Mod. Policies Map Number:	MAP 36 and area H43

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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5.2 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:

(Please tick)

Positively Prepared:	<input checked="" type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

The modifications are not sound, because they are:

NOT Positively Prepared

A hasty and ill-considered response to the Inspector's initial report that the Local Plan was not 'sound', with no consultation or notification before 24th Feb 2016 of considering Kings Hill, which was previously not included. Simplistic approach to just “dump” all the overspill into one area right on the Coventry border, and to minimise costs for developers by destroying scarce green belt land.

NOT Justified

To accommodate Coventry's overspill of 4000 new houses in Warwickshire, it cannot be justified to create very high density housing in the small Kings Hill area when other areas have much lower density - Nuneaton and Bedworth has 1596 people per sq.Km whereas Rugby has only 289 and North Warwickshire has 211. Those areas could accommodate higher overspill. Continued....

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal 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.

Most of the 4000 new dwellings should be distributed across multiple sites in Warwickshire to maintain reasonable densities – e.g. Nuneaton and Bedworth with 1596 people per sq.Km, Rugby with only 289 and North Warwickshire with only 211 people per sq.Km.

4000 new houses and their residents in the small Kings Hill site would completely overwhelm the constrained local capacity for services, drainage, access, traffic and schools. A much smaller number of dwellings (less than 500) could be built on part of the Kings Hill site, using the south-western area only. This would maintain some working farmland and protected green belt separation between Warwick District Council and Coventry areas; would avoid destruction of protected oak trees, ancient hedgerows and forest; would protect bats, crested newts and badgers; would utilise available access from Stoneleigh and the A46; would retain the ancient Wainbody Wood and would prevent excess loading on roads and services in the Finham area.

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 changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

9.

If your representation is seeking a change, 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

Y

☐

10.

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

To hear directly from the Authority and the Council Members their reasoning for the propose modifications, and to explain in person why the proposed modifications are unsound and why they are not positively prepared, not justified, not effective and not in line with national policy.

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:

Duncan Gowing

Date:

21/04/2106

Copies of all the comments 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.

CONTINUATION OF BOX 7

NOT Effective

Placing all of the housing against the border with Coventry would remove any green space between the two Authorities. Previous Local plans have maintained the Green Belt for this very reason. The new houses would be under Warwick District Council jurisdiction but would be separate from other WDC populations and would “feel” to belong to Coventry.

The land is wet due to Finham Brook basin – major building will create flood risk in lower areas i.e. Green Lane with its primary and secondary schools

Local drinking water comes from a bore hole in Green Lane. Development in this area could lead to contamination of the water supply.

In 2009 The Environment Agency stated that the Sewerage Works at Finham were at capacity. The number of new houses in this area would require large expansion of the Finham Plant.

The development would remove acres of working farmland and increase the net carbon footprint.

The only feasible access for the development would be from Stoneleigh. There is no viable access through Green Lane because of the protected hedgerows and already severe traffic congestion caused by narrow road network .

NOT consistent with National Policy

The Kings Hill location is designated Green Belt land, intended not to be developed and to maintain open space between built-up areas. The proposed modification blatantly ignores this and would completely fill the area with housing.

1977/8 Coventry Local Plan had proposed building on Green Belt of Kings Hill. This was rejected completely by Michael Heseltine MP.

Building would destroy protected Oak trees, protected ancient hedgerows and ancient Arden Forest which goes across King's Hill

Intensive building would disrupt the bat colonies, against the conservation regulations

Development would destroy two Anglo Saxon sites - Farmers have not been allowed to plough deeper than 9" to protect the sites

Kings Hill has protected wildlife populations of Bats, Crested newts and Badgers.