

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	David Michael	
Last Name	Broadbent	
Job Title (where relevant)	Consultant in Disaster Management, Civil Engineering and Environmental Management	
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 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"/>

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:	Modification
Mod. Number:	Modification 20
Paragraph Number	DS New 1
Mod. Policies Map Number:	35

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 policy and strategy in the proposed modification to the WDLP set out to address an unmet development requirement of Coventry CC, but this fails to comply objectively with the requirements of “soundness”. Both the policy and strategy in the WDLP recognize that there is a significant priority for new and improved infrastructure to meet even existing needs, but fail to provide (1) either adequate or even reasonable evidence that the plan for proposed development, including its required essential supporting needs, could ever be delivered in conformity with good practice over the plan period (ie effective); (2) the relevant ingredients for meeting national policies for achieving sustainable development, including its delivery in practice (ie positively prepared & consistent with national policy); and (3) proportionate evidence that the most appropriate strategy of potential reasonable alternatives has been considered in consultation with neighbouring authorities (ie justified). These observations on the proposed modification(s) to the WDLP are being made on the basis of the following details, which apply specifically to DS NEW1 Mod 20, but equally to Mod 21, and also to DS New 2, Mod 22 and Mod 23, including the relevant supporting text in the Sustainability Appraisal Addendum Report:

With respect to effectiveness (ie 1 above), over the last 30 years, existing communities in Westwood Heath have experienced the detrimental impacts of significant policy and strategic initiatives in connection with housing developments; the ongoing long term growth development plans and projects at Warwick University; development proposals at Lidl, Tesco and Coventry University Sports; changes at the Business Park; and the ongoing proposals for HS2. There has been and continues to be little effective management or co-ordination. The communities have faced unprecedented problems associated with improvement works, including long and costly unproductive delays; important road closures over significant periods and various times; parking issues; traffic growth, peak congestions, major safety issues etc. These experiences give communities the confidence to recognize weak planning, unrealistic assumptions, the risks of uncertainties, and what can be realistically achieved. Current infrastructure is inadequate to meet existing needs, in spite of many and various improvements, and yet a potential but ill-defined new corridor is now being promoted from the A46 to Kirby Corner to A452 or A45 as a possible means to alleviate current and possible future problems. The policies and strategies for sustainable development, including detailed measures for mitigating impacts, covering the wellbeing of current communities, future traffic congestions, increased pollution levels, further impacts on biodiversity and urban creep, all at the expense of our current Green Belt which WDLP even promotes for retention, are all being eroded from simplified planning statements that cannot be realistically delivered in the defined period.

With respect to a Plan which has been Positively Prepared; is Consistent with National Policy; and is Justified (ie 2 & 3 above), then the plan and its modifications do not provide clarity on precisely how objectives can be met. The plan identifies precisely plot(s) of land on Map 35, and specifies the number of houses and other desirable facilities to be provided in the plan period on one specific plot. However, these specifications cannot be realistically delivered without major additional infrastructure changes/improvements outside the limits of Map 35 to deliver an effective, efficient and economic complete package. Many of such major changes and improvements must be implemented outside the limits of Map 35, and such ill-defined and uncertain changes will have significant cost and environmental implications. Plans to meet National Requirements for all future assets with a life of 100 years or more require clarity on all impacts, biodiversity proposals and meeting the full spectrum of sustainable development objectives. Simple mitigation statements do not meet this planning need.

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.

Mod 20 specifies that a precise number of 425 dwellings at Westwood Heath are proposed for the plan period to 2029, but this development proposal is capped by infrastructure.

Mod 20 also specifies that development proposals must account of all significant constraints; other development within the vicinity; and future opportunities for integrated growth. It states this will require close co-operation.

It then states that, to give a degree of longer term certainty, a series of KEY OBJECTIVES are identified to provide clear guidance to landowners, institutions, infrastructure providers and major developers. There is no mention of existing local communities who have an interest in their local environment, and even perhaps the cornerstones of sustainable development, including holding their national as well as their local politicians to account for statements made in the past, including decisions already taken and now could be being taken in the future?

With a focus on the key objectives, it is clear the parameters set in the text are far too vague. To provide a robust plan, clarity is an essential requirement for “soundness”. Some key objectives require proposals that “must”; others that “should”; and others are even more vague and inter-dependent. In this respect, it is suggested duplications should be clearly avoided in order to provide clarity. A provision for even more highway network improvements in Coventry South is a clear duplication of the potential for a new highway link delivered within the planning period.

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

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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.

Signed:

David Michael Broadbent

BSc MSc CEng CEnv CSci FICE FCIWEM FICPEM

Date:

Thursday, 21st April 2016

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.