

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	Nick	
Last Name	Corcoran	
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 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:	Allocation of land north of Milverton for Development
Mod. Number:	16
Paragraph Number	2.81
Mod. Policies Map Number:	H44

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes No

5.2 Sound?

Yes No

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:

Justified:

Effective:

Consistent with National Policy:

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.

Having moved from Hampton Magna to Milverton in 1984, attended Warwick School and played for Leamington Moorefields rugby club, all areas featuring significantly in the New Local Plan, I have extensive knowledge of the day to day reality of the area, of both its scope and its limitations and am writing this cognisant of the need to accommodate a growing and more mobile population from a neutral viewpoint of how best to do so.

I believe that modifications 14 & 16, are both direct contraventions of elements within the National Planning Policy Framework (NPPF) and a poor optimisation of spending and practical logistics, making the proposition unsound. I have chosen to group corresponding Paragraphs of the NPPF together to show collectively how modifications 14 & 16 correspondingly contravene.

The first issue is the sheer impracticality of assigning land in Leamington Spa to accommodate Coventry's unmet housing requirements and the lack of precise study into how Milverton can be used to achieve this. The area proposed is arguably amongst Leamington's most desirable areas in which to live and there is ZERO way that you can prevent people wishing to live AND WORK in Leamington or Warwick from buying these homes. It can only be done on a forecasted hope of adoption by Coventry workers, something that has yet to be even studied let alone precisely forecasted.

Even if a scheme were setup to entice buyers from Coventry to the properties, would that be sustainable in the medium to long term? No. What's more the logistical and administrative workload necessary to attempt to locate such housing to Coventry employees would significantly offset any net gains. I expect that it would rather attract buyers from Kenilworth not Coventry, helping neither Leamington nor Coventry and thereby totally defeating the Plan's objectives and at the same time depriving Leamingtonians of a coveted area of natural beauty.

It would make far more sense to allocate land closer to Coventry, such as Coventry's undeveloped north west, Bedworth, Nuneaton and Kenilworth. This would create a natural demand from Coventry workers to live there. It may be argued that the transferability of skills would enable the movement of heads from Coventry to the new proposed developments with new employment in the local area, but I have seen no evidence of any such study or appraisal. Housing in Milverton would necessitate commuting even if one were working in Leamington Spa, as employment in Leamington Spa is generally in the south east towards the M40 corridor with Milverton being in the north west. When comparing the vastly differing economic compositions of Coventry and Leamington Spa, I believe that any such skill transferability would be of minimal realistic value.

The Inspector's report casts significant negative weight on WDC's reliance on forecasts of potential land becoming available and how such uncertainty is not supportable. WDC has made modifications to try and amend this, assigning the land in Milverton as a secured buffer zone as one contributory solution to achieve this. This is however a superficial and unsound proposal as the allocation of Milverton land is merely an uncalculated, short-term 'fix' on previous land uncertainty, that only temporarily alleviates the Inspector's concerns without offering a quantified solution. The actual, as of yet, unexplored implementation of developing on that land, has such a reliance on undefined parameters such as %age Coventry uptake, %age use of as yet undefined sustainable transport, uncalculated infrastructure cost such as road widening and further land purchase to achieve this, that it cannot possibly be deemed sound. Just looking at the "Warwick Strategic Transport Assessment - Phase 3" there has not been one single analysis on the sole road connecting the A452 & A445 that would feed any development in Milverton or any potential

train station, a road that is barely wide enough for two cars to pass and is bound by oak-lined hedgerows and ditches. How can such a proposal be deemed sound when 100% of the proposed modification rests on unquantified facts. The Inspector cannot justifiably accept such uncertainty as a sound solution for such a precisely defined goal.

On a visual level, the land is stunningly beautiful with none of it being flat but rather being continuations of gently rolling hills against such historic backdrops as the Saxon Mill, Chesford Grange and the picturesque Old Milverton hamlet, ancient church and rectory. Anyone, be they first time visitor or regular local Rambler, dog walker, cyclist, photographer, fisherman, will note that irrespective of season it is always busy with people enjoying its surroundings, all without impacting a single carbon footprint.

The land identified in Milverton in Modifications 14 & 16 is not only Green Belt, but also highly productive agricultural land. According to the NPPF, "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." According to "Agricultural Land Classification of England and Wales" by Natural England, the land would be categorised as between Category 2 and Category 3a. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non food crops for future generations. Natural England has a **statutory role** in advising local planning authorities about land quality issues".

Ref. <http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/brownfield-land-soils-and-agricultural-land/> Paragraph: 026 Reference ID: 8-026-20140306

Having lived in this exact area since 1984 I can vouch that the Milverton land is rarely left fallow and has a crop rotation between root crops, grains such as wheat and barley and crops such as rapeseed. The crops have been substantial year on year and therefore reflect its high agricultural value.

In the Government's "Natural Environment White Paper - The Natural Choice: securing the value of nature (June 2011)", it is clear that protecting both the natural landscape & productive agricultural land is a national priority - "We will retain protection and improvement of the natural environment as core objectives for local planning and development management.....to protect our best and most versatile agricultural land."

Yet I see no evidence that Natural England has had any involvement in the process and having contacted them myself, they have no record of any such involvement. The nearest analyses I see are the February 2012 "Warwick District Green Infrastructure Delivery Assessment" by "Land Use Consultants" and "Coventry Joint Green Belt Study - LA05 Green Belt Study Appendices" by "SSR Planning". This however concentrates more on optimising Green space for recreational use, largely around Kenilworth and does not feature any agricultural analysis. I believe that the exact composition of WDC's Site Selection Methodology/Matrix which incorporates WDC's "Green Belt Assessment" should be made public and why, if an Agricultural Land Classification analysis has been done, this has not featured in any documentation. If it has been done then firstly it needs to be published and I believe it needs to be analysed for impartiality as the landowners (farmers) have a vested interest. If no independent study has been conducted then the Public should be informed as to why and an action plan put in place to remedy this.

● WDC has admirably vowed to strengthen the preservation of Green Belt land by making the following modifications to the New Local Plan:

- **Mod. 32** Amend policy NE4 Landscape to add an additional clause New development will be permitted which positively contributes to landscape character. Development proposals will be required to demonstrate that they:—(*"minimise the loss of best and most versatile agricultural land"* Addition)

- **Mod. 33** Amend Policy NE5 Protection of Natural Resources (Clause d) as follows ...d) minimise loss of the best and most versatile agricultural land (*"unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes"* (Removal));
- **Mod. 34** Amend Policy 5.198 This need is increasing due to the anticipated reduction in the ability of countries continuing to export food to the UK due to increased flooding, erosion or drought. (*"A number of housing allocations have been identified on agricultural land, with the result that the remaining resource is considered to be of increasing importance and vulnerability."* (Addition)) Development affecting the best and most versatile agricultural land will not be permitted unless (*"there is an overriding demonstrable need for the development and"*(Removal)) it can be shown that development of lower grade land would have overriding adverse sustainability impacts, such as on biodiversity, natural resources, landscape character or conservation of heritage assets (*"or in an unsustainable location"* (Removal)).

Reason for Opposition: The proposed removal of Milverton land from the Green Belt is not in compliance with any of the above proposed modifications. Such polar opposite violation cannot be deemed 'sound'. Modifications 32-34 should be thoroughly supported and Modifications 14 & 16 firmly opposed for being in total contravention of this. To have such polar contradicting modifications risks challenging the soundness of the whole Plan.

- By contrast the land allocated in Hampton Magna for a mere 145 houses was, for the 9 years that I lived there, grazing land for Friesian cattle. This and surrounding unallocated land is arguably lower value agricultural land far more suitable for development than that identified in Milverton. I understand that even far less valuable land has been identified around Nuneaton and Bedworth but has not been put forward for development. This is in direct contravention of a number of NPPF and WDC's own objectives. Please justify this.

NPPF Paragraph 30 Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

NPPF Paragraph 34 Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

NPPF Paragraph 95 To support the move to a low carbon future, local planning authorities should: plan for new development in locations and ways which reduce greenhouse gas emissions;

Reason for Opposition: The location of the proposed housing on the edge of Leamington to support Coventry's housing needs is the furthest distance out of a choice of Coventry, Nuneaton, Bedworth, Kenilworth, and Leamington Spa. Automatically with the goal being to accommodate Coventry's housing need this creates a need to commute and commute at the greatest possible distance out of the four options. This creates an automatic increase in carbon emissions, irrespective of what available mode of transport is used - car, motorbike, bus or train. I see no study of such a site-specific impact. The CC04 "Air Quality Action Plan (Addendum) Low Emission Strategy Guidance for Developers April 2014" gives advice about how analysis should be conducted prior to development. The analysis should not be done ONCE sites are chosen but BEFORE sites are chosen. What's more the recommendations are too generic, not site specific. For example, on Page 11, the Road Transport Emission Increase formula states "A trip length of 10km should be used which is derived from the DfT National Travel Surveys estimation of average trip length". This does nothing to evaluate the greenhouse gas emissions of each proposed development. It merely measures the increase in greenhouse gas emissions correlating to the volume increase in households of each development. The results of the study would be the same if 20,000 homes were built in Coventry or if 4,000 homes were each built in Coventry, Kenilworth, Nuneaton, Bedworth and Leamington. The reality is that the carbon emissions between the two options would be far from identical as the following figures show.

Coventry outskirts (Browns Lane) to Coventry	= 5.2 miles	- 13 minutes
Kenilworth to Coventry	= 5.2 miles	- 13 minutes
Bedworth to Coventry	= 8.2 miles	- 19 minutes
Nuneaton to Coventry	= 10.0 miles	- 23 minutes
Leamington Spa to Coventry	= 11.2 miles	- 21 minutes

(Google Maps journey planner by car, times with zero traffic)

The proposed formula does not achieve the **NPPF's targets 30 and 95**, but rather hides the truth. As the goal is to absorb Coventry's housing needs through dispersal across Warwickshire, then the specific impact of each development solution needs to be analysed

NPPF Paragraph 32 improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Reason for Opposition The proposal to partially offset the need to commute with a 'potential' building of a new train station in Old Milverton and/or a Park and Ride scheme is not feasible, provides minimal potential financial or Carbon returns at a significant financial, social and environmental cost. The existing train line in Milverton is deeply recessed over several miles in its original and successful bid to minimise noise pollution, something noted in a number of WDC studies as a positive feature. Building a new train station in such a location is going to be a logistical challenge requiring extensive studies and resultant surveying & consultancy costs, landscape remodelling, car parking creation, road widening and creation and significant investment to serve a comparatively small new population of which only a percentage (yet to be calculated in the NLP) would use the service. I believe the return on investment would be significantly negative.

The Park & Ride scheme would be of minimal returns for parallel above costs albeit on a lesser scale. I see no study of percentage uptake, I certainly wouldn't use it as the buses are old, noisy, cramped and slow. This is not an emotional objection but a practical reality. I doubt that I would be the only one of this viewpoint. Cars per household is at the highest level in history. Whilst not desirable, that is the reality. Culturally it would take a huge investment to change this 'independence' and the proposal features nothing to achieve this - no dedicated buses, no financial incentive, no financial disincentive for car use etc. It would require households eco-conscience to volunteer adoption of the scheme and with the potential targeted demographic, I foresee little, if any, such uptake.

I take note of the proposed incorporation of sustainable transport infrastructure within each development by incorporating electric/hybrid car recharging points, but no figures are provided on the %age of households likely to use such facilities. It would require replacing a/both current household cars with an electric/hybrid for a premium of between £1500 to £7000 on top of a standard car price. Add into this the resultant reduction in car size and the targeted demographic being families, I struggle to see how such an investment would have any returns but become something of a well-intentioned, badly researched, uncalculated white elephant.

The location of both the Park & Ride and Milverton housing is simply going to further congestion on a route which has recently received significant investment in widening in parts, new roundabouts all because it couldn't cope with the existing volume of traffic. Add onto this the carbon footprint of all the construction, the volume of cement being used and removal of CO2 absorbing land and trees, it unnecessarily contributes both directly and indirectly to CO2 emissions. (The concrete industry is one of the two largest producers of carbon dioxide, creating up to 5% of worldwide man-made emissions of this gas, of which 50% is from the chemical process and 40% from burning fuel. - Source World Business Council for Sustainable Development - The Cement Sustainability Initiative - 1st June 2002)

A far more sustainable solution on every front - financial, social and environmental - is to focus the housing around Kenilworth, where the original train station is being reinstalled, thereby removing 100% the carbon footprint of Milverton train station, Milverton road building and car commuting, yet achieving the same strategic goals. This shortens the journey time to Coventry thereby reducing

CO2 miles and increasing the likelihood of uptake by Coventry workers, it significantly minimises direct environmental impact as not only does it remove the need for an extra train station in Milverton but, unlike in Milverton, the foundations of a train station are already there, requiring minimal infrastructural investment, far more in keeping with **NPPF Paragraph 32**. The total project and environmental costs would therefore be significantly lower. What's more the project has been approved and finance allocated (DfT, LEP, WCC).

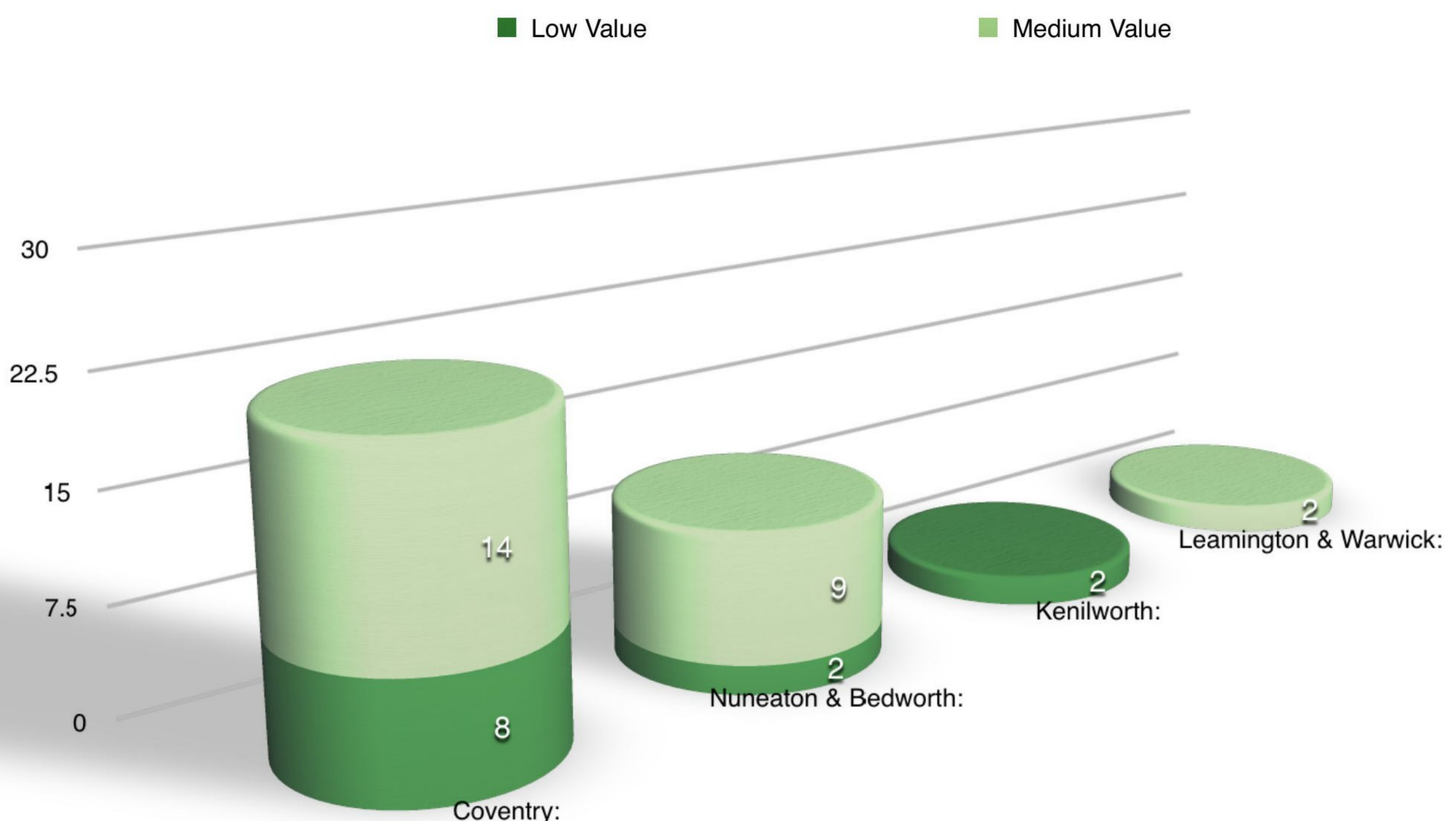
As noted in a study, Kenilworth has seen minimal housing development in the past 20 years yet the facilities of the town are developing to meet in advance a growing population - Waitrose, train station etc. in addition to the ED2 (Major Education Allocation), the two areas SP1 & SP2 Outdoor Sports (a disproportionate net increase in area once removal of existing space by new housing H40 happens) in the proposed Local Plan. The train station is proposed to be finished by 2017, three years before proposed work in the Local Plan were to start. Strategically this fits in perfect synchrony. If a Park and Ride scheme were to be added to serve Kenilworth Train Station then this further serves the ultimate goals of sustainable transport to serve Coventry's external housing needs, whilst Milverton only exacerbates them due to:

The road connecting the Kenilworth Road A425 to Rugby Road A455 is nothing more than a country lane that is barely wide enough for two cars to pass without slowing down. There is no way that this can accommodate extra housing without complete road replacement and widening for nearly 2.5 miles, which, with oak-lined ditches either side, will be a considerable and unnecessary cost to the Council and environmental loss to Warwickshire. As noted in the Green Belt study, a distinguishing feature of the Arden valley is the oak-lined fields and country roads.

Combine the environmental impact with the Green Belt Value study conducted by SSR, then it becomes abundantly clear that the most sound option is to prioritise housing development in Coventry, followed by Nuneaton & Bedworth, Kenilworth and lastly Leamington & Warwick.

Coventry:	8 Low Value, 14 Medium Value & 51 High Value
Nuneaton and Bedworth:	2 Low Value, 9 Medium Value & 8 High Value.
Kenilworth:	2 Low Value, 0 Medium Value & 9 High Value.
Leamington & Warwick:	0 Low Value, 2 Medium Value & 10 High Value.

(Green Belt Land Value according to the Coventry Joint Green Belt Study by SSR Planning)



All parties have to accept that development is needed to accommodate each Council's growing housing needs, but the above evidence, most notably that the combined volume of Coventry's low and medium value land exceeds by almost double the whole of Leamington & Warwick's land combined, shows that there is no sound reason for Coventry's housing needs to be met by Leamington & Warwick and particularly not by high value Green Belt.

NPPF Paragraph 80 Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Reason for Opposition - The proposed developments in north Leamington/Milverton contravene each of the above five points by directly building upon Green Belt, thereby increasing the urban spread and reducing the distance between Leamington Spa and nearby Kenilworth.

NPPF Paragraph 85 "where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;"

Reason for Opposition - the highlighted "safeguarded land" is not "BETWEEN" the urban area and the Green Belt but is a direct encroachment ONTO the Green Belt and immediate removal thereof, for future construction if 'necessary', the viability of which has not even been studied.

NPPF Paragraph 116 Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Reason for Opposition - No evidence of any such studies with regards specifically to Milverton.

NPPF Paragraph 123 Planning policies and decisions should aim to: identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Reason for Opposition - Removing Milverton from the Green Belt would be a total contravention of the above, both from my personal experience of the area which is reinforced in the "Final Report Coventry Joint Green Belt Study - LA05 Green Belt Study appendices COMPLETE", by SSR Planning.

In the study, areas WL5a & 5b (Milverton) are described as being a "distinctive landscape....a well used section of the Green Belt, with various recreational opportunities... that would be sensitive to change...". Old Milverton itself is described as "a picturesque hamlet perched on a knoll above the valley" culminating in "We recommend both WL5a & 5b be retained within the Green Belt". These areas are graded as Level 3 High Value. I can add to this from my personal experience that the Milverton area is an area of calm and of natural beauty, with an omnipresence of ramblers, dog walkers, cyclists, photographers, fishermen, enjoying its 'on-the-doorstep' escape from the town. I have attached photographs that I feel are far more representative of this than the sole photograph used in Appendix 10 Photomontage 7 of the Study.

NPPF Paragraph 159 Local planning authorities should have a clear understanding of housing needs in their area. They should:prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross

administrative boundaries; prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

Reason for Opposition - It is clear that Warwick District Council has set a fine precedent for fulfilling their "duty to cooperate" at all stages of the process with Coventry and neighbouring Councils, but that should not be taken by the Inspector as an acceptance/submission. The goal is not to find 'a' solution but to find a fair and sustainable solution. I do not agree with the Inspector's letter of the 1st June 2015 saying that all other parties have fulfilled their duties to cooperate. Nuneaton & Bedworth appear to have NOT cooperated in the same manner as WDC and it would be unfair if our cooperation worked to our disadvantage and Nuneaton & Bedworth's lack of cooperation were to work to their advantage. "The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities" This brings me to a key point: In LA06 - Report to the Coventry and Warwickshire Joint Committee - April 2014, Paragraph 3.6 states that "A Joint Green Belt Study....against the green belt criteria set out in the National Planning Policy Framework" needs to be conducted and "methodologies used by each Council are common, as far as possible".

The Green Belt Study by SSR Planning predates this and I see no evidence of any subsequent study. Until such an independent, published study has been conducted and all corresponding NPPF criteria FULLY complied with, including the involvement of Natural England, using synchronised Matrices, our diligent cooperation should not work to our disadvantage and no proposal should be put forward. I see no studies justifying a change from the April 2014 "SA07 Site Selection Methodology" reasons for the sites WL5a & 5b being removed from the Local Plan strategy.

Equally I think Coventry have not been exhaustive in their exploration of opportunities, rather relying on the diligence of WDC to fill the holes.

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.

Changes

- Conduct an open, publicly available, independent, Agricultural Land Classification study overseen by Natural England of ALL potential development sites on Green Belt agricultural land.
- Conduct a study to analyse actual feasibility of percentage Coventry worker uptake of all proposed sites.
- Conduct a financial & environmental study of Kenilworth train station v. Milverton train station.
- Conduct a Greenhouse Gas transport emissions study of all proposed developments - eg. 1000 new Kenilworth homes + Place of Employment - eg. (500/1000 Kenilworth, 200/1000 Leamington, 300/1000 Coventry); Kenilworth = (500 x %age car commute x GG emissions per mile x mileage) + (500 x %age bus commute x GG emissions per mile x mileage) + (500%age train commute.....) + Leamington = (200 x %age car commute x GG emissions per mile x mileage) + (200 x %age bus commute x GG emissions per mile x mileage) + (200 x %age train commute.....) + Coventry = (300 x %age car commute x GG emissions per mile x mileage) + (300 x %age bus commute x GG emissions per mile x mileage) + (300 X %age train commute.....) to provide the true Greenhouse Gas footprint of each proposed development site.
- Conduct an analysis of each Council's contribution, mapping in parallel what they have contributed - Greenhouse Gas analysis, Green Belt analysis, Agricultural Land Classification analysis etc. and what they haven't. This should be a very simple analysis that is easy to

visually represent. The findings should be made public and an agenda set to equalise the contributions. Standard due diligence.

- To minimise convergence through urban sprawl, the developments should be prioritised East of Coventry, West of Kenilworth, East of Leamington Spa and West of Warwick, South West of Nuneaton and East of Bedworth.
- Removal of Modifications 14 & 16.

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

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:

Date:

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.

For Official Use Only

Person ID:

Rep ID: