

Consultation on Proposed Modifications (2016) Response Form

For Official Only	
<u>Person ID</u>	
<u>Rep ID</u>	

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)
Title	Mrs	
First Name	Peter	
Last Name	Manning	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
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 No

Publication of the recommendations of any person appointed 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

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

Modification or SA:	Removal of land north of Milverton from the green belt
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.

I believe that Modifications 16 and 14 are unsound because:

The EXCEPTIONAL CIRCUMSTANCES required by the National Planning Policy Framework to remove the land North of Milverton from the Green Belt have not been demonstrated by Warwick District Council.

The proposed development is to support Coventry City Council's housing need. There are sustainable sites closer to Coventry that should be used in preference to the land North of Milverton to reduce unnecessary commuting, inevitable congestion and further road construction.

In practice it is unlikely that people who want to live and work in Coventry will buy houses on land North of Milverton and therefore this development proposal will not support Coventry's housing need. The costs of houses in the Leamington area will also be higher than in Coventry restricting the viability of people buying houses with the express purpose of commuting to Coventry. This is not the best financial option for the council in helping boost affordable housing.

Precedence for releasing land from the Green Belt requires the "value" of potential sites to the Green Belt to be taken into account and those with the least value to be removed from the Green Belt first. WDC, in cooperation with Coventry City Council, has assessed sites on the edge of Coventry as being of lower Green Belt value. Even if development at Old Milverton was acceptable as a sustainable location for development, there are sites with a lower Green Belt value that should be used in preference to the land north of Milverton.

The "green lung" between Leamington and Kenilworth will be reduced to less than 1 ½ miles.

The picturesque northern gateway to the historic regency town of Royal Leamington Spa will be destroyed.

Highly productive farming land will be lost together with long established wild life habitat.

The residents of local towns will be deprived of an area which is highly valued and sustainable for walking, running, cycling, riding, bird watching and is also used by local schools for educational walks.

In short rather than adding value to the area this development will degrade it and create unnecessary pressure on the road network going in and out of Leamington – which is already stretched to say the least!

The proposed park-and-ride scheme is unsustainable because:

- There will be no dedicated buses, so users will have to time visits to coincide with the bus timetable
- The site is too close to Leamington. It would be better if the site was focused on the A46 roundabout with the A452, which could form part of the Thickthorn development, and provide for Leamington, Warwick, Kenilworth, Warwick University and potentially Coventry.
- Much of the traffic using the A452 crosses to the south of Leamington where there are the major employers
- Shoppers are unlikely to use the park and ride when there is plenty of parking in Leamington
- Oxford appears to have the only park and ride scheme in the country which really works and this is because there is such limited parking in Oxford city centre.
- There are already a lot of car parks in this area of Green Belt with impervious surfaces all of which reduce the areas ability to absorb rainfall and contribute to flooding

A railway station is unviable because the railway line is in a deep cutting in Old Milverton making construction impractical

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.

I believe that in order for Modifications 16 and 14 to become sound:

- The land North of Milverton should remain in the Green Belt
- The development proposed on the land north of Milverton should be reallocated to alternative sites closer to Coventry which have a lower “Green Belt” value and are capable of delivering the required housing.
- The road network is already overwhelmed and this whole project will be a stain on the green and pleasant land that is Leamington Spa.

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:	<input type="text" value="Allocation of land north of Milverton for development"/>
Mod. Number:	<input type="text" value="14"/>
Paragraph Number	<input type="text" value="Policy DS15"/>
Mod. Policies Map Number:	<input type="text" value="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:	<input 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.

I believe that Modifications 16 and 14 are unsound because:

The EXCEPTIONAL CIRCUMSTANCES required by the National Planning Policy Framework to remove the land North of Milverton from the Green Belt have not been demonstrated by Warwick District Council.

The proposed development is to support Coventry City Council's housing need. There are sustainable sites closer to Coventry that should be used in preference to the land North of Milverton to reduce unnecessary commuting, inevitable congestion and further road construction.

In practice it is unlikely that people who want to live and work in Coventry will buy houses on land North of Milverton and therefore this development proposal will not support Coventry's housing need. The costs of houses in the Leamington area will also be higher than in Coventry restricting the viability of people buying houses with the express purpose of commuting to Coventry. This is not the best financial option for the council in helping boost affordable housing.

Precedence for releasing land from the Green Belt requires the "value" of potential sites to the Green Belt to be taken into account and those with the least value to be removed from the Green Belt first. WDC, in cooperation with Coventry City Council, has assessed sites on the edge of Coventry as being of lower Green Belt value. Even if development at Old Milverton was acceptable as a sustainable location for development, there are sites with a lower Green Belt value that should be used in preference to the land north of Milverton.

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Highly productive farming land will be lost together with long established wild life habitat.

The residents of local towns will be deprived of an area which is highly valued and sustainable for walking, running, cycling, riding, bird watching and is also used by local schools for educational walks.

In short rather than adding value to the area this development will degrade it and create unnecessary pressure on the road network going in and out of Leamington – which is already stretched to say the least!

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There will be no dedicated buses, so users will have to time visits to coincide with the bus timetable

The site is too close to Leamington. It would be better if the site was focused on the A46 roundabout with the A452, which could form part of the Thickthorn development, and provide for Leamington, Warwick, Kenilworth, Warwick University and potentially Coventry.

Much of the traffic using the A452 crosses to the south of Leamington where there are the major employers

Shoppers are unlikely to use the park and ride when there is plenty of parking in Leamington

Oxford appears to have the only park and ride scheme in the country which really works and this is because there is such limited parking in Oxford city centre.

There are already a lot of car parks in this area of Green Belt with impervious surfaces all of which reduce the areas ability to absorb rainfall and contribute to flooding

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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.

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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:

Not applicable

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:

Peter Manning

Date:

21 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.

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