

LOCAL PLAN

helping shape the district



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.

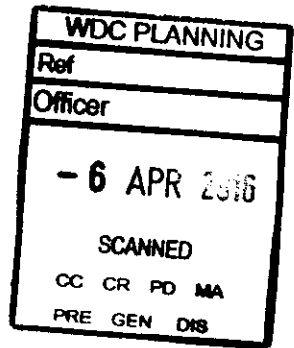
All forms should be returned by **4.45pm on Friday 22 April 2016**

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**

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 | James | |
| Last Name | Plaskitt | |
| 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

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:

land north of Milverton / Blackdown

Mod. Number:

DSF and others

Paragraph Number

see note

Mod. Policies Map Number:

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.

The proposed modification create a clear incompatibility between the proposals and the declared objectives of the plans issued by both Warwick District Council and Coventry City Council.

For details, please see separate sheet.

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.

Deletion of proposed development (both the metrics 250 and the move to redefine the Greenbelt area as 'safeguarded' for future development. The alternative is to locate additional development at the Kings Hill site

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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The Old Milverton/Blackdown proposal does not align with the plan objectives of the two councils most directly involved - WDC and Coventry. This makes the proposed modification to build houses on the land north of Milverton unsound.

Coventry City's Plan is all about jobs. The council wants to plan for significant jobs growth, indeed they want to make the city one of the top 10 growth cities in the country. But they cannot provide the houses to meet the jobs strategy - hence the call on their neighbouring districts. But this means that the issue of co-location of homes and jobs becomes central.

WDC's own modified plan document says, **"Where greenfield sites are required for housing, they should generally be located close to areas of employment."** (DS4). Why are extra houses now needed (as opposed to where we were in 2012)? To meet the Coventry shortfall. WDC acknowledge this in their latest 'exceptional circumstances' document and also in the revised Plan - **"there is a limited amount of land available outside the Greenbelt to meet long term needs, particularly those arising in Coventry (my emphasis). Therefore identifying safeguarded land in appropriate (my emphasis) locations may assist in meeting long term development needs."** (para 2.2)

But is the land north of Leamington 'appropriate' for these circumstances? Not if we take Coventry's view into account.

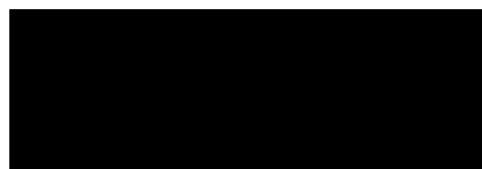
They say, **"the City council will support its Warwickshire neighbours in bringing forward land for housing and employment that sits adjacent (my emphasis) to the city's existing administrative boundaries."** (page 15).

They too want co-location, to keep the homes close to the new jobs. But they also want to cut down in-commuting:

"in-commuting to Coventry for work has increased substantially in the last decade, placing pressure on sustainable travel patterns and air quality. The city must do something to reduce in-commuting and rebalance its housing/employment offer." (page 93)

So Coventry want co-location of homes and jobs, as well as WDC. But the Milverton/Blackdown site does not offer the co-location, nor does it meet Coventry's objective to curb in-commuting. So the site proposal is inconsistent with the stated objectives of the City's and WDC Plans.

Kings Hill is far more logical - it has the capacity, although it is not being taken at this point for questionable reasons. It is adjacent to the City boundary. It would not add to in-commuting. So it satisfies the numbers requirement but is also consistent with other plan objectives.



04/04/16

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:

04 / 04 / 16

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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