

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		Oliver
Last Name		Bell
Job Title (where relevant)		Principal Planner
Organisation (where relevant)	CEG	Nexus Planning
Address Line 1		Suite A, 3 Weybridge Business Park
Address Line 2		Addlestone Road
Address Line 3		Weybridge
Address Line 4		Surrey
Postcode		KT152BW
Telephone number		01932 837850
Email address		o.bell@nexusplanning.co.uk

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:	<input type="text" value="Policy DS20"/>
Mod. Number:	<input type="text" value="17 and 18"/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

5. Do you consider the Local Plan is:

5.1 Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
5.2 Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

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 type="checkbox"/>
Consistent with National Policy:	<input 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.

Please see attached comments.

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.

Please see attached comments.

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:

As the landowner of a substantial proportion of the safeguarded land 'S1', it is essential that we are able to attend and speak at the Examination.


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:

21/04/2016

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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Land south of Westwood Heath Road

Representations to Proposed Modifications to the Publication Draft Warwick District Local Plan (Part 1)

on behalf of CEG

April 2016

Policy DS20 'Review of the Local Plan'

- 1.1 The following representations have been prepared by Nexus Planning Ltd, on behalf of CEG, in response to the Warwick District Council (WDC) Regulation 19 Consultation on Proposed Modifications to the Local Plan (Part 1).
- 1.2 CEG controls around 129 hectares of land south of Westwood Heath Road, identified in part in the emerging Plan as Safeguarded Land (site ref. S1). We consider that site S1 could deliver circa 900 dwellings, with further development capacity on land to the south, as advocated in the Westwood Heath Garden Suburb Vision and Technical Annex (Appendix 1).
- 1.3 Policy DS20 identifies a Local Plan review mechanism that will be triggered if a range of circumstances arise, generally relating to issues that would affect the District as a whole and are not necessarily unique to Warwick, i.e. changes in national planning policy.
- 1.4 The Council has however also identified a very specific issue the District faces which would trigger a review of the Local Plan as follows:
- “d) development and growth pressures arising from the specific circumstances in the area to the south of Coventry (as identified in Policy DS New 1)”*
- 1.5 Paragraph 2.83 of the supporting text to Policy DS20 also states that:
- “Policy DS NEW 1 indicates that a partial review of the Local Plan will be undertaken within five years of the adoption of the plan, to address specific circumstances in the area to the south of Coventry. This proposed partial review will be undertaken in any event.”*
- 1.6 Furthermore, in the Council's recent report to the Executive on 6th April 2016, a draft Vision for the area south of Coventry has been published and a Member lead identified to advance this. It should be noted no other area in the District has seen such a proactive and focussed approach by the Council to secure its comprehensive and coordinated development.
- 1.7 Given the above, it is clear that the Council has identified and acknowledged that a specific set of circumstances exist in the area south of Coventry that could warrant a review of the Local Plan. No other part of the District is under similar pressures or likely to experience such transformational change. Policy DS NEW 1 clarifies that this review would be in the form of a partial Local Plan review that would occur within five years.
- 1.8 As detailed in our representations to other policies, site S1 could come forward as part of a comprehensive development with site H42, delivering up to 1,500 dwellings and at least 425

dwellings within the Plan period. This should however be allocated within the Local Plan from the outset to enable greater certainty on infrastructure delivery and to enable the establishment of key masterplanning principles, rather than adopting a piecemeal approach. Such development can come forward in advance of other potential development proposals south of Coventry.

- 1.9 The suggested allocation of 1,500 dwellings on sites H42 and S1 would however fail to address all development pressures south of Coventry and should be seen as an initial phase of wider development growth. Given the significant and complicated nature of these development pressures (which clearly do not exist elsewhere in Warwick District), we consider that WDC should require the preparation of an Area Action Plan (AAP) for the wider area south of Coventry, rather than dealing with it through a partial review of the Local Plan. Indeed the Council's recent report to the Executive on 6th April 2016 identifies the diverse range of stakeholders who would need to be involved to bring development forward in this location and the complicated array of infrastructure that must be delivered. An AAP is an ideal planning tool to resolve such issues.
- 1.10 To establish a 'policy hook' and to give landowners and developers greater certainty and confidence, the broad area could be referenced in the Local Plan with the exact extent determined through the preparation of the AAP itself.
- 1.11 The AAP would provide specific planning policy and guidance for the defined area in order to specify the required land uses in particular locations and identify key strategic interventions. AAPs have a strong focus on delivery and implementation, and of course form a statutory component of the Local Development Framework, enabling them to review Green Belt boundaries, for example when further details regarding HS2 are known. It would therefore be an entirely appropriate tool to address the development pressures and potentially transformational change that is likely to occur south of Coventry.
- 1.12 Given the above, we consider that Policy DS20 "Review of the Local Plan" is not 'justified' by failing to be the most appropriate strategy for the District.

Suggested Change

- 1.13 The policy should be amended to remove the proposed partial review of the Local Plan in respect of land south of Coventry. The Policy (or supporting text) should however identify that work will commence immediately for the preparation of an AAP relating to land south of Coventry. The broad area this AAP will cover could be referenced in the Local Plan, potentially as land in the area south of Coventry, north of the HS2 alignment and west of A46.

**APPENDIX 1 – WESTWOOD HEATH GARDEN SUBURB VISION DOCUMENT AND
TECHNICAL ANNEX (SEE SEPARATE ATTACHMENT)**