



#### 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 <a href="mail: email: newlocalplan@warwickdc.gov.uk">email: newlocalplan@warwickdc.gov.uk</a>

#### 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 <a href="https://www.warwickdc.gov.uk/newlocalplan">www.warwickdc.gov.uk/newlocalplan</a> and also at the following locations:

- Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa;
- Learnington Town Hall, Parade, Royal Learnington 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 Learnington Spa
- Finham Community Library, Finham Green Rd, Finham, Coventry, CV3 6EP

#### Part A - Personal Details

	1. Personal Details*     * If an agent is appointed, pleas boxes below but complete the full complete.	2. Agent's Details (if applicable) se complete only the Title, Name and Organisation ull contact details of the agent in section 2.
Title	MR	
First Name	DAYID	
Last Name	HALL	
Job Title (where relevant)	RETIRED	
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
	Ī	
Postcode		
Telephone number		
Email address		
2 N-05 - 0 - 1 - 1 - 1 - 1 - 1	and of the Level Plan	
<ol><li>Notification of subsequent sta Please specify whether you wish t</li></ol>	o be notified of any of the following:	
The submission of the Modification		Yes / No
Publication of the recommendation to carry out an independent examination		Yes V 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:	MODIFICATION AND SA
Mod. Number:	MOD 19 AT LOCATION H42 WESTWOOD HEATH
Paragraph Number	ALL PERTAINING TO H42
Mod. Policies Map Number:	POLICIES MAP 35

5. Do	you	consider	the	Local	Plan	is	:
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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.

PLEASE REFER TO THE ATTACHED PRIMARY REPRESENTATION
AND ALTERNATIVE REPRESENTATION COMPRISING NINE
PAGES AND A MARKED UP SKETCH OF POLICIES MAP 35
(SHETCH 1) ON BEHALF OF LODGE FARM RESIDENTS
LIVING AT OLD LODGE FARM AND LODGE FARM
1400SE.

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.

THE CHANGES CONSIDERED NECESSARY ARE SET OUT IN THE ABOVE REPRESENTATIONS WITHIN THE NINE PAGE SUBMISSION AND SKETCH I.

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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Rep ID:

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
Ye	s, 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:
C	continue on a separate sheet if necessary
repre	se note: This written representation carries the same weight and will be subject to the same scrutiny as oral esentations. The Inspector will determine the most appropriate procedure to adopt to hear those who have ated that they wish to participate at the oral part of the examination.
11.	Declaration
	nderstand that all comments submitted will be considered in line with this consultation, and that my comments will made publicly available and may be identifiable to my name/organisation.
Sign	ned:
Dat	e: 17 April 2016
off Lo	pies of all the comments and supporting representations will be made available for others to see at the Council's ces at Riverside House and online via the Council's e-consultation system. Please note that all comments on the cal Plan are in the public domain and the Council cannot accept confidential objections. The information will be d on a database and used to assist with the preparation of the new Local Plan and with consideration of planning plications in accordance with the Data Protection Act 1998.
For	Official Use Only
Pers	on ID: Rep ID:

## Representations against Modification 19 part H42 Westwood Heath (Policies Map 35) (and associated modifications arising from Modification 19).

Residents at Old Lodge Farm and Lodge Farm House, located within the northwestern boundary of proposed housing site H42 as shown on Policies Map 35, make the primary and alternative representations of objection, which follow. Their names, addresses and signatures follow at the end.

#### PRIMARY REPRESENTATION

### Reasons why it is believed that Modification 19 part H42 is not legally compliant and not sound:

#### Reason 1 - Duty to Co-Operate:

Modification 19 part H42 may not be legally compliant because the duty to co-operate has not been fully satisfied. This is evident from the lack of involvement of any other relevant parties in the sustainability appraisal, the green belt assessment, the landscape character assessment, the historic setting assessment and the strategic transport assessment, which were all used to "justify" the allocation of housing at Westwood Heath. The above appraisals and assessments were carried out independently for Warwick District Council (WDC) without any input from other relevant parties as to the briefs and do not take into account the wider implications associated with neighbouring areas. A holistic approach has not been taken.

For example, the brief to Vectos Microsim to carry out the Strategic Transport Analysis Phase 5: Westwood Heath and Kings Hill Supplementary Analysis only required the assessment of the impacts of assigning houses at Kings Hill and Westwood Heath. It failed to consider the combined impact of assigning houses at these two sites together with the proposed housing assignments in neighbouring areas at Burrow Hill Nursery (90 houses) and at Cromwell Lane by Tile Hill Station (240 houses) in Coventry which sites are very close to Westwood Heath and whose occupants will have no alternative but to utilise the same road network.

## Reason 2 - Site Selection Methodology/Matrix not based on complete, accurate and up to date information:

Modification 19 part H42 is not compliant nor sound because WDC's site selection methodology/matrix for suitability of additional housing sites is not based on complete, accurate and up to date information pertaining to Westwood Heath. This is in part because the sustainability appraisal addendum was not commissioned until October 2015 and not completed until February 2016 and the relevant addendum assessments mentioned above under Reason 1 were carried out in a very limited time or were not carried out at all. Examples of some the relevant assessments and the implications are summarised as follows, to help demonstrate the point:

 Green Belt Assessment – the joint study of the green belt was commissioned and completed on 25 June 2015 before any decision had been taken to propose and screen Westwood Heath as a housing allocation site. Therefore, the green belt study does not look specifically at the Westwood Heath site but combines

- it with a very large parcel of green belt land referenced as C20. The study concludes that this large block of green belt land in C20 is mid performing as to the purposes of the green belt with a mixture of high and low scores across the purposes. This representation against Modification 19 part H42 maintains that the green belt study is not sufficient for the purposes of Westwood Heath H42 and that the relatively small area within C20 pertaining to Westwood Heath is of exceptionally high significance and this has not been considered.
- Landscape Character Richard Morris Associates were appointed by WDC in November 2015 to review sixteen areas including Westwood Heath. The review was not finalised until February 2016 so it is difficult to understand how there has been any time for due consideration to be given to this assessment. Also, the assessment for Lodge Farm, referenced C13, covering all the 25.4 ha area of housing proposed at Westwood Heath, appears to have been carried out on a very dull day because it does not explain the full extent of the open landscape. The parties to this representation would like to bring to the attention of the Planning Inspector the exceptional character of the landscape at Westwood Heath because it is not mentioned in either the landscape assessment or the green belt assessment. Westwood Heath is located at the most northern boundary of WDC and the open views extend in a mainly southerly direction across the majority of the area of the District and a considerable distance beyond that to neighbouring counties. From some points on Westwood Heath there can be seen the ruins of Kenilworth Castle in the foreground, beyond which and at a lower level lies the historic Town of Warwick with the church tower of St Mary's being clearly visible, then beyond that the historic place of Edge Hill can be seen on the horizon, some nineteen and a half miles away as the crow flies. Westwood Heath overlooks the City of Coventry to the northeast and many historic landmarks of the city are clearly visible. To the east, beyond Gibbet Hill and Kings Hill, aircraft can be viewed as they make their descent into Coventry's airport at Baginton, although the actual runway surface is hidden. The landscape then extends in the distance to beyond Daventry. This open landscape is panoramic and extends out from Lodge Farm at Westwood Heath through approximately 180 degrees generally in a southeasterly direction uninterrupted from the northeast to the southwest for twenty to thirty miles to the horizon. It gives rise to some spectacular scenes in various weather conditions and at different times of the year especially at sunrise.
- 3. Historic Setting Assessment a Heritage Assets review of Westwood Heath along with seventeen other sites was carried out by Amec Foster Wheeler Environment and Infrastructure UK Limited by site visits to all the sites on 25 and 26 November 2015 according to the assessment report issued in December 2015. It is questionable as to whether adequate time has been spent on investigating the historic setting and whether sufficient time was available for the December 2015 report to be fully considered by WDC. Also, the assessment does not appear to be complete. For example, no mention is made of the skirmish on Westwood Heath during the civil war in the seventeenth century which occurred between Cannon Park to the east, Cromwell Lane immediately to the west, Red Lane to the south west and Banner Lane to the north of Westwood Heath, evidence of which has been found by local metal detecting groups. Nor is there any mention of the strategic significance of

- Westwood Heath during the Second World War in providing smoke screens to confuse enemy aircraft approaching Coventry City during the blitz.
- Habitat Assessment no specific habitat assessment has been found for Westwood Heath on the WDC web site although it is accepted this does not prove that one has not been carried out.
- 5. Strategic Transport Assessment Warwickshire County Council and WDC commissioned Vectos Microsim to update the Strategic Transport Assessment to account for the allocation of new housing sites across the district of WDC in addition to those previously identified in the submitted local plan under suspension. This update was finally issued in February 2016 and included at Appendix A, a supplementary analysis specifically for Westwood Heath and Kings Hill. This Appendix is dated December 2015. It is not known when this assessment was actually commissioned but it is questionable as to whether sufficient time was available for the assessment to be carried out as thoroughly as would be expected. It would certainly appear there was insufficient time for the sustainability addendum to take this strategic transport assessment fully into account but it is noted that this assessment was used as the basis for capping the numbers of housing at Westwood Heath to four hundred and twenty five.

#### Reason 3 - The Strategic Transport Assessment is not sound:

As mentioned above, the Strategic Transport Assessment was updated by February 2016 to take into account the new allocation of housing at Westwood Heath and at other locations. A site-specific analysis was carried out to review the implications of housing at Westwood Heath. The analysis looked at the relative capacity of the routes between Westwood Heath and Kenilworth, Warwick, Learnington and the A46. It concluded that by the addition of 425 dwellings at Westwood Heath, the Crackley Lane route is likely to be nearly over capacity as are the links which comprise Gibbet Hill Road which routes will serve traffic between the proposed sites and Kenilworth, Warwick and Leamington towns as well as the A46 south. The assessment failed to look at the routes into Tile Hill, Burton Green, Balsall Common or even Coventry from Westwood Heath. It also failed to take into account the additional housing proposed at Burrow Hill Nursery (90 houses) and at Cromwell Lane by Tile Hill Station (240 houses) in Coventry which sites are very close to Westwood Heath and whose occupants would have no alternative but to utilise the same road network described in the analysis to travel to Kenilworth, Warwick and Learnington towns and to the A46 south. By failing to take the additional neighbouring houses into account, it is put to the Planning Inspector by this representation that WDC have not justified the allocation of 425 houses at Westwood Heath. Furthermore, the effect of such housing allocations on the other routes out of Westwood Heath as mentioned above is not known. Therefore it is believed in this representation that this is another reason why Modification 19 part H42 is not soundly justified.

### Reason 4 - The proximity of Warwick University and road links through the university campus:

One of the main routes out of Westwood Heath is via Gibbet Hill Road, which runs through the main campus of Warwick University. It is stated in the Strategic Transport Assessment Appendix A (for Westwood Heath and Kings Hill) that this

road through the university campus is more comparable to a shared space surface with a large number of pedestrians in the area. The university plans to expand and therefore more pedestrians will be in the area crossing Gibbet Hill Road in future. The effect of an additional 425 houses at Westwood Heath will exacerbate the difficulties along this route but WDC have not provided a solution to this major problem. This is believed to be another reason why Modification 19 part H42 is not soundly justified.

#### Reason 5 - Parking at Tile Hill rail station, Coventry:

There is currently a traffic problem in the vicinity of Tile Hill rail station due to there being insufficient parking in the area. Visitors to the station on weekdays have nowhere to park and have to resort to parking further and further away from the station and then walking. The effect of an additional 425 houses at Westwood Heath would result in more people needing to park at the station. This issue does not appear to have been considered by WDC and is therefore another reason why Modification 19 part H42 is not sound.

## Reason 6 - The updated Infrastructure Delivery Plan (Appendix 6 of the report to the Council meeting on 24 February 2016) fails to address the implications of the proposed housing allocation at Westwood Heath:

Item (g) in the WDC letter to the Planning Inspector dated 26 February 2016 refers to the updated Infrastructure Delivery Plan. This Infrastructure Delivery Plan considers the implications and mitigation required to support the modifications, but does not contain any proposals for Westwood Heath. It is stated that work on this plan is ongoing in coming months and beyond. Without any Infrastructure Delivery Plan being considered for Westwood Heath, the Modification 19 part H42 is not justified.

#### Reason 7 - Primary Schools:

There appear to be no plans to consider the need for primary schooling due to the additional 425 houses proposed at Westwood Heath. Therefore, the proposed Modification 19 part H42 has not been justified.

#### Reason 8 - Secondary Schools:

WDC state it will be necessary to consider the capacity of secondary schools in Coventry in relation to the proposed Westwood Heath housing allocation but have no "plan B" in the event Coventry cannot accommodate the extra secondary schooling requirement. Furthermore, WDC do not appear to have considered the effect on Coventry's secondary schooling capacity of the additional 240 houses proposed at Cromwell Lane by Tile Hill railway station in Coventry, which is in close proximity to Westwood Heath. Without this being considered the proposed Modification 19 part H42 is not justified.

## Reason 9 - Sustainability Assessment Addendum Report (SAAR) site screening of H42 Westwood Heath (425 dwellings):

With regard to the site screening of H42, the SAAR relies on the site appraisal undertaken for the previously published report in 2015 (referenced on page 69 of

Appendix V of the Submission Local Plan SA Report of February 2015). No new or updated screening of H42 has been carried out. This is not satisfactory because the February 2015 appraisal for Westwood Heath states on page 69 that at this stage, little detail is known about existing traffic and transport issues and how the allocation [of housing] will affect them. Suitable infrastructure improvements would be required....

This representation against Modification 19 part H42 maintains that the modification is not justified due to the above disclosure in the SAAR that there is a lack of information on fundamental issues such as existing traffic and transport issues.

# Reason 10 - The Sustainability Assessment Addendum Report (SAAR) fails to take into account that a large number of residents in Coventry City commute out of the City to work each day to Warwick, Leamington, Stratford and south Warwickshire generally:

Because the SAAR does not take into account the fact that a large number of Coventry residents commute to Warwick, Leamington, Stratford and south Warwickshire generally for employment and other reasons, the SAAR is not sound. This representation puts forward the proposal that the allocation of 425 houses at Westwood Heath is not justified because there are several reasonable alternative locations identified in the updated SHLAA in places south of Warwick that would be found to be justified and sound on examination.

### Reason 11 - The Sustainability Assessment Addendum Report (SAAR) does not clearly identify what updated baseline information, if any, has been used:

It is not possible to ascertain whether the SAAR has been carried out effectively because the baseline information used is not clear. If no updated information has been taken into account then the SAAR is not sound. In particular there appears to be a serious lack of information and the timing of issue of information pertaining to Westwood Heath. It is likely that such information whether baseline or other information was not issued in time to be used constructively in the SAAR, hence making Modification 19 part H42 unsound.

## Reason 12 - The Sustainability Assessment Addendum Report (SAAR) does not identify what professional judgement has been used. Nor does it explain why it has been necessary to use such professional judgement:

Without knowing what and why professional judgement has been used, as referred to in paragraph 2.8 on page 6/26 of the SAAR, it is not known what effect this has (if any) on Westwood Heath. This is another reason why Modification 19 part H42 is not considered to be sound.

## Reason 13 - The Sustainability Assessment Addendum Report (SAAR) does not appear to justify urban extensions at the edge of Coventry such as at Westwood Heath:

At paragraph 3.24 on page 18/26 of the SAAR, it is stated that urban extensions at the edge of Coventry has a cumulative and potentially major negative effects on landscape/visual amenity and openness through loss of green belt. It is obvious that

this statement does not support housing at Westwood Heath. The statement at paragraph 3.24 continues by stating that provision of urban extensions (with a scale of over 500 dwellings) offers more opportunities for mitigation and enhancement through strong masterplanning and sustainable design. This appears to be a further negative statement as regards housing at Westwood Heath because Westwood Heath is capped at 425 houses and does not fulfil the above criteria of being on a scale of over 500 dwellings. Furthermore, the parties to this representation do not understand how opportunities for mitigation, enhancement through strong masterplanning and the need for sustainable design can be interpreted as reasons to justify additional housing at Westwood Heath. It is therefore put to the Planning Inspector that the SAAR not only fails to justify Modification 19 part H42 but gives reasons why it should not be adopted.

#### Conclusion to the Primary Representation:

It is believed that the above thirteen reasons demonstrate why Modification 19 part H42 might not be legally compliant and is not sound.

With the complexity of all the constraints; the other plans for developments by Warwick University, the Westwood Business Park, the Science Park, Cannon Hill Retail Park to name a few; the impact of HS2; parking issues at Tile Hill railway station; the lack of Primary Schools; poor water pressure in the area; very slow broadband speeds; and all the existing traffic congestion problems (as are acknowledged to exist by WDC) in the vicinity of Westwood Heath, it seems unlikely that any housing allocation at Westwood Heath can be justified and planned successfully within a reasonable timescale, if at all. Furthermore, expansion will be necessary in the future and it is not known if this will be possible due to all the constraints, especially due to the lack of infrastructure and lack of infrastructure feasibility studies being carried out before any detailed infrastructure plans are initiated. There are a lot of unknown factors and many parties involved with conflicting interests. It is known there will be a major loss to the landscape character, the extent of which is not currently recognised, and higher performing green belt land than is currently recognised will be lost. There is also an unknown danger of losing valuable heritage assets and habitats. There are a number of other areas within the SHLAA that are suitable, outside the green belt and within reasonable commuting distance of Coventry and surrounding areas, which the parties to this representation believe are worthy of further consideration as alterative sites to that of Westwood Heath. Such sites already have the infrastructure in place (or have detailed readily achievable improvements planned) located to the south of Warwick. They have similar capacities to that at Westwood Heath and are in single ownership. They are also immediately available for development without any complex constraints and with scope for further expansion if it becomes necessary.

Furthermore, WDC will most probably be required to accommodate further housing because Nuneaton and Bedworth are unlikely to be able to deliver their entire share of the housing overspill from Coventry. WDC has stated it will adjust its Local Plan proposals to address this is in the likely event it will arise, but does not appear to have safeguarded any areas specifically for this eventuality. This is another reason to consider the replacement of Westwood Heath by another site in the SHLAA, possibly

located south of Warwick where there is space to accommodate further such housing needs that will arise.

The parties to this representation believe that Modification 19 part H42 cannot reasonably be amended to make it sound and there are reasonable grounds for requesting consideration is given to its removal from the proposed modifications. If the Planning Inspector wishes to investigate this, then it is respectfully suggested that there are reasonable alternatives within the 2015-2016 SHLAA site assessments, which are outside the green belt. Such sites, which appear to be of sufficient size, are R19, R177 and R187 (or parts of them).

The parties to this representation would like to thank the Planning Inspector for considering the above submission.

#### ALTERNATIVE REPRESENTATION

Alternative representation in the event the Planning Inspector decides not to remove Modification 19 part H42.

If the Planning Inspector decides the above thirteen reasons (and any other representations against H42 by others), individually or collectively, do not carry sufficient weight for him to instruct the removal or substitution of H42 with another suitable site, then the parties to the above representation hereby submit the following as an alternative representation.

This alternative representation is submitted to invite the Planning Inspector to consider how the openness of the green belt can be preserved to the northwest boundary of H42, without affecting the capacity of site H42.

Alternative representation Reason 14 - The northwest boundaries of Modification 19 part H42 shown on Policies Map 35 are not sound because they do not accord with green belt policy under the National Planning Policy Framework (NPPF):

The most western area on the boundary of site reference H42 on Policy Map 35 is an obscure shape located between Old Lodge Farm to the northeast and the public footpath to the southwest. This particular part of the H42 site severely affects the openness of the retained green belt to the north of the site by creating a "bottleneck". Also, the properties of Lodge Farm House and Old Lodge Farm are shown on the said Policy Map 35 as being retained in green belt, but no longer serve any purpose by remaining in the green belt. This is because proposed housing to the fronts and sides of these properties swallows them up. It is therefore submitted by this representation that Modification 19 part H42 generates boundaries that are not consistent with the NPPF policy on green belt. Therefore proposed Modification 19 part H42 is not sound.

This representation proposes that by changing the boundaries of H42 to that shown in the enclosed sketch number 1, which is a marked up copy of Policies Map 35 Westwood Heath), the above non-compliance with green belt policy can be rectified.

In essence, it requires the reinstatement of an area within site H42 on its northwest boundary to green belt and exchange this with a similar area currently shown as retained green belt land in the vicinity of the residential properties Old Lodge Farm and Lodge Farm House. Part of the latter has been assessed by WDC under SHLAA reference C09 in 2014 as being suitable, subject to it being brought forward with an adjacent site (such as the Lodge Farm H42 site) and the owners of the above mentioned properties are willing to make their land available.

If this change is effected it will preserve the openness of the greenbelt and remove a like area of land from green belt which will no longer serve any purpose of being retained in green belt.

## Alternative representation Reason 15 - Modification 19 part H42 is not consistent with proposed future modification numbers 32, 33 and 34:

Proposed future Modification 32 adds a clause (j) to the Landscape Policy NE4 stating, "minimise the loss of the best and most versatile agricultural land."

Proposed future Modification 33 changes clause (d) to the Protection of Natural Resources Policy NE5 to read, "minimise loss of the best and most versatile agricultural land."

Proposed future Modification 34 changes paragraph 5.198 to address increasing pressures on the best and most versatile agricultural land as a result of increasing development allocations.

"...... Development affecting the best and most versatile agricultural land will not be permitted unless it can be shown that development of lower grade land would have overriding adverse sustainability impacts, such as biodiversity, natural resources, landscape character or conservation of heritage assets. ..... "

It is put to the Planning Inspector that Modification 19 part H42 is not compliant with the above proposed future modifications because the boundaries of H42 utilise the best and most versatile agricultural land unnecessarily. By this representation it is requested that consideration is given to amending the boundary of H42 in accordance with the enclosed sketch number 1, as referred to above in Reason 14. This boundary change would reallocate part of the proposed area of housing at Westwood Heath away from agricultural land to an area of largely residential and previously utilised non greenfield land in the vicinity of Lodge Farm House and Old Lodge Farm.

#### Conclusion to the Alternative Representation

The parties to this representation as a whole wish to emphasise that this alternative representation would fall away if the primary representation set out at the beginning of this document, i.e. to remove H42 or substitute it with another suitable site, is accepted and implemented.

It is also believed that this alternative representation if implemented would offer a unique opportunity for high quality self build or custom build sites to be considered for development in the vicinity of the Lodge Farm residences outlined above.

The concept of removing the above Lodge Farm residences out of green belt was discussed verbally with the WDC Local Plan policy manager on 22 February 2016 who then stated that in his view he considered this suggestion was reasonable.

#### LODGE FARM RESIDENTS WHO SUPPORT THESE REPRESENTATIONS

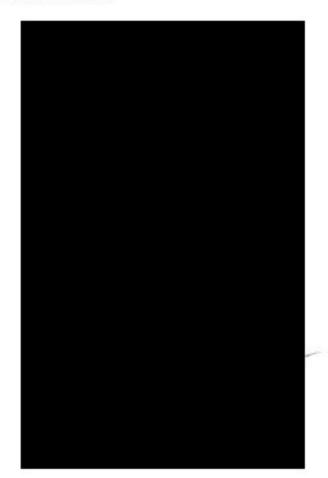
The residents in the vicinity of Lodge Farm at Westwood Heath Road, Coventry, CV4 8AA who make and/or support the above representations are:

Mr D J Hall of Lodge Farm House

Mrs H J Hall of Lodge Farm House

Mr P Pandya of Old Lodge Farm

Mrs D Pandya of Old Lodge Farm



Date 17 April 2016

