

5671

# LOCAL PLAN

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## 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](http://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](http://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	MICHAEL	
Last Name	KELSEY	
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:	H 44

## 5. Do you consider the Local Plan is :

5.1 Legally Compliant?	PROBABLY	Yes	<input checked="" type="checkbox"/>	No	<input 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 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.

SEE ATTACHMENT

ATTACHMENT COVERING MODIFICATION NUMBERS 16 & 14

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.

SEE ATTACHMENT

ATTACHMENT COVERING MODIFICATION NUMBERS 16 & 14

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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Person ID: \_\_\_\_\_ 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

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:

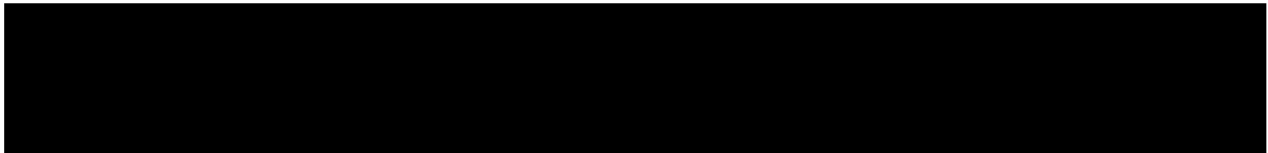
20 April 2016

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.

For Official Use Only

Person ID:

Rep ID:



Development Policy Manager  
Development Services  
Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
CV32 6SA

20 April 2016

To Whom It May Concern

### **Objection to Warwick District Council Local Plan Proposed Modifications Consultation**

**Allocation of Land North of Milverton for Development, mod, no 14 Policy DS15 MapH44  
Removal of land north of Milverton from the Green Belt, no16 Para 2.81 MapH44**

#### **Modifications are Unsound**

The Parish consulting planner's advise that the National Planning Policy Framework requirement of **Exceptional Circumstances** necessary to remove land North of Milverton from the Green Belt, have not been obtained/demonstrated by Warwick District Council. Furthermore both the original Local Plan and the proposed Modifications went ahead before this vital step was established. The warning signs should have been apparent from the local reaction to the original Local Plan and advice given to the District Council by the Parish Council. **The principal of Localism (cooperation) seems to have been completely ignored by the District Council**, a cadre of which individuals appear determined to develop this Green Belt at any cost.

The proposed development is stated to be in support of Coventry City Council's outstanding housing need. There is an awareness that sustainable sites of lower green belt value than land north of Milverton are available much closer to Coventry. These should be used in preference to the much valued land North of Milverton, nearly 10 miles away from Coventry. This would avoid unnecessary additional commuting, increased levels of congestion/pollution, and unnecessary road construction including bridge building over the River Avon.

The urban planning route has been sidestepped in favour of **Developer Options** offered up making it inevitable developers will be able to continue the practice of **Brownfield Site Land Banking** in favour of the **Destruction of the Green Belt**. This section of Green Belt is high value grade 2 agricultural land. It is a vital component of the one remaining commercially viable farming business in the parish, which successfully co-exists with a high value sustainable watershed of wild life habitat (ecosystem). The consequences of removing this vital section of land from the existing Farming Business will be far reaching. It will render the business no longer viable, which will result in serious implications for the remaining sections of farming land south and East of the River Avon, whilst also putting at risk all the existing wildlife corridors which extend from the south and east banks of the River Avon and its flood plain up to both Kenilworth and Northumberland Road.

District Councillors appear to have little concept of the importance of this tract of land for recreational, educational and sustainable food security, or of the associated established Wildlife watershed the local lay public take for granted, or will do until it is lost. A Green Belt wedge is a vital safeguard and amenity which at present prevents developers merging Coventry with Kenilworth and Kenilworth with Leamington. If this were to be lost, there are powerful implication for the maintenance of the integrity of the River Avon, its watershed and wildlife, the very ecosystem it embodies which at present is protected for the people of Leamington, Warwick and Kenilworth

Planners, first priority appears to have been to seek Developer Options available to 'spread the load' of development across the district, rather than **target specific planning locus options**, to commence the planning process and concentrate development to **optimise the transport network and other available infrastructure**. The authors of the Local Plan and its Modifications have decided on the highest cost option arising from maximum infrastructure installation with minimal optimisation of that presently existing. In fact very little detailed planning has been made available merely hinted at; and Certainly **insufficient to hold the Planners and Developers to account**.

A good example of this, is the reluctance to detail a specific site for the proposed Milverton Rail Station, and agree a single site for a Park & Ride. Several sites appear to be under consideration on the plan, one including the site designated for the first phase of developing houses. The proposal to build a new, unnecessary Milverton Railway Station has unusually high cost implications. To be effective, a second track, or a passing track would be required. The present single track passes through a deep cutting in Old Milverton bordered on the west side by a significant part of the total housing stock in the village. The potential disruption and implications for building security is daunting.

There is general agreement that a Park & Ride in this location, even with a dedicated bus services (to which areas?) would have little application and become a white elephant, a total waste of money and of green belt land.

It is unrealistic to expect people travelling to work in Leamington, to deposit their cars and belongings so near and yet so far from work, to wait and pay for a bus which will not deposit them at their place of work. Many will require their car for work use. Locals dropping children off at different schools before proceeding to their place of work and even carrying out a shopping expedition, need their car easily available. Increasingly residents of north Leamington shop out-of-town or in Kenilworth where parking is convenient and can be free.

If a P&R is deemed necessary to resolve parking problems, then a far more useful one should be appropriately sited with dedicated bus services to Warwick Hospital and for tourists visiting Warwick, Warwick Castle and Warwick races.

In admitting that there would be a significant increase in commuting from Leamington and Warwick to Coventry, the very purpose of the A46 Warwick bypass was ignored, and the possibility of exploiting the B4455 Fosseway to create a Leamington/Warwick Ring Road was not indicated as even considered. Such a ring road would be extremely valuable for a Coventry commute from the whole of the district bearing in mind Developers are most likely to build high cost executive houses if permitted to build north of Milverton as proposed. Such buyers are unlikely to be enthusiastic about commuting to Coventry when more attractive options are available. For example to commute to London and Birmingham from one of the **three main line stations already in place on the Birmingham London Commuter line**. Whereas many Warwick, south and central Leamington residents already do and use the A46 Warwick bypass, the rat run through Old Milverton or the heavily congested Kenilworth Leamington road.

### **In Summary**

1. The Plan Modifications proposed create and adds to the existing commuting problems faced by both Leamington and Warwick residents. It is certainly not the solution.
2. Use of, and optimisation of existing resources, mainly infrastructure, is compromised in favour of an incomprehensible initiative to spread the load of housing development across the towns to the detriment of Green Belt Conservation and optimisation of existing planned Infrastructure.
3. Planning, Strategy, Concepts and Detail are remarkably lacking, with the inevitable result that if approved there will be little scope to hold Planners and Developers to Account.
4. Justification for much of what is presented is lacking in terms of National Policy, seemingly paying attention mostly to Developer Interests, which are rarely in the interest of Local Communities and the Fiscal Responsibility, the only legitimate interest of Local Council Planners.

This submission is intended to cover aspects of both sections 14 & 16 modifications (as stated above), together with relevant local background which appears to have been overlooked by the architects of the Local Plan and Modification required.

**For the Modifications to be considered Sound**

I consider the Proposed Modifications to be unsound as it is not Justified, Effective or Consistent with National Policy.

In order to make the 2016 Local Plan Modifications 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, if necessary, which has a lower "Green Belt " value and capable of delivering the required housing.

