

# LOCALPLAN

helping shape the district



## Consultation on Proposed Modifications (2016)

Only  
**Response  
Form**

For Official	

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 (not 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

Mrs

First Name

Susan

Last Name

Illingworth

Job Title (where relevant)

N/A

Organisation (where relevant)

N/A

Address Line 1

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

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes

The adoption of the Local Plan.

Yes

## 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? **Possibly but debatable** Yes ☐ No ☒

5.2 Sound? **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: ☒

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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.

**Modifications 16 and 14 are unsound because:**

Warwick District Council (WDC) is putting forward the land North of Milverton to fulfil Coventry's unmet housing need. Coventry's Local Plan declares that it prefers sites adjacent to the City's existing administrative boundaries. The land North of Milverton is Green Belt. The National Planning Policy Framework requires there to be "Exceptional Circumstances" for removal of such land from the Green Belt. WDC has failed adequately to demonstrate "Exceptional Circumstances". It is good planning practice to consider first any deliverable and developable non-Green Belt land, followed by land that makes a lesser Green Belt contribution, before considering land of greater Green Belt contribution. There are more suitable and deliverable sites adjoining or very much closer to Coventry and Kenilworth including many with lesser Green Belt scores shown by WDC's own Green Belt Study. These would be far more sustainable, reducing commuter traffic into Coventry with its attendant pollution, congestion and new road construction requirements.

Allocating the land North of Milverton for development would reduce the green space between Leamington and Kenilworth and adversely affect the northern gateway into to the historic regency town of Royal Leamington Spa. Building houses over this land with its roads and other infrastructure will impair the environment for all those who value open green space and all that goes with it and will not support Coventry's housing need as much as other more sustainable sites. Further consideration and unbiased analysis should concentrate, but not be limited to Kings Hill, sites adjacent to Coventry airport, sites adjacent to Westwood Heath and Hurst Farm adjoining Warwick University. Furthermore, it is obvious that Government policy favours sites larger the land at Old Milverton, which could not qualify for funding under the Department for Communities and Local Government's Large Sites Infrastructure Programme (last updated 19/10/15) with its 1,500 dwellings minimum, while Kings Hill, Westwood Heath and Hurst Farm could qualify.

The proposal for a Park and Ride development is also unsustainable. These schemes only work where there is a high demand by visitors and where the end destination is uneconomic to visit by car or there is a significant time advantage in using public transport. If such a scheme really can be shown to be necessary, its location would be best on a major existing trunk road such as the A46, probably adjacent to Warwick Parkway rail station or close the Thickthorn Island. If commuters ever use Park and Ride facilities to get to work, they also need to be on a major road system closest to the areas of current and projected employment, i.e. south Coventry and south Leamington, not in north Leamington. The concept of building a railway station in Old Milverton is neither justified nor effective and would only be deliverable at great cost. With railway stations at Leamington Spa, Warwick and Warwick Parkway 2.5, 2.7 and 4.2 miles away respectively by road, this Old Milverton station proposal is unsustainable.

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.

**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 which are closer to Coventry and have a lower "Green Belt" value and are capable of delivering the required housing.**

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.

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

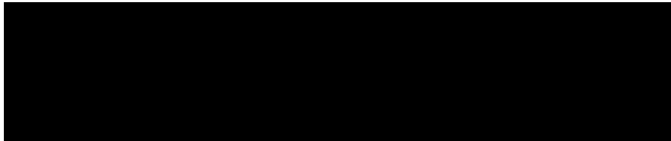
N/A

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: 17 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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