

Leek Wootton & Guy's Cliffe Neighbourhood Plan Response Form 2017

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Leek Wootton & Guy's Cliffe Neighbourhood Development Plan
If you are commenting on multiple sections of the document you will need to complete a separate copy of 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
plan has been made available (see back page). You can also respond online using the LDP Consultation System,
visit: www.warwickdc.gov.uk/neighbourhoodplans

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Andrew	Nick
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Job Title (where relevant)	Strategic Planning Manager	Director
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Notify you when the Neighbourhood Plan is 'Made' (adopted)?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You (optional):		
Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24	<input type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64	<input type="checkbox"/> 65+

Part B - Commenting on the Leek Wootton & Guy's Cliffe NDP

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

All

Paragraph number / Heading / Subheading (if relevant)

Map (if relevant)

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Please note that various documents referenced in these representations as Appendices I - XIII have been submitted in a separate ring binder for the attention of the Examiner.

Place Partnership Ltd objects to the Neighbourhood Development Plan as a whole, on the following grounds:

- a) In advance of a masterplan for the entirety of the Former Police HQ being agreed with the Local Planning Authority (as required by Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029), the Neighbourhood Development Plan is overly prescriptive in relation to development requirements on the site. Paragraph 423 of the Report on the Local Plan Examination (Appendix I) states that the requirement in Policy DSNEW3 to develop the site in line with an agreed masterplan provides a "comprehensive and robust policy basis... to ensure that the impacts on the significance of heritage assets and landscape character are taken into account". Accordingly, it should be for the masterplan to establish the appropriate form and quantum of development to be provided in any particular location within the site, and the attempt to do so in the Neighbourhood Development Plan is therefore considered to be premature. (Please see separate representations regarding Policies LW6 and LW10);
 - b) Despite stating in several places that it acknowledges the need for a whole site approach, the Neighbourhood Development Plan continues to compartmentalise development into separate discrete land parcels based on earlier, now abandoned, site allocations from the then emerging Local Plan (see paragraph 421 of the Report on the Local Plan Examination - Appendix I). This does not accord with Policies DS11 and DSNEW3 of the adopted Warwick District Local Plan 2011-2029, and therefore also paragraph 184 of the NPPF. (Please see separate representations regarding paragraphs 2.6, 2.11, 6.3.9 and Policy LW6);
 - c) The Neighbourhood Development Plan relies on an out of date evidence base, largely ignoring the more recent and comprehensive evidence prepared on behalf of Place Partnership Ltd, which was submitted to the Local Plan Examination and accepted by Warwick District Council. It was this more recent evidence that led to a single allocation for 115 dwellings at the Former Police HQ in Policy DS11 of the adopted Warwick District Local Plan 2011-2029, in lieu of the separate discrete land parcels that the Neighbourhood Development Plan continues to revert to. In particular, the continued reliance on the now superseded AECOM work and Setting Assessment undertaken by
- (cont...)

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(...cont)

Warwick District Council is a major concern, and undoubtedly one of the key drivers for the compartmentalised approach taken in the Neighbourhood Development Plan. (Please see separate representations regarding paragraphs 2.11, 6.2.19, 6.2.21, 6.3.9, 6.3.14 - 6.3.19, 6.3.21, 6.3.23 and Policy LW5);

d) There are statements in the Neighbourhood Development Plan that are potentially misleading and even factually incorrect, particularly in relation to the transfer or management of "The Lunch", and the heritage significance of this woodland. It is essential that the Neighbourhood Development Plan has integrity. Aspirations must be clearly identified as such, and the community must not be misled, albeit unintentionally, in relation to the status and sensitivity of particular assets. (Please see separate representations regarding paragraphs 3.7, 3.8, 3.9, 3.10, 6.1.15, and 6.1.18); and

e) There is no technical evidence referenced in the Neighbourhood Development Plan to support the identified requirements for local highway improvements and developer contributions. Place Partnership Ltd commissioned a Transport Assessment (Milestone Transport Planning, August 2016) for the Former Police HQ, which was submitted to the Local Plan Examination. This demonstrates that development of the site will, at worst, have only a negligible impact on the operation of the surrounding highway network, and that the network has a good safety record (see paragraph 7.3 of Appendix XIII). Furthermore, were significant off-site highway improvements necessary to mitigate the impacts of new development on the Former Police HQ, then this would have been specified in Policy DSNEW3 by the Local Plan Inspector. Instead, paragraph 427 of the Report on the Local Plan Examination (Appendix I) states that there are no fundamental constraints to development on the Former Police HQ. Despite this, the Neighbourhood Development Plan creates an expectation that the development of the Former Police HQ will contribute towards these improvements. This would be contrary to national policy and impact on the viability of the development, which could prejudice the delivery of housing on the site. (Please see separate representations regarding Objective 5 and Policies LW11 and LW12);

Accordingly, Place Partnership Ltd does not consider that the Neighbourhood Development Plan satisfies the basic conditions to proceed to a referendum, set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Specifically, we do not consider that the

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What is the nature of your representation?

Support

X

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

(...cont)

Neighbourhood Development Plan:

a) Is in general conformity with the strategic policies of the development plan, in particular Policies DS11 and DSNEW3 (see Appendix III);

b) Contributes to the achievement of sustainable development, because it is founded on out of date evidence and places unnecessary and unjustified policy burdens on the development of the Former Police HQ; or

c) That it is appropriate to make the Neighbourhood Development Plan having regard to national policies and advice contained in guidance issued by the Secretary of State, particularly paragraphs 184 and 204 of the NPPF (as well as paragraph 122 of the CIL Regulations), which respectively require conformity with the strategic policies of the development plan and planning obligations to be necessary, relevant, and reasonable in scale and kind to the development.

Therefore, the Neighbourhood Development Plan should not proceed to a referendum unless significant modifications are made to fully address the serious concerns raised in these representations.

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Which part of the document are you responding to?

Part 2 - Planning Policy Context

Paragraph number / Heading / Subheading (if relevant)

Paragraph 2.6

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd supports the statement in paragraph 2.6 that the allocation under Policy DS11 of the adopted Warwick District Local Plan 2011-2029 for 115 dwellings at the Former Police HQ now "supersedes the previous more specific allocation of sites within Woodcote".

This is because the Neighbourhood Development Plan must be in general conformity with the strategic policies of the Local Plan, and to do otherwise would mean that the Neighbourhood Development Plan would not satisfy the basic conditions to proceed to a referendum, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

However, despite paragraph 2.6, subsequent sections of the Neighbourhood Development Plan maintain a compartmentalised approach to the development of the Former Police HQ, and therefore Place Partnership Ltd does not consider that the Neighbourhood Development Plan as a whole is in general conformity with the strategic policies of the Local Plan, or that it contributes to the achievement of sustainable development. Separate representations have therefore been made to object to the Neighbourhood Development Plan on those grounds.

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Part 2 - Planning Policy Context

Paragraph number / Heading / Subheading (if relevant)

Paragraph 2.11

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd support the acknowledgement in paragraph 2.11 that the Neighbourhood Development Plan must be in general conformity with the strategic policies of the Local Plan. To do otherwise would mean that the Neighbourhood Plan would not satisfy the basic conditions to proceed to a referendum, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

However, the compartmentalised approach to the development of the Former Police HQ in later sections of the Neighbourhood Development Plan is inconsistent with the whole site approach required in Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029 (see Appendix III).

The Neighbourhood Development Plan also relies on out of date evidence in the form of the AECOM studies.

Accordingly, Place Partnership Ltd does not consider that the Neighbourhood Development Plan as a whole is in general conformity with the strategic policies of the Local Plan, or that it contributes to the achievement of sustainable development. Separate representations have therefore been made to object to the Neighbourhood Development Plan on those grounds.

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Which part of the document are you responding to?

Part 3 - Parish Portrait

Paragraph number / Heading / Subheading (if relevant)

Paragraph 3.7

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (use a separate sheet if necessary).

Whilst it is acknowledged that "The Lunch" has not been actively managed for some time, Place Partnership Ltd do not accept that this area of woodland has been "badly neglected" under the ownership of Warwickshire Police.

In addition, it is considered that the term "woodland management plan" is more appropriate in this context than "complete management plan".

Paragraph 3.7 should therefore be amended to read:

"To the north of the village there is a substantial area of woodland, known as "The Lunch". This is currently part of the Woodcote Estate, and originally formed part of a wooded backdrop to the formal gardens of the listed manor house, having been planted both as a source of fuel and for commercial use as telegraph poles and pit-props. The woodland has not been actively managed since 1948 when the estate was sold to the County Council (subsequently transferred to the Police Authority), and would therefore benefit from a woodland management plan to ensure that it is managed sustainably for the long term."

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Part 3 - Parish Portrait

Paragraph number / Heading / Subheading (if relevant)

Paragraph 3.8

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Although discussions have taken place between Warwickshire Police and the Parish Council regarding the latter's aspiration for ownership of "The Lunch" to be transferred, Paragraph 3.8 is considered to imply that a legal transfer is in the process of being negotiated. This is not the case, and there is no intention to dispose of any part of the Former Police HQ site prior to a comprehensive masterplan being agreed with the Local Planning Authority.

To do otherwise would prejudice the preparation of the masterplan for the entire site, which would not be in conformity with Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029 (see Appendix III) and could hinder the delivery of sustainable development. This would not satisfy the basic conditions for the Neighbourhood Development Plan to proceed to a referendum, set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

Accordingly, Paragraph 3.8 should be amended to read:

"The Parish Council has been instrumental in achieving the designation of part of the woodland as a local wildlife site, and Warwickshire Police have been made aware of the Parish Council's aspiration for "The Lunch" to be transferred into public ownership as amenity land (as acknowledged in the Woodcote Masterplan - see section 6.1)."

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Part 3 - Parish Portrait

Paragraph number / Heading / Subheading (if relevant)

Paragraph 3.9

Map (if relevant)

What is the nature of your representation?

Support

X

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Paragraph 3.9 refers to a "provisional agreement". This could easily be misinterpreted as being linked to the discussions between the Parish Council and Warwickshire Police referenced in Paragraph 3.8. There is no "agreement", provisional or otherwise, between the Parish Council and Warwickshire Police regarding the transfer or management of "The Lunch".

Place Partnership Ltd also object to the use of the term "proper woodland management" in paragraph 3.9. Whilst it is acknowledged that "The Lunch" has not been actively managed for some time, Place Partnership Limited do not accept that this area of woodland has been managed improperly under the ownership of Warwickshire Police.

Accordingly, Paragraph 3.9 should be amended to delete reference to "the provisional agreement" and replace "proper woodland management" with "woodland management", as follows:

"There may be opportunities to develop a project with the Warwickshire College to introduce woodland management as part of their arboriculture teaching programme. The eventual aim would be to restore public access, constructing a series of woodland walks to linked to the 'Jubilee Way' footpath network."

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Part 3 - Parish Portrait

Paragraph number / Heading / Subheading (if relevant)

Paragraph 3.10

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Paragraph 3.10 identifies "The Lunch" as "an important heritage and wildlife asset". Place Partnership Ltd consider that this greatly exaggerates the heritage significance of this area of woodland. As detailed in the Heritage Assessment for the Former Police HQ (Grover Lewis, August 2016) (Appendix XI) submitted to the Local Plan Examination, the garden to Woodcote House and its surrounding parkland is identified by Warwick District Council as being of only local interest (as confirmed in Paragraph 3.23 of the Neighbourhood Development Plan), and a specific boundary to the locally listed park and garden has not, as yet, been defined. Consultation on a proposed boundary was undertaken by Warwick District Council in 2013, but this was drawn relatively tight to Woodcote House, and specifically excluded, inter alia, the vast majority of "The Lunch". It is therefore questionable whether "The Lunch" does, in fact, form part of the locally designated historic park and garden at all.

Furthermore, the significance of the parkland is cumulative, and other than possibly forming part of this wider local designation, "The Lunch" itself has no specific heritage significance.

Accordingly, Paragraph 3.10 should be amended to more accurately reflect the heritage status of "The Lunch" by reference only to its possible inclusion within a locally designated historic park and garden, as follows:

"The Lunch helps to preserve the Green Belt by providing a natural buffer between Leek Wootton and Kenilworth. It also has potential significance as part of a wider locally designated historic park and garden (although the boundaries of this designation have not, as yet, been defined), and as a wildlife asset."

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Place Partnership Ltd welcomes the acknowledgement in Paragraph 4.1 sub section 1 that the "site at Woodcote presents a major opportunity for sensitive development on a brownfield site".

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Support Object

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The first bullet point of Objective 1 seeks to ensure that the natural environment is both protected and enhanced through "improving public access to open spaces within the neighbourhood for a variety of purposes".

Place Partnership Ltd supports this broad aim but objects to the inclusion of "The Lunch" in brackets at the end of the bullet point, as doing so suggests that this particular requirement applies only to that area of woodland and not to other open spaces within the Neighbourhood Development Plan area. There is no explanation as to why this should be the case, and we do not consider that it is appropriate to make this bullet point site-specific. Such references should be included, where appropriate, in the subsequent site-specific policies regarding development on the Former Police HQ site.

Accordingly, the first bullet of Objective 1 should be amended to delete the specific reference to "The Lunch".

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Objective 5 seeks to ensure that the impacts of proposed development are managed effectively and supported by appropriate investment in infrastructure through, inter alia, "considering appropriate measures to improve safety and traffic flow at particular locations within the neighbourhood e.g. the Anchor junction (Warwick Road/Woodcote Lane)...".

Place Partnership Ltd supports this broad aim, but objects to the mention of this specific junction within bullet point 3, as doing so suggests that there is a need for local highway improvements in this location despite there being no technical evidence to support such a position.

It is clearly demonstrated in the Transport Assessment for the Former Police HQ (Milestone Transport Planning, August 2016) submitted to the Local Plan Examination, that following development of the site this particular junction would operate within capacity during the future forecast year 2029 AM and PM peak periods, and that the impact of development-related traffic in terms of queues /delays would be almost imperceptible to road users (see paragraph 7.3 of Appendix XIII). The Transport Assessment also noted that the surrounding highway network, including the Anchor junction specifically, has a good safety record. Furthermore, were significant off-site highway improvements necessary to mitigate the impact of development on the Former Police HQ, then this would have been specified in Policy DSNEW3 by the Local Plan Inspector. Instead, paragraph 427 of the Report on the Local Plan Examination (Appendix I) states that there are no fundamental constraints to development.

Accordingly, the third bullet of Objective 5 should be amended to delete the reference to this particular junction.

To do otherwise would mean that the Neighbourhood Development Plan would not satisfy the basic conditions for a referendum set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Specifically, it creates an expectation that the development of the Former Police HQ will deliver unnecessary off-site highway improvements, which would:

- Be contrary to national policy in the form of paragraph 204 of the NPPF (and paragraph 122 of the CIL Regulations), which requires that planning obligations be necessary, directly related to the development, and fairly and reasonably related in scale and kind to the development;
- Impact on the viability of development at the Former Police HQ, which could potentially make it undeliverable and therefore prevent or hinder the achievement of sustainable development; and

(cont...)

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Support Object

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(...cont)

- c) Prejudice the delivery of housing on the Former Police HQ consistent with Policies DS11 and DSNEW3 of the adopted Warwick District Local Plan 2011-2029, which would then not be in general conformity with the strategic policies in the development plan.
- Therefore, the Neighbourhood Development Plan should not proceed to a referendum unless significant modifications are made to fully address the serious concerns raised in this objection. In addition, Objective 5 bullet point 4 could be interpreted as requiring new developments to reduce the 'noise nuisance' of the A46. Place Partnership Ltd therefore objects to this bullet point on the following grounds:
- a) This is a pre-existing issue, and therefore the responsibility of the relevant Highway Authority;
 - b) The 'noise nuisance' of the A46 is not directly related to new development in Leek Wootton, which will have only a negligible impact on traffic volumes using the A46;
 - c) There is no technical evidence to support the requirement to reduce the 'noise nuisance' of the A46; and
 - d) Reducing the 'noise nuisance' of the A46 would likely involve substantial measures, which could threaten the viability of new developments in Leek Wootton.

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Support Object

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Place Partnership Limited objects to Map 2 on the grounds that it is an out-of-date version of the Warwick District Local Plan 2011-2029 Policies Map for Leek Wootton. It should be substituted for the correct version, which is submitted as Appendix II.

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Part 6.1 - Natural Environment

Paragraph number / Heading / Subheading (if relevant)

Policy LW1

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to landscape design principle 9 of Policy LW1 on the grounds that it imposes excessive and impractical policy requirements on new housing development, and therefore has the potential to prejudice development on the Former Police HQ. Whilst we accept that landscaping schemes should be designed to mitigate the landscape and visual impacts of development, and create a strong sense of place reflecting the distinctive local landscape character, we simply do not consider that it is possible for new housing development to "conserve pastoral character" or "reverse the sub-urbanisation of the landscape". Design principle 9 should therefore be deleted.

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Map (if relevant)

What is the nature of your representation?

Support Object

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Although discussions have taken place between Warwickshire Police and the Parish Council regarding the latter's aspiration for "The Lunch" to be acquired by either Warwick District Council or the Parish Council, there is no intention to dispose of any part of the Former Police HQ site prior to a comprehensive masterplan being agreed with the Local Planning Authority in accordance with Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029.

It is important that the Neighbourhood Plan accurately reflects this position, and therefore Paragraph 6.1.15 should be amended as follows:

"The Lunch is an area of existing woodland which provides opportunities for walking and informal recreation just to the north of the village of Leek Wootton. The landowners (Warwickshire Police) have been made aware of the Parish Council's aspiration for ownership of "The Lunch" to be transferred to a public body such as Warwick District Council and/or the Parish Council for the benefit of the local community and wildlife..."

The above notwithstanding, Place Partnership Ltd is committed to continued dialogue with the Parish Council regarding development on the Former Police HQ site.

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Map (if relevant)

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Support Object

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Although discussions have previously taken place between Warwickshire Police and the Parish Council, there is no intention to dispose of any part of the Former Police HQ site prior to a comprehensive masterplan being agreed with the Local Planning Authority, in accordance with Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029. This Masterplan will determine the future use of "The Lunch" and the former Police playing fields. Accordingly, Place Partnership Ltd considers that paragraph 6.1.18 should be deleted.

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Part 6.1 - Natural Environment

Paragraph number / Heading / Subheading (if relevant)

Policy LW3

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

In accordance with Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029, the future use of "The Lunch" will be determined through a comprehensive masterplan for the entirety of the Former Police HQ site to be agreed with the Local Planning Authority. This will have regard to Policy LW3.

However, Place Partnership Ltd objects to the current wording of Policy LW3, which encourages development in the Green Belt for which there is no established need, and that could have an adverse impact on the amenity of future residential occupiers on the Former Police HQ site. It also imposes a specific requirement on the development of the Former Police HQ, which would be better included within Policy LW5.

Accordingly, Policy LW3 should be amended to read:

"The area of woodland known as "The Lunch" (shown on Map 2 and Map 5) will be protected as a local community resource for its wildlife, recreation and educational value. Opportunities to provide improved pedestrian and cycle accessibility and linkages to the woodland will be supported."

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.15 and Policy LW4

Map (if relevant)

Map 7

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

The acknowledgement in Paragraph 6.2.15 that there are (a) very few long range views into the Former Police HQ site and (b) where there are near views into the site these are largely at least partially obscured, is welcomed.

Place Partnership Ltd also support the requirement in Policy LW4 that new development should be sited and designed to enhance the important views identified in Map 7.

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.18

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to paragraph 6.2.18 on the basis that it refers to "emerging New Local Plan Policy DSNEW3...". The Warwick District Local Plan 2011-2029 (including Policy DSNEW3) has now been adopted, and this paragraph should therefore be amended to read:
"Adopted Warwick District Local Plan Policy DSNEW3..."

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.19

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to the references in paragraph 6.2.19 to the AECOM work, which pre-dates the evidence base prepared and submitted to the Local Plan Examination on behalf of Place Partnership Ltd, including the:

- Former Police HQ Masterplan (GVA, August 2016 - Appendix VII);
- Former Police HQ Capacity Study (GVA, August 2016 - Appendix IX);
- Former Police HQ Transport Assessment (Milestone Transport Planning, August 2016 - Appendix XIII);
- Former Police HQ Heritage Assessment (Grover Lewis, August 2016 - Appendix XI); and
- Former Police HQ Landscape/Visual Impact Update Report (DNS, August 2016 - Appendix XII).

These documents were key to securing:

- a) The deletion of the separate allocations for The Paddock, Land East of Broome Close and the Former Tennis Courts in Policy DS11 of the now adopted Warwick District Local Plan 2011-2029, and their replacement with a single allocation for 115 dwellings on the Former Police HQ site (see also paragraph 421 of the Report on the Local Plan Examination - Appendix I); and
- b) The inclusion of Policy DSNEW3 (Appendix III) in the now adopted Warwick District Local Plan 2011-2029, which introduced the requirement to agree a masterplan for the entirety of the Former Police HQ site (see also paragraph 423 of the Report on the Local Plan Examination - Appendix I).

The initial AECOM study (November 2015) focused on development options only for the Former Tennis Courts and a previous smaller allocation at The Paddock/Land at Broome Close, as opposed to taking a comprehensive approach to the development of the site as a whole. This is inconsistent with the approach of considering the site in its entirety established in Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029, which paragraph 6.3.2 of the Neighbourhood Plan also now acknowledges should be employed. It also significantly underplays the capacity of both parcels when compared with more recent work commissioned by Place Partnership Ltd (as listed above). In addition, although the later AECOM study (February 2016) considered an expanded site area for The Paddock/Land East of Broome Close, it again failed to take a holistic view of the former Police HQ site, resulting in the majority of the parcel being shown as amenity space, when there is already substantial areas of open space within the wider site (i.e. the former police playing fields) that could be used for this purpose. Consequently, the 'preferred option' in the AECOM study (February 2016) delivers only 26 dwellings on a site of 2.56 hectares, which equates to a exceptionally low density of

(cont...)

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.19

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

(cont...)

approximately 10 dwellings per hectare. In contrast, the more recent Capacity Study (GVA, August 2016 - Appendix IX) demonstrates that this area of the site can satisfactorily accommodate in the region of 57 dwellings, which equates to a much more appropriate density of 22 dwellings per hectare.

The more recent evidence base prepared on behalf of Place Partnership Ltd has also been informed by a far greater depth of site analysis than the AECOM studies, including comprehensive Baseline Technical Assessments on Transport, Historic Environment, Landscape and Ecology, Flood Risk and Ground Conditions (June 2015 - Appendix VII).

The reliance of the Neighbourhood Plan on the AECOM studies, when there is more up-to-date and more detailed evidence available that has been accepted by the District Council and the Local Plan Examination, is wholly inappropriate, especially as the AECOM studies present a lower assessment of development capacity.

Paragraph 6.2.19 should therefore either be amended to refer to the more recent Former Police HQ Masterplan and Capacity Study, rather than the earlier AECOM work, or be deleted entirely. To do otherwise would mean that the Neighbourhood Development Plan would not contribute to the achievement of sustainable development (by unduly limiting the development capacity of the site) or be in general conformity with the strategic policies of the development plan (which are founded on the more recent evidence base).

Accordingly, without significant modifications to fully address the serious concerns raised in this objection, the Neighbourhood Development Plan does not satisfy the basic conditions for a referendum as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.21

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to the reference in Paragraph 6.2.21 to a "Heritage Assessment" published by Warwick District Council, on the following grounds:

- a) This is not the correct title of the document, and therefore creates unnecessary confusion about what paragraph 6.2.21 is referring to. The correct title is "The Setting of Heritage Assets at Woodcote House, Leek Wootton";
- b) The document is not "recently published" as stated in paragraph 6.2.21, but was prepared in January 2015. It has since been acknowledged by Warwick District Council and Historic England, in a Statement of Common Ground agreed with Place Partnership Ltd (see Appendix IV) that this document has been superseded by the more recent Former Police HQ Heritage Assessment (Grover Lewis, August 2016 - Appendix XI) prepared on behalf of Place Partnership Ltd and submitted to the Local Plan Examination; and
- c) The document was prepared very quickly ahead of the first round of Local Plan hearings, and assessed the Publication Draft Local Plan allocations at The Paddock, Land at Broome Close and the Former Tennis Courts, rather than the wider site as subsequently allocated under Policies DS11 and DSNEW3. It led directly to the original site allocation being reduced significantly, before the more recent Former Police HQ Masterplan and Capacity Study (both August 2016 - Appendices VII and IX) and associated technical studies successfully demonstrated that a much larger allocation was appropriate.

To rely on this out-dated document when there is more recent evidence available that has directly informed the Warwick District Local Plan allocation for the Former Police HQ is wholly inappropriate, and paragraph 6.2.21 should therefore be amended accordingly.

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.22

Map (if relevant)

What is the nature of your representation?

Support

X

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Despite acknowledging the benefit of replacing the poor quality 1960s concrete office block with a "small-scale, low height development", the fifth bullet point of Paragraph 6.2.22 also suggests that an alternative "could be an extension to the main house incorporating more apartment space". Place Partnership Ltd object to this on the basis that it was agreed with Historic England in a Statement of Common Ground submitted to the Warwick District Local Plan Examination (see Appendix IV) that the removal of the "highly insensitive" 1960s extension to Woodcote House would better reveal its significance. This therefore represents one of the main benefits of the development of the Former Police HQ. Reintroducing the previously rejected idea of an apartment block in this location runs counter to this objective, and therefore the Neighbourhood Development Plan, as currently drafted, does not satisfy the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Specifically, it would not be appropriate to make the Neighbourhood Development Plan "having regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses".

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.2.26

Map (if relevant)

What is the nature of your representation?

Support

X

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Paragraph 6.2.26 identifies the following as "Woodcote's heritage assets":

- Listed Building
- Historic Park and Gardens
- Key Views
- Conservation Area

Place Partnership Ltd objects to the inclusion of "Key Views" in this list. National Planning Practice Guidance (Annex 2: Glossary) defines a "heritage asset" as a "building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest". Views of a heritage asset are not "heritage assets" in their own right, and should not therefore be identified as such.

Paragraph 6.2.26 should therefore be amended to delete the reference to "Key Views".

Notwithstanding the above, it is accepted that there are views into the site, albeit mostly partially obscured, that development on the site should seek to preserve or enhance, consistent with Policy LW4 of the Neighbourhood Plan.

In addition, whilst part of the Former Police HQ site does extend into the Leek Wootton Conservation Area, this is only a very small portion, and excludes the parts of the site where development is likely to take place. This should be acknowledged in Paragraph 6.2.26, so as not to exaggerate that the significance of the Conservation Area in relation to development on the Former Police HQ site.

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Policy LW5

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd welcomes the support in Policy LW5 for a sensitive development comprising a mix of housing, including the conversion of Woodcote House for apartments, on the Former Police HQ site.

However, we object to the requirement in Policy LW5 for new development to be informed, inter alia, by the "Historic Landscape Character Study" for the site. This is the only reference to such a Study in the entire Neighbourhood Plan, and we do not believe that such a document exists. Furthermore, it is unclear if, when and by whom the Study will be carried out. Accordingly, Policy LW5 should be amended to delete the reference to the "Historic Landscape Character Study".

In addition, Place Partnership Ltd objects to the reference in Policy LW5 to the "Heritage Assessment Study", on the following grounds:

- a) This is not the correct title of the document, and therefore creates unnecessary confusion about what Policy LW5 is referring to. The correct title is "The Setting of Heritage Assets at Woodcote House, Leek Wootton";
- b) The document was prepared in January 2015, and it has since been acknowledged by Warwick District Council and Historic England in a Statement of Common Ground (see Appendix IV) that this document has been superseded by the more recent Former Police HQ Heritage Assessment (Glover Lewis, August 2016 - Appendix XI) prepared on behalf of Place Partnership Ltd and submitted to the Local Plan Examination; and
- c) The document was prepared very quickly ahead of the first round of Local Plan hearings, and assessed the Publication Draft Local Plan allocations at The Paddock, Land at Broome Close and the Former Tennis Courts, rather than the wider site as subsequently allocated under Policies DS11 and DSNEW3. It led directly to the original site allocation being reduced significantly, before the more recent Former Police HQ Masterplan and Capacity Study (both August 2016 - Appendices VII and IX) and associated technical studies successfully demonstrated that a much larger allocation was appropriate.

To rely on this out-dated document when there is more recent evidence available that has directly informed the Warwick District Local Plan allocation for the Former Police HQ is wholly inappropriate, and Policy LW5 should therefore be amended accordingly.

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Part 6.2 - Built Heritage

Paragraph number / Heading / Subheading (if relevant)

Policy LW5 - Design Requirement 19

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to Design Requirement 19 of Policy LW5. It is unclear from the Policy or the accompanying explanatory text what materials or architectural language would satisfy this particular Design Requirement. Consequently, it is not possible to determine whether the requirement is, in fact, reasonable or not, and it is considered appropriate for detailed design matters such as this to be addressed at the planning application stage. Accordingly, Design Requirement 19 should be deleted.

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Part 6.3 - Housing

Paragraph number / Heading / Subheading (if relevant)

Paragraphs 6.3.1 and 6.3.2

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd welcomes the acknowledgement in paragraph 6.3.1 that the Former Police HQ site is allocated in the emerging Warwick District Local Plan for 115 dwellings. We also welcome the acceptance in paragraph 6.3.2, that the Neighbourhood Plan needs to follow the approach set out in the emerging Local Plan of considering the site in its entirety, as opposed to 3 separate land parcels.

This is because the Neighbourhood Development Plan must be in general conformity with the strategic policies of the Local Plan, and to do otherwise would mean that the Neighbourhood Development Plan would not satisfy the basic conditions to proceed to a referendum, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). However, Place Partnership Ltd does not consider that the Neighbourhood Development Plan as a whole is in general conformity with the strategic policies of the Local Plan, or that it contributes to the achievement of sustainable development. Separate representations have therefore been made to object to the Neighbourhood Development Plan on those grounds.

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Which part of the document are you responding to?

Part 6.3 - Housing

Paragraph number / Heading / Subheading (if relevant)

Paragraph 6.3.9

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Although we support the Parish Council's view that the most appropriate mix of dwellings on the site would comprise 2, 3 and 4 bedroom houses and some apartments, Place Partnership Ltd objects to the suggestion in paragraph 6.3.9 that different types of housing could be focused on specific parts of the site. We also object to the breakdown of the 115 unit allocation for the Former Police HQ site across the 3 component development parcels. This is overly prescriptive, and runs counter to the adopted Warwick District Council Local Plan approach of considering the site in its entirety, which paragraph 6.3.2 of the Neighbourhood Plan acknowledges should now be adopted. This was also the basis on which the Local Plan Inspector considered the site at Examination (see paragraph 4.21 of the Report on the Local Plan Examination - Appendix I).

The current approach employed by the Neighbourhood Development Plan is founded in an out of date evidence base in the form of the AECOM studies (also see representations in relation to paragraph 6.2.19) and the Warwick District Council document "The Setting of Heritage Assets at Woodcote House, Leek Wootton" (also see representations in relation to paragraph 6.2.21 and Policy LW5), as opposed to the more recent Former Police HQ Masterplan, Capacity Study and Heritage Assessment (all August 2016 - Appendices VII, IX and XI) prepared on behalf of Place Partnership Ltd and submitted to the Local Plan Examination.

It is this more recent evidence that has directly informed the Warwick District Local Plan allocation for the Former Police HQ, and it is considered wholly inappropriate for the Neighbourhood Plan to ignore it.

As a result the Neighbourhood Development Plan continues to adopt a compartmentalised approach to the development of the Former Police HQ, which is inconsistent with the whole site approach required in Policy DSNEW3 of the adopted Warwick District Local Plan, and Paragraph 6.3.9 should therefore be deleted.

To do otherwise would mean that the Neighbourhood Development Plan would not satisfy the basic condition of being in general conformity with the strategic policies of the development plan, as required by paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Accordingly, the Neighbourhood Development Plan should not proceed to a referendum unless significant modifications are made to fully address the serious concerns raised in this objection.

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Part 6.3 - Housing

Paragraph number / Heading / Subheading (if relevant)

Paragraphs 6.3.14 - 6.3.19

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Whilst it is acknowledged in paragraph 6.3.19 that the AECOM proposals are "merely indicative of what might be achieved and are not prescriptive", Place Partnership Ltd objects to the reliance on the AECOM studies as the basis for guiding development on the Former Police HQ site, and particularly the distribution of housing numbers across the site.

The AECOM studies of November 2015 and February 2016 pre-date the following evidence base prepared and submitted to the Local Plan Examination on behalf of Place Partnership Ltd:

- Former Police HQ Masterplan (GVA, August 2016 - Appendix VII);
- Former Police HQ Capacity Study (GVA, August 2016 - Appendix IX);
- Former Police HQ Heritage Assessment (Grover Lewis, August 2016 - Appendix XI); and
- Former Police HQ Landscape/Visual Impact Update Report (DNS, August 2016 - Appendix XII); and
- Former Police HQ Transport Assessment (Milestone Transport Planning, August 2016 - Appendix XIII);

These documents were key to securing:

- a) The deletion of the separate allocations for The Paddock, Land East of Broome Close and the Former Tennis Courts in Policy DS11 of the now adopted Warwick District Local Plan 2011-2029, and their replacement with a single allocation for 115 dwellings on the Former Police HQ site; and
- b) The inclusion of Policy DSNEW3 in the now adopted Warwick District Local Plan 2011-2029 (see Appendix III), which introduced the requirement to agree a masterplan for the entirety of the Former Police HQ site.

The initial AECOM study (November 2015) focused on development options only for the Former Tennis Courts and previous smaller allocation at The Paddock/Land at Broome Close, as opposed to taking a comprehensive approach to the development of the site as a whole. This is inconsistent with the approach of considering the site in its entirety established in Policy DSNEW3 of the adopted Warwick District Local Plan 2011-2029, which paragraph 6.3.2 of the Neighbourhood Plan also now acknowledges should be employed. It also significantly underplays the capacity of both parcels when compared with more recent work commissioned by Place Partnership Ltd (as listed above). In addition, although the later AECOM study (February 2016) considered an expanded site area for The Paddock/Land East of Broome Close, it again failed to take a holistic view of the Former Police HQ site, resulting in the majority of the parcel being shown as amenity space, when there is already substantial areas of open space within the wider site (i.e. the former police playing fields) that could
(cont...)

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Paragraph number / Heading / Subheading (if relevant)

Map (if relevant)

What is the nature of your representation?

Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

(cont...)

be used for this purpose. Consequently, the 'preferred option' in AECOM study (February 2016) delivers only 26 dwellings on a site of 2.56 hectares, which equates to an exceptionally low density of approximately 10 dwellings per hectare. In contrast, the more recent Capacity Study (GVA, August 2016) demonstrates that this area of the site can satisfactorily accommodate in the region of 57 dwellings, which equates to a much more appropriate density of 22 dwellings per hectare. The more recent evidence base prepared on behalf of Place Partnership Ltd has also been informed by a far greater depth of site analysis than the AECOM studies, including comprehensive Baseline Technical Assessments on Transport, Historic Environment, Landscape and Ecology, Flood Risk and Ground Conditions (June 2015 - Appendix VIII). The reliance of the Neighbourhood Plan on the AECOM studies, when there is more up-to-date and more detailed evidence available that has been accepted by the District Council and the Local Plan Examination, is wholly inappropriate, especially as the AECOM studies present a lower assessment of development capacity. Paragraphs 6.3.14 - 6.3.19 should therefore either be amended to refer to the more recent Former Police HQ Masterplan and Capacity Study, rather than the earlier AECOM work, or be deleted entirely. To do otherwise would mean that the Neighbourhood Development Plan would not contribute to the achievement of sustainable development (by unduly limiting the development capacity of the site) or be in general conformity with the strategic policies of the development plan (which are founded on the more recent evidence base). It would not therefore satisfy the basic conditions for proceeding to a referendum as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Accordingly, the Neighbourhood Development Plan should not proceed to a referendum unless significant modifications are made to fully address the serious concerns raised in this objection.

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Part 6.3 - Housing

Paragraph number / Heading / Subheading (if relevant)

Paragraphs 6.3.21 and 6.3.23

Map (if relevant)

Appendix II

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to paragraphs 6.3.21 and 6.3.23 on the grounds that they rely on an old study that has now been supplemented by the more recent evidence base prepared on our behalf and submitted to the Local Plan Examination. In particular, no regard has been had to the Former Police HQ Landscape/Visual Update Report (see Appendix XII) which concludes that the Former Police HQ Masterplan and Capacity Study (see Appendices VII and IX):

"...demonstrate a landscape led approach, retaining all of the significant landscape features that make up the landscape character of the parkland setting and delivering new residential development that will retain the overall integrity of the parkland and setting of Woodcote Manor House."

It is this more recent evidence that has directly informed the Warwick District Local Plan allocation for the Former Police HQ, and it is wholly unreasonable for the Neighbourhood Development Plan to ignore it.

Paragraphs 6.3.21 and 6.3.23 should therefore be amended to acknowledge this more recent evidence.

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Part 6.3 - Housing

Paragraph number / Heading / Subheading (if relevant)

Policy LW6

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to Policy LW6 for the following reasons:

- a) It seeks to compartmentalise the site and divide the 115 unit allocation into 3 distinct development schemes, contrary to the whole site approach established in Policy DSNEW3 of the adopted Warwick District Local Plan (see Appendix III), which paragraph 6.3.2 of the Neighbourhood Plan acknowledges should now be adopted (see also paragraph 4.21 of the Report on the Local Plan Examination - Appendix I).
- b) Policy DSNEW3 of the adopted Local Plan requires that a masterplan be agreed with the Local Planning Authority for the entirety of the site in advance of a planning application being submitted. This masterplan will establish the appropriate quantum of development on the various land parcels comprising the site. Indeed, paragraph 423 of the Report on the Local Plan Examination (Appendix I) states that the need to develop the Former Police HQ in line with an agreed masterplan provides a "comprehensive and robust policy basis... to ensure that the impacts on the significance of heritage assets and landscape character are taken into account". It is therefore premature and unnecessary for Policy LW6 to be so prescriptive in this regard;
- c) The necessity for Policy LW6 in its entirety is questionable, given that it relies on an out of date evidence base, Policy LW5 already establishes the key design guidelines for development on the site, and Policy DSNEW3 of the adopted Warwick District Local Plan requires that a masterplan for the entire site be agreed with the Local Planning Authority. Also, much of the policy content in LW6 is descriptive, as opposed to prescriptive, and therefore better included as explanatory text; and
- d) Policy LW6 sets out car parking standards which are entirely consistent with the Warwick District Council Vehicle Parking Standards SPD (adopted 2007). It is therefore unclear why it is necessary for the Neighbourhood Development Plan to restate this, when it is already adopted policy at the District level. In addition, the adopted Warwick District Local Plan acknowledges that the current Vehicle Parking SPD will need to be reviewed to ensure it is consistent with the NPPF and more recent census data on car ownership and usage. This suggests that parking standards could change, which could then make the Policy LW6 out of date in this regard. It would therefore be better for the policy to refer to the District Council's "adopted SPD" instead of specifying numbers of spaces, if it is even necessary to do so at all.

(cont...)

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Paragraph number / Heading / Subheading (if relevant)

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

(...cont)

Consequently, Place Partnership Ltd considers that the Neighbourhood Development Plan is not in general conformity with strategic policies in the development plan. It does not therefore satisfy the basic conditions for proceeding to a referendum set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended), and Policy LW6 should be deleted.

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Part 6.4 - Community

Paragraph number / Heading / Subheading (if relevant)

Policy LW10

Map (if relevant)

Map 10

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to Policy LW10 and Map 10 on the following grounds:

- a) Policy DSNEW3 of the adopted Warwick District Local Plan (see Appendix III) requires that a masterplan be agreed with the Local Planning Authority for the entirety of the site in advance of a planning application being submitted. This masterplan will establish the requirement for, location and extent of any necessary outdoor sports and recreation facilities in connection with development at the Former Police HQ. Policy LW10 is therefore premature in seeking to define an area of Local Green Space within the site;
- b) Map 10 is not of sufficient scale or detail to adequately define the boundaries of the Local Green Space having regard to future development on the site, especially as the detail of the latter has yet to be established through a masterplan to be agreed with the Local Planning Authority, in accordance with Policy DSNEW3; and
- c) The Former Police HQ is currently private property, and any existing outdoor sports and recreation facilities on the site are provided solely for use by Warwickshire Police. Public access is strictly controlled, and pending a masterplan for the entire site being agreed with the Local Planning Authority, it is premature to suggest that the playing pitches on the Woodcote site will be used by "various sports clubs" or that the site should accommodate development to meet the needs of those clubs.

Accordingly, Map 10 should be amended to delete the Local Green Space boundary, and the current wording of Policy LW10, insofar as it relates to the Former Police HQ, should be amended to read:

"Proposals that deliver new outdoor sports and recreation facilities at the Former Police HQ for use by the local community will be supported, together with any necessary associated built development, subject to careful siting and design in accordance with Policy LW5."

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Part B - Commenting on the Leek Wootton & Guy's Cliffe NDP

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Sheet of

Which part of the document are you responding to?

Part 6.5 - Transport, Infrastructure etc

Paragraph number / Heading / Subheading (if relevant)

Policy LW11

Map (if relevant)

Map 11

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to Policy LW11 and Map 11 on the following grounds:

- a) Map 11 shows pedestrian routes through "The Lunch" which do not currently exist, and are therefore presumed to be indicative, although this is not sufficiently clear from sub section 2 of Policy LW11. Policy DSNEW3 of the adopted Warwick District Local Plan requires that a masterplan be agreed with the Local Planning Authority for the entirety of the Former Police HQ site in advance of a planning application being submitted. It is therefore premature and unnecessary for Policy LW11 to do more than identify indicative routes;
- b) Sub section 3 of Policy LW11 sets out car parking standards which are entirely consistent with the Warwick District Council Vehicle Parking Standards SPD (adopted 2007). It is therefore unclear why it is necessary for the Neighbourhood Development Plan to restate this, when it is already adopted policy at the District level (and set out in Policy LW6 too) In addition, the adopted Warwick District Local Plan acknowledges that the current Vehicle Parking SPD will need to be reviewed to ensure it is consistent with the NPPF and more recent census data on car ownership and usage. This suggests that parking standards could change, which could then make Policy LW11 out of date in this regard. It would therefore be better for the policy to refer to the District Council's "adopted SPD" instead of specifying numbers of spaces, if it is even necessary to do so at all.

Accordingly, Policy LW11 sub section 2 should be amended to read:

"Existing footpaths within development sites must be retained. Proposals which deliver new pedestrian routes linking to existing public footpaths and roadways and to the village centre will be supported. Possible pedestrian routes are shown on Map 11."

Sub section 3 of Policy LW11 should be deleted.

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Part 6.5 - Transport, Infrastructure etc

Paragraph number / Heading / Subheading (if relevant)

Policy LW12

Map (if relevant)

Map 12

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Whilst Place Partnership Ltd is supportive of measures to improve road safety generally, we object to the specific requirement in Policy LW12 to seek developer contributions, on the following grounds:

a) The traffic issues identified in the accompanying explanatory text to Policy LW12 are largely pre-existing and there is no transport evidence referenced in the Neighbourhood Development Plan to demonstrate how new development specifically would exacerbate the situation, or its impacts would be mitigated by the identified improvements;

b) It is clearly demonstrated in the Transport Assessment for the Former Police HQ (Milestone Transport Planning, August 2016 - Appendix XIII) submitted to the Local Plan Examination that, based on a comparative assessment of trip demands associated with the existing permitted uses on the site, development of the Former Police HQ will, at worst, have only a negligible impact on the operation of the surrounding highway network (see paragraph 7.3 of Appendix XIII). It was also noted in the Transport Assessment that the surrounding highway network has a good safety record;

c) Were significant off-site highway improvements necessary to mitigate the impact of development on the Former Police HQ, then this would have been specified in Policy DSNEW3 of the Warwick District Local Plan 2011-2029 by the Local Plan Inspector. Instead, paragraph 427 of the Report on the Local Plan Examination (Appendix I) states that there are no fundamental constraints to development; and

d) Footnote 19 on page 75 of the Neighbourhood Development Plan acknowledges that although Warwickshire County Council are supportive of some of the thinking underpinning Policy LW12, "it is nonetheless clear that eventual traffic management initiatives will need to be framed in the context of the Masterplan for Woodcote, and the associated, more detailed housing development proposals and plans for changes to road layouts etc. in nearby settlements, especially Kenilworth".

In seeking developer contributions towards improvements without appropriate evidence the Neighbourhood Development Plan would not satisfy the basic conditions for a referendum set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Specifically, Policy LW12 creates an expectation that the development of the Former Police HQ will deliver off-site highway improvements, the need for which is not supported by technical evidence. This would:

(cont...)

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Part 6.5 - Transport, Infrastructure etc

Paragraph number / Heading / Subheading (if relevant)

Policy LW12

Map (if relevant)

Map 12

What is the nature of your representation?

Support

Object

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(...cont)

- a) Be contrary to national policy in the form of paragraph 204 of the NPPF (and paragraph 122 of the CIL Regulations), which requires that planning obligations be necessary, directly related to the development, and fairly and reasonably related in scale and kind to the development;
- b) Impact on the viability of development at the Former Police HQ, which could potentially make it undeliverable and therefore prevent or hinder the achievement of sustainable development; and
- c) Prejudice the delivery of housing on the Former Police HQ consistent with Policies DS11 and DSNEW3 of the adopted Warwick District Local Plan 2011-2029, which would then not be in general conformity with the strategic policies in the development plan.

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Paragraph number / Heading / Subheading (if relevant)

Map (if relevant)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Place Partnership Ltd objects to the inclusion of Appendices III - V in the Neighbourhood Development Plan on the grounds that they are all now out of date following the adoption of the Warwick District Local Plan 2011-2029. None are specifically referenced anywhere within the main body of the Neighbourhood Development Plan. Appendices III - V should therefore be deleted.

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Guidance on Making Representations

- Please use this response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at www.warwickdc.gov.uk/neighbourhoodplans
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. **If your address or email details change, please inform us** in writing
- All forms should be received by **4.45pm on Friday 13 October 2017**
- Copies of all the 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 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 planning policy documents and with consideration of planning applications in accordance with the Data Protection Act 1998
- Please return this form to: Business Manager, Policy & Development, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH or email: newlocalplan@warwickdc.gov.uk