



Warwickshire  
**POLICE**



West Mercia  
**POLICE**

**POLICY TC8: WARWICK CAFÉ QUARTER**  
**POLICY TC17: LOCAL SHOPPING FACILITIES**

- 7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Whilst we do not dispute the economic benefits that converting Use Class A1 retail units to Use Classes A3, A4, A5 and D2 units would bring to the locations covered by Policies TC8 and TC17, we are deeply concerned about the following problems in the Local Plan: -

1. No specific policy and supporting explanation on the evening and night-time economy.
2. What guidance there is in the Local Plan on this matter is fragmented and ineffectual.

Evening and night-time economy related development is the most resource intensive type of development that the emergency services have to attend to on an-going weekly basis. We would therefore like to see the following in the Local Plan: -

1. Policy and guidance that sets out in a clear and concise way where and when evening/night-time economy related development will be located and delivered within Warwick District. Whilst this information can be predicted from reviewing the Local Plan as a whole, it would be much better if a clear list of sites was provided in a similar manner to proposed housing and employment sites. This would in turn help stakeholders like the emergency services to undertake their own planning work in relation to this type of development.
2. Providing sufficient policy and supporting guidance in terms of explaining how the well documented negative side effect of evening/night-time economy related development will be actively managed. This is essential in order to ensure that the public are safe and feel safe and thereby secure the maintenance of The Queen's Peace in the District.
3. Establishing the basis by which public sector agencies, private companies and other stakeholders will work together to coordinate the active management of the evening/night-time economy in Warwick District. The relationship between the partnership work concerning the planning system and that taking place in respect of implementing licensing arrangements, as required by the Police Reform and Social Responsibility Act 2011, also requires explanation in the Local Plan.
4. Providing sufficient encouragement for development proposals relating to the evening/night-time economy to: -
  - Locate in preferred locations for this type of development;
  - Positively integrate with surrounding uses; and
  - Provide a high quality, safe and secure public realm.

In our experience, a lack of good quality planning and subsequent follow-up active management after delivery simply equates to a rise in crime and anti-social behaviour levels in direct proportion to the increase in licensed premises. This in turn places excessive and sometimes unsustainable demands on the emergency services and local medical facilities. If this were to come to pass, it would be in contravention of Section 110 of the Localism Act and Section 17 of the Crime and Disorder Act 1998 (as amended by Schedule 9 of the Police and Justice Act 2006).

Notwithstanding all of these issues, it is also worth noting that the introduction of the National Planning Policy Framework (NPPF) meant that previous national guidance on the evening/night-time economy set out in Planning Policy Statement 4 – '*Planning for Sustainable Economic Growth*' (2009) (PPS4) is no longer in effect. For the avoidance of doubt at this juncture, the following policies of PPS4 were relevant: -

- EC3.1 (h)
- EC4.1 (f)
- EC4.2; and
- A9 and A12

There is consequently a need for robust guidance in the Local Plan to address the specific problems highlighted above, but also to address the lack of policy in the NPPF covering the evening/night-time economy.

Alongside considering the points made above, we ask that the following facts be borne in mind as these representations are being considered: -

- The '*Warwickshire Drug and Alcohol Treatment Needs Assessment 2012/13*', prepared by the Warwickshire Observatory, stated that Warwick District has the second highest rate of alcohol attributed recorded crimes in the County at 25%.
- The Warwickshire Observatory, in its report '*Warwickshire Violent Crime Analysis Brief*' (February 2014), stated that data for Warwick Hospital and George Eliot Hospital (Nuneaton) for September to December 2013 showed that 60% of assault victims can be directly linked to alcohol, where the victim has admitted they had been drinking at the time of the attack.
- West Mercia Police carried out an analysis of the impact of the evening/night-time economy, in terms of crime and anti-social behaviour incidents, in Worcester in 2013. This involved examining the crimes and incidents experienced by a representative sample of 7 licensed clubs over a 7 year period. The analysis demonstrated that those areas which have licensed bars and clubs will suffer disproportionately from crime and anti-social behaviour relative to those areas that do not.
- The available data also showed that when crime and anti-social behaviour incidents did take place at licensed bars and clubs in Worcester, intervention by the establishments themselves to resolve them accounted for only between 7% and 21% of incidents. Police intervention accounted for the remainder; between 93% and 79% of incidents respectively. As there is a current trend of a growing number of crime and anti-social behaviour incidents in Worcester related to the evening/night-time economy, there will be a corresponding requirement for increased police and emergency service resource to serve the evening/night-time economy.

- Whilst there was insufficient time available to undertake a similar detailed analysis of bars and clubs in Warwick District, we consider it reasonable to assume that the above patterns of crime and anti-social behaviour incidents will be replicated, if the evening/night-time economy develops as envisaged by the Local Plan without sufficient robust planning policies being put in place.
- The main objectives of the South Warwickshire Community Safety Partnership, of which the Council is a principle member, include tackling the violence in the night-time economy and the harm resulting from excessive alcohol consumption.

**8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan 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.**

We recommend that the evening/night-time economy should be the subject of a specific planning policy and supporting explanation within the Local Plan. As detailed above, the realisation of a successful evening/night-time economy requires careful regulation at the outset and active on-going management once operational.

Whilst it is not within the remit of the police service to write large amounts of planning guidance, we have enclosed (**Appendix 1**) with these representations the text of a policy and reasoned justification we agreed with Wyre Forest District Council that was included in their Kidderminster Central Area Action Plan (adopted July 2013). This provides an example of the type of policy we would like to see in the Warwick District Local Plan covering evening/night-time economy related development.

In addition, a further example of the type of planning policies we would like to see in the Warwick District Local Plan covering the evening/night-time economy are those set out on pages 80-83 of the Central Telford Area Action Plan (adopted March 2011) (see **Appendix 2**), prepared by Telford & Wrekin Council in consultation with us.

Notwithstanding the above, we would be very willing to work with the Council in the preparation of the new planning guidance to cover this area. We can be contacted in this regard via the details given in these representations.

## BE1 LAYOUT AND DESIGN

7. **Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We welcome and support part (i) of BE1 in so far as it is written, however we consider its effectiveness is undermined through lack of a direct reference to 'Secured by Design'. The omission is surprising, given that paragraph 5.9 of the supporting Explanation does reference Secured by Design.

Policy support for Secured by Design would help to ensure new developments comply with a nationally recognised consistent standard. This in turn would mean they would contribute to the achievement of the Government's objectives for the planning system set out in paragraphs 58 and 69 of the National Planning Policy Framework (NPPF).

In case the Council and Inspector are not aware, Secured by Design is a long-running flagship initiative of the Association of Chief Police Officers (ACPO). Its objective is to design out crime during the planning process. It is a respected standard in the sector, supported by numerous local authorities (including Warwick District Council) and professional bodies and is therefore, a vital guidance resource for planners.

Independent research has shown that homes with low level security suffer far more burglaries than those with Secured by Design level security, whilst criminal damage is reduced by 25%. In one year alone for example, some 700,000 burglaries nationwide could have been thwarted if appropriate Secured by Design measures had been installed, according to Professor Ken Pease OBE and Professor Martin Gill of Perpetuity Research – an independent organisation which specialises in looking at crime reduction, community safety and security. Furthermore, The Future Homes Commission report in October 2012 noted that 43% of people view security as the most important aspect of homes.

The problem with part (i) of the policy as it stands is that it is open to interpretation by all parties, which will seriously undermine its effectiveness in soundness terms. As explain above however, Secured by Design is a recognised consistent standard that will remain in existence throughout the life of the Local Plan. It is also a scheme which is continually managed and updated through the joint efforts of the police, landowners, housing associations, councils, architects and developers in a holistic multi-faceted approach. It is and will remain the "*Gold Standard*" by which proposed measures in new developments for designing out crime can be judged.

The Inspector and Council can be assured that the above points about Secured by Design have been accepted by other planning authorities in the geographical area covered by Warwickshire Police and West Mercia Police, namely: -

- Bromsgrove District Council – Bromsgrove District Plan: Proposed Submission Version 2011-2030 – Policy BDP19 '*High Quality Design*' – paragraph 8.261.
- Nuneaton & Bedworth Borough Council – Borough Plan: Preferred Options – Policy ENV3 '*Urban Character and Design Quality Policy*'

- Redditch Borough Council – Borough of Redditch Local Plan No.4: Proposed Submission Document – Part (vi) of Policy 40 ‘*High Quality Design and Safer Communities*’.
  - Stratford-on-Avon District Council – Core Strategy: Proposed Submission Version (June 2014) – Part B of Policy CS.9 ‘*Design and Distinctiveness*’.
  - Wyre Forest District Council – Kidderminster Central Area Action Plan (adopted July 2013) – Part (j) of Policy KCA.UP1 ‘*Urban Design Key Principles*’.
  - Wyre Forest District Council – Site Allocations and Policies Local Plan 2006-2026 (adopted July 2013) – Part (vii) of Policy SAL.UP7 ‘*Quality Design and Local Distinctiveness*’.
8. **Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan 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.**

For the reasons detailed above and to resolve all of our concerns, we request the following amendments to part (i) of BE1: -

- i) incorporate building and street design and layout to reduce crime and the fear of crime in accordance with the standards and principles of Secured by Design.*



### Leisure and Cultural Economy

#### Leisure Objectives

The overall leisure objectives for the KCAAP area are to :

- Develop the entertainment and cultural offer.
- Improve the evening economy.
- Encourage the number and variety of events and performances.
- Attract a major leisure development (i.e. cinema, bowling alley).

There is a desire to develop the cafe and restaurant opportunities in the town.



**5.59** A key aim for the KCAAP is to continue to develop the leisure and cultural offer of the town. This is also essential if the aspiration for Kidderminster to become the tourism hub of the District is to be realised. The District Council will promote and encourage the provision, enhancement, and diversification of Kidderminster's leisure and cultural facilities. Particular encouragement will be given to expanding the town's evening offer.

**5.60** The diversification of the entertainment attractions that enhance

the vitality of Kidderminster Town Centre will be improved by:

- Promoting a street café culture in the town centre's pedestrianised areas, public realm spaces, and along the river and canalsides.
- Encouraging the provision of new restaurants, bars, music venues, and other licensed premises.
- Promoting the creation and use of multi-purpose public spaces for public entertainment.
- Encouraging the holding of events within the town centre, particularly in the evening.

#### Policy KCA.GPB7

##### Leisure Development

Major new D2 leisure and multiple-unit A3 and A4 food and drink developments will be concentrated towards the waterside environments of the Western Gateway area.



Other leisure developments will be supported throughout the Primary Shopping Area subject to these being in line with the site specific policies in Part B and the relevant policies in the Site Allocations and Policies Local Plan. Elsewhere in the KCCAP area, smaller scale proposals will be considered favourably subject to them meeting the broad objectives of the KCAAP.

The enhancement of the Town Hall and its use as a multi-functional venue for the arts will be encouraged.

### Evening Economy

The District Council will encourage developments that enhance the evening and night-time leisure offer of the town centre. A balanced mix of uses will be specifically encouraged, including late-night shopping, cafes, restaurants, bars, take-aways, clubs and cultural activities.

No development should on its own, or cumulatively with other uses, create an unacceptable impact on neighbouring uses or the surrounding area by reasons of noise pollution, light pollution, anti-social behaviour, crime, disturbance or traffic.

Developments should seek to ensure activity during the daytime to avoid the clustering of 'dead' frontages.

Developments linked to the evening economy will be required to contribute towards public realm and infrastructure improvements in order to improve the sense of well being, safety and security within the town. Contributions to improving the public transport for the benefit of the evening economy will be particularly encouraged.

Working in partnership with the Council and other stakeholders, owners and operators of evening economy related development will be expected to take part in active management measures to help the public and support the emergency services.

Developments linked to the evening economy should also have specific regard to Policy KCA.UP1 and ensure that development incorporates 'Secured by Design Principles.

## Reasoned Justification

### Cultural Economy

**5.61** The idea of a cultural economy is closely associated with the KCAAP aim to improve Kidderminster's status as a tourism destination. The existing Severn Valley Railway and Railway Museum, as well as the newly established Carpet Museum, already play a big part in the town's cultural economy by virtue that they celebrate its heritage. Similarly, the conservation of the town's historic buildings and the enhancement of its waterways also have an important contribution to make.



**5.62** The Town Hall is at the heart of the town centre and has an important role in the improvement of Kidderminster's cultural offer. The Town Hall already plays host to numerous events and shows and is a real asset to the town. The enhancement of the Town Hall and its use as a multi-functional venue for the arts will be encouraged. This will help to promote its reputation as a quality performance venue and seek to increase the diversity of shows that will contribute to the town's cultural and visitor economy.

Multifunctional event space is important to develop the leisure and cultural economy.



**5.63** A number of town centre areas have been identified as future important public spaces. These spaces will also be expected to be multi-functional and be able to host outdoor events and performances. Free public events make an important contribution to the quality of life in the town and the District Council will continue to promote and encourage them.

### Commercial Leisure

**5.64** Kidderminster has a lack of leisure facilities, particularly those that would appeal to the more family-orientated market. As an example, there is demand in the town for a multiplex cinema, and residents currently need to travel to either Merry Hill, Telford or Worcester.

**5.65** The District Council will encourage the provision of leisure facilities to help to improve and diversify Kidderminster's leisure offer and add to the vitality of the town centre. The focus for these uses will be towards the canalside areas of town and the site specific policies in Part B set out suitable locations in more detail.

### Evening Economy

**5.66** Despite being the strategic centre of the District, Kidderminster has traditionally had a less successful evening economy than Stourport-on-Severn and Bewdley. The town has a real deficiency in this respect and its evening offer is limited in terms of both quantity and variety. In particular, the town lacks facilities such as restaurants, bars, music venues and other licensed premises that would usually provide life to a town during the night. There is also a distinct lack of family-orientated evening uses and the town currently only appeals to a very narrow sector of society.

**5.67** The result of this lack of activity is that the town centre is very quiet in the evening and becomes an unwelcoming place which provides opportunities for anti-social behaviour. This is especially true for the canalside area which is currently an underutilised cultural asset.



**5.68** The ambition is to increase the diversity of the entertainment offer in order to increase the number of people in town during the evening and improving natural surveillance and vibrancy.

**5.69** A safe, balanced and socially responsible evening and night-time economy is needed to create a leisure and cultural experience which will continue throughout the day-time, evening and into the night. These different periods of activity will complement each other, yet provide a different experience for people at different times of the day. Therefore a balanced mix of cafés, restaurants, bars, clubs, live music venues and other cultural activities will be sought. Proposals that will help to improve the offer of family orientated leisure will be a particular target.

**5.70** The District Council will support proposals to make the most of the waterside leisure environment as a particular area in which to enhance the evening economy of the town centre. The site specific policies highlight the areas in which it is felt that this development should be targeted. The areas around the canal will be particularly suitable in order to stimulate activity here during the evening.

**5.71** Although the District Council wishes to enhance the evening economy of the town centre, it is important to ensure that new developments do not cause an unacceptable nuisance to neighbouring uses and the surrounding environment. Increased activity in the evening provides important additional natural surveillance and vitality to streets and spaces in the town. However, consideration must also be given for the potential of these uses to generate issues of anti-social behaviour, particularly but not exclusively in respect to pubs and bars. The District Council will look to work with West Mercia Police and the Wyre Forest Community Safety Partnership (WFCSP), as well as other town centre stakeholders, to tackle any issues of crime and anti-social behaviour that may arise from an increase in evening activity through public realm improvements, active management measures or new security infrastructure.

**5.72** The Kidderminster Town Team, established as a result of a recommendation from the Government commissioned Mary Portas's High Street Review, is a partnership of public and private sector stakeholders who work together and aim to produce innovative ideas about how to improve the town. Working with the Police and the Community Safety Partnership, the Town Team will have a role in bringing forward anti-social behaviour initiatives such as 'Pubwatch' and 'Best Bar None' schemes to help tackle anti-social behaviour.

**5.73** The District Council will encourage the existing and new operators of evening orientated uses such as cafés, restaurants, bars, take-aways, clubs and other cultural activities to work with the Town Team, WFCSP and the Police in managing the evening economy.



## 4 Policy Areas

### POLICY

#### CT6a - Leisure, Culture and Tourism

Development proposals for new cultural, tourism and leisure activities and improvements to existing uses in the Central Telford area will be supported where they meet all of the following criteria:

- (a) they are located in Central or East Southwater, or the existing shopping area;
- (b) they take appropriate account of the need to contribute to improved links between Southwater, the existing shopping area and Telford Town Park;
- (c) they include a high quality public realm in line with Policy CT17;
- (d) and they are well integrated with a range of other uses such as employment, retail and housing.

New hotel and conferencing development will be particularly encouraged in the Events Quarter (TC3).

Elsewhere in Central Telford, leisure, cultural and tourism facilities will be permitted provided that it can be demonstrated that they cannot be accommodated in Central Southwater, East Southwater or the shopping area. They must also be a subsidiary part of a wider mixed use development, and that they must be directly accessible to the Town Centre Core by pedestrians, cyclists or public transport.

### The Evening and Night-Time Economy

#### Establishing and Evening and Night-Time Economy in Telford Town Centre

**4.5.7** The evening and night-time economy (ENTE) is defined as bars and pubs, restaurants, cafés, take-aways, night clubs, theatres, cinemas, concert halls, live music venues, and other arts cultural and leisure venues that are open in the evening and in some cases, into the night.

**4.5.8** Telford Town Centre's evening and night-time economy is currently very limited and it does not meet the expectations of a 21<sup>st</sup> century centre. While the town centre does provide some excellent shopping facilities, it has failed to provide an equivalent level of entertainment facilities and what provision there is has been developed in an uncoordinated way.

**4.5.9** Many other towns and cities have shown that an ENTE has positive benefits for broader economic expansion and urban renaissance. This Action Plan proposes to create, virtually from scratch, a concentration of entertainment venues appropriate to Telford's size, of varying types including restaurants and bars, which will provide a choice of activities stretching from the late afternoon into the evening and night-time. These will be integrated with other uses such as offices and new residential developments in such a way that ensures that they complement each other and avoid conflict.



## 4 Policy Areas

4

**4.5.10** To be successful it will be necessary to provide a seamless flow of activities, from daytime into the evening and night-time, with activities changing with time but always maintaining interest, inclusiveness and vibrancy.

**4.5.11** It is not appropriate to specify the numbers of venues because this Area Action Plan runs until 2016 and the establishment of an ENTE can only begin in this plan period with completion later. As elsewhere, ideas and fashions change in the entertainment sector. The ENTE will need to evolve with these changes over time. This Area Action Plan avoids being too prescriptive so that its policies are not quickly outdated. What must remain as an unchanging principle is that the leisure needs of people of all ages are met in a safe and enjoyable environment without causing nuisance to other users of the town centre.

**4.5.12** In order to gain maximum benefit from the clustering of activities, a revamped Southwater Square and surroundings will be where these uses will be located, along with continued development of the emerging cluster of bars, clubs and restaurants at Central Square. The Events Quarter should incorporate a small element of bar and restaurant development on a limited scale related to the area's primary function as a conference venue.

### POLICY

#### **CT6b - Establishing the Evening and Night-Time Economy**

A safe, balanced and socially responsible evening and night-time economy will be developed to enrich the vitality of Telford Town Centre. This will create an exciting leisure and cultural experience which will continue throughout the day-time, evening and into the night.

These different periods of activity will complement each other, yet provide a different experience for people at different times of the day.

Evening and night-time economy uses will be located in Central and East Southwater and Central Square (see Map 2). A balanced mix of late-night shopping, cafés, restaurants (A3), bars (A4), take-aways (A5), clubs and cultural activities will be created. Developments will conform to the principles set out in the Design for Community Safety SPD and will meet the criteria set out in other CTAAP policies, particularly Policy CT6 Leisure, Culture and Tourism, CT15 Design and Policy CT17 Public Realm.

No leisure use will, either on its own or cumulatively with other uses, create an unacceptable impact on neighbouring uses by reason of noise and light pollution, disturbance or traffic.

#### **Managing the Evening and Night-Time Economy**

**4.5.13** The management of the ENTE is vitally important to ensure that the public are safe and feel safe so that they may fully enjoy their visit to everything that the Town Centre has to offer.

**4.5.14** Telford is aiming to set up an almost entirely new ENTE and is therefore seeking agreement with relevant organisations and responsible bodies to guide the development of a properly planned and effectively managed ENTE over the coming years.



## 4 Policy Areas

**4.5.15** Effective management also ensures that all operators and organisations that have an interest in the ENTE are fully involved and signed up to an agreed set of principles.

**4.5.16** Paramount in ensuring an enjoyable experience is to ensure that people feel safe within the new town centre environment and when taking part in or leaving evening and night-time activities.

**4.5.17** Addressing safety issues will involve the police and emergency services. A team of "evening stewards" will provide help and advice to the public and will support the police and emergency services, as well as the entertainment operators. Help points will be established with essential phone numbers which will be prominently displayed. A Safe Child Scheme will be set up to operate throughout the daytime and into the evening. Articles in the press and in community newsletters will be used to publicise the arrangements for public safety. A website will be established to provide essential information and help lines. The Design for Community Safety SPD provides practical advice which will be taken into account in the design and establishment of the ENTE.

**4.5.18** Licensing has a vital role to play. The 2003 Licensing Act already requires operators of entertainment premises to submit a business plan which demonstrates how they will meet their responsibilities and plan for mitigating against potential adverse impacts. A "Best Bar None" scheme will be established and operators will be encouraged to participate in Pubwatch.

**4.5.19** Good lighting provides a sense of well-being and enhances the ambiance of the area. Lighting should be energy efficient and white light increases the feeling of safety and provides enhanced CCTV quality. CCTV provision itself will be placed where it is needed yet discrete.

**4.5.20** Access to the new facilities will be designed to provide ease of movement with safety and natural surveillance and linking them with other existing facilities such as the cinema (currently the Odeon). The nearby housing areas will have improved pedestrian access to the Town Centre in accordance with policy CT13.

**4.5.21** Noise is often a problem associated with an ENTE and steps will be taken to ensure that this is kept to a minimum in order that the enjoyment and well-being of residents is not compromised. This will take the form of such measures as adequate sound insulation of buildings, preventing the emission of sound into the public realm (e.g. through open doors and windows), and guiding people along routes that avoid residential areas as they leave the town centre.

**4.5.22** Keeping the area clean helps people feel safe and provides a pleasant environment which influences appropriate behaviour and so street cleansing regimes will be revised to ensure that streets are cleaned at regular intervals during the operation of the ENTE. Effective street cleaning will also include the provision and regular emptying of litter bins placed at convenient intervals and locations. The provision of adequate toilet facilities will help prevent public health problems and nuisance to residents and businesses.



## POLICY

### **CT6c - Managing the Evening and Night-Time Economy**

The Council will establish a partnership to collaborate and co-ordinate management of the evening and night-time economy in Telford Town Centre.

The Partnership will include representatives of Telford & Wrekin Council, emergency services, retailers, landowners, operators of leisure facilities, public transport operators, hoteliers, the Primary Care Trust and other interested parties.

Working with its partners the Council will undertake a range of management measures, which will include, but will not be limited to:

- Establishing "Help Points" in the Town Centre and a team of evening stewards to provide support and advice for the public and to support the police and emergency services;
- Establishing a "Best Bar None" scheme and "Pubwatch";
- Ensuring adequate street and building lighting;
- Providing effective CCTV coverage;
- Ensuring that there is adequate public transport at all hours until all activities close;
- Ensuring adequate provision of toilet facilities;
- Protecting other town centre uses and residents from disturbance and nuisance;

Planning decisions will include conditions and legal agreements to ensure that relevant premises are open in the daytime to avoid "dead" frontages and to secure closing times where appropriate.

## Publication Draft Representation Form 2014

For Official Only	
Person ID	
Rep ID	

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

**If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.**

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 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 received by **4.45pm on Friday 27 June 2014**

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 Plan

Copies of the Plan are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and 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

**Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.**



# 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	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Estate Strategic Planner		
Organisation (where relevant)	Warwickshire Police and West Mercia Police		
Address Line 1	Estate Services HQ		
Address Line 2	Hindlip Hall		
Address Line 3	PO Box 55		
Address Line 4	Worcester		
Postcode	WR3 8SP		
Telephone number	01905 332885		
Email address	andrew.morgan.60139@westmercia.pnn.police.uk		

## 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

For Official Use Only

Person ID:

Rep ID:

## Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

### 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:	<input type="text" value="Local Plan"/>
Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text" value="TC8 Warwick Café Quarter and TC17 Local Shopping Facilities"/>
Policies Map Number:	<input type="text"/>

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

5.1 Legally Compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.3 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

### 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:	<input type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

For Official Use Only

Person ID:

Rep ID:



7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see the enclosed sheets.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the enclosed sheets.

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 modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

For Official Use Only	
Person ID:	Rep ID:

9. If your representation is seeking a modification, 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:

Given the issues highlighted in these representations and the need for a new policy concerning the evening and night-time economy, a representative of Warwickshire Police and West Mercia Police is considered desirable at the public examination to discuss the issues further.

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:

Andrew Morgan

Date :

26 June 2014

Copies of all the objections 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:

## Publication Draft Representation Form 2014

For Official Only	
Person ID	
Rep ID	

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

**If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.**

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 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 received by **4.45pm on Friday 27 June 2014**

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 Plan

Copies of the Plan are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and 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

**Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.**



# 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	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Estate Strategic Planner		
Organisation (where relevant)	Warwickshire Police and West Mercia Police		
Address Line 1	Estate Services HQ		
Address Line 2	Hindlip Hall		
Address Line 3	PO Box 55		
Address Line 4	Worcester		
Postcode	WR3 8SP		
Telephone number	01905 332885		
Email address	andrew.morgan.60139@westmercia.pnn.police.uk		

## 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

For Official Use Only

Person ID:

Rep ID:

## Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

### 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:	<input type="text" value="Local Plan"/>
Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text" value="BE1 Layout and Design"/>
Policies Map Number:	<input type="text"/>

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

5.1 Legally Compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.3 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

### 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:	<input type="checkbox"/>
Justified:	<input type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

For Official Use Only

Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see the enclosed sheets.

Continue on a separate sheet if necessary

8. **Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see the enclosed sheets.

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 modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

For Official Use Only

Person ID:

Rep ID:



9. If your representation is seeking a modification, 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:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the examination should the Council and/or the Inspector consider this beneficial to proceedings.

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:

Andrew Morgan

Date :

26 June 2014

Copies of all the objections 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: