

Publication Draft Representation Form 2014

For Official Use Only
Person ID:
Rep ID:

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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.

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All forms should be received by **4.45pm on Friday 27 June 2014**

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or email: newlocalplan@warwickdc.gov.uk

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Part A - Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
	<small>* 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.</small>	
Title		Mr
First Name		Gary
Last Name		Stephens
Job Title (where relevant)		Senior Associate
Organisation (where relevant)	J S Bloor (Tamworth) Ltd	Marrons Planning
Address Line 1		1 Meridian South
Address Line 2		Meridian Business Park
Address Line 3		Leicester
Address Line 4		
Postcode		LE19 1WY
Telephone number		0116 281 6904
Email address		gary.stephens@marrons-planning.co.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"/>

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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:

Local Plan

Paragraph Number:

Policy Number:

Strategic Policies DS10 & DS: Growth Villages (Bishop's Tachbrook)

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

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:

Justified:

Effective:

Consistent with National Policy:

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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.

The context to this representation is the representation made by Bloor Homes Limited in relation to the draft Local Plan Strategy and Strategic Policies DS1, DS2, DS6, DS7, DS8 and DS10. In summary, this representation identifies that the draft Local Plan has not been positively prepared and is not consistent with national policy as it fails to make provision for sufficient housing growth to meet the economic needs and aspirations of the area. Furthermore, it fails to identify sufficient specific developable sites or broad locations to meet the housing requirement.

The Council will therefore need to consider whether additional land could be allocated in accordance with the National Planning Policy Framework (the Framework) prior to submission to the Secretary of State, and the following representation should be read in this context.

Bloor Homes Limited has an interest in the land to the south of the school at Bishop's Tachbrook, which is identified as one of the Growth Villages within Policy DS10, and in the Settlement Hierarchy Report as one of the more sustainable villages. Their land interest includes the area allocated for 150 dwellings for Bishop's Tachbrook within Policy DS11.

cont'd on separate sheet

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.

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.**

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Response to Q7 continued

Having regard to the Council's five year land supply and the need to boost housing land supply within the District, Bloor Homes Limited submitted a planning application for 150 dwellings within the area to the south of the school and expect a decision from the District Council during August 2014. The planning application demonstrates that development of this area is 'deliverable' in accordance with the definition within paragraph 47 of the Framework. Furthermore, Bloor Homes Limited have worked closely with representatives of the Parish Council in designing the development to deliver a number of significant community benefits, such as improved access to the village school and sustainable links between the village and nearby Country Park at Oakley Wood.

Subject to securing satisfactory planning permission, Bloor Homes Limited envisages the commencement of development and the first housing completions during 2015/2016. It is likely the development will take four years to complete, i.e. by 2019/2020.

Bloor Homes Limited land interest at Bishop's Tachbrook extends further to land beyond the housing allocation and the planning application boundary. The attached location plan shows the relationship between the housing allocation, the planning application boundary, and further land that is considered developable and available for development as defined by the Framework.

This further land has the capacity to be developed for around 150 dwellings over the plan period. The land is free from environmental constraints and designations, and in part is identified of least environmental value compared to other options around Bishop's Tachbrook having regard to the Council's evidence base within the Landscape Sensitivity and Ecological & Geological Study.

This land can be viably developed and utilise the infrastructure proposed as part of the development of the adjoining land, including the sustainable links created to the village school, shops, and community facilities. These links will ensure the site is located where use of sustainable transport modes to access village facilities and services can be maximised by future occupiers. Furthermore, development can help further support and improve community facilities, infrastructure and services within the village, including links into the urban area.

Reference is made within the evidence base to a National Grid high pressure gas pipeline running to the south. This pipeline provides an effective and long term boundary to development to the south, which along with Oakley Wood Road and the prominent ridgeline to the north, ensures that the future growth of the village in this area can be contained. Suitable boundary treatments can provide a sensitive transition between the settlement and open countryside.

The Landscape Sensitivity and Ecological & Geological Study identified this further land as having high to medium sensitivity, with land to the west of the existing settlement edge being regarded as 'high' and land to the east being defined as of 'medium' sensitivity. No other land around the village was defined as being of 'medium' sensitivity (aside from the area the subject of the planning application referred to above).

The further land available forms part of one large arable field that includes the planning application site, and shares the same character, although it is recognised that the ridgeline along the northern boundary with the open countryside is more visually prominent. Development of this area along the ridgeline should be avoided, as acknowledged within the Council's evidence, and this area could contribute further open space adding to the

landscaping proposals as part of the planning application. An initial sketch plan is attached to demonstrate how this could be accommodated.

However, the remainder of the further land available is at a lower level than the eastern half of the field as it slopes down to the south. This combined with the existing vegetation around the edges of the site, particularly along Oakley Wood Road and Banbury Road, generally screen this land from close views. Whilst it is acknowledged that there may be some perceived encroachment in more distant views to the south east, these would be seen from distance and could be mitigated by additional tree belts and small blocks of woodland as suggested within the Landscape Sensitivity and Ecological & Geological Study.

Any adverse impacts of the development of this land in terms of landscape and visual impacts cannot therefore be regarded as significantly and demonstrably outweighing the benefits in terms of increasing housing supply. Given the failure to make sufficient specific provision for housing growth, the draft Local Plan has not been positively prepared in failing to identify 'developable' land at Bishop's Tachbrook as shown on the plan attached.

In the context of its review of housing growth, and when assessing the effects of increasing housing delivery within the draft Local Plan, the Council should therefore have regard to the potential of allocating further land at Bishop's Tachbrook as shown on the plan attached for around 150 dwellings within Policy DS11.

In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.

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:

It is considered that the concerns expressed in these and related representations in respect of the soundness of the Plan and the need for additional allocations necessitate participation at the oral part of the Examination in order to elaborate on them and the requisite changes to the Plan as well as to answer any questions which the Inspector may have.

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:

Jane Gardner

Date :

27th 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.

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First Name		Gary
Last Name		Stephens
Job Title (where relevant)		Senior Associate
Organisation (where relevant)	J S Bloor (Tamworth) Ltd	Marrons Planning
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Address Line 2		Meridian Business Park
Address Line 3		Leicester
Address Line 4		
Postcode		LE19 1WY
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4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

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Local Plan

Paragraph Number:

Policy Number:

Strategic Policies DS10 & DS: Growth Villages (Leek Wooton)

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

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:

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Bloor Homes Limited has an interest in the land adjoining the village of Leek Wootton, between the village's eastern boundary and the A46 (referred to as north of Hill Wootton Road). The attached plan shows the relationship between the proposed village boundary for Leek Wootton, the A46 and the land in question. The land is not currently proposed to be allocated by Policy DS11.

The historic settlement of Leek Wootton is predominantly to the west of the village, with a number of listed buildings, a locally designated historic parkland including many significant protected trees, and the area being designated as a Conservation Area. This half of the village is therefore of far greater environmental value, than other areas of the village that have developed in more recent times. It is somewhat surprising therefore that the majority of the new housing planned for Leek Wootton is proposed within this historic area, as opposed to on land of no historic value elsewhere.

Policy DS11 allocates four sites for new housing on the edge of the village. Three of these sites (H34, H35 and H36) form part of the historic environment of the District. The sites fall within the setting of Woodcote (a Grade II listed building), the setting of the Leek Wootton Conservation Area, and within the locally listed park and garden associated with Woodcote (subject to further consultation being undertaken by the Council).

cont'd on separate sheet

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Response to Q7 continued

The Landscape Sensitivity and Ecological & Geological Study confirms the sites are constrained by Woodcote and Leek Wootton Conservation Area, and that there are visual and functional links between the sites and the heritage assets. Furthermore, it concludes that the sites would not be suitable for commercial development due to their proximity to the Conservation Area and listed building. It is recognised that a commercial use of a building may be different from a residential use in terms of the nature of its use, e.g. hours of use, traffic movements, noise emissions, etc. However, the development itself will have a very similar physical impact on the heritage assets and their setting in terms of changing the character and appearance of the land, and the loss of important views as a result of built development.

The Village Sites Appraisal Matrix also casts doubt as to whether these sites are suitable and deliverable, with references to the sites being 'potentially suitable', and 'achievable, subject to overcoming landscape heritage issues'.

The evidence base does not therefore support the allocation of these sites for new housing. Moreover, having regard to paragraph 129 of the Framework, the Council are required to specifically identify and assess the particular significance of the asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

No such assessment has been published by the Council as part of its evidence base for the draft Local Plan, or therefore taken into account when considering the impact of these potential allocations. It is therefore no surprise that the available evidence base is inconclusive and that there is a lack of an adequate evidence base to justify the allocation of these sites.

The draft Local Plan has therefore failed to demonstrate the proposed allocations (H34, H35 and H36):

- are justified in being the most appropriate strategy for Leek Wootton, when considered against the reasonable alternatives outside of the historic environment of the village (land north of Hill Wootton Road);
- are effective in being deliverable in that the proposed number of dwellings can be accommodated within the potential allocations without causing harm to the heritage assets and their setting; and,
- it is sustainable development and consistent with national planning policy, in particular it will not lead to harm to the significance of the designated heritage assets.

This absence of evidence compares with the Council's evidence base that does support the residential allocation of land north of Hill Wootton Road to which Bloor Homes have an interest, and which is shown on the attached plan.

The Landscape Sensitivity and Ecological & Geological Study confirms the land is free from environmental constraints and designations, and is identified of least environmental value compared to other options around the village. Furthermore, it concludes that the site would be suitable for residential development, providing noise impact from the adjacent A46 could

be reduced. Evidence has been provided to the Council demonstrating that suitable mitigation could be incorporated into any detailed design to achieve a satisfactory noise environment for the development, and this evidence has not been challenged. Furthermore, evidence has been provided to the Council to demonstrate development would be 'deliverable' as defined by the Framework.

Notwithstanding this evidence, the Council have concluded within the Village Sites Appraisal Matrix that the site acts as an environmental buffer between the A46 and the village, and an attractive landscape break before entering the village. This is not a formal landscape or environmental designation referred to within the evidence base, and is a designation which is not applied by the Council to other settlements alongside the A46, such as Kenilworth (the proposed allocation at Thickthorn adjoins the A46), or Warwick (where development adjoins the A46). Concern is also raised as to the width of the site, although it will be noted the site is the same width as other proposed allocations within the village and District.

The Framework requires Plans to allocate land with the least environmental or amenity value, and the evidence base would suggest that the selection of proposed allocations at Leek Wootton has not adhered this principle. Accordingly, it is concluded that the Plan does not contain the most appropriate strategy for Leek Wootton when considered against the reasonable alternatives (i.e. the land to the north of Hill Wootton Road).

The Council should therefore review its evidence base and strategy for housing growth within Leek Wootton, and reconsider its proposed allocation of sites within the more sensitive historic parts of the village. At present, the draft Local Plan cannot be considered sound and consistent with national policy in its approach to the village.

This conclusion must also be seen in the context of the representation made by Bloor Homes Limited in relation to the draft Local Plan Strategy and Strategic Policies DS1, DS2, DS6, DS7, DS8 and DS10. In summary, this representation identifies that the draft Local Plan has not been positively prepared and is not consistent with national policy as it fails to make provision for sufficient housing growth to meet the economic needs and aspirations of the area. Furthermore, it fails to identify sufficient specific developable sites or broad locations to meet the housing requirement.

Any adverse impacts of the development of the land to the north of Hill Wootton Road in terms of landscape or amenity cannot be regarded as significantly and demonstrably outweighing the benefits in terms of increasing housing supply. Given the failure to make sufficient specific provision for housing growth, the draft Local Plan has not been positively prepared in that it fails to identify 'developable' land at Leek Wootton as shown on the plan attached.

In the context of its review of housing growth, and when assessing the effects of increasing housing delivery within the draft Local Plan, the Council should also therefore have regard to the potential of allocating further land at Leek Wootton as shown on the plan attached for around 35 dwellings within Policy DS11.

In the absence of these exercises being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.

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:

It is considered that the concerns expressed in these and related representations in respect of the soundness of the Plan and the need for additional allocations necessitate participation at the oral part of the Examination in order to elaborate on them and the requisite changes to the Plan as well as to answer any questions which the Inspector may have.

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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:

Jane Gardner

Date :

27th June 2014

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Last Name		Stephens
Job Title (where relevant)		Senior Associate
Organisation (where relevant)	J S Bloor (Tamworth) Ltd	Marrons Planning
Address Line 1		1 Meridian South
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The National Planning Policy Framework (Framework) provides the following context to this representation:

'To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);

identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.. (paragraph 49)'

Policy H10 b) requires the housing mix of rural schemes to reflect evidence of local housing need through a parish or village housing needs assessment. However, a local housing needs assessment does not take into consideration demographic trends, market trends, or local demand as required by the Framework. Accordingly, the first part of policy H10 b) as currently worded is not consistent with national policy.

/ cont'd on separate sheet

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.

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.**

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Rep ID:

Response to Q7 continued

Policy H10 b) goes on to state that beyond meeting the local housing need (or where a local housing needs assessment does not exist), the housing mix should reflect the needs of the District as set out in the latest Strategic Housing Market Assessment (SHMA). The evidence within the latest SHMA is a District wide assessment of housing need based on the average size of property occupied by heads of household in 2011. It does not reflect market trends, or the local demands of the parish or village as required by the Framework. Accordingly, the second part of policy H10 b) as currently worded is not consistent with national policy.

The Council should review its drafting of this policy prior to submission to the Secretary of State.

It is suggested that the policy should be amended to include reference to 'other available evidence as to the housing demands within the parish or village'. This would allow the Council and applicants to consider other available evidence as to the appropriate housing mix within a scheme in a rural location.

In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.

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:

It is considered that the concerns expressed in these and related representations in respect of the soundness of the Plan and the need for additional allocations necessitate participation at the oral part of the Examination in order to elaborate on them and the requisite changes to the Plan as well as to answer any questions which the Inspector may have.

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:

Jane Gardner

Date :

27th 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.

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Publication Draft Representation Form 2014

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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

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

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 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)
	<small>* 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.</small>	
Title		Mr
First Name		Gary
Last Name		Stephens
Job Title (where relevant)		Senior Associate
Organisation (where relevant)	J S Bloor (Tamworth) Ltd	Marrons Planning
Address Line 1		1 Meridian South
Address Line 2		Meridian Business Park
Address Line 3		Leicester
Address Line 4		
Postcode		LE19 1WY
Telephone number		0116 281 6904
Email address		gary.stephens@marrons-planning.co.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"/>

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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:

Local Plan

Paragraph Number:

Policy Number:

Strategic Policy H10 c): Rural Housing

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

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:

Justified:

Effective:

Consistent with National Policy:

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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.

Policy H10 c) requires housing allocations of more than 50 dwellings within the rural area to be phased at a rate of no more than 50 dwellings over a period of 5 years. The reason given for the policy in the supporting text below the policy is to avoid the village growth allocations being exhausted within the first few years of the Plan, and to support social cohesion of the smaller settlements.

Phasing rural developments of up to 150 dwellings over a 15 year period will not boost significantly the supply of housing within an authority that cannot demonstrate a five year supply of deliverable housing sites. It is contrary to the Framework and will have adverse unintended consequences on the character of the villages and will not support social cohesion within the settlements.

Phasing development will result in the phased delivery of roads, infrastructure, open space, landscaping, social and community facilities, etc. Depending on the manner in which a site is to be accessed and therefore developed, this may result in occupiers of new housing being isolated from existing communities and services whilst later phases of development are held up. Alternatively, it may mean that community and environmental benefits to be secured by communities from new developments may not be delivered until the end of the plan period. The prospect of developments being left part completed for long periods will also not enhance the appearance of the villages or the District.

/ cont'd on separate sheet

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.

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Response to Q7 continued

The Council should review its drafting of this policy prior to submission to the Secretary of State, and delete this part of policy H10.

In the absence of this exercise being undertaken, Bloor Homes Limited would invite the Inspector to find this Plan 'unsound'.

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

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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:

Jane Gardner

Date :

27th June 2014

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