

Publication Draft Local Plan: Focused Consultation 2014

For Official Only	
Person ID	
Rep ID	

This consultation is a formal process and represents an opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) in light of the information published in the "Focussed Consultation" 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 12 December 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)

* 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	Phillip	
Last Name	Clark	
Job Title (where relevant)	Clerk	
Organisation (where relevant)	Baginton Parish Council	
Address Line 1	c/o 45 Mill Hill	
Address Line 2	Baginton	
Address Line 3	Warwickshire	
Address Line 4		
Postcode	CV8 3AH	
Telephone number	07746521087	
Email address	bagintonpc@gmail.com	

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?

Plan (tick one only):	<input checked="" type="checkbox"/> Focused Changes <input type="checkbox"/> Sustainability Appraisal
Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text"/>
Policies Map Number:	<input type="text"/>

5. Do you consider the Plan is :

5.1 Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes <input type="checkbox"/>	No <input checked="" 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 checked="" type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

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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.

Please refer to Baginton Letter L151 (09/12/2014), attached

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 refer to Baginton Letter L151 (09/12/2014), attached

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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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 noted that Baginton Parish Council, as representatives of all our Parish residents adversely affected by this damaging development contrary to National Planning Policy Framework, should be afforded the opportunity to present our views as to why the Local Plan is unsound and why the Gateway Development should be removed from it.

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:

Phillip Clark

Date :

9th December 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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BAGINTON PARISH COUNCIL

PHIL CLARK - CLERK

c/o 45 MILL HILL, BAGINTON, WARWICKSHIRE, CV8 3AH
TELEPHONE 07746 521087

Our Ref: L151

Your ref

Development Policy Manager,
Development Services,
Warwick District Council,
Riverside House,
Milverton Hill,
Leamington Spa,
CV32 5QH

9th December 2014
By Email Only

Dear Sirs

Local Plan
Focused Changes Consultation and
Gypsies & Travellers Options Consultation

On 31.10.14 we received your email linking to the Focused Changes Consultation and Gypsies & Travellers options consultation. These were duly downloaded and distributed to all Councillors on 1.11.14.

We subsequently received written confirmation from you that all our previously made representations on the Local Plan would remain valid, would not need to be resubmitted and would be heard at the future examination.

The new consultation documents have now been given consideration by Councillors and discussed at two ordinary meetings of BPC.

We have no comments on the Gypsies & Travellers options consultation.

We write regarding our OBJECTION to certain of the proposals in the Focused Changes Consultation in so far as they adversely affect our rural village community and we write to make representations on your Forms. We enclose a copy of your consultation forms, duly completed as requested, which refer to this letter.

We remain strongly opposed to the onslaught of developer proposals adversely affecting the undisturbed rural Green Belt surrounding our lovely village. Councillors and Parishioners are tired of this onslaught and ask that WDC look after the interests of our longstanding community and do not allow the existing Green Belt to be both removed and developed in this area.

For reasons given in the below paragraphs, BPC continues to OBJECT to the Local Plan as it stands and believes it to be UNSOUND, procedures have not been properly followed and WDC has not complied with the statutory duty to cooperate, all as per our letter L136 of 26.6.14 enclosing all our representations made on your forms.

In addition, with reference to the Focused Changes Consultation please note the following matters.

Coventry and Warwickshire Strategic Employment Land Study –

General.

We note that this report has been issued as “final” three times. This gives Councillors the impression that others are unduly influencing its content and conclusions.

Section 3.

This section invalidates the report in our view as the list referred to in Appendix A comprises organisations with vested interests in the development, rather than taking the considered views of Parish Councils, local residents and local enterprises.

Section 4.

This section is based on a number of assumptions which in our view are questionable and lead to inappropriate conclusions. In particular, the job forecast is wholly unreasonable as it grossly overestimates job creation compared with other documents and representations previously made.

Section 6.

This section is fundamentally flawed for many reasons, such as, but not limited to the following:-

- A. The SELS claims that the Gateway sites satisfy strategic sites criteria despite the fact that the sites are all in the Green Belt,
- B. The site by site analysis ignores the fact that planning policy such as Green Belt may influence the provision of employment sites, despite the fact that this was acknowledged in section 5 point 5.2.2
- C. There is no rail link,
- D. There is poor amenity provision,
- E. It has proven negative environmental impact,
- F. Access requires extensive highway improvements,
- G. There are plans for improvements to railway network to the North of the city and it is the North of the City of Coventry and North Warwickshire where there is most socio-economic need. This is not even recognised in the report's conclusions

Section 7.

This section fails to recognise key strategic sites in the periphery of the CWLEP area such as Blythe Valley Business Park and the development site at Gaydon. The report overstates claimed demand and understates supply.

Sustainability appraisal.

Please see below abstract of the SA.

SA of the Sub Regional Employment Land Site

Site: Land surrounding Coventry Airport (Baginton, Bubbenhall and Coventry Airport)																			
Size, Capacity & Use: 235 ha sub-regional employment site for uses B1, B2, and B8 (118ha developable area)																			
SHLAA Ref: N/A																			
SA Objectives	Economy	Sustainable transport	Reduce need to travel	Waste & Recycling	Prudent use of land and natural resources	Natural environment & landscape	Built environment	Historic environment	Air, water & soil quality	Climate change mitigation	Climate change adaptation - flood risk	Housing needs	Local services & community facilities	Health & well being	Poverty & social exclusion	Crime			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16			
Appraisal Summary	++	+	-	-	-	-	?	?	-	-	+	-	-	=	=	+	-	+	?
Summary:																			

This demonstrates that the vast majority of criteria for this site are negative impacts. This is not acceptable.

In conclusion, the new information is in the view of Councillors fundamentally flawed in a number of key areas, so should not be given any weight in argument for the Gateway. Indeed the errors and omissions and flawed conclusions in the report serve to further reinforce our view that the Gateway is inappropriate development of the Green Belt, with no very special circumstances. The Local Plan therefore remains fundamentally flawed in this respect and the Gateway development must be removed.

Please ensure that this letter, which shall be read with and forms part of the Representation Form, are distributed for your consideration and included in representations to the Planning Inspectorate should the Local Plan not be withdrawn beforehand.

Please also note that we once again formally request that we be given the opportunity to make representations at any hearing during the examination of the Local Plan by the PI.

Please advise the timescales for the examination and what more we need to do, if anything, to ensure our representations are heard together with those of our adjacent Parishes and The Community Group.

Finally, we recommend non-adoption of the plan as it stands.

Yours faithfully,

Phil Clark
Clerk to Baginton Parish Council