

## Consultation on Proposed Modifications (2016) Response Form

|                   |  |
|-------------------|--|
| For Official Only |  |
| Person ID         |  |
| Rep ID            |  |

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

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

If your comments relate to more than one proposed Modification you will need to complete a separate Part B of this form for each representation.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the Modifications have been made available (see the table below). You can also respond online using the Council's e Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be returned by **4.45pm on Friday 22 April 2016**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or **email:** [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)

### Where to see copies of the documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and also at the following locations:

- Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa;
- Leamington Town Hall, Parade, Royal Leamington Spa
- Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
- Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
- Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
- Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
- Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
- Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa
- Finham Community Library, Finham Green Rd, Finham, Coventry, CV3 6EP

# Part A - Personal Details

## 1. Personal Details\*

## 2. Agent's Details (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                         |                              | Mrs                       |
| First Name                    |                              | Karin                     |
| Last Name                     |                              | Hartley                   |
| Job Title (where relevant)    |                              | Senior Planner            |
| Organisation (where relevant) | Oaklands Farm/AC Lloyd Homes | Delta Planning            |
| Address Line 1                |                              | 1 Chester Court           |
| Address Line 2                |                              | 1677A High Street         |
| Address Line 3                |                              | Knowle                    |
| Address Line 4                |                              | Solihull                  |
| Postcode                      |                              | B93 0LL                   |
| Telephone number              |                              | 0121 285 1244             |
| Email address                 |                              | karin@deltaplanning.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 Modifications to the appointed Inspector

Yes  No

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

Yes  No

The adoption of the Local Plan.

Yes  No

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## Part B - Your Representations

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Please note: this section will need to be completed for each representation you make

### 4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?

|                           |   |
|---------------------------|---|
| Modification or SA:       | <input type="text" value="Modification"/> |
| Mod. Number:              | <input type="text" value="Mod 6"/>        |
| Paragraph Number          | <input type="text" value="Policy DS7"/>   |
| Mod. 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 Sound?             | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |

### 6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:

(Please tick)

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

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

Warwick District Council has allocated a number of additional sites for housing through the Proposed Modifications document to meet an increased housing requirement of 16,776 dwellings (2011-2029). This includes a number of Green Belt sites.

Mod6 states that in total 9,369 dwellings are to be delivered on sites allocated in the Plan bringing the total provision to 17,577 dwellings.

Whilst we acknowledge that the identified housing land supply (17,577 dwellings) is above the agreed objectively assessed housing need for Warwick District (16,776 dwellings) and therefore allows for some flexibility if allocated sites fail to come forward or are delivered with reduced capacity, we consider that the proposed housing land supply does not provide a sufficient degree of flexibility to significantly boost the supply of housing in the District.

The proposed supply is only 801 dwellings above the identified requirement. This represents less than 5% of the District's overall housing need and in our view is not sufficiently flexible to ensure that the Local Plan can readily adapt to changing circumstances.

It is considered that the Local Plan is not effective as it risks not delivering the full objectively assessed housing requirements unless additional sites are allocated to provide for a greater choice of sites and increased flexibility to respond to change.

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Local Plan should allocate a greater number and range of suitable sites to provide sufficient flexibility to ensure that the District's full objectively assessed housing needs are delivered over the plan period.

We consider that Oaklands Farm (see attached Site Location Plan) is a suitable and sustainable development option and should be included in the Local Plan as an additional housing allocation.

We recently submitted this site to the Council for inclusion in the Local Plan. A copy of the SHLAA 'call for sites' submission and accompanying covering letter is attached to this representation.

It shows that although the site at Oaklands Farm is located in the Green Belt, it is a brownfield site which comprises a mix of residential and commercial uses including a caravan site, caravan repair workshop and storage, kennel/cattery, stables and timber yard.

Given its largely developed character and the fact that it is well contained by substantial and defensible boundaries, it is considered that a sensitively designed housing scheme on the site including additional landscaping along the site boundaries would not cause substantial harm to the openness of the Green Belt in this location.

**Continued on separate sheet**

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 changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Continued from previous page**

The site lies at the edge of Hatton Park, one of the growth villages in the District, where the Local Plan seeks to focus some of the housing growth. The southern edge of Hatton Park has been acknowledged as an appropriate location for growth with land opposite Oaklands Farm allocated for housing in the emerging Local Plan.

Oaklands Farm lies in a very accessible location with easy access to the services and facilities at Hatton Park and easy reach of Warwick Parkway Station, which is located less than one mile away. The site's accessibility to Warwick Parkway station and employment opportunities in Warwick and the wider sub-region, would make this site particularly attractive to young workers. The site clearly offers potential for redevelopment for residential uses including a substantial proportion of starter homes.

In a recent consultation, the Government has signalled its intention to introduce greater flexibility into the National Planning Policy Framework to enable suitable, sensitively designed housing development on brownfield sites in the Green Belt to come forward. Oaklands Farm is such a site and we consider that it should be included as an additional allocation in the Local Plan.

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Detailed engagement in discussions regarding housing site allocations.

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:

*lc Kelly*

Date:

20/04/2016

Copies of all the comments and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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