

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

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**

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 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)
Title	Mrs	
First Name	Jane	
Last Name	Fleming	
Job Title (where relevant)	Parish Clerk	
Organisation (where relevant)	[REDACTED]	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		

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

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="Policy DS NEW1 Directions for Growth South of Coventry"/>
Mod. Number:	<input type="text" value="Ref Mod 20"/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

5. Do you consider the Local Plan is :

5.1 Legally Compliant? Yes No

5.2 Sound? Yes No

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:

Justified:

Effective:

Consistent with National Policy:

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.

The proposed approach is based on Warwick District providing in full unmet needs including those arising from outside the district (Ref Mod 20 and DS16). The Proposed Modifications claim that meeting Coventry's needs "is an important aspect of creating a sustainable and secure base for the growth of the city" (Ref Mod 21). The National Planning Policy Framework (NPPF) explicitly excludes Green Belt from its presumption in favour of sustainable development (NPPF para 14 and fn 9), stating that unmet needs from neighbouring authorities should be met 'where it is reasonable to do so and consistent with achieving sustainable development' (NPPF para 182).

The Government has repeatedly confirmed that the single issue of unmet demand is unlikely to outweigh harm to the Green Belt to constitute the very special circumstances needed to justify inappropriate development in the Green Belt (DCLG July 2013, NPPG 3-034-20141006).

The cumulative impact of meeting in full sub-regional needs for both housing (Policy DS NEW1) and employment (DS16 Sub-Regional Employment Site) would be very harmful, excessive and not justified. In addition the policy is unsound because it has not fully considered the findings of the Joint Green Belt Study 2015.

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.

There are alternative brownfield sites and capacity in existing technology parks to meet the need for employment land without removing 235 hectares from prime Green Belt which the Joint Green Belt Study of 2015 has classified as 'higher performing Green Belt'.

Warwick District has accepted uncritically the figures underpinning Coventry's unmet housing needs. These must be scrutinized, and Warwick District's share of the unmet needs scaled back to a figure per annum that is achievable and sustainable and which does not require Green Belt sites south of Coventry.

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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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:

The Parish Council considers it imperative that Warwick District reconsiders the numbers of houses it can realistically build per annum, based on its record for house building between 2011 and 2015. It is particularly concerned about the impact of the proposed developments at King's Hill (H43) and the Rosswood Farm, Baginton (H19) on traffic through the surrounding villages. These, added to the even more profound impact of the proposed sub-regional employment site (DS16) will result in the extension of the city of Coventry's boundaries southwards into Warwickshire, and the removal of key Green Belt parcels C10 and C14 south of the A45, both of which are examples of 'higher performing Green Belt' according to the Joint Green Belt Study of 2015.

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:

Date:

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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