



# 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 <u>email</u>**: <a href="mailto:newlocalplan@warwickdc.gov.uk">newlocalplan@warwickdc.gov.uk</a>

### 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 <a href="https://www.warwickdc.gov.uk/newlocalplan">www.warwickdc.gov.uk/newlocalplan</a> 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
- Learnington Spa Library, The Pump Rooms, Parade, Royal Learnington 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

	Personal Details*  * If an agent is appointed, please complete boxes below but complete the full contact.	2. Agent's Details (if applicable) te only the Title, Name and Organisation details of the agent in section 2.
Title	Mrs	
First Name	Jane	
Last Name	Fleming	
Job Title (where relevant)	Parish Clerk	
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		
3. Notification of subsequent stages o	f the Local Plan	
Please specify whether you wish to be n	notified of any of the following:	
The submission of the Modifications to th	e appointed Inspector	Yes √ No
Publication of the recommendations of a to carry out an independent examination		Yes
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

<ol><li>To which proposed Modification to the S</li></ol>	ubmission Plan or th	he updated Sustainability	<b>Appraisal</b>
(SA) does this representation relate?			

Modification or SA:	DS 19 Green Belt	
Mod. Number:		
Paragraph Number		
Mod. Policies Map Number:		
5. Do you consider the Loca	Plan is :	
5.1 Legally Compliant?	Yes No V	
5.2 Sound?	Yes No V	
6. If you answered no to que	stion 5.2, do you consider the Proposed Modification is unsound because it is n	ot:
(Please tick)		
Positively Prepared:	$\sqrt{}$	
Justified:	$\sqrt{}$	
Effective:	$\sqrt{}$	
Consistent with National Pe	licy: √	

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.

Although the Joint Green Belt Study of June 2015 (JGBS) is listed in the Evidence Base, its findings are effectively ignored in the Proposed Modifications to the Local Plan. The associated Sustainability Assessment Addendum (SA) makes a single mention of the JGBS with reference to Baginton as a growth village, recognizing that the JGBS 'found that the parcel of land (C14) comprising the Rosswood Farm site (H19) represents the principal protector of the countryside from further encroachment' and consequently the SA concluded that Rosswood Farm development in Baginton would have 'major negative effects on SA Objective 5' (Prudent Use of Land and Natural Resources).

The SA acknowledges that the proposed urban extensions south of Coventry would have cumulative and potentially major negative effects on landscape, visual amenity and openness through loss of Green Belt and that these would remain even after so-called mitigation. These include the proposed Sub-Regional Employment Site (DS16) of 235 hectares in Baginton and the proposed development at King's Hill (H43) near Stoneleigh.

Development in the Green Belt is excessive and is not justified, particularly when the chosen sites are some of the most sensitive – highest performing – parts of the Green Belt around Coventry. The JGBS's conclusions have effectively been ignored in the Proposed Modifications and in the Local Plan. Therefore the proposed plan is unsound because it has not taken the Joint Green Belt Study properly into account.

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.

Brownfield sites and other sites outside the Green Belt are suitable alternatives. These should be reconsidered in both Coventry and Warwick District together with unfilled capacity in existing technology parks in the sub region.

Warwick District's share of Coventry's unmet housing needs must be reduced so that these can be met without removing an unsustainable portion of higher performing Green Belt, particularly key Green Belt parcels south of the A45 which effectively restrict Coventry's urban sprawl southwards.

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
<b>Yes,</b> I wish to participate at the oral examination $\sqrt{}$
10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
Bubbenhall Parish Council considers that the amount of land that Warwick District is proposing to remove from Green Belt to meet the unfilled need for housing and employment land in Coventry is unsustainable. The result will be the extension of Coventry's boundary southwards into the Warwickshire countryside and the absorption of the village of Baginton into the City of Coventry The villages of Bubbenhall and Stoneleigh will be in danger of a similar fate.
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: 22/04/2016
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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