

Publication Draft Representation Form 2014

For Official Use Only

Person ID:

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)
	* 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	Paul	
Last Name	Hodge	
Job Title (where relevant)		
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 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	☒	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	☐

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:

DS10

Policy Number:

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes

No

X

5.2 Complies with the Duty to Co-operate?

Yes

No

X

5.3 Sound?

Yes

No

X

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:

X

Justified:

X

Effective:

X

Consistent with National Policy:

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.

- Excessive provision to the south of Warwick .The New Local Plan, possibly after emotive pressure from North Leamington protestors about green belt, disregards green belt yet does not pursue with sufficient vigour brownfield sites. Obviously, brown field sites are preferable yet appropriate greenbelt would be a far better option to distribute the development, rather than inappropriate green field sites. The area of restraint between Myton Road and Europa Way is a case in point. It is high grade agricultural land, full of wildlife and ancient trees and hedgerows, and should not be handed over to developers who prefer it to brownfield alternatives.
- During the last 13 or 14 years Warwick has undergone a large increase in population, indeed 12% since 2000, which is approximately twice the rate of increase for Warwickshire and twice the national average, and indeed three times the increase for the West Midlands. The plan is not justified because it crams so much of the new development into the already congested south part of the district. This is because of pressure from developers who wish to build in the areas which will afford them the most profit. The pressure on schools and the road system is already immense. Myton Road suffers congestion due to school traffic (there are 4 schools on it) as well as commuter traffic. The road network between Myton Road and Europa Way will not cope with the development and then the massive associated increase in school traffic. Looking towards the town centres, the road system is inadequate as it relies on restricted river crossing points to get to the middle of both Warwick and Leamington. Castle Bridge in particular and the historic centre of Warwick face potential harm by greatly increased traffic flow.
- The plan is not justified because it is creating more car-dependent suburbs. Warwick Gates is one of the large recent developments in the south of the district. Stagecoach bus companies says that the bus services around the Warwick Gates area would be unprofitable so the new development would create thousands more car journeys each day.
- The plan is unsound because it will contribute to the already illegal air quality in central Warwick. I walk my children to school along congested Myton Road and into central Warwick and I am horrified by the discovery that the entirety of Warwick town centre road network is in breach of Nitrogen Dioxide levels. This problem has been in existence long before the Preferred Options were set out (Warwick District Air Quality Action Plan 2008), and remains in breach of these regulations today. I object to the increased public health risk which adding more cars to the centre of Warwick at peak times will certainly contribute to. Slightly outside the centre of Warwick, anyone who lives in Warwick knows how congested Myton Road is for 1.5 hours at the start of each day and again from 3.30pm until about 6pm at the end of each day. I walk past stationary vehicles and noxious fumes as I walk my children to and from school. In 2013 Dr Linane recommended to WDC that they carry out a Health Impact Assessment and WDC have ignored the request.

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.

- There needs to be a better and more balanced spread of new housing allocations included in the Plan through an alternative approach to locational distribution of housing in order to avoid some 52% (or 3245) of the 'new' sites (6188) being located South of Warwick town, by:
 1. Increased provision on the northern side of the main settlements, i.e., on the Birmingham and Coventry sides, where a significant proportion of the car borne workers travel daily, and especially the northern side of Warwick town.
 2. Such locations should include: Budbrooke which is close to the park nad Ride facility and the A46 corridor; Hatton, with similar advantages; and areas adjoining Coventry (airport and Gateway,) where very large scale employment proposals of a regional scale are becoming available.

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

X

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

This process is extremely complicated and will preclude most of those who wish to voice their opinion and concern. I wish to represent their opinion.

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:

Paul Hodge

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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