

## Publication Draft Representation Form 2014

For Official 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](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 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](mailto: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](http://www.warwickdc.gov.uk/newlocalplan) and at the following locations:

**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**

**John Holland**  
**County Councillor for Warwick West**  
**55 West Street**  
**Warwick**  
**CV34 6AB**  
**01926 401168**  
**johnholland@warwickshire.gov.uk**

**Angela Warner**  
**County Councillor for Warwick South**  
**14 Arlescote Close**  
**Hatton Park**  
**CV35 7TX**  
**01926 712065**  
**angelawarner@warwickshire.gov.uk**

**Jenny St John**  
**County Councillor for Warwick North**  
**10 Eborall Close**  
**Warwickshire**  
**CV34 5QA**  
**01926 774373**  
**jennystjohn@warwickshire.gov.uk**

**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**

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

**The adoption of the Local Plan Yes**

**Do you consider the Local Plan is :**

**5.1 Legally compliant. No**

**5.2 Duty to cooperate No**

**5.3 Sound?**  
**No**

**6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:**

**Justified x**

**Consistent with National Policy x**

## Part B - Your Representations

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

**Representation by Warwickshire County Councillors, John Holland, Jenny St John, Angela Warner**

**We consider the Local Plan to be unsound as it is not (a) Justified or (b) Consistent with National Policy, with regard to Policies, TR2 Traffic Generation and DS10 Broad Location of Allocated Housing Sites and DS6 Level of Housing Growth:**

**a) To be 'justified', the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.**

***The Plan is not justified, as the over-development of the greenfield sites on the edge of south Warwick will result in air pollution which the Strategic Transport Assessments cannot mitigate. This will affect both the health of residents and the structure of our multiple historic buildings, which are so important to our sense of place and culture.***

***Warwickshire County Council officers have produced the best transport mitigation plan they can in response to the proposals for housing offered by the District Council. This does not imply support, but a neutral response on the best option for increasing flow.***

***Unequivocally, the proposed traffic mitigation still results in increased traffic and increased pollution as laid out in the report from Arup. Warwick already suffers from pollution levels above European guidelines on safety. Air pollution from traffic is linked to strokes, heart and respiratory diseases as well as some cancers and asthma. About 4,300 premature deaths a year in London alone are attributable to air pollution, according to studies for the London Mayor.***

***Public Health Warwickshire offered Warwick District Council a Health Impact Assessment on their Plan. This was not commissioned by WDC before the publication of the Plan. As a result of our intervention, WDC has now agreed to a partial HIA to be completed before the end of the consultation.***

***The 1993 Local Plan and the Inspector's Report in 1994 required measures to reduce the impact of traffic on our town centre. And yet, over two decades on, we have been unable to mitigate the traffic effect of this development, despite funding from the developer. We do not believe further development should be approved without first meeting our previous obligations.***

**b) To be 'consistent with national policy', the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.**

***The plan is not consistent with Policy 11, Conserving and Enhancing the Natural Environment, as the conditions set out in Paragraph 124 cannot be met:***

***'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.'***

***In addition, the location of the proposed development does not allow sustainable transport to be taken forward. Distances will be too great for pedestrians. Viable public transport will not be possible.***

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.

**Modifications Required:**

**A modification is required to Policies: DS10 Broad Location of Allocated Housing Sites and DS6 Level of Housing Growth.**

**The latest ONS statistics predict 29% fewer residents for Warwick District throughout the life of the Plan.. We suggest:**

- a) a reduction in the number of homes required in Warwick District to reflect the new ONS figures.**
- b) the removal of a substantial number of development sites south of Warwick to prevent an increase of air pollution, and comply with the NPPF.**

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

**Yes, we 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:**

***As Warwick councillors, we wish to be given the opportunity to speak at the hearing on our representation and on submissions that we have not yet seen, on behalf of our residents.***

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.

For Official Use Only

Person ID:

Rep ID:

***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.***



