

## 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	Caroline	
Last Name	Marrow	
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 Modifications to the appointed Inspector	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The adoption of the Local Plan.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

## 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:	New Local Plan proposed modification February 2016
Mod. Number:	H50
Paragraph Number	Policy DS10,19,
Mod. Policies Map Number:	Map 13

### 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.

Please see attached sheet

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 policy to develop H50 should be abandoned.  
As far as alternative sites are concerned the section on LP09 Village Profile and Housing Allocations pages 26/52 and 27/52 would aptly propose and discount all alternative development sites available in Cubbington as all of them have already been discounted as unsuitable for development.

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.

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

n

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:

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:

Caroline Marrow

Date:

22<sup>nd</sup> April 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.

Local Plan Consultation Response Form - Question 7

I object to the New Local Plan proposals for Cubbington in the "Sustainability Appraisal Addendum 2016 including appendices" file

[http://www.warwickdc.gov.uk/download/downloads/id/3207/sustainability\\_appraisal\\_addendum\\_report\\_2016\\_inc\\_appendices.pdf](http://www.warwickdc.gov.uk/download/downloads/id/3207/sustainability_appraisal_addendum_report_2016_inc_appendices.pdf)

**Site:** Land East of Cubbington **Size & Approx. Capacity:** 95 dwellings Ref L17 (aka H50)

Natural Environment and Landscape

1. Safeguarded land in H50 is reserved for the construction of HS2. The impact of the changes that HS2 will bring to the site has not been considered. When built the HS2 line will run approximately 400metres from the new housing and is likely to cause noise nuisance.
2. The H50 sites on Rugby Road are adjacent to rejected sites which have a similar landscape value and any building there would be a significant new development. Why can H50 now be accepted if the rejected sites were found unsuitable?
3. Ref SA 10 report Feb 2013 Table 4.20 - Page 88/126  
In the previous plan the Allotment Gardens (CU3\*O) and the Waverley Equestrian Centre (CU4\*O) were rejected on grounds "would lead to a significant finger of new development into an area of high landscape value."

Location, Shops and Community Facilities

1. Error - The site is not located adjacent to the Rugby Road Local Shopping Centre. The Rugby Road Shops are around 1.4km away.  
The nearest local shops are in Cubbington Village which does constitute a "Shopping Centre". Ref page 36/57 (104).
2. There is no GP Practice in Cubbington.
3. No proposals to mitigate expected increased pressure on existing services and facilities.

Sustainable Transport and Traffic

1. Error -The site is not on the 538 bus route.
2. Bus Route 69 only runs once a day from Weston at 10.31am and has NO return services listed.
3. The nearest bus stop for No 68 bus service is more than 400m away on Rugby Road near Church Lane. This service is unreliable.
4. It was recognised in November 2013 that local roads A452, A445 and B4453 are identified as being heavily used. Development may have cumulative negative effects on transport and travel times, as well as Air Quality.

Green Belt and Agricultural Land

1. The erosion of the Green Belt is to be deplored. It has been recognised that the area around H50 is of high landscape value and should be protected.
2. Additionally, the Grade 2 farmland which is to be lost from the Greenbelt was not assessed and this could affect its' suitability for a building development. See also flood risk.

Local Plan Consultation Response Form - Question 7

Nature Conservation

1. North Cubbington Wood is designated Ancient Woodland and the Princethorpe Woodlands Living Landscape Trust area is a conservation area only a short distance from Cubbington and H50.

Flood Risk

1. Some of the serious concerns about flooding have been omitted from the SA Addendum Feb 2016. Pages 37/57 (105) and 38/57 (106)

Notwithstanding that we are now looking at the effects of developing H50 instead of the Allotment Gardens and land opposite Willow Sheets Meadow I think this is relevant:  
Below is a transcript of November 2013 SA of potential village site allocations – Cubbington Pages 23/61 to 25/61 – Ref: SA04\_SustainabilityAppraisalPotentialVillageSiteAllocations.pdf

*“One site is located within an area of medium or high flood risk and therefore there could be major negative effects on flooding. It is recommended that any residential development avoids the flood risk areas which would prevent the major negative effects identified. All other potential allocations are not located within an area of flood risk. However, it has been identified by the Strategic Flood Risk Assessment (SFRA) (2013) that Cubbington suffers from major surface water flooding and that the drainage systems in the area (public, private, highway or land drainage) were not designed to cope with the exceptional conditions. The SFRA recommended that future development is avoided and that effective planning policies should be implemented in accordance with the SUDS recommendations provided in the SFRA. Unless local plan policies are developed to address the issues of flooding with regard to new development in Cubbington, given its sensitivity there are likely to be major short to long-term negative effects.”*

Water Quality

1. H50 is also in the Surface Water Drinking Water protected area as well as a Surface Water Safeguarded Zone. – This is not referred to in the new report.

Do we really need this many dwellings?

1. The plan covers 2011 -2029 - How many dwellings were completed in the period 2011 – 2016?  
Have these completion figures been factored into the totals?

Suitability to accommodate Coventry’s housing need:

1. Strong links to Coventry –  
*There are no strong links with the City of Coventry and no transport services available to link the two places*
2. Villages with the best infrastructure facilities –  
*Cubbington’s infrastructure facilities and local services will need to be improved to accommodate more housing, more people and more traffic.*
3. Areas that could provide quick turnaround to meet the 5 year housing supply –  
*The construction of the HS2 overbridge and road realignment will have to be completed before construction could commence. This would delay the start until at least 2020.*