

## 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:

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		Miss
First Name		Kathy
Last Name		Else
Job Title (where relevant)		
Organisation (where relevant)	The Trustees of Haseley Settlement	
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	<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"/>

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## 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:	<input type="text" value="Local Plan"/>
Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text" value="DS19"/>
Policies Map Number:	<input type="text"/>

### 5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
5.3 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

### 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:	<input checked="" type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

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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.

The Council has failed to give the Green Belt a degree of permanence as required by the NPPF in that it cannot endure within the current plan period, yet alone beyond it. The Plan is unjustified and thus unsound.

The NPPF requires planning authorities to establish Green Belt boundaries that should only be altered in exceptional circumstance and that once established they should have permanence for the long term, including beyond the plan period. It is noted that draft **Policy DS19 Green Belt** within the Warwick Plan identifies areas of land to be removed from the Green Belt around the main settlements of Leamington Spa and Kenilworth as well as the area comprising the Warwickshire Gateway south of Coventry City.

However, as RPS has set out elsewhere, the Council has not provided for both its objectively assessed need, nor has it made satisfactory provision for the level of housing that will be generated by the Gateway Site based upon the employment attributable from it to Warwick District, or that of Coventry and Nuneaton. There is therefore a significant deficiency in the level new homes being provided in Warwick, compared to the level of new employment being provided in the District. This inequity should be addressed, particularly in respect of the Council's strategy and objectives to balance housing and employment provision.

The level to which the Green Belt has been amended is therefore insufficient to meet the needs of the District and Sub-Region. There is also clear evidence that Warwick District is severely under providing for in housing need and land within the Green Belt offers sustainable options for addressing this.

RPS is aware that the Council has committed to a shared evidence base for future strategic planning and has indicated that (paragraph 2.84, bullet 4) a Green Belt Study comprises part of this. While it states that the Green Belt Study needs to be up to date, there is no commitment to undertake a review of the Green Belt either locally or strategically. As such therefore there is no formal statement that they authorities will undertake a strategic review of the Green Belt, despite committing to reviewing housing numbers by 2015 within the CWLEP Strategic Growth Plan.

The published SHLAA 2014 update identifies sites as suitable, available and potentially deliverable that are located beyond village boundaries within the Green Belt and are reliant upon Green Belt boundary changes to villages to deliver small scale residential developments. In terms of the distribution of housing amongst rural settlement the development of small sites at village locations is key to the delivery of the Plan's proposed rural strategy of achieving sustainable development in accordance with the NPPF. However, the failure of the plans is to take account of its SHLAA evidence base to inform the settlement boundaries of the villages within the Green Belt.

A clear example of this is the proposed settlement boundary around Hatton Green and the failure to identify any housing sites at this sustainable location which has a primary school and nursery facility as well as other community facilities such as the parish church and village hall. Despite the Council's SHLAA identifying a site (R39 – details attached) within the village as suitable and available for development, the proposed village boundary for Hatton Green actively excludes the site from the village envelope and limits any opportunities for in fill development to garden curtilages. This approach is clearly contrary to the advice of the NPPF and the stated strategic objectives of the plan that seek to provide rural housing through modest additions to existing settlements.

In direct contradiction to the opportunities at Hatton Green is the proposed site allocation at Hatton Park for 80 dwellings. The proposed site allocation and focus of housing growth at Hatton Park, which has no facilities or community resources, is considered to extend built form beyond clearly identifiable and defensible limits of the Green Belt contrary to the NPPF and PPG guidance on Green Belt Boundary reviews and the location of new development within rural areas close to community facilities.

**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 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.**

A further review of the Green Belt is required to provide for additional housing and to adequately meet the needs of rural areas. The village boundary for Hatton Green should be redefined to incorporate SHLAA site R37 and allow for housing to be delivered within the village. As part of this review of Green Belt boundaries the justification for large scale development at Hatton Park and Hatton Station should be reviewed due to the lack of facilities these settlements offer and therefor the contradiction to the NPPF's principal aim of locating development in sustainable locations.

While it is understood that the Hatton Green SHLAA site R39 lies within the Green Belt, the site is entirely suitable, available and achievable for the purposes of the NPPF and should be either allocated for residential or the village boundary revised to incorporate the site and allow its delivery as a rural windfall site.

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

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:

Date :

27/06/14

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.

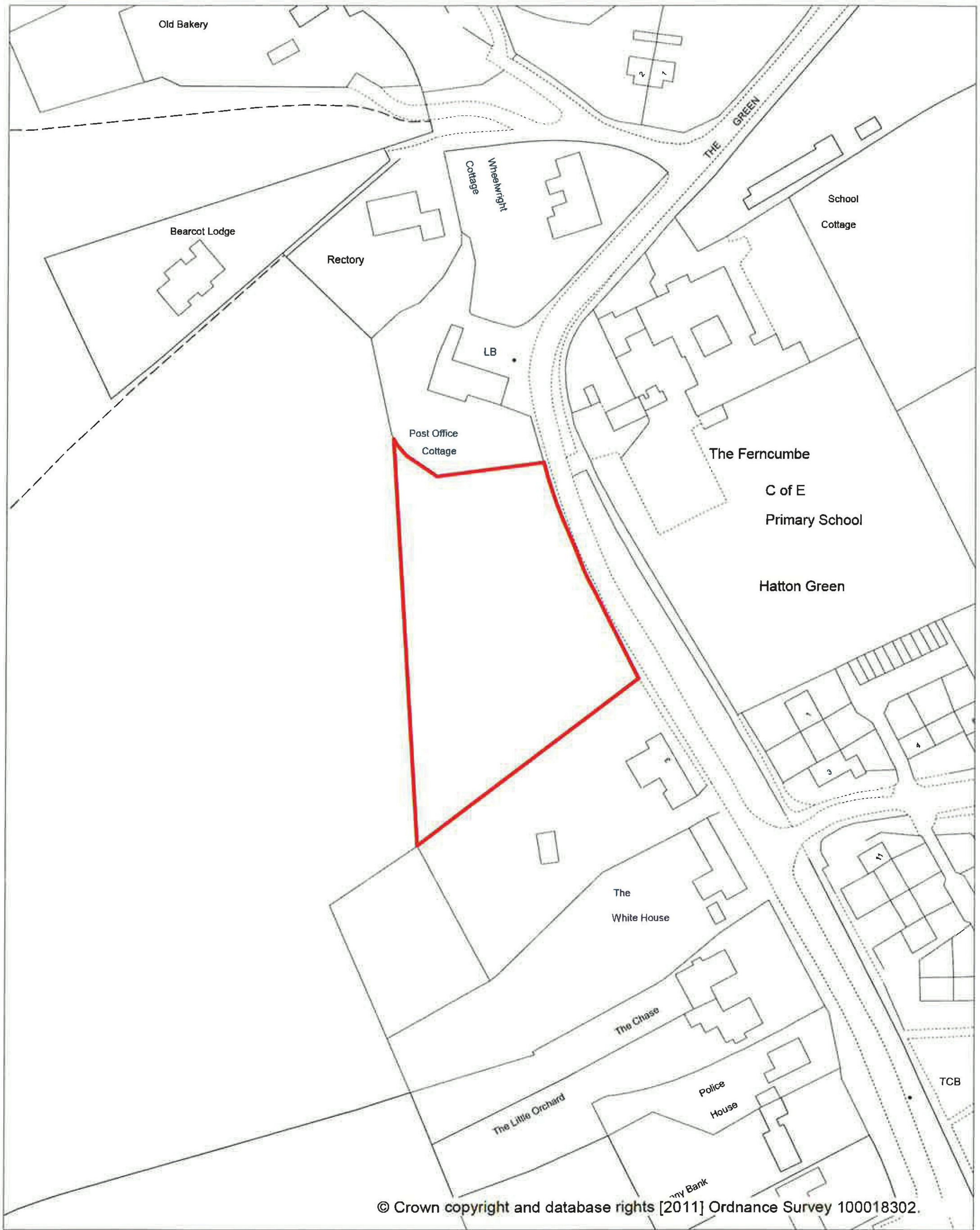
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<b>Site Ref</b>	R39	<b>Site Name</b>	Land at Hatton Green
<b>Site Size (Hectares)</b>	0.36	<b>Settlement</b>	Hatton
<b>Source</b>	SHLAA 08	<b>Land Type</b>	Greenfield
<b>Adjacent/ Overlapping Site</b>			

<b>Suitability for Housing</b>	
<b>Location</b>	Within existing built up area of the village. Hatton Green has a primary school and church and public transport to the towns
<b>Policy Restrictions</b>	Green Belt
<b>Physical Constraints</b>	
<b>Potential Impacts</b>	Grade II Listed Buildings at No 3 and Post Office Cottage on neighbouring sites
<b>Environmental Conditions</b>	Satisfactory
<b>Overall Suitability</b>	Potentially suitable for small development of houses fronting the existing public highway subject to appropriate design which is sympathetic to setting of nearby Listed Buildings
<b>Availability</b>	
Owner has expressed willingness to release the site for development	
<b>Achievability</b>	
Subject to alteration of Green Belt and/ or evidence of need for affordable housing	
<b>Housing Capacity</b>	
Potentially suitable for 3 dwellings fronting the highway.	



R39 Land at Hatton Green

LOCATION PLAN

Scale:  
1:1250

Drawn By:  
CP

Date:  
24 October 2011

Grid Reference:  
423291 E, 267381 N

North:

Development Services: P.O. Box 2178, Riverside House, Milverton Hill, Royal Leamington Spa. CV32 5QH.  
Telephone: (01926) 450000. Facsimile: (01926) 456542.