

LOCALPLAN

helpingshapethedistrict



Publication Draft Representation Form 2014

For Official Use Only	
Person ID:	11538
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

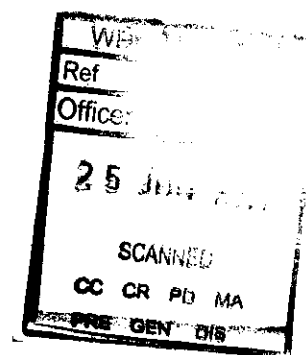
Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick

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

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Address Line 2

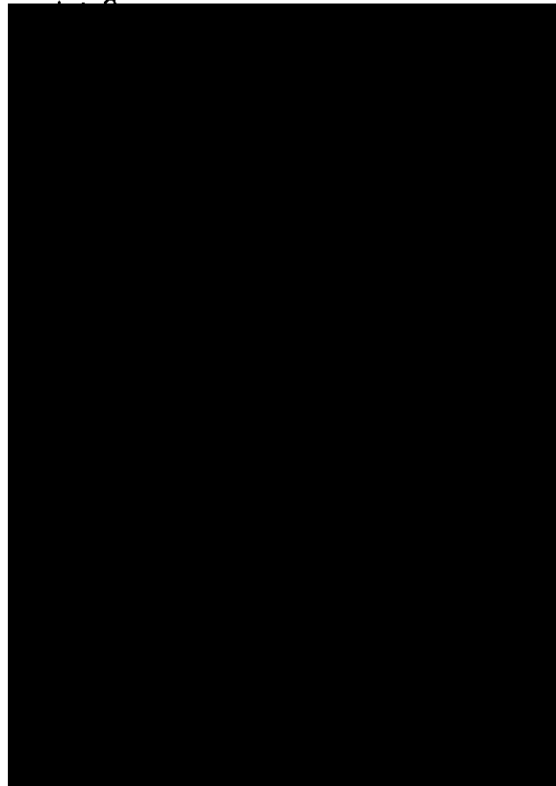
Address Line 3

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

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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: Site H28
Paragraph Number: WHOLE PLAN FLAWED
Policy Number: NOT KNOWN
Policies Map Number: NOT KNOWN

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	No	UNKNOWN
5.2 Complies with the Duty to Co-operate?	Yes	No	UNKNOWN
5.3 Sound?	Yes	No	✓

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: ✓
Justified: ✓
Effective: ✓
Consistent with National Policy: ✓

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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. 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.

SEE ATTACHED.

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.

1. WDC SHOULD USE THE ONS STATISTICS TO ACCURATELY REFLECT THE NUMBER OF HOUSES REQUIRED.
2. SHOW AND PROVE THE PROPER PLANNING ON HOW TO SUPPORT THE INFRASTRUCTURE FINANCIALLY AND PRACTICALLY.
3. DEFINE AND SHOW WHAT THE "EXCEPTIONAL CIRCUMSTANCES" ARE TO BUILD ON GREEN BELT.

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

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 : 23 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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Preparation and Soundness details forming part of representation to WDC on the latest draft of the Local Plan

Preparation:

- There has not been a genuine process of consultation.
- The initial consultation as to the level of development indicated a majority in favour of a low level (about 5,500 dwellings). The eventual plan proposes 12,900.
- Although the Plan has been presented to the public at the various stages of its evolution, there has been little change as a result of the response from the public opposing the overall scale of development, urbanisation of the South of the District a. encroachment on the Green Belt.
- Site H28 (Hatton Park): The final revision of this site, reducing the site area without commensurate reduction in housing numbers took place without proper consultation with the local community, although the Authority was in contact with the developer involved.

Soundness:

- Housing numbers: This calculation is highly speculative and inevitably based on poor quality evidence and data. The LPA calculate a need for 12,900 dwellings, while another equally competent assessment reached a figure of 5,500.
- Given the pressure from developers to acquire and develop greenfield sites in areas of high property value, where profit can be maximised, and given the acknowledged negative impact of over-development on the District, it would be safer to plan for the lower figure.
- As the plan is subject to review during its 15 year life, this could be revised upwards if need were demonstrated.
- The recently published ONS population projection shows a 29% reduction on its previous estimate. This illustrates the difficulty of making such predictions, and thus the need for caution in using this data in consequent planning decisions. The process of 'development' is not reversible.
- Infrastructure: There is insufficient planning (including financial) for the additional infrastructure necessary to support the proposed level of growth. This would in any case be constrained by the historic nature of Warwick centre, the site and size of Warwick Hospital and the capacity of local schools.
- Sustainability: '*Sustainable* means ensuring that better lives for ourselves don't mean worse lives for future generations.' [*sic*], Ministerial Forward, NPPF. Increased congestion, loss of open countryside, burden on infrastructure and fundamental change to the character of the District will do nothing to better the lives of the present, or future generations.
- Green Belt: Site H28 (Hatton Park) (amongst others) lies in the Green Belt. No 'exceptional circumstances', as required by the NPPF to justify such development are identified, nor indeed exist. A Housing Needs Survey for the Parish of Hatton carried out in May 2014 demonstrated a need for 12 dwellings, for which there is already sufficient windfall and brownfield sites. In a survey for the recently prepared Parish Plan 64% opposed any further development in the Parish, and 80% opposed any change to the Green Belt.