

## 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                         |                                     | Mr                                 |
| First Name                    |                                     | Oliver                             |
| Last Name                     |                                     | Bell                               |
| Job Title (where relevant)    |                                     | Principal Planner                  |
| Organisation (where relevant) | CEG (on behalf of Steel / Pittaway) | Nexus Planning                     |
| Address Line 1                |                                     | Suite A, 3 Weybridge Business Park |
| Address Line 2                |                                     | Addlestone Road                    |
| Address Line 3                |                                     | Weybridge                          |
| Address Line 4                |                                     | Surrey                             |
| Postcode                      |                                     | KT152BW                            |
| Telephone number              |                                     | 01932 837850                       |
| Email address                 |                                     | o.bell@nexusplanning.co.uk         |

## 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  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

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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:       | <input type="text" value="Policy DS10"/> |
| Mod. Number:              | <input type="text" value="8 and 9"/>     |
| Paragraph Number          | <input type="text"/>                     |
| Mod. Policies Map Number: | <input type="text"/>                     |

## 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 comments.

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.

Please see attached comments.

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.

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**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

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:**

As the landowner of a substantial proportion of the safeguarded land 'S1', it is essential that we are able to attend and speak at the Examination.


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:

21/04/2016

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.

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# Land south of Westwood Heath Road

## Representations to Proposed Modifications to the Publication Draft Warwick District Local Plan (Part 1)

**on behalf of CEG**

April 2016

## Policy DS10 'Broad Location of Allocated Housing Sites'

- 1.1 The following representations have been prepared by Nexus Planning Ltd, on behalf of CEG, in response to the Warwick District Council (WDC) Regulation 19 Consultation on Proposed Modifications to the Local Plan (Part 1).
- 1.2 CEG controls around 129 hectares of land south of Westwood Heath Road, identified in part in the emerging Plan as safeguarded land (site ref. S1). We consider that site S1 could deliver circa 900 dwellings, with further development capacity on land to the south, as advocated in the Westwood Heath Garden Suburb Vision Document, and Technical Annex (see Appendix 1).
- 1.3 Coventry City Council (CCC) has identified a shortfall of 17,800 dwellings between 2011 and 2031. The Duty to Cooperate requires all the Warwickshire planning authorities to work with the City Council to reach an effective solution to this shortfall and to act in a reasonable and constructive way.
- 1.4 On 29th September 2015, the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity (CWJCEGP) considered a Memorandum of Understanding (MoU) to ensure the housing needs of the Coventry and Warwickshire Housing Market Area (HMA) are met in full. The MoU was agreed to by the Leaders of Coventry CC, Warwick DC, Warwickshire CC, Rugby BC, North Warwickshire BC and Stratford-on-Avon DC. For Warwick District, the implication of the MoU is to provide an additional 4,032 dwellings in Warwick District by 2029 to address unmet need arising in Coventry. The MoU also identifies a further 664 dwellings to be accommodated in Warwick District by 2031. As the MoU has not been agreed to by the Leader of Nuneaton and Bedworth BC, the unmet need figure for Warwick District could potentially increase as the MoU currently proposes that Nuneaton and Bedworth BC accommodate almost 23% (4,020 dwellings) of CCC's unmet needs.
- 1.5 WDC has prepared a Distribution of Development Strategy Paper (2016) in support of the emerging Local Plan. In respect of dealing with unmet housing needs from Coventry, this paper states at paragraph 16:

*"it is recognised that (subject to environmental and policy constraints) the most sustainable locations to achieve this are those closest to or with the best access to Coventry."*
- 1.6 This conclusion is further supported by the conclusions of the Sustainability Appraisal of the Local Plan.

- 1.7 Paragraph 37 of the NPPF states that planning policies should aim for a balance of land uses within their area, so that people can be encouraged to minimise journey lengths for employment. Given the significant level of unmet housing needs arising from Coventry, which WDC has agreed to accommodate, the Council should maximise opportunities to locate housing on the edge of Coventry.
- 1.8 However, while the emerging Local Plan is proposing to accommodate 5,976 dwellings relating to Coventry's unmet needs, it only proposes to allocate 2,225 dwellings on the edge of Coventry i.e. less than 50%. This is not due to a shortage of available land. Indeed, the Council's Distribution of Development Strategy Paper highlights that a *"number of substantial sites on the southern edge of Coventry have been submitted through the SHLAA"* (para. 23).
- 1.9 Land south of Westwood Heath Road is identified in the emerging Local Plan as an appropriate location for growth and for the reasons set out in our representations to Policy DS11, CEG consider that the Council should allocate both H42 and S1 as a single strategic allocation, with a restriction on dwelling occupation in advance of the required highway interventions being delivered. It is considered that this is fully consistent with the NPPF and would provide a much more logical and robust framework for the comprehensive planning of the area. Furthermore, it would enable the allocation of a larger proportion of housing where significant pressures exist.
- 1.10 The current restriction on housing delivery in the Westwood Heath area prior to the completion of certain highway interventions, as identified in the draft Local Plan, is derived from the findings of the WDC Strategic Transport Assessment (STA) (February 2016) which considered four different development scenarios for housing at Kings Hill and Westwood Heath. The STA identifies that for 'Scenario One' (425 dwellings at Westwood Heath and 1,050 dwellings at Kings Hill) the highway network would operate within capacity. 'Scenario Two' would however lead to overcapacity issues at Crackley Lane and Gibbet Hill Road through the cumulative impact of 850 dwellings at Westwood Heath and 2,100 dwellings at Kings Hill. All other scenarios also generate highway capacity issues.
- 1.11 Having regard to the conclusions of the STA, the emerging Local Plan identifies that 2,225 dwellings can be accommodated on land south of Coventry (at Kings Hill and Westwood Heath) without significant highway interventions. Kings Hill is expected by the draft Plan to deliver the majority of this capacity, being allocated for 1,800 dwellings within the Plan period. The Council's housing trajectory identifies that Kings Hill will deliver 200 dwellings per annum between 2020/21 and 2028/29, the highest annual delivery rate of any single site allocated within the Local Plan. This demonstrates the significant reliance of the draft Plan upon Kings Hill to achieve its overall housing requirement.



- 1.12 In light of the above, it is important to note that the STA failed to consider scenarios comprising a more equitable distribution of housing between Westwood Heath and Kings Hill. This would enable a reduced reliance upon any single site for housing delivery and limit the risk that the housing trajectory is not realised. Such an approach would be entirely logical, given a review of Census travel to work data shows that future residents of both developments are likely to have similar destinations of travel and as a result, development at both sites will cumulatively generate the capacity issues identified (principally at Crackley Lane and Gibbet Hill Road). Furthermore, a more even distribution of housing across Westwood Heath (sites S1 and H42) and Kings Hill, with similar dwellings limits for highways infrastructure delivery, could enable a more co-ordinated and multi-developer led approach to the delivery of the required highway interventions, providing greater certainty on delivery.
- 1.13 Given the above, we consider that Policy DS10 'Broad Location of Allocated Housing Sites' of the emerging Plan is not 'justified' by failing to be the most appropriate strategy for the District, nor it is 'positively prepared'.

Suggested Change

- 1.14 The policy should be amended to allocate a greater proportion of housing in sustainable locations on the southern edge of Coventry, in recognition of the significant unmet housing needs from the City. This should involve the allocation of land south of Westwood Heath Road as a single allocation of 1,500 dwellings (comprising sites H42 and S1), with a restriction on the level of housing expected to be delivered in the Plan period at both land south of Westwood Heath and Kings Hill, prior to the implementation of the required highway interventions.

**APPENDIX 1 – WESTWOOD HEATH GARDEN SUBURB VISION DOCUMENT AND  
TECHNICAL ANNEX (SEE SEPARATE ATTACHMENT)**