

## 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 DS19"/>
Mod. Number:	<input type="text" value="16"/>
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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
5.2 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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

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 DS19 'Green Belt'

- 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 and Technical Annex (Appendix 1).
- 1.3 Site S1 falls within parcel C20 of the Joint Green Belt Study 2015 which scored a relatively low 13/20 in the study, suggesting that it only played a limited role in fulfilling the purposes of including land in the Green Belt. Parcel C20 does however cover a substantial area, with site S1 making up only a small portion of it. Appendix E of the Westwood Heath Garden Suburb Technical Annex includes an assessment of site S1 against the Green Belt assessment methodology used in the Joint Green Belt Study, concluding that it only scores 9/20 and clearly demonstrating that this parcel demonstrably fails to fulfil the five purposes of including land in the Green Belt.
- 1.4 We support the Council's findings that site S1 fails to adequately fulfil the purposes of including land in the Green Belt. However, for the reasons set out in our representations to policies DS10, DS11 and DS15, we consider that site S1 should be identified as an allocation of up to 900 dwellings, rather than safeguarded. This, in combination with site allocation H42, would enable the comprehensive planning of a development for circa 1,500 dwellings in the Westwood Heath area. Furthermore, it would ensure that a more successful and integrated masterplan is developed and that on and off site infrastructure is appropriately planned.
- 1.5 Appendix E of the Westwood Heath Garden Suburb Technical Annex demonstrates how two further development options south of Coventry could deliver up to 2,500 dwellings.
- 1.6 Green Belt land required to deliver the 'Phase 2' option detailed in the Technical Annex scores slightly below the C20 parcel score detailed within the Joint Green Belt Study (2015), whilst land required to deliver the 'Phase 3' option score slightly above the C20 score. It must however be recognised that, with particular relevance to the Phase 3 option, the presence of HS2 and its associated infrastructure has not been included within the baseline assessment. If HS2 was considered to be part of the baseline condition, this option would in particular be de-sensitised in respect of countryside encroachment and coalescence purposes and could be considered appropriate for Green Belt release. Given the increasing certainty of HS2 and

significant growth pressures south of Coventry, the Council could reasonably reference this in the Local Plan as a potential area of focus for a partial Green Belt review, should further 'special circumstances' arise. Such a review could take place as part of the evidence base to inform an Action Area Plan (AAP) for land south of Coventry, the justification for which is set out in our representations to Policy DS20 and Policy DS NEW 1.

- 1.7 For the reasons set out above and comments made in respect of linked policies in the emerging Plan, Policy DS19 is not sound as it not 'justified' by failing to be the most appropriate strategy and is not 'consistent with national policy'.

Suggested Change

- 1.8 Site allocation H42 and safeguarded land S1 should be combined to form a single housing allocation of up to 1,500 dwellings which is removed from the Green Belt, with at least 425 dwellings to be delivered within the Plan period.



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