

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

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

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 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		Tim
Last Name		Watton
Job Title (where relevant)		Technical Director
Organisation (where relevant)	Lenco Investments	RPS Planning & Development
Address Line 1		Highfield House
Address Line 2		5 Ridgeway
Address Line 3		Quinton Business Park
Address Line 4		Birmingham
Postcode		B32 1AF
Telephone number		0121 213 5500
Email address		Tim.Watton@rpsgroup.com

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

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="SA"/>
Mod. Number:	<input type="text"/>
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 checked="" type="checkbox"/>	No	<input 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 checked="" type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input 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.

1. In support of the Proposed Modifications, the Council has proposed a revised Sustainability Appraisal (SA) prepared by Enfusion in February 2016.
2. In many cases, the SA is the principal source of evidence in support of the Proposed Modifications and Lenco Investments remains concerned that the SA is not sufficiently robust as a means of evidence.
3. Lenco Investments is particularly concerned with the lack of consideration of new strategic sites south of Coventry, which has only been given cursory assessment through the SA.

SA Growth Options

4. The SA has tested four options for growth figures, ascending between 600 and 1,000 dwellings per annum. The final strategy proposed by the SA is a combination of Option 3 (900) and Option 4 (1,000), resulting in the Proposed Modification figure of 932 dwellings per annum.
5. It is unclear from the justification in the SA why the figure of 1,000 dwellings (Option 4) has been discounted, particularly, when it ranks an identical score to Option 3 (900 dwellings) as indicated in Table 3.1 of the SA. This omission becomes clearer when considered against the context of the Coventry and Warwickshire MoU, which it has claimed to consider.
6. Whilst the Council may opt to follow a 18 year plan period, the same period cannot be attributed to need arising from Coventry, as this would lead to a shortfall of 664 dwellings that will remain unmet across the HMA. If Warwick therefore intends to retain the 18 year trajectory, it should do so with the full allowance of need from Coventry (6,640), presenting a requirement of 17,740 (969 dwellings per annum). This is closer to Option 4 (1,000) dwellings per annum and the SA needs to be amended to reflect the fact that the other options below this figure will not be capable of meeting the required housing need from Warwick and Coventry Districts.

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.

Westwood Heath Site Assessment

7. Notably, this site is not included as part of the assessment as part of the February 2016 SA Addendum. Pages six and seven of Appendix IV to the SA indicates that this site does not need to be appraised, as it has been considered previously as part of a larger site and due to the reduction of the site to 425 dwellings, there will not be any significant effects. Lenco Investments does not consider this a legitimate approach to take.
8. Though the site has been considered previously, it has not been considered against the strategy for growth in the Proposed Modifications document. In terms of the SA this is important, because there are a number of new sites proposed by the Council, all of which should have been tested for cumulative impacts.
9. Table 3.5 of the SA details a summary of five growth options for strategic sites to dovetail with the Council's strategy for distribution. Whereas the other policies have detailed justifications in this regard, there is no detailed SA for these options. The justification is instead included within each of the individual sites – not a cumulative assessment.
10. Without this assessment, it is not possible to fully consider the implications of the Council's latest strategy as part of the Proposed Modifications and it cannot be assured that the strategic locations around Coventry are the most sustainable locations for growth.
11. It is therefore contended that the SA is incomplete. It does not fully account for the cumulative effects of the sites proposed and cannot be subjected to further scrutiny as part of public examination until it is demonstrated how the SA has informed the plan development.

7. 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.

- Additional testing of growth options through SA process.
- Revised assessment of strategic sites to the South of Coventry, which incorporates a cumulative assessment.

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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:

- RPS has presented a number of objections to the Proposed Modifications and would like the opportunity to discuss these matters in more detail.

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:

Tim Watton

Date:

21 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.

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