

Part A - Personal Details

Title: Mr

First name: Robin

Last Name: Fryer

Address: Grovewood,
Grove Lane,
Ashow
Warwickshire,
CV8 2LE

Notification of subsequent stages of the WDLP

Submission to the Inspector Yes

Publication of recommendations Yes

Part B-Your Representations

4. To which modification of the Submission Plan or updated Sustainability Appraisal does this representation relate? Mod 1 to 11, Mod 14 to 16, Mod 19 to 22.

5. Do you consider the Local Plan is:

5.1 Legally Compliant? -No

5.2 Sound? -No

6. The proposed modifications are unsound because it is not:

Positively Prepared (not)

Justified (not)

Effective (not)

Consistent with National Policy (not)

7. Reasons why the proposed Local Plan submission is unsound:

Inconsistent with National Policy on Green Belts

Mod. 1 & 2 Most of the modified submission relates to increasing the number of new houses and proposes building a major housing development in the narrow greenbelt between Kenilworth-Stoneleigh and Coventry. This is contrary to the NPPF requirements in Paragraph 80 "*To check the unrestricted sprawl of large built-up areas.*" "*To prevent neighbouring towns from merging into one another*"; therefore the proposed modified Local Plan is unsound.

Duty to Co-operate

The proposed new housing numbers are based on Coventry housing numbers and population expansion which has not been approved in a LP examination and could be revised before 2017 as the claim that Coventry with a population of 337,000 needs to grow by 42,400 houses (approx 84,000 people) in 15 years is unrealistic and is yet to be examined in public. The WDC proposals in the current Local Plan are premature and unjustified.

The Coventry claim that they do not have any alternative housing sites and need to build in Warwickshire has not been critically examined by WDC. The Coventry 2016 draft Local Plan shows large areas of Coventry Greenbelt that can be developed which would have far less damage than WDC's proposals and would not contravene the aims of the NPPF.

Coventry's refusal to consider building on land in the Meriden Gap should be challenged by WDC as this Green Belt land has no more value or legal protection than the Kings Hill or Baginton Green Belt land. The map attached below on page 4 shows alternate locations for Coventry's housing and employment site which would be less damaging to WDC. The lack of consideration by WDC for alternative sites shows that the WDC Local Plan has not been positively prepared.

No justification has been provided for the proposed reserving of large areas of the Green Belt for unspecified future development. This is in contravention of the NPPF which requires 'exceptional circumstances' to be demonstrated for greenbelt land to be used for development. These reserved development areas around Old Milverton Parish (Policy Map 2, S43) and Kings Hill (Policy map 36, H43) should be deleted from the Plan. The removal of a large area of the Green Belt in WDLP, Area H43 is unjustified because it is far in excess of any land required for 1,800 Coventry overspill housing and contravenes the NPPF requirement to demonstrate 'exceptional circumstances' for use of Green Belt land for development.

The Sub-Regional Plan

The claim that the two Baginton sites are "Sub-Regional Employment Allocation (DS16, Policy Map 8)" is without legal basis as there is no Sub-Regional Development Plan that has been put to public consultation and agreed. There is not even a document on the Sub-Regional Plan that the public can consult. The Sub-Regional Plan appears to be a fictional invention of the WDC Planning Department to justify their proposals and undermines the credibility of the WDLP. The only Regional Plan that was officially approved was the Regional Spatial Strategy which was abolished in 2010 and WDLP does not even comply with this policy.

Sustainability

Sustainability is the key policy underlying the NPPF and is set out in paragraphs 6, 7, 18 to 219. The Local Plan Sustainability Assessment Addendum accepts the employment estimate that 10,000 jobs can be created in WDC area during the plan period and also accepts that 16,700 new homes will be built. It does not deal with the problems this imbalance will create for commuting traffic and congestion. The WDLP accepts Coventry's claim that it cannot provide the 42,400 houses but ignores Coventry's admission that it needs 47,600 extra jobs but can only provide 18,100 jobs for this population increase and looks to Warwickshire to provide the balance of 29,500 which confirms that Coventry's spread in WDLP is unsustainable.

Warwick District Council claim to be working to a Sub-Regional Plan to justify development but the WDLP does not indicate the way their proposals integrate with neighbouring development and this poor planning co-ordination makes the WDLP proposals 'not effective'. Policy Map 8 is misleading as it shows Warwick District in isolation. The Government have imposed a Duty to Co-operate with Councils but secret talks and Memorandum of Understanding between Council Officers is not a open and transparent way of conducting planning decisions that affect all this District's residents. Working in this way is circumventing the democratic process and the principles of the NPPF.

The A46 is running at over capacity and has become a vital transport link between the M4/M42 and the M6,M69,M1 motorways. WCC have confirmed that the A46 dual carriageway carries almost as much traffic as the M40 and 50% more traffic than the M69. The traffic was estimated at 86,000 vehicle movements per day in 2014 on the A46.

The traffic impact of several thousand new houses at Thickthorn and Kings Hill next to the A46 has not been considered in the SA Addendum which attempts to ignore the problems Option 6 creates. A sensible planning policy would locate major development away from the congested A45 and A46 to areas, closer to the M40, M6 or M69. The Thickthorn development proposal (policy map 5) should move a future retail area to provide a park-&-ride facility close to the A46 traffic Island and remove congestion caused by Leamington commuters along the A452.

The proposed retention of an industrial development (Zone A) in Baginton Green Belt (Policy Map 8) which was previously refused shows that WDC have ignored all the evidence produced at the Gateway Inquiry of the damaging environmental impact on the Village of 4,000 goods vehicle movements per day. The construction of high bay warehouses or factories on the edge of the prominent Baginton ridge will damage the character and environment of Warwick District. New Warehouse or factory development should be in a sustainable transport location; next to a motorway and having rail access to take the congestion off local roads.

The claim by WDC that it is providing Sub-Regional solutions in Warwick District to provide employment land and overspill housing for the Coventry area of the West Midlands Combined Authority is against the NPPF requirements that all new development should have a Sustainability Assessment. The WDLP Sustainability Assessment Addendum has been updated to cover the new proposals only in WDLP area. This report accepts blindly the Coventry overspill without assessing any sub-region impact. The WDLP is not positively prepared because it requires a Sub-Regional Sustainability Assessment to comply with the core requirements of the NPPF paragraphs 6 and 7 and without this the WDLP proposals do not appear to be legally compliant.

8. Necessary Changes to the WDLP

The present Local Plan should be withdrawn and a thorough co-operation undertaken on Sub-Regional facilities when the needs of the City of Coventry have been established after the Coventry Local Plan Inquiry.

A new sub-regional sustainability assessment should be undertaken by an independent organisation to determine whether the so called sub-regional developments are in the right locations.

Warwick District Council should undertake a consultation with each area where significant development is proposed.

9. Participation in the oral part of the examination.

Yes, I consider this is necessary and wish to participate.

10. Reasons for participation.

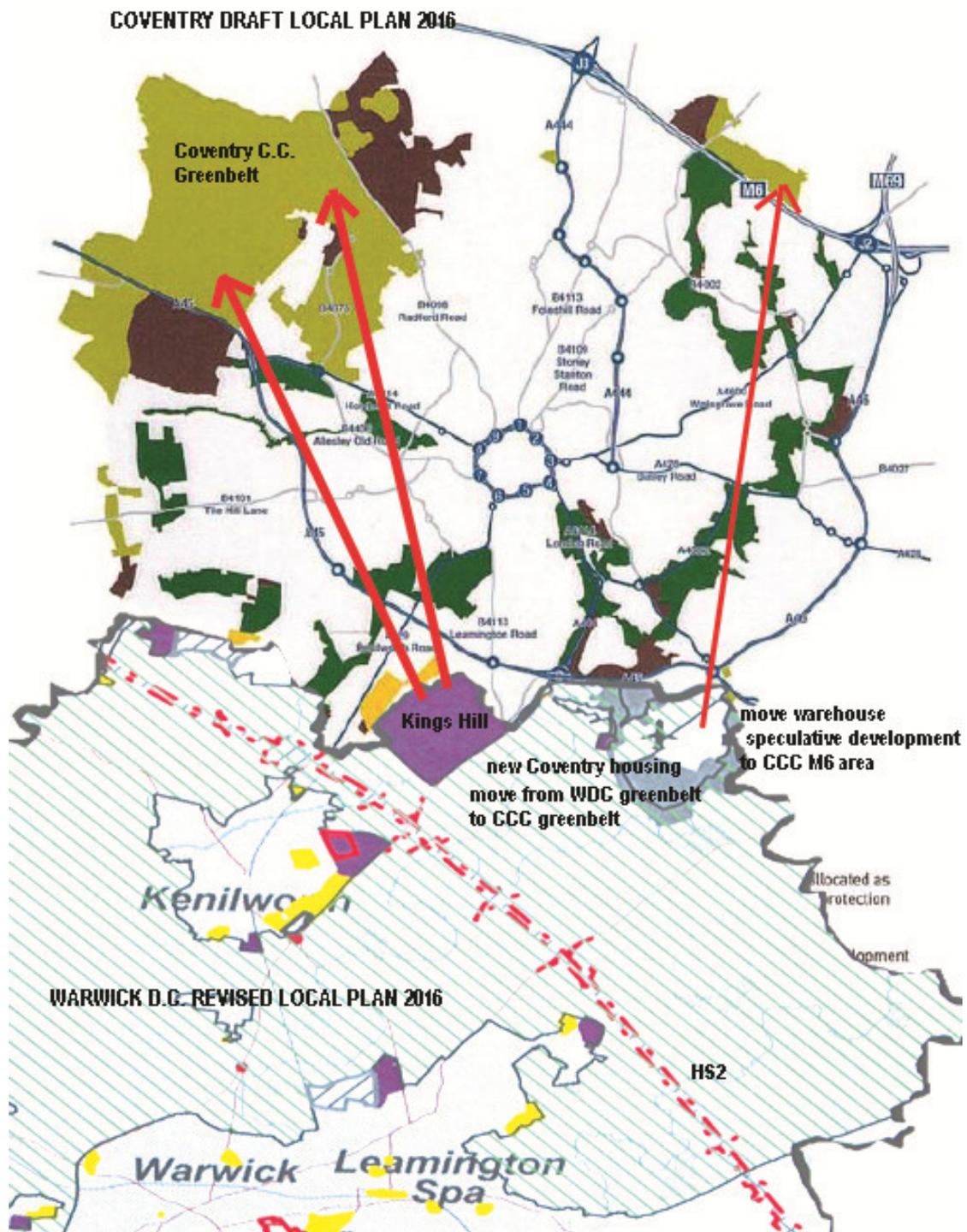
I do not believe that the proposed plan is the best solution for the District due to the poor level of planning shown by the Council and members of the public can improve the proposals.

Taking part in the democratic process is a duty of all residents who are technically able to do so.

11. Declaration

I understand that comment and name will be made public.

Signed: *R.W.Fryer* 20 April 2016



Proposed 2016 Local Plan maps for Coventry & WDC shown merged.

Comments and arrows are added for alternative development locations that are less damaging to WDC's Green Belt. The Meriden Gap to the north west of the City is far wider than the Finham-Kenilworth gap and should be developed first to comply with the NPPF. The NW location would have transport advantages for the new development.