

**Warwick District Local Plan**

**Proposed Modifications to  
Submitted Plan**

**Addendum to Statement of Consultation**

**Regulation 22c  
Town and Country Planning (Local Planning)  
Regulations 2012**

**June 2016**

## **Background**

This report has been produced as an addendum to the Statement of Consultation submitted to the Secretary of State for Communities and Local Government for public Examination in January 2015 which detailed previous stages of consultation undertaken in preparing the Plan.

At the meeting of the Council on the 24 February 2016 it was agreed to undertake consultation on modifications to the submitted local plan in order to rectify the issues of unsoundness identified in the Inspector's initial findings. The Proposed Modifications provide for increased new housing in order to meet an identified unmet need in Coventry, as was agreed in a Memorandum of Understanding reached between the Warwickshire local authorities and Coventry City on 29 September 2015.

This statement outlines the consultation process undertaken on the proposed modifications, which followed the procedural requirements at regulations 19-21 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

In consulting on the Main Modifications the Council has also followed the Planning Inspectorate's Examining Local Plans Procedural Practice, December 2013.

## **Introduction**

The Draft Warwick Local Plan was submitted to the Secretary of State for Communities and Local Government for public Examination on 30 January 2015 and was accompanied by a Statement of Consultation which detailed previous stages of consultation undertaken in preparing the Plan. An updated statement of compliance on the legal Duty to Cooperate has also been produced, which outlines the cooperation undertaken in the formulation of the modifications.

Initial hearing sessions were held between the 6th and 12th of May 2015. The Inspector issued his preliminary findings in a letter dated 1 June 2015. Following that the Inspector accepted a request from Warwick District Council to put forward Main Modifications to address the issues of unsoundness identified. Since that time additional work was undertaken by the Council including the commissioning of new evidence in order to produce the Main Modifications. The Main Modifications were agreed for consultation by the Council on the 24 February 2016. The proposed modifications were consulted on for a period of six weeks from Friday 11 March 2016 until Friday 22 April 2016,

## **Consultation Process**

The Schedule of Proposed Modifications and all supporting evidence including the Sustainability Appraisal addendum were published on the Council's website ([www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)). Paper copies were placed in local libraries including response forms and guidance notes to take away.

An email and letter mailshot was sent to all those listed on the Council's local plan consultee database. The database includes bodies and individuals who have made representations at previous stages of the plan. The email and letters gave notice that Warwick District Council is undertaking statutory consultation on Main Modifications to the Local Plan, where the documents can be viewed and how representations can be made. The consultee database consists of individual members of the public, statutory and non-statutory consultation bodies, Councillors, and town and parish council clerks.

A public notice was placed in the Friday 11 March edition of the Leamington Courier, and listed details of the locations where the documents could be inspected. To aid the process the Council also produced a schedule of FAQ's on the process which was also made publicly available on the Council's website. Contact details for help in making representations were also supplied where enquiries could be made by email to [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk) or by calling call 01926 456504 or 456330 or 456331.

It was made clear that comments can be made using one of the following methods:

- Online at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan). This is the preferred method which enables quicker processing and recording of comments and is recommended.
- on the representations form which should be returned:
  - by email to [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk). by post to: Planning Policy Manager, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa. CV34 5QH
  - by hand to the address above

PDF and word versions of the response form were made available for downloading from the website.

As the modifications have significant implications briefing sessions to explain the reasoning behind the proposals were held with representatives of Town/Parish Councils at 6pm on Monday 21st March at Leamington Town Hall; and at 7pm on Tuesday 22nd March also at Leamington Town Hall. Local Plan surgery sessions were also held with Town and Parish Council representatives on the 5th and 6th April 2016.

Written letters and emails which did not use the response form or the online system have also been accepted by the Council as being duly made.

### **Representations Received**

As a result of the consultation undertaken 890 individual responses have been received with a significant number of respondents submitting multiple representations relating to 2 or more modifications. Overall a total of 2032 representations have been received, 1000 were made by e mail, 546 on

paperand 486 used the Council's onlineconsultation system. There were 25 representations made on the Sustainability Appraisal

The consultation generated a significant amount of community interest as well as from developers and landowners. In addition to concerns being expressed there was also support for the Modifications.

### **Review of Representations**

A summary of the main issues arising from submissions made on the Proposed Modifications are identified in brief below.

#### General Comments

- Concern about the process being too technical, legal and overcomplicated
- Residents not made aware of the Proposed Modifications
- No consultation was undertaken with parish councils prior to the statutory consultation commencing
- Concern that the six week consultation period was inadequate
- Concern that the Memorandum of Understanding on distribution of Coventry's housing need circumvents the democratic process

#### Providing the Homes the District Needs (Mod 1& 2)

- Some respondents expressed concern that the Plan should not be seeking to solve housing need from outside the District. However, there were also expressions of support from other respondents for the Council in meeting the Duty to Cooperate by increasing housing land supply to accommodate need from outside the District
- Some concerns as to whether or not the OAN for Warwick is higher than the 600 dwellings per annum. Some respondents argued that it is justified
- Mixed views on the housing needs evidence of the updated SHMA September 2015. Some respondents expressed concerns relating to the assumptions used to assess housing need suggesting that the assumptions are questionable and figures inaccurate. Some respondents expressed support for the increase in provision with several arguing that it should be higher.
- A few respondents argued that the proposed housing provision should be viewed as a minimum
- A number of responses highlighted concerns around the housing

provision to be provided by Nuneaton and Bedworth and the contribution towards Coventry's unmet need.

### Spatial Strategy (Mod 3)

- Support from Coventry City to the strategy to pro-actively and positively plan for strategic issues across the sub-region; and to proposed development adjacent to the City's southern boundary
- A large number of respondents expressed concerns relating to the allocation of land in the Green Belt being contrary to established Green Belt policies, and leading to urban sprawl
- Concerns that development in the Green Belt south of Coventry would have a negative effect on the landscape, visual amenity and openness. However some respondents expressed support for allocations south of Coventry as being the most sustainable.
- Some support for site allocations on the edge of the built up areas and that Policy DS4 therefore accords with NPPF.
- A significant number of representations highlighted concerns about the capacity of villages to accommodate the levels of growth and its impact on social and community facilities and infrastructure.
- Several representations supported allocations in a wide range of settlements close to employment, services and facilities
- A significant number of responses received argued that lower value Green Belt agricultural land closer to Coventry should be used in preference to land in the Green Belt to the north of Leamington

### Level of Housing Growth (Mod 4& 5)

- Support for the increase in housing provision, with some developers arguing that the increase would not be sufficient to meet future housing need
- Concern about whether or not the housing needs of the HMA are being met in full
- Some concerns that the Plan, upon adoption, will not provide a 5 year housing land supply
- Mixed support and objections to the Council's approach in addressing

Coventry's unmet housing need,

- A limited number of respondents expressed concerns that planned housing delivery target is unjustified and could under deliver in the short term
- Some responses argued that more sites should be allocated to meet the needs of the District and the housing market area, whilst others considered that there is unnecessary overallocation
- The OAN should meet a proportion of Birmingham's identified unmet need

#### Meeting the Housing requirements (Mod 6 & 7)

- Base end of the plan should be extended to 2031 which will mean figures in Policy DS7 will need to change
- Some support for the provision of a 4.5% buffer which will deal with minor fluctuations in supply and demand. Some representations however also suggested that this is insufficient and should be increased to 10%
- A number of representations suggested a need to allocate an additional layer of small to medium sized sites of 50-150 dwellings.
- Some concerns that the Plan's approach towards windfalls is still unsound. The Council cannot assume historic windfall development will continue
- Some objections and some support for the approach to the safeguarding of land
- A representation suggested that a new settlement to meet the assessed need would have been a more appropriate solution
- Some comments expressed concern about timing of delivery and ability of sites to deliver within the plan period particularly at Kings Hill

#### Broad Locations of Housing Sites mod (8 & 9)

- Concerns expressed that some of the allocated sites are in unsustainable locations
- There was mixed support and opposition to allocation of greenfield sites on the edge of Coventry.
- Some responses supported additional sites directed towards the southern edge of Coventry

- Some support for an increase in the distribution of houses to the Growth Villages. Some of the responses argued against this as the infrastructure would not cope with proposed housing
- Some responses argued for more use to be made of brownfield sites and focus on the areas outside the Green Belt

#### Allocation of Housing Sites (Mod 10 &11)

- A large number of respondents object to the release of land from the Green Belt for development
- Particular concerns relating to proposals on land north of Milverton and the Park and Ridescheme (H44); villages allocations at Hampton Magna, Radford Semele, Hatton Park, Cubbington, Bishop Tachbrook and Barford
- Petitions received objecting to development in Hampton Magna and against development at Milverton (H44)
- A significant number of representations suggesting Coventry's need should be located close to Coventry and does not justify the allocation of land north of Milverton was a main issue of concern raised
- There were significant expressions of support for the additional housing allocations proposed including some support for the allocation at Old Milverton
- A number of representations put forward additional sites(omission sites) as reasonable alternatives and in some cases in preference to proposed allocations.

#### Allocation of Land for Education(Mod 12 & 13)

- General Support for the allocation of land for education to meet needs

#### Comprehensive Development of Strategic Sites (Mod 14 & 15)

- Site at Gallows Hill and the Asps already has planning permission. It is therefore not possible for the remaining part of the site to be comprehensively planned for. The requirement to produce a development brief is unnecessary in this case
- General expressions of support for the need for development briefs to be prepared for comprehensive development of strategic sites proposed

#### Green Belt (Mod 16)

- Concerns from many residents who responded particularly in the Growth Villages that no exceptional circumstances have been demonstrated to justify removal of land from the Green Belt
- Many respondents argued for the retention of the Green Belt
- Major concerns from local residents over proposed removal of land from the Green Belt for housing development and a Park and Ride site north of Milverton, Leamington
- Concern raised regarding removal of land from Green Belt adjacent to some growth villages such as Hatton Park, Hampton Magna and Cubbington

#### Review of the Local Plan (Mod 17 & 18)

- Some responses concerned that adequate provision should be made to lessen the chances of an early review of the Local Plan
- A number of representations suggested that Policy DS20 should contain a trigger mechanism for a review based on housing delivery

#### Direction for Growth South of Coventry (Mod 20 & 21)

- Some concerns that no evidence has been produced to support the sites allocations in the Green Belt. There are alternative brownfield sites and capacity in existing technology parks.
- General support for the allocations south of Coventry at Kings Hill and Westwood Heath – sites sustainable and well related to employment growth. However there were concerns that the sites allocated bear no relationship to the strategic employment growth at Coventry Gateway site
- Support for the Council's approach to uncapping development at Kings Hill and Westwood Heath
- Concern from the Coventry and Warwickshire Local Enterprise Partnership that the Policy DS NEW1 should be revised to include additional provision for employment growth
- University of Warwick supports cooperation in the development of proposals in the area
- Concern over traffic impact, infrastructure and landscape as a result of the development of the sites

#### Safeguarded Land (Mod 22 & 23)



Land South of Westwood Heath

Land North of Milverton

- Some objections to the safeguarding of land in Milverton and at Westwood Heath which are not considered as sustainable to meeting Coventry's housing need. There was also support expressed to the safeguarding of land.

#### Former Police Headquarters, Woodcote House (Mod 24 & 25)

- Support for the need for the site to be developed in accordance with a masterplan, and limiting development to within the Growth Village Envelope
- No wording in policy to ensure protection of habitat ancient trees and wood pastures (Woodland Trust)
- Historic England concern about the need to protect the setting of the listed building heritage asset
- Some concern about the potential delivery of 115 houses on the site and impact on Leek Wootton, the environment and traffic
- Support for the redevelopment of a brownfield site

#### Allocation of Land for the Provision of Outdoor Sport (MOD 26 & 27)

- General support for the allocation of land at Castle Farm and land at Warwick Road for outdoor sport

#### Sustainability Appraisal

- Concerns about the adequacy of the Sustainability Appraisal supporting the Modifications
- Concerns that assessment of some sites is inaccurate and does not take into account all issues of likely impact

All representations received have been sent to the Inspector who will consider all those duly made.

The full representations made with summaries can be viewed on the Council's website

