

North Warwickshire Borough Council

Draft Submission Local Plan 2011-2033

Regulation 19 – Consultation Response Form

Completed representation forms can be emailed to; planningpolicy@northwarks.gov.uk or posted to the Forward Planning Team at; Forward Plans, North Warwickshire Borough Council, The Council House, South Street, Atherstone, CV9 1DE

All information supplied will be made available for public inspection

Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on

Representations received after 31/1/2018 will not be considered

The Council reserves the right not to publish or take into account any representations which it considers offensive or defamatory

Section 1 - Personal Details

Name:	Gary Palmer
Organisation (where relevant):	Solihull MBC
Address:	Policy and Delivery Managed Growth and Communities Council House Manor Square Solihull
Post Code:	B91 3QB
Telephone Number:	[REDACTED]
Email Address:	[REDACTED]

Please note that representations must be attributable to named individuals or organisations at a postal address. Anonymous representations will not be accepted.

Agent Details (if applicable) Please note that if agents' details are provided all correspondence will be through them.	<i>Name</i>	
	<i>Company</i>	
	<i>Address</i>	
	<i>Telephone</i>	
	<i>Email</i>	

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Section 2 - Your Representation (please tick where necessary)

2.1 Please indicate which part of the Draft Submission Local Plan this representation relates to?

Paragraph reference		Policy reference number	LP6	Site Allocations		Sustainability Appraisal	
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Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on.

2.2 Do you support or object to the above?

Support	X	Object	
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2.3 Do you consider the Draft Submission Local Plan to be legally compliant?

Yes	X	No	
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2.4 Do you consider the Draft Submission Local Plan to be compliant with the Duty to Cooperate?

Yes	X	No	
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2.5 Do you consider the Draft Submission Local Plan to be Sound?

Yes	X	No	
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2.6 If you think that the Draft Submission Local Plan is not sound, this is because it is:

Not Positively Prepared		Not Justified	
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Not Effective		Not Consistent with National Policy	
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The above are the tests set out in paragraph 182 [Examining Local Plans] of the National Planning Policy Framework (March 2012).

2.7 Within this section, please provide details of why you do or do not consider the Draft Submission Local Plan to be legally compliant, sound or in accordance with the Council's Duty to Co-operate. Please be as precise as possible.

The Draft Submission document retains the commitment to test a contribution towards addressing the shortfall of land for housing in the Greater Birmingham & Black Country Housing Market Area, based on migration and commuting patterns. Whilst the minimum amount of development would not include this element, the Draft Submission document has a clear aspiration to deliver the 3,790 additional dwellings, reflecting the Memorandum of Understanding that North Warwickshire Borough Council has agreed with Birmingham City Council.

2.8 Within this section, please specify any modifications that you consider necessary to ensure that the Draft Submission Local Plan is legally compliant, sound and in accordance with the Council's Duty to Co-operate. 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 continue from previous box if required)

Section 3 – Hearing Sessions

3.1 Please indicate if want to participate in the hearing sessions for the oral part of the examination process?	Yes		No	
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3.2 If you wish to participate in the hearing sessions please indicate why you consider this to be necessary

N/A

Please note that the appointed Planning Inspector, not the Council, will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination.

NWBC DSLP Regulation 19 Response Form

Signature	G Palmer	Date	31/1/18
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Section 2 - Your Representation (please tick where necessary)

2.1 Please indicate which part of the Draft Submission Local Plan this representation relates to?

Paragraph reference		Policy reference number	LP39	Site Allocations		Sustainability Appraisal	
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Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on.

2.2 Do you support or object to the above?

Support	X	Object	
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Yes	X	No	
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Yes	X	No	
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The proposed housing allocations will provide sufficient land to meet the aspiration, subject to infrastructure provision, with 2 additional sites in reserve.

2.8 Within this section, please specify any modifications that you consider necessary to ensure that the Draft Submission Local Plan is legally compliant, sound and in accordance with the Council's Duty to Co-operate. 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.

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N/A
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Signature	G Palmer	Date	31/1/18
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Section 2 - Your Representation (please tick where necessary)

2.1 Please indicate which part of the Draft Submission Local Plan this representation relates to?

Paragraph reference	9.4	Policy reference number		Site Allocations		Sustainability Appraisal	
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Yes	X	No	
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2.7 Within this section, please provide details of why you do or do not consider the Draft Submission Local Plan to be legally compliant, sound or in accordance with the Council's Duty to Co-operate. Please be as precise as possible.

The Draft Submission recognises the opportunity provided by the proposed development at the HS2 Interchange as recommended in Solihull MBC's response to the Draft Local Plan dated 31 March 2018.

2.8 Within this section, please specify any modifications that you consider necessary to ensure that the Draft Submission Local Plan is legally compliant, sound and in accordance with the Council's Duty to Co-operate. 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.

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Dittman, Mike

From: stella dogget [REDACTED]
Sent: 31 January 2018 16:54
To: planningpolicy
Cc: [REDACTED]
Subject: Consultation Response Letter to Draft Submission Local Plan 2011-2033

Planning Policy
 North Warwickshire Borough Council
 Council Offices
 Atherstone

Dear Sir/Madam,

The following is my representation on the Draft Submission Local Plan 2011-2033

From:- Stella Doggett



Do you consider the draft submission local plan to be legally compliant? NO

It is not easy to find a definition of legally compliant, but I would like to state that on several counts I do not think that the consultation process has been fully and properly carried out. I am referring particularly to the development to the east of Dordon and Polesworth [H7] .

1. The joining together and designating Dordon and Polesworth a market town does not in fact make it a market town, it has no market place, no town centre and the people of Dordon and Polesworth do not consider this to be one. The proposal to only develop housing around market towns is fundamentally flawed in this instance because there is no centre around which to build, therefore no infrastructure to develop.

2. I do not believe the consultation has been a fully proper process given that there were over 2000 responses to the initial consultation in 2016/2017 and a large number of these were with respect to [H7]. The responses to the objections raised by the people of Dordon and Polesworth were derisory and inadequate, e.g. 'objections and issues noted' was repeated many many times, and now in the new draft local plan there are only relatively wording changes to the plan. There are no real amendments to the plan with respect to the 160.8 ha development to the east of Dordon and Polesworth [H7] of 2000 houses (see Appendix 6 of the draft submission). It appears that in effect, the new draft local plan, whilst noting and making smaller changes does not respond adequately to the representations of a very large number of residents of Dordon and Polesworth with any significant actions or amendments.

Proper and reasonable suggestions have been totally ignored raising the question as to whether the consultation has been a fully proper process in terms of what should happen in neighbourhood and local plans. We are talking here about two whole communities and a great deal of the green area and between them being destroyed and turned into one massive housing estate, to the detriment of the health of those communities and the health and well being of individuals living there.

3. I believe the council has been unduly affected in its planning choices by local developers and landowners. This seems to be the only explanation for their unwillingness to properly represent the people of this locality and to properly address their concerns, by making even a few significant changes or properly exploring other options, (see below). In addition I have received no reply to my request to the leader of the N Warwickshire borough council to assure me that his party funds had received no significant money from any of the developers waiting to take this very precious area for housing.

Do you consider the local plan to be sound? NO

1. This plan has not been properly prepared for the following reasons.
2. As stated above, the new draft local plan does not appear to give sufficient significant regard, in terms of practical actions, to the views of a very large number of residents in the Dordon and Polesworth area in the consultation process in the plan for H7. It appears that only small, cosmetic or wording changes have been made to the plan regarding H7 as a result in the consultation. I believe many people will not take part in this stage of the process because they are so disillusioned by being effectively ignored by the council. We only found out for example that a special meeting was taking place to discuss some late proposed amendments to the plan, at the last minute, because we were not properly informed about it by the council. This meeting was open to the public but they clearly did not want us there to see then veto all the perfectly reasonable and well argued amendments that were being proposed.
3. These included proper consideration of alternative sites. It would appear that this has not been undertaken. For example a large number of the houses required are for Birmingham and Coventry and the public transport links between the Polesworth Dordon site and Birmingham and Coventry are not good and direct. Therefore the main commuting is likely to be by car, significantly increasing congestion. A site near the sustainable urban expansion (SUE) area of Birmingham, near junction nine of the M 42, where future infrastructure and transport links are likely to be much better and more sustainable does not appear to have been seriously considered. Also small developments in villages where infrastructure would not be significantly strained, and where, for example, there could be possible beneficial moderate increases in the village primary school class size should have been seriously considered. A combination of these along with smaller than the proposed developments around the category one settlements, would be more sustainable, and should be seriously considered. Proper public consultation on alternative plans for housing growth do not appear to have happened and should be undertaken. The council stated that it could not do this because these were green belt areas, and yet the government is seriously looking at this whole question of using green belt land, and in this particular area [H7] the green field area they are proposing to build on constitutes exactly the same function as the green belt land they are unwilling to look at in other parts of North Warwickshire.
4. An assessment should be undertaken to consider aligning the distribution of growth in housing in North Warwickshire more closely to the area where more housing is demanded. It's no good building in Dordon and Polesworth for Coventry and Birmingham when the transport links are so bad, and the roads so congested.
5. Of the three category one settlements (Atherstone with Mancetter, Coleshill and Polesworth with Dordon), the first two have better local services, for example shopping, town centres and public transport than Polesworth with Dordon, yet the proposed housing numbers for Dordon and Polesworth are the highest and the plans for improved or increased infrastructure and local facilities appear to be rather aspirational, with a great deal of uncertainty that there will be the finance or a resource to deliver them, and therefore there appears to be a reduced prospect that these will be provided. This could result in a large housing estate or dormitory area, rather than a healthy sustainable enlargement of the community. Whether for employment or for shopping this is likely to result in a significantly increased number of car journeys to neighbouring towns with consequent increases in congestion and pollution.
6. In these areas it appears that the new draft local plan does not consider or take full account of the evidence available or consider the evidence that might come from wider consideration or consultation, for alternative broader arrangements to provide for housing growth in North Warwickshire.

Do you consider the local plan to be justified? NO

1. It would appear that there has been no independent verification of the number of houses North Warwickshire is supposed to take for Birmingham and Coventry under the 'Duty to Cooperate' system. Much of the predicted increase in demand may not in fact be verifiable, and would be better satisfied by housing closer to those towns. In addition is there sufficient evidence that all brownfield sites have been used and earmarked for housing. It sometimes seems that developers would rather use greenfield sites where they can charge more for their houses that use more appropriately positioned sites within the existing town and city boundaries.
2. Even should the area need to 'cooperate' it is not clear that the number of houses required as part of the duty to cooperate with Birmingham is a final settled figure. It may be that the number of houses planned for

site [H7] is not just too much for the area but it is unnecessary too. Resulting in more people coming into an area of severely overstressed infrastructure.

In effect it does not appear to be appropriate to build all the houses required from our borough for Birmingham in an area of North Warwickshire, where the public transport links to Birmingham are poor, and road links are vulnerable to the effects of significantly increased congestion. Also bearing in mind the significant strain put on the roads in the area by the huge increase in heavy goods vehicles due to the building of massive warehouses all around the junction 10 of the A5 with the M42, a motorway that is only a two-lane motorway between junctions 10 and 9 and already gets significantly congested at rush hour times.

Do you consider the local plan to be effective? NO

1. The draft local plan is unlikely to be deliverable or sustainable as it stands particularly in respect of infrastructure.

2. The very large development at the east side of Dordon and Polesworth, along with the large development on the west side of Atherstone, and the significant development between Polesworth in Tamworth will increase by thousands the number of cars using the A5 in particular as well as the M42 and B5000. To make this deliverable and sustainable will require major improvements of the A5, not just dualling, as the roundabouts will continue to cause congestion. A bypass with slip roads, as in Tamworth will be required and the likelihood that there will be the finance and resource or perhaps the commitment of Highways England, to undertake this appears to be very uncertain. It appears that the Council has very limited power to make this happen, which puts the whole deliverability, sustainability and effectiveness of the draft plan in doubt.

3. Similarly, the ability to deliver an effective public transport rail service to service the housing development by effectively reopening Polesworth station (currently one train a day in one direction) appears very uncertain, as I gather that it is not in the power of the Council to make this to happen. Again this means that the plan is not sound and it does not have the power to be effective.

4. The figures for those killed and seriously injured on the roads of North Warwickshire (2012 to 2014) is 92.8 per hundred thousand resident population in North Warwickshire, as opposed to a figure of 54.8 in all of Warwickshire and 39.3 in England. This very significant excess of death and injury on the roads in North Warwickshire. It emphasises the need for a draft local plan that has definite resource and finance for improved public transport, including rail transport, and improvement to the local main roads. The current draft plan does not appear to be sound or effective for this.

5. The plan describes intentions and has aspirations for services to the community such as shops of sufficient size (to reduce shopping travel on congested roads to nearby towns), services, schools, a health centre, social, leisure, and other community facilities, again within the plan and at consultation it seems clear that the Council has very limited power and limited finance to ensure that this all happens and much of the power lies with the developers / builders, and it seems likely that provision of funding for community facilities and services will be at the expense of other services or infrastructure, or a reduced number of affordable homes. I have not seen costings for the requirements of a sustainable, deliverable, effective community enlargement plan and there must be concern as to whether the local plan is deliverable and sound without this.

6. In the strategic objectives of the local plan draft submission, item 9 is "to ensure the satisfactory provision of social and cultural facilities". Paragraph 5.18 indicates this will secure the social and physical infrastructure necessary to improve the health, education, lifelong learning and well-being, safety and security of all sectors of the community. Para 5.19 This will be achieved by securing opportunity to link new development to the provision of new facilities and services. There are no guarantees in the local plan that this will be certainly financed, resourced and sustainably delivered.

7. Government guidance indicates that the Council should ensure that the policy in the local plan recognises the diverse types of housing needed in the area, and where appropriate identify specific sites for all types of housing to meet their anticipated housing requirement. This could include sites for older people's housing, including accessible mainstream housing such as bungalows and step free apartments, sheltered housing, extra care housing, retirement housing and residential care homes. These are mentioned in the local plan but the question is: does the council have the power to insist on the developers providing this without jeopardising provision and finance for other needed infrastructure?

8. Polesworth and Dordon do not have a town centre comparable to Atherstone, or Coleshill. To describe the centre of Polesworth as the town centre and the centre of Dordon as a neighbourhood centre is artificial and seems to discount the significant difference between the two communities. The 'centre' of Dordon

doesn't really exist and the only 'row' of shops consists mainly of take aways, but there is no way that those in Dordon would consider the main street in Polesworth as their 'centre'.

There is nothing definite in resource terms on;y aspirations, ideas and plans mentioned in the box on H7, in the local plan to explain how an effective town and community centre will be costed, developed and paid for in this area - described as a category one settlement by the local plan. The concern and likelihood appears to remain that money for one area of infrastructure will make other areas in the plan not viable financially. The plan as it stands therefore appears not to be sustainable or effective.

9. Even if there were to be some finance available, the plan does not specify for example whether it has been established that there are family doctors prepared to set up a new surgery in this large development. At a time of an apparent shortage of GPs this is a significant consideration as to whether the plan is sustainable, deliverable and effective.

10. Whilst the draft local plan has areas of green space within the development to the east of Dordon and Polesworth, it does not adequately take account of the likelihood that when an area such as Hollies Wood is surrounded by housing even with a small boundary band around it, it's nature will change significantly, both with regard to the wildlife, biodiversity and benefit to the public. If that area falls into public ownership, then no one will own it and like many other similar places surrounded by new estates it will become neglected or used by local youth in detrimental ways. The Hollies wood and the surrounding fields are home to a very diverse flora and fauna, butterflies and other natural phenomena. Many different birds live or migrate through that area, and it should be preserved at all costs. No significant funds are available to ensure it's preservation and maintenance. On the other hand the identified areas of green space towards the A5, having been mine and tip sites, will need significant work to make them areas of genuine, full and safe recreational value, and it is not clear in the draft local plan where the finance for all this work will definitely be found. Therefore in these areas the draft local plan does not appear to be sustainable and effective. Nor does it seem that the local objections have been seriously listened to.

11. The sustainability report notes that the indices of health deprivation for North Warwickshire indicate that areas of deprivation are found in the East of the Borough, including Polesworth and Dordon and Atherstone. It is therefore unsound for the draft local plan to go for a very large increase in housing around these three communities without first ensuring that that the finances and resources for a very significant improvement in health and community services and facilities and infrastructure are definitely in place, and that the green areas will be adequately improved where necessary and maintained after the builders have gone.

12. It is very salutary that with all the building proposed in the area it appears that (from what I heard at the consultation last year,that due to cost savings, there is only one 'monitor' now who will check that plans are properly implemented. We know that builders will always need monitoring and that enforcing good practice to protect local interests and keep standards high will be paramount, but impossible under current staff provision in this area.

Is the local plan consistent with national policy?NO

1. Paragraph 155 of government guidance indicates that 'early and meaningful engagement in collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area including those contained in any neighbourhood plans that may have been made'.

In my opinion this draft local plan does not reflect the collective vision of a large number of people in Dordon and Polesworth and the consultation process has not been a fully meaningful engagement in collaboration with the local neighbourhood. The local plan does not appear to have fully taken on board the views of a large number of local people in terms of collaboration and making significant real practical changes to the local development plans for Dordon/Polesworth.

2. Government guidance also states that 'the local plan should also be realistic about what can be achieved, and when, (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of the development. Early discussion with infrastructure and service providers is particularly important to help understand their investment plans and critical dependencies.'

'The local plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development.'

'When the deliverability of critical infrastructure is uncertain, then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However, the key infrastructure requirements on which delivery of the plan depends should be contained in the local plan itself' [Drawn from paragraph 018 Reference ID 12- 0-1-8 2014 0306].

I see no evidence of this in the draft plan. In fact the opposite has happened with the failure to address these issues and others raised by local people in the consultation.

It makes it less and less likely that any of the above underlined will happen if this draft plan is examined and accepted by the inspectorate and then adopted by the local planning authority. The consultations and conversations following publishing of these planning proposals have led me to believe that the deliverability of critical infrastructure is uncertain and therefore that this local plan is not even consistent with National policy.

The current local draft plan does not adequately address the consequences of this or give possible contingency arrangements and alternative strategies, as the government guidance for local plans indicates it should.

Do you want to participate in the hearing sessions for the oral part of the examination process? YES

Why?

Because of the size of the intended development east of Dordon and Polesworth is unsustainable and will ruin the area.

Because of the problems of the location for 'duty to cooperate' housing for commuting to Birmingham and Coventry making it an inappropriate site for the size of these 'duty to cooperate' numbers.

Because of the apparently limited practical changes in the local plan in response to the initial consultation, representations and responses by so many local people from Polesworth and Dordon

Because the infrastructure, facilities and service provisions that might make the planned development sustainable and deliverable, appear to be rather aspirational in the draft local plan with little or insufficient information about how they will definitely be resourced, financed and delivered. Indeed it appears that there may be a good chance that the infrastructure will not be effectively resourced, financed or delivered, thus appearing to render the plan unsound.

Mrs Stella Doggett
31.1.2018

Dittman, Mike

From: stella dogget [REDACTED]
Sent: 16 March 2018 20:29
To: planningpolicy
Subject: SLP338Draft Submission Local Plan 2011-2033 Regulation 19 - Consultation Response Letter Additional comments from extended consultation

North Warwickshire Borough Council
 Draft Submission Local Plan 2011-2033
 Regulation 19 – Consultation Response Letter
 Additional comments from extended consultation

Reference **SLP338**

From:

[REDACTED]

Tel: [REDACTED]
 Email: [REDACTED]

16/3/2018

Objection to the Draft Submission Local Plan 2011-2033 – additional comments

These objections can be added to my submission on 31 January 2018. Following attendance to the further consultation on Saturday, 17 February and seeing the further documents on North Warwickshire Borough Council's website with regard to leisure facilities, green space strategy, playing pitch strategy, planning obligations for open space sport and recreation, assessment of the meaningful gap and the archaeology assessment, **I would like to add my further and stronger objections.**

It feels like the added things we were to consider were merely put in to satisfy the whole problem of the area being robbed of its green spaces and therefore healthy lifestyle. If however the question is whether the draft submission local plan is sound and effective, I would have to say a resounding no for the following reasons

Is the plan sound?

Is it justified, and I quote 'the most appropriate strategy when considered against the reasonable alternatives'.

My response:- I do not believe proper consideration has been given to the alternative of creating a garden village elsewhere in North Warwickshire because the council does not want to start from scratch creating infrastructure. They are claiming that Dordon and Polesworth is 'a market town and therefore forms a basis for expansion. They also think that the developers are going to be made to provide the extra infrastructure needed but this is highly unlikely as the council now has only one monitor and no environmental officer due to the cuts in staffing in the planning office. Someone needs to look at these two villages first hand, and not just on a map, to see that there is no infrastructure adequate to cope with this scale of development in the area, and there are no guarantees that the developers will cooperate and provide what is needed.

The added idea (in this further consultation) that somehow there will be money to build a swimming pool/leisure centre is an illusion. For example in the document on SPD on planning obligations for open space, sport and recreation, the worked example for a new leisure centre, with swimming pool, at Polesworth appears to indicate that having taken developer contributions into account, there is a shortfall of just less than £4 million. Even with other sources of money mentioned, in the current climate of local and central government finances it appears to me that it is unlikely that this example of infrastructure will be delivered.

This is particularly true because, as indicated in my earlier submission, it does not appear that there is likely to be the enough financial resource to provide for all the essential infrastructure for the draft local plan and development such as transport, roads and other important community facilities let alone increased leisure facilities.

Is it going to be effective?ie deliverable, sustainable and able to be monitored?

My response. The documents, strategies, options, and assessments and information gleaned at the consultation appear to indicate that, as in other areas of essential and planned infrastructure to make this plan viable, the finance does not appear to be available, because in particular the contributions from the developers will fall far short of what is required by the plan. It is not clear how the significant financial shortfall will be made up in the current financial climate. Indeed it appears that this money is not likely to be available and therefore that the plan is not sound, effective, deliverable or sustainable.

I note again as described in 1.166 of the SPD on planning obligations for open space, sport and recreation that the NWBC draft IDP Feb 2017 is quoted: *“improvements to infrastructure will be fundamental to achieving our ambitions for shaping the Borough to 2031. They are considered necessary to cater for a growing and changing population. It is recognised that any proposed growth within North Warwickshire must be supported by improvements to physical, social and green infrastructure, and where necessary, be delivered in advance of development. This infrastructure will include facilities needed for development to function and to ensure the integration and creation of sustainable communities”*. Whilst the IDP goes on to set out that contributions will be sought from developers, it appears that there will be a very significant shortfall between contributions and what is required to make the plan sound and effective, and there is no clarity or certainty about where all the necessary money will come from in the current financial climate, and therefore whether the required infrastructure will actually be delivered or be deliverable. Indeed it appears that it is very unlikely that financial resources will be available to deliver all the required infrastructure.

Government guidance also states that **‘the local plan should also be realistic about what can be achieved, and when, (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements the plan as a whole will not prejudice the viability of the development. Early discussion with infrastructure and service providers is particularly important to help understand their investment plans and critical dependencies.’**

‘The local plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development.’

‘When the deliverability of critical infrastructure is uncertain, then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However, the key infrastructure requirements on which delivery of the plan depends should be contained in the local plan itself’ [paragraph 018 Reference ID 12- 0-1-8 2014 0306].

This extra consultation and the evidence given at the event at Dordon Parish Hall on 17th February was a complete waste of time and money because the council have still not satisfied and indeed cannot satisfy the requirement to state clearly where and how they are going to ensure that infrastructure is going to be provided. Putting in aspirations for green space/recreation etc does not I believe make clear in the draft plan [as the guidance above states it should], who is going to fund and provide the required infrastructure, and bring it on stream at the appropriate time, as well as exactly what the required infrastructure will be. It also appears that it may not be realistic about what can be achieved, and when, in relation to the infrastructure. The plan and consultations and conversations have indicated to me that the deliverability of critical infrastructure is uncertain. **The current local draft plan does not adequately address the consequences of this or give possible contingency arrangements and alternative strategies, as the government guidance for local plans indicates it should.**

The Section 106 money that the NWBC does try to get from developers is not going to be enough to develop the local infrastructure for the scale of housing planned. In addition it is a well known fact that the developers will trade some of that S106 money in order to provide the level of social housing required. This is because they will say that social housing cuts away at their profits. Developers are in the housing development business to make a profit for shareholders and not (as Mrs May would like them to be) to do there patriotic duty and provide good communities and housing schemes that create wholesome living areas. The government has set it up that local councils have very few powers to enforce required infrastructure building, and therefore I am appealing to you - the inspector to save our communities from this disastrous badly thought out draft submission local plan, that no one wants, and no one believes to be 'effective'.

In conclusion I would also like to point out that the green fields that we have at the moment particularly around Hollies Wood now provide the habitat for numerous speices of butterfly, hares, monkjack deer, as well as the usual woodland creatures including badgers on the east side of the wood. In addition well over 50 varieties of birds breed, winter or visit the area because of the variety of habitat provided by the woods fields and hedges. To replace all this wild life by building a huge numbers of houses and telling us in the consultation that the plans will help to create green space and healthy lifestyles by somehow allowing green pathways between the houses and by planning a phantom leisure centre that cannot be financed is frankly insulting to the intelligence of the people of the area.

I therefore continue to believe that the draft submission local plan is not sound, justified, or likely to be deliverable or sustainable and therefore effective. I also do not believe that it is consistent with national policy as outlined in my previous submission, because I do not believe that within the duty to cooperate, which has been invoked in order to build houses for Coventry, and Birmingham, there has been sufficient evidence that all the brown field sites in those cities have been fully used. Yet again we are victims of a system where the developers have the upper hand and can get away with building on untouched greenfield sites because the profit margins are higher for them unless the inspector can challenge this plan for us the people of Dordon and Polesworth.

I wish for my previous submission on the 31 January 2018, as well as this one, to be considered and submitted to the planning inspector.

Yours sincerely

Stella Doggett

North Warwickshire Borough Council

Draft Submission Local Plan 2011-2033



North Warwickshire
Borough Council

Regulation 19 – Consultation Response Form

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Section 1 - Personal Details

Name:	Vicky Bilton
Organisation (where relevant):	Lioncourt Strategic Land Limited
Address:	Lioncourt House, 3 Apex Park, Wainwright Road, Worcester
Post Code:	WF4 9FN
Telephone Number:	[REDACTED]
Email Address:	[REDACTED]

Please note that representations must be attributable to named individuals or organisations at a postal address. Anonymous representations will not be accepted.

Agent Details (if applicable) Please note that if agents' details are provided all correspondence will be through them.	<i>Name</i>	
	<i>Company</i>	
	<i>Address</i>	
	<i>Telephone</i>	
	<i>Email</i>	

Section 2 - Your Representation (please tick where necessary)

2.1 Please indicate which part of the Draft Submission Local Plan this representation relates to?

Paragraph reference		Policy reference number	LP39	Site Allocations		Sustainability Appraisal	
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Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on.

2.2 Do you support or object to the above?

Support		Object	X
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2.3 Do you consider the Draft Submission Local Plan to be legally compliant?

Yes		No	X
-----	--	----	---

2.4 Do you consider the Draft Submission Local Plan to be compliant with the Duty to Cooperate?

Yes		No	X
-----	--	----	---

2.5 Do you consider the Draft Submission Local Plan to be Sound?

Yes		No	X
-----	--	----	---

2.6 If you think that the Draft Submission Local Plan is not sound, this is because it is:

Not Positively Prepared	X	Not Justified	X
-------------------------	---	---------------	---

Not Effective	X	Not Consistent with National Policy	X
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The above are the tests set out in paragraph 182 [Examining Local Plans] of the National Planning Policy Framework (March 2012).

2.7 Within this section, please provide details of why you do or do not consider the Draft Submission Local Plan to be legally compliant, sound or in accordance with the Council's Duty to Co-operate. Please be as precise as possible.

Policy LP39 sets out the DSLP proposed 'Housing Allocations' to be delivered over the Plan period to 2033.

It is noted that some DSLP proposed housing allocations are reliant upon significant external infrastructure funding, and in some cases, third party land, to come forward.

For example, proposed housing allocation H1 Land at Holly Lane, Atherstone, requires access over the West Coast Mainline either by bridge strengthening or a new bridge. Either access option brings uncertainty over funding/cost and the time delays known to arise in dealing with third party land.

Equally, in the case of proposed reserved site RH1 'Dairy Farm Phase 3', there is direct conflict between the proposed reserve housing site and planned essential infrastructure (re-alignment of the A5), as stipulated in policy LP28.

The DSLP cannot be said to have been 'positively prepared', as delivery of its 'minimum' housing number is at risk, as it depended upon apparently unknown infrastructure costs. Additionally, there is a direct conflict between policy LP39(a) site reference RH1 and policy LP28 regarding the delivery of essential infrastructure (i.e. realignment of the A5).

The DSLP cannot be said to be 'justified', as it proposes to allocate land for housing that is reliant upon apparently unknown infrastructure costs and as it proposes to allocate reserve land for housing that conflicts with an essential infrastructure requirement. This approach undermines the soundness of the Plan.

The DSLP cannot be said to be 'effective' due to its reliance upon sites that require either external infrastructure sources, or third party land (for example in the case of Holly Lane, Atherstone), and as it proposes to allocate reserve land for housing that conflicts with an essential infrastructure requirement (re-alignment of the A5).

For the reasons briefly explained above, the DSLP is not considered to meet the test of soundness.

'Spring Farm, Watling Road, Grendon' can be delivered independent of significant external funding, or potentially impeding the route of the re-aligned A5. It is therefore a reasonable alternative site that should be brought forward as suitable alternative to those that rely of unknown external infrastructure funding sources, or RH1 'Dairy Farm Phase 3' reserve housing site.

2.8 Within this section, please specify any modifications that you consider necessary to ensure that the Draft Submission Local Plan is legally compliant, sound and in accordance with the Council's Duty to Co-operate. 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.

Land at 'Spring Farm, Watling Road, Grendon', as outlined in red on the attached plan (hereafter referred to as 'the Site') should be allocated for housing in policy LP39 'Housing Allocations' of the Draft Submission Local Plan.

The Site comprises of 9.8 hectares of agricultural land. It is bounded by woodland to the west and south and fronts the A5 Watling Road to the north. Other than a few existing trees within the site, it is relatively unconstrained. Based on a net to gross development ratio of 66% at 30 dwellings per hectare, the Site could deliver around 200 dwellings.

The Site is available now and offers a suitable location for development, outside the Green Belt, that could

NWBC DSLP Regulation 19 Response Form

be delivered within the next five years.

This is a deliverable and developable site that can be brought forward independently, without the need to rely on the delivery of other housing allocations to justify its sustainability (as in the case of proposed housing allocations H14 - Lindridge Road, Wishaw), external funding to deliver infrastructure requirements arising from it (as in the case of proposed housing allocation H1 - Land at Holly Lane, Atherstone), or impeding upon the potential route of the re-aligned A5.

Suitable and safe access to the Site can be achieved from the A5 Watling Road.

The draft Submission Local Plan recognises Grendon as a sustainable settlement, a settlement that is located outside the Green Belt (noting that 60% of the borough is designated Green Belt).

The settlement benefits from a good range of local facilities and services, including two local primary schools, a Church, Parish Hall, two pubs and two local shops, and adjacent Baddesley Ensor provides further services. All are ready walking and cycling distance of the Site.

The Site is in single ownership. Lioncourt Strategic Land are acting in capacity as land promoter. There are no overriding barriers to bringing forward the Site for a sustainable housing development of around 200 homes, including the delivery of affordable housing, within the next five years.

Section 3 – Hearing Sessions

3.1 Please indicate if you want to participate in the hearing sessions for the oral part of the examination process?	Yes	X	No	
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3.2 If you wish to participate in the hearing sessions please indicate why you consider this to be necessary

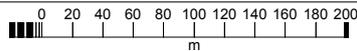
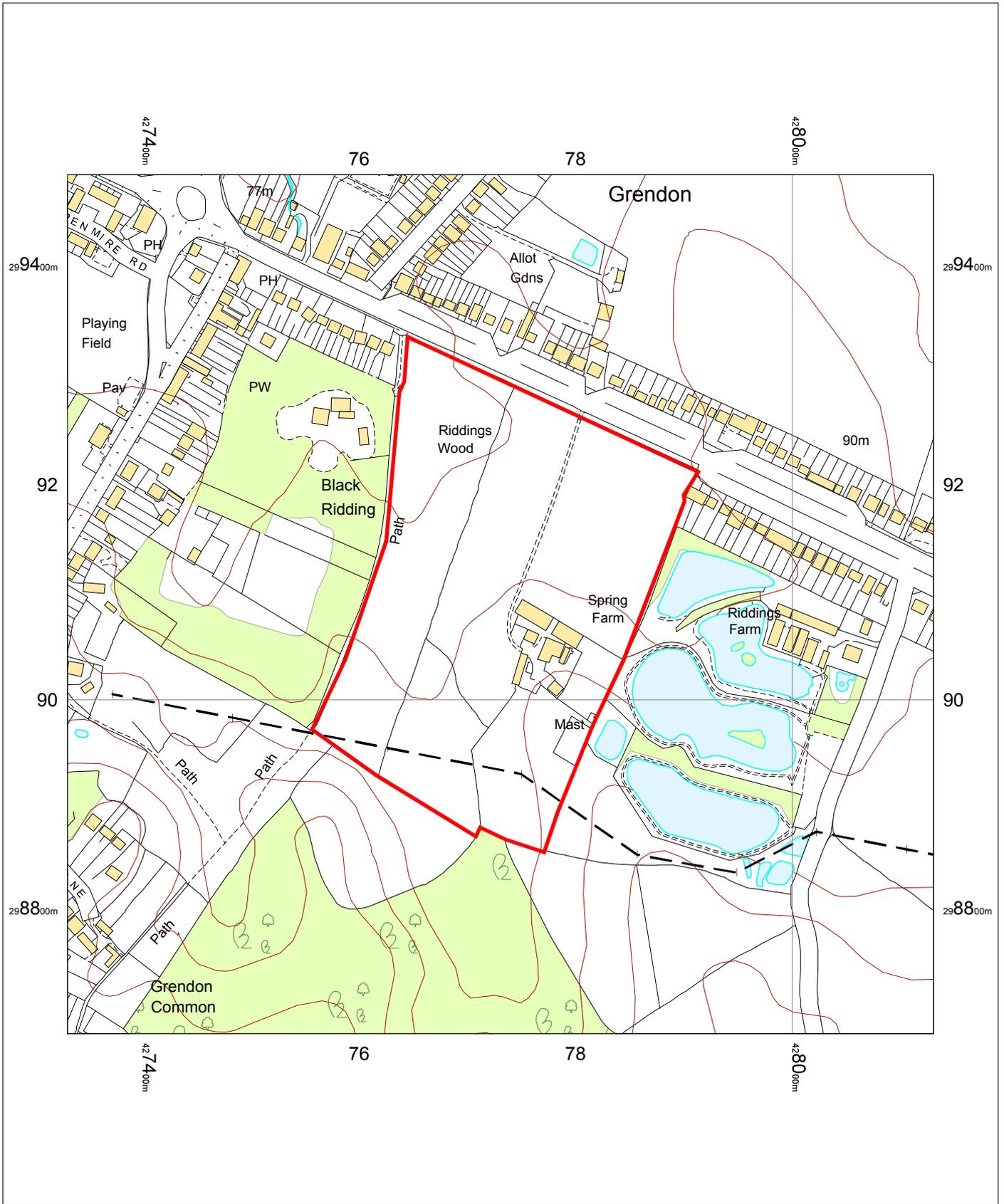
To ensure that the merits of Site as a proposed housing allocation are fully explored in the context of the proposed housing requirement of the draft Submission Local Plan and in relation to other proposed housing allocations.

Please note that the appointed Planning Inspector, not the Council, will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination.

Signature	Vicky Bilton	Date	31 January 2018
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If you require further information and guidance on the latest consultation phase of the Draft Submission Local Plan, please refer to the Frequently Asked Questions document which is available on the Council's website: www.northwarks.gov.uk or contact the Forward Planning Team on 01827 719499/451.

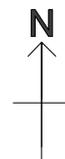
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 10 March 2017, ID: HMC-00606777
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North Warwickshire Borough Council

Draft Submission Local Plan 2011-2033



North Warwickshire
Borough Council

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Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on

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Section 1 - Personal Details

Name:	Vicky Bilton
Organisation (where relevant):	Lioncourt Strategic Land Limited
Address:	[REDACTED]
Post Code:	[REDACTED]
Telephone Number:	[REDACTED]
Email Address:	[REDACTED]

Please note that representations must be attributable to named individuals or organisations at a postal address. Anonymous representations will not be accepted.

Agent Details (if applicable) Please note that if agents' details are provided all correspondence will be through them.	<i>Name</i>	
	<i>Company</i>	
	<i>Address</i>	
	<i>Telephone</i>	
	<i>Email</i>	

Section 2 - Your Representation (please tick where necessary)

2.1 Please indicate which part of the Draft Submission Local Plan this representation relates to?

Paragraph reference		Policy reference number	LP6	Site Allocations		Sustainability Appraisal	
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Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on.

2.2 Do you support or object to the above?

Support		Object	X
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2.3 Do you consider the Draft Submission Local Plan to be legally compliant?

Yes		No	X
-----	--	----	---

2.4 Do you consider the Draft Submission Local Plan to be compliant with the Duty to Cooperate?

Yes		No	X
-----	--	----	---

2.5 Do you consider the Draft Submission Local Plan to be Sound?

Yes		No	X
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2.6 If you think that the Draft Submission Local Plan is not sound, this is because it is:

Not Positively Prepared	X	Not Justified	X
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Not Effective	X	Not Consistent with National Policy	X
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The above are the tests set out in paragraph 182 [Examining Local Plans] of the National Planning Policy Framework (March 2012).

2.7 Within this section, please provide details of why you do or do not consider the Draft Submission Local Plan to be legally compliant, sound or in accordance with the Council's Duty to Co-operate. Please be as precise as possible.

Policy LP6 sets out the proposed 'Amount of Development' (dwellings) to be delivered over the Plan period to 2033. Policy LP6 acknowledges that the amount of development to be delivered (5808 dwellings) is a 'minimum' number, however the final sentence of the policy casts a shadow over the anticipated number of dwellings to be delivered by specific reference to being governed by the 'provision of infrastructure'. (Paragraphs 7.42 and 14.8 of the DSLP also refer).

It is noted that some DSLP proposed housing allocations are reliant upon significant external infrastructure funding, and in some cases, third party land, to come forward.

For example, proposed housing allocation H1 Land at Holly Lane, Atherstone, requires access over the West Coast Mainline either by bridge strengthening or a new bridge. Either access option brings uncertainty over costs and the time delays known to arise in dealing with third parties.

The DSLP cannot be said to have been 'positively prepared', as delivery of its 'minimum' housing number is at risk, as it depended upon apparently unknown infrastructure costs.

The DSLP cannot be said to be 'justified', as it proposes to allocate land for housing that is reliant upon apparently unknown infrastructure costs. This approach undermines the soundness of the Plan.

Alternative sites, such as those at 'Spring Farm, Watling Road, Grendon' that can be delivered independent of significant external funding, are reasonable alternatives that should be brought forward as suitable alternatives to those that rely of unknown external infrastructure funding sources.

The DSLP cannot be said to be 'effective' due to its reliance upon sites that require either external infrastructure sources, or third party land (for example in the case of Holly Lane, Atherstone).

For the reasons briefly explained above, the DSLP is not considered to meet the test of soundness.

2.8 Within this section, please specify any modifications that you consider necessary to ensure that the Draft Submission Local Plan is legally compliant, sound and in accordance with the Council's Duty to Co-operate. 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.

Land at 'Spring Farm, Watling Road, Grendon', as outlined in red on the attached plan (hereafter referred to as 'the Site') should be allocated for housing in policy LP39 'Housing Allocations' of the Draft Submission Local Plan.

The Site comprises of 9.8 hectares of agricultural land. It is bounded by woodland to the west and south and fronts the A5 Watling Road to the north. Other than a few existing trees within the Site, it is relatively unconstrained. Based on a net to gross development ratio of 66% at 30 dwellings per hectare, the Site could deliver around 200 dwellings.

The Site is available now and offers a suitable location for development, outside the Green Belt, that could be delivered within the next five years.

This is a deliverable and developable site that can be brought forward independently, without the need to rely on the delivery of other housing allocations to justify its sustainability (as in the case of proposed housing allocations H14 - Lindridge Road, Wishaw), or external funding to deliver infrastructure requirements arising from it (as in the case of proposed housing allocation H1 - Land at Holly Lane, Atherstone).

NWBC DSLP Regulation 19 Response Form

Suitable and safe access to the Site can be achieved from the A5 Watling Road.

The draft Submission Local Plan recognises Grendon as a sustainable settlement, a settlement that is located outside the Green Belt (noting that 60% of the borough is designated Green Belt).

The settlement benefits from a good range of local facilities and services, including two local primary schools, a Church, Parish Hall, two pubs and two local shops, and adjacent Baddesley Ensor provides further services. All are ready walking and cycling distance of the Site.

The Site is in single ownership. Lioncourt Strategic Land are acting in capacity as land promoter. There are no overriding barriers to bringing forward the Site for a sustainable housing development of around 200 homes, including the delivery of affordable housing, within the next five years.

Section 3 – Hearing Sessions

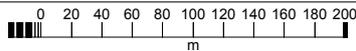
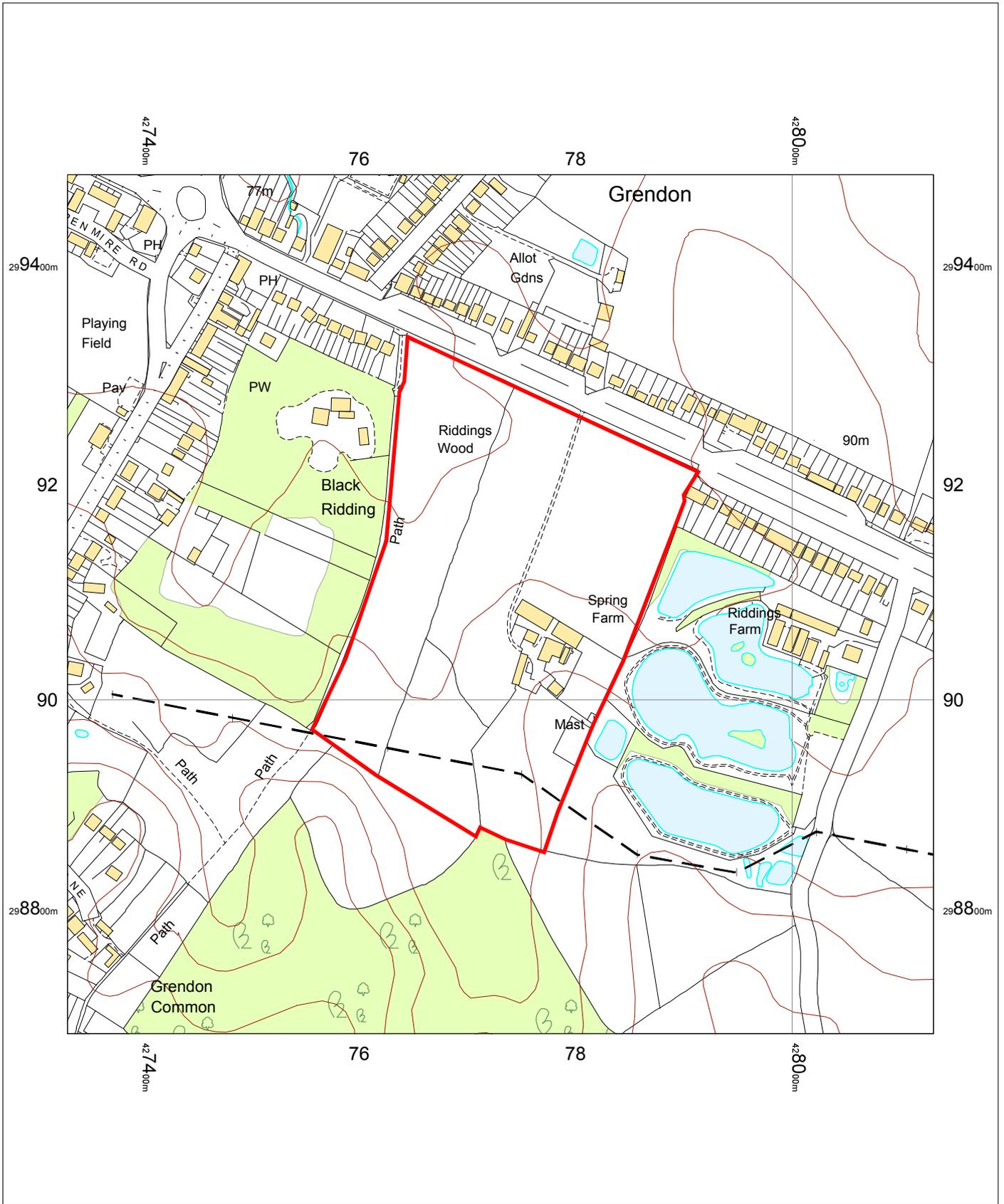
3.1 Please indicate if you want to participate in the hearing sessions for the oral part of the examination process?	Yes	X	No	
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3.2 If you wish to participate in the hearing sessions please indicate why you consider this to be necessary
<p>To ensure that the merits of Site as a proposed housing allocation are fully explored in the context of the proposed housing requirement of the draft Submission Local Plan and in relation to other proposed housing allocations.</p> <p><i>Please note that the appointed Planning Inspector, not the Council, will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination.</i></p>

Signature	Vicky Bilton	Date	31 January 2018
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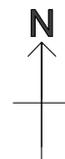
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North Warwickshire Borough Council

Draft Submission Local Plan 2011-2033



North Warwickshire
Borough Council

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Organisation (where relevant):	Lioncourt Strategic Land Limited
Address:	[REDACTED]
Post Code:	[REDACTED]
Telephone Number:	[REDACTED]
Email Address:	[REDACTED]

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	<i>Company</i>	
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	<i>Telephone</i>	
	<i>Email</i>	

Section 2 - Your Representation (please tick where necessary)

2.1 Please indicate which part of the Draft Submission Local Plan this representation relates to?

Paragraph reference		Policy reference number	LP39A	Site Allocations		Sustainability Appraisal	
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Please use a separate representation form for each paragraph, policy, site allocation that you wish to comment on.

2.2 Do you support or object to the above?

Support		Object	X
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2.3 Do you consider the Draft Submission Local Plan to be legally compliant?

Yes		No	X
-----	--	----	---

2.4 Do you consider the Draft Submission Local Plan to be compliant with the Duty to Cooperate?

Yes		No	X
-----	--	----	---

2.5 Do you consider the Draft Submission Local Plan to be Sound?

Yes		No	X
-----	--	----	---

2.6 If you think that the Draft Submission Local Plan is not sound, this is because it is:

Not Positively Prepared	X	Not Justified	X
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Not Effective	X	Not Consistent with National Policy	X
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The above are the tests set out in paragraph 182 [Examining Local Plans] of the National Planning Policy Framework (March 2012).

2.7 Within this section, please provide details of why you do or do not consider the Draft Submission Local Plan to be legally compliant, sound or in accordance with the Council's Duty to Co-operate. Please be as precise as possible.

Policy LP39(a) proposes Dairy House Farm (Phase 3) as a reserve housing site, to be released if there is a need to maintain a housing land supply in the Borough, and if 'access issues can be addressed'.

Land at Dairy House Farm (Phase 3) is proposed to be reserved for 360 dwellings, under site reference RH1. Amongst other requirements, site RH1 is subject to a requirement to safeguard land for dualling of the A5.

Proposed reserve site RH1 is in direct conflict with policy LP28 Strategic Road Improvements, as LP28 seeks to protect the land from development to 'ensure the dualling of the A5 can take place'.

In the absence of clarity on the proposed route for the realigned A5, reserving land for housing that could infringe upon a potential route option (as proposed by site RH1), is wholly inconsistent with the NPPF, as there can be no certainty over the deliverability and developability of the land for housing.

An alternative site, 'Spring Farm, Watling Road, Grendon' can be delivered without infringing upon the potential route of the re-aligned A5. Spring Farm is a site that should be brought forward as an alternative housing site to RH1.

The DSLP cannot be said to have been 'positively prepared', as there is a direct conflict between policy LP39(a) site reference RH1 and policy LP28 regarding the delivery of essential infrastructure (i.e. realignment of the A5).

The DSLP cannot be said to be 'justified' or 'effective', as it proposes to allocate reserve land for housing that conflicts with an essential infrastructure requirement. This approach undermines the soundness of the Plan.

For the reasons briefly explained above, the DSLP is not considered to meet the test of soundness.

2.8 Within this section, please specify any modifications that you consider necessary to ensure that the Draft Submission Local Plan is legally compliant, sound and in accordance with the Council's Duty to Co-operate. 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.

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The Site is available now and offers a suitable location for development, outside the Green Belt, that could be delivered within the next five years.

This is a deliverable and developable site that can be brought forward independently, without the need to rely on the delivery of other housing allocations to justify its sustainability (as in the case of proposed housing allocations H14 - Lindridge Road, Wishaw), or external funding to deliver infrastructure requirements arising from it (as in the case of proposed housing allocation H1 - Land at Holly Lane, Atherstone).

NWBC DSLP Regulation 19 Response Form

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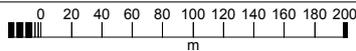
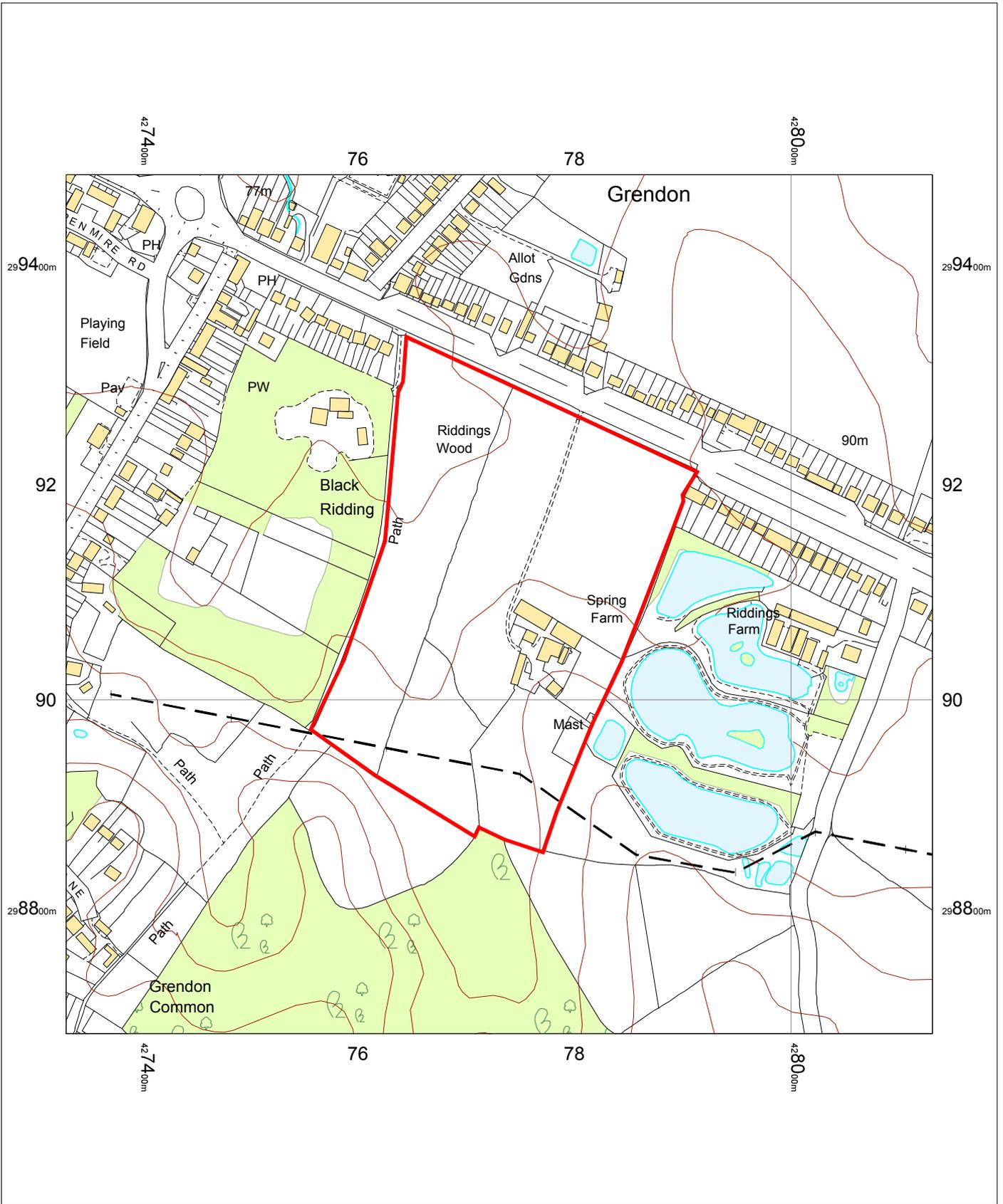
3.1 Please indicate if you want to participate in the hearing sessions for the oral part of the examination process?	Yes	X	No	
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3.2 If you wish to participate in the hearing sessions please indicate why you consider this to be necessary
<p>To ensure that the merits of Site as a proposed housing allocation are fully explored in the context of the proposed housing requirement of the draft Submission Local Plan and in relation to other proposed housing allocations.</p> <p><i>Please note that the appointed Planning Inspector, not the Council, will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination.</i></p>

Signature	Vicky Bilton	Date	31 January 2018
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If you require further information and guidance on the latest consultation phase of the Draft Submission Local Plan, please refer to the Frequently Asked Questions document which is available on the Council's website: www.northwarks.gov.uk or contact the Forward Planning Team on 01827 719499/451.

Comments received after 31/1/2018 will not be considered



OS VectorMap Local - Landplan Style
 10 March 2017, ID: HMC-00606777
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