

# Warwick District Local Plan – Modifications

## Part B - Your Representations

Please note: this section will need to be completed for each representation you make

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.

### **4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?**

Modification or SA:

Mod. Number: 20

Paragraph Number Policy DS NEW 1

Mod. Policies Map

Number:

### **5. Do you consider the Local Plan is :**

5.1 Legally Compliant? Yes

5.2 Sound? Yes No NO

### **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: ✓

Justified: ✓

Effective: ✓

Consistent with National Policy: ✓

### **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.**

*Policy DS NEW1 Directions for Growth South of Coventry*

The proposed approach is based on Warwick District providing in full unmet needs including those arising from outside the district, which are claimed to be sub-regional needs (Ref Mod 20 and DS16). The Proposed Modifications claim that meeting Coventry’s needs “is an important aspect of creating a sustainable and secure base for the growth of the city” (Ref Mod 21).

The National Planning Policy Framework (‘NPPF’) requires plans to take into account broader policies and explicitly excludes Green Belt from its presumption in favour of sustainable

development (NPPF paragraph 14 and footnote 9). Unmet needs from neighbouring authorities should be met 'where it is reasonable to do so and consistent with achieving sustainable development' (NPPF paragraph 182). Green Belt is explicitly cited as a policy indicating that there can be exception from the need for plans to meet objectively assessed needs (NPPF paragraph 14). See Planning Practice Guidance, 'Housing and economic land availability assessment' para 044.

The Government has consistently committed to protect the Green Belt and has repeatedly confirmed that the single issue of unmet demand is unlikely to outweigh harm to the Green Belt to constitute the very special circumstances needed to justify inappropriate development in the Green Belt (DCLG July 2013, NPPG 3-034-20141006).

The cumulative impact of meeting in full sub-regional needs for both housing (Policy DS NEW1) and employment (DS16 Sub-Regional Employment Site) would be very harmful. These demands are excessive and not justified.

In order to progress at the rate of expansion it feels necessary to achieve its own ambition, Coventry has to require its neighbours to provide both housing and employment land to meet its alleged needs. When a city cannot accommodate either sufficient housing or sufficient employment within its own area or means, its plan is not sustainable. It might be justified for a city to request its rural neighbours to contribute either housing or employment in order to help it balance its urban plan; it is certainly not justified to demand that rural neighbours provide both housing and employment in order that urban Coventry can grow at a rate that is clearly beyond its means and capability. Coventry living beyond its means is not sustainable and Warwick District should not have to pay the consequent price of Coventry's excessive demands to the sever detriment and amenity loss of its own residents and businesses. The proposed plans are unsound and unsustainable.

**8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete Policy DS NEW 1. The removal of this Proposal will make the Plan sound. The proposal is not justified or in accordance with national planning policy and the Plan will be unsound if it is retained.

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

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Person ID: Rep ID:

**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:**

To advance the arguments put in this representation and to respond to statements made by the local planning authority and any development interests taking part

### **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: M A Sullivan for CPRE Warwickshire

Date: 20 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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