

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: 16

Paragraph Number

Mod. Policies Map H40 East of Kenilworth

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.

This location is for housing in the Green Belt. This is not justified and not in accordance with national planning policy. Need for housing will rarely be sufficient to constitute the very special circumstances required for inappropriate development in the Green Belt. In July 2013, the Local Government Minister Brandon Lewis said in a Commons Written Statement that 'The single issue of unmet demand...is unlikely to outweigh harm to the green belt and other harm to constitute the 'very special circumstances' justifying inappropriate development in the green belt'. The DCLG Policy Statement of October 2014 states, 'The local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability...of land...and take account of any constraints such as green belt which indicate that development

should be restricted and which may restrain the ability of an authority to meet its need'. This is detailed in Planning Practice Guidance issued in October 2014, on 'Housing and economic land availability assessment' at paragraphs 034, 044, and 045.

This would be a long swathe of urban development which would close the Green Belt gap which currently exists between the built-up area of the town and the A46. On rising ground, the development would be very visible from countryside to the east near Ashow and the National Agricultural Centre. It would undermine the rural character of the Avon Valley and the setting of the Gade I Stoneleigh Abbey and its eighteenth-century landscaped park (registered by English Heritage) by extending Kenilworth's urban area up to the A46, which is near to the western boundary of the parkland. This would halve the distance between the urban area and the parkland to no more than 250 metres.

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 Proposal H40 or scale back to the Thickthorn area only as originally proposed.

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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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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