

Preferred Options Response Form

2012

For Official Use Only

Ref: 6925
Rep. Ref.

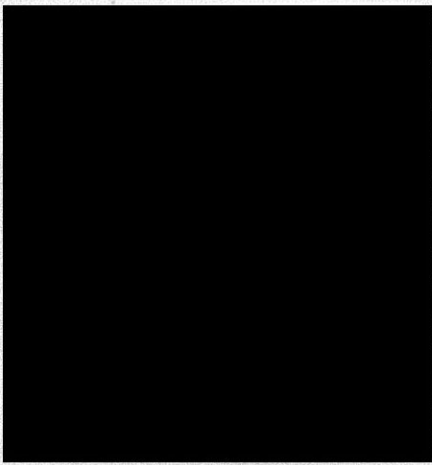



Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available for members of the public. You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

WDC PLANNING
Ref
Officer
24 JUL 2012
SCANNED
CC CR PD MA
PRE GEN DIS

	1. Personal Details	2. Agent's Details (if applicable)
Title	MRS	
First Name	SANDRIA	
Last Name	BARNWELL	
Job Title (where relevant)	RETIRED TEACHER	
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		
Would you like to be made aware of future consultations on the new Local Plan?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age		

Part B - Commenting on the Preferred Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which document are you responding to?
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

PREFERRED OPTION BOOKLET

Which part of the document are you responding to?
Preferred Option Box (e.g. PO1)

PO BOX 4

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites - Whole District)

WHOLE DISTRICT

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Please see attached paperwork as factual, valid reasons for me opposing the District Council's plan to develop Green Belt land.
Thank you



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Policy PO4 – Distribution of Housing Sites

We object to the allocation of the land referred to as Thickthorn, Kenilworth (and as shown on Map 4 as one of the Preferred Sites for Development) for the following reasons:-

a) Green Belt

- i. The land forms part of the Green Belt as shown on the current Development Plan. It is not shown on the Plan as an area for potential longer term development, or safeguarded land, in the terms of paragraph 85 of the National Planning Policy Framework (NPPF). The Council did not consider, at the time of the preparation of the existing Local Plan, that the Green Belt would require alteration to meet longer term development needs and therefore no areas of safeguarded land were identified in the District or specifically at Kenilworth. It had been anticipated that beyond 2011 land outside the Green Belt would meet development needs. It is not clear from the plan why this option is no longer viable.
- ii. The West Midlands Regional Spatial Strategy (RSS), which forms part of the present development plan, makes no provision for changes to established Green Belt boundaries in Warwickshire. The RSS remains a material consideration in the preparation of this plan.
- iii. The proposed allocation site serves all of the five purposes for Green Belt, as set out in paragraph 80 of the NPPF.
 1. It checks the urban expansion of Kenilworth.
 2. It serves to maintain the open gap between Kenilworth and Cubbington/Leamington.
 3. It safeguards the open countryside around Kenilworth.
 4. It is part of the setting of the historic town of Kenilworth.
 5. It assists in encouraging the recycling of derelict and other urban land in the nearby larger urban areas of Coventry and Warwick/Leamington Spa.

On that basis it is not, therefore, an area of Green Belt that should be sacrificed for development when other areas of Green Belt that serve fewer purposes may be more appropriately released subject to their suitability and the observation at (i) above.

- iv. Within this area of Green Belt, to the east of Kenilworth, there are four established land uses. Previous national guidance on Green Belts (PPG2 Green Belts) recognised these as appropriate to Green Belt areas.
 1. The proposed site includes established facilities for outdoor sports and recreation. The grounds and grass pitches of the Kenilworth Rugby Club and Kenilworth Wardens Cricket and Football Club, occupy a substantial part of the proposed development land. They provide valued and well used sports facilities for the local community being conveniently located and within comfortable walking and cycling distance of a substantial area of residential development to the east of the town.

- The loss of these facilities should not be contemplated except in the most exceptional of circumstances and even then only if they could be relocated to a site or sites similarly convenient to the community they serve.
2. The area provides opportunities for access to the open countryside, there being a bridal way (Rocky Lane) and a footpath across the site with links over the A46 to the Stoneleigh and Ashow villages.
 3. The proposed allocation included an important area of nature conservation interest in the form of the managed woodlands along Rocky Lane and Glasshouse Lane. The site also acts as a setting to the Ancient Woodland to the east of the A46.
 4. The remaining land within the site is an agricultural use (arable) or used for grazing horses. The land is some of the best and most versatile agricultural land (ALC Grades 1 and 2). It is accepted planning policy that where land of a lower agricultural grade is available it should be used, where appropriate, for development as opposed to land in the higher grades.
- v. It would therefore be inappropriate to sacrifice this area of Green Belt to development where the established uses properly assist in sustaining the openness of the Green Belt hereabouts.
 - vi. Once established, Green Belts should only be altered in exceptional circumstances. Table 7.2 of the plan and paragraph 7.22 indicate that the sites and locations identified for development provide land for 1,370 additional houses, over and above the 6,986 houses that need to be provided on new allocations in the plan (see table 7.1). This approach would suggest that the need to find development land from within the Green Belt is not so "pressing" as to warrant the need for the proposed allocations being described as an exceptional circumstance, which is a prerequisite to any changes to established Green Belt.
 - vii. The Green Belt land to the east of Kenilworth is appropriately designated because it serves all of the five purposes identified in national policy, and it includes a range of established uses that are appropriate to Green Belts and preserve its openness. The removal of the proposed allocation from the list of strategic sites in proposed policy PO4, would not result in the under-provision of land for housing, for the reasons noted at (vi) above.
 - viii. There are a range of other sites identified in the Strategic Housing Land Availability Assessment that are available for development outside of the Green Belt. These could be identified in the Plan to maintain the "flexibility" of provision in the forward supply of land should the Council consider that to be a necessary aspect of the Plan in the event that the land at Thickthorn was deleted from Policy PO4. Therefore the site is not key to the approach taken to providing land for development set out in the plan.

b) ~~Infrastructure~~