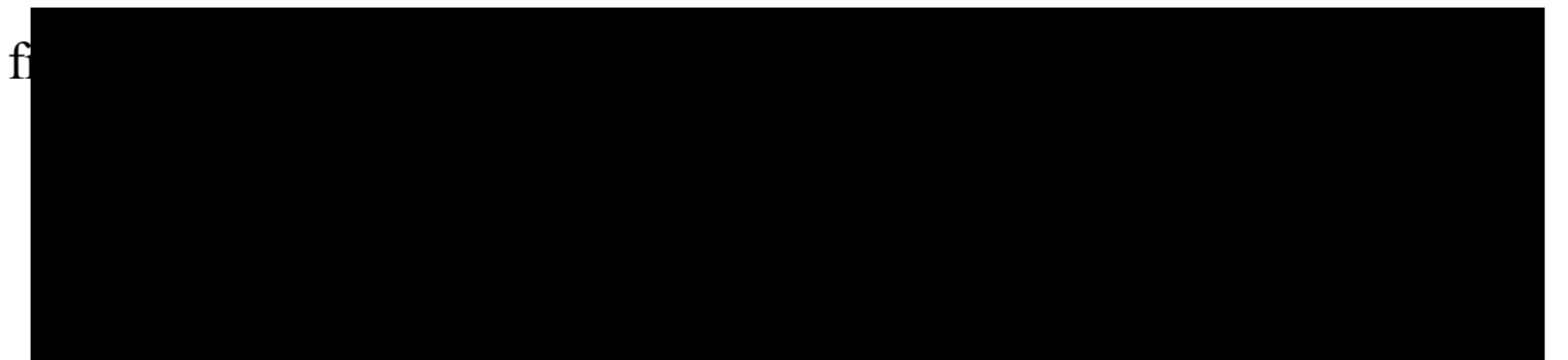


THE WARWICK SOCIETY



David Barber,
Warwick District Council

22 April 2016

Warwick District Local Plan: Proposed Modifications, February 2016

The Warwick Society does not accept that the proposed modifications make the proposed Local Plan 'sound'. It objects specifically to these policies:

Policies DS2, DS6 and DS7: the proposed increase in the numbers of houses to be built does not reflect a satisfactory 'objective assessment of need', but are instead based on exaggerated and unfounded projections of housing demand in Coventry. The revised Plan therefore fails to meet the requirement of the NPPF that it should be based on the best available information.

Policy DS11, map 3a, northern part of site H46A: the allocation for suburban housing development of the triangle of land between Banbury Road and Gallows Hill, generally known as the Strawberry Fields, is unsustainable. Development there would directly damage the settings of Warwick Castle Park and Warwick Castle (both Grade I listed) and the Warwick Conservation Area (and its many listed buildings).

It would also increase the damage to the Conservation Area, its Listed Buildings, town centre commercial activity, and the health of residents and users of the town centre caused by the proposed Transport Strategy. This, based on meeting the needs of low density car-dependent suburbs, routes much of the new traffic generated by developments south of the Avon through the streets of Warwick and Leamington town centres. No detailed proposals have been made, nor has any Heritage Impact Assessment been carried out, for the changes to Warwick town centre street layouts which would be necessary to accommodate this increased flow. Nor have the impacts on health of the continuing excessive air pollution caused by the traffic and its congestion been satisfactorily evaluated.

In the earlier stages of the development of the Transport Strategy (in particular in the Strategic Transport Assessment Stages 3 and 4 Reports), it was noted that changes in junction layouts would be essential if the road network is to provide the demanded capacity, but that, because of their effect on Listed Buildings and on residential amenity, they might not be feasible. So there is no feasible or implementable Transport Strategy for further development south of the Avon.

This makes these elements of the plan unsustainable and therefore the Plan as a whole unsound.

The Inspector's Initial Hearings, limited in their scope, did not deal with this vital issue nor with many of the other objections which we submitted to earlier draft Plans on 27 July 2012, 29 July 2013, and 27 June 2014. We would be grateful if you would add this note to those earlier objections, making clear to the Inspector that we would like the opportunity to present them all to him when his hearings resume.

yours sincerely,

James Mackay, Chairman