

# LOCALPLAN

helpingshapethedistrict



## Consultation on Proposed Modifications (2016) Response Form

For Official Only	
Person ID	
Rep ID	

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

Part A – Personal Details  
Part B – Your Representations

If your comments relate to more than one proposed Modification you will need to complete a separate 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 Modifications have been made available (see the table below). You can also respond online using the Council's e Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be returned by **4.45pm on Friday 22 April 2016**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH or email: [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)**

### Where to see copies of the documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and also at the following locations:

- Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa;
- Leamington Town Hall, Parade, Royal Leamington Spa
- Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
- Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
- Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
- Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
- Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
- Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa
- Finham Community Library, Finham Green Rd, Finham, Coventry, CV3 6EP

# Part A - Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
Title	Mrs	
First Name	SUZANNE	
Last Name	ROBBINS	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		

### 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Modifications to the appointed Inspector	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

# Part B - Your Representations

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

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

Modification or SA:	REMOVAL OF LAND NORTH OF MILWERTON FROM THE GREEN BELT
Mod. Number:	16
Paragraph Number	2.81
Mod. Policies Map Number:	H44

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

5.1 Legally Compliant? Yes  No

5.2 Sound? Yes  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:	<input type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

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.

SEE ATTACHMENT

ATTACHMENT COVERS MODIFICATION NUMBERS 16 + 14

Continue on a separate sheet if necessary

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.

SEE ATTACHMENT

ATTACHMENT COVERS MODIFICATION NUMBERS 16 + 14

Continue on a separate sheet if necessary

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.

For Official Use Only

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:

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### 11. Declaration

I understand that my comments will be made available to the public and that my comments will

Signed:

Date:

18 / 04 / 15

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.

For Official Use Only

Person ID:

Rep ID:



# Part B - Your Representations

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

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

Modification or SA:	ALLOCATION OF LAND NORTH OF MILVERTON FOR DEVELOPMENT
Mod. Number:	14
Paragraph Number	POLICY DS15
Mod. Policies Map Number:	H44

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

5.1 Legally Compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.2 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

## 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:	<input type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

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.

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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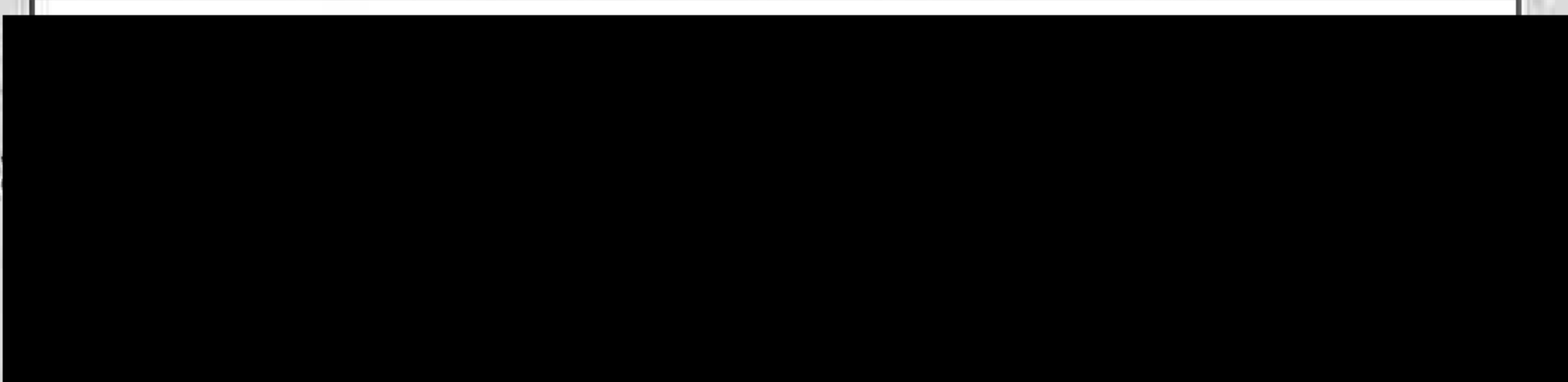
Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### 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



Date:

18/04/18

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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18<sup>th</sup> April 2016

Development Policy Manager  
Development Services  
Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
CV32 5HQ

To Whom It May Concern

**Re: Local plan proposed modifications consultation: 22<sup>nd</sup> April 2016**

I am writing this letter to oppose some of the modifications proposed in the amended Local Plan submission; in particular I support the absence of development on the North Leamington Green Belt around Old Milverton and Blackdown. As Brandon Lewis says, it “is not development at any cost or development anywhere.”

Source: <https://hansard.digiminster.com/Commons/2016-03-15/debates/16031557000003/HousebuildingKing'SHillCoventry>

It is essential that the plan does not return to a scheme involving any development on the North Leamington Green Belt. The Green Belt in this area meets the 5 key roles of Green Belt and is an excellent and well used cultural and exercise related resource. Recent developments in Kenilworth, Baginton and Lillington already take land from this essential Green Belt and further development on it would not be sustainable. I object to further such development whilst recognising the need for further housing requirements.

I would like to make the following points:

- A Joint Strategic Housing Needs Analysis was performed with Coventry City Council. As the review identified the necessity to increase the number of houses above those originally proposed I believe that there is sufficient non Green Belt land to accommodate this additional development;
- This should be about Warwick District Council and the ability of our district to accommodate the required housing for the next 15 years. We should not have to use additional district land to satisfy the shortfall of other councils. That should be their responsibility as I foresee the same matter arising in a further 15 years and if Warwick district land is utilised then that means we will have less options at our disposal in the future;
- The Revised Development Strategy has a fair distribution of new housing across the District. It is fair because there are still plans for new houses in the Green Belt at Thickthorn and Lillington as well as proposed development in villages;
- The original Revised Development Strategy proposed that most of the new development be located close to where employment opportunities already exist (e.g. industrial parks to the south of Leamington and Warwick) this provides an opportunity for people to live close to their place of work, reducing or eliminating commuting for many people, reducing pollution and improving quality of life. Furthermore there is ample space to build to the south of Leamington as the next nearest town is Banbury;
- Focusing development in the South, in one broad area, ensures adequate public services can be provided and developed to meet the needs of the new population. These services can be

designed to meet the exact needs of that new population and planned within easy walking and cycling distance, minimising traffic congestion. If development were to be more spread across the district public services would have to be developed in an inferior and unacceptable “make-do-and-mend” fashion which would provide poorer levels of service to both existing and new residents in those areas;

- The original Revised Development Strategy provided for improvement to the road network south of Leamington to relieve the existing congestion and to cater for the new development. The transport assessment clearly showed that development in the north would generate more traffic congestion in the district as it would have forced people to travel south to employment land, shopping (e.g. supermarkets) and the M40. Loss of vital Green Belt recreation land would also have resulted in more people travelling by car for recreation;
- It is possible that mitigation methods may need to be employed in the southern areas to reduce pollution and congestion but the work needed to do this would be less than for development in the north. For instance putting the country park in the south next to the existing houses, with new housing beyond it, would make the green-park more accessible. It could be crossed by cycle-ways and would act as a green-lung to reduce air pollution

To expand on some of the points raised above, WDC has now responded to the Government Planning Inspector's concerns on its Local Plan. This includes providing 6,000 houses to meet Coventry City Council's housing need of which only 2,245 will be close to Coventry with the remaining houses being in Warwick and Leamington.

WDC (Warwick District Council) wants to remove about half of Old Milverton from the Green Belt. Initially 250, and later a total of 1,350 of Coventry's houses will be built in Old Milverton together with a primary school, a railway station, medical centre and employment opportunities. It makes no sense to locate housing for Coventry in Old Milverton and to create more traffic on the A452, A46 and Stoneleigh Road courtesy of approx. 3,000 new cars (on the premise there will be two per new house). To cope with the traffic problems there are plans to make the A452 into a dual carriageway between Thickthorn and Blackdown, with existing proposals to find a site for a Park and Ride Scheme in Blackdown remaining. These proposals will significantly change North Leamington and open the area to major development in the future.

The expression in the plan to build a railway station in Old Milverton to be used for a commute to Coventry would suggest that in the first instance the houses are going to be located too far from Coventry. The alternative travel plan for the Park and Ride overlooks the fact that the proposed site is too far from the A46. To put this in perspective, the equivalent in terms of a park and ride for Leamington would be over a seven or eight mile radius which would extend further than the boundaries of surrounding local towns like Kenilworth and Warwick. As will be explored there are clearly better options closer to Coventry to reduce the requirement for people to commute.

The plan talks about employment opportunities and a proposal for a Park and Ride Scheme in Blackdown. I feel that we need to be creating jobs near where people live or enable them to work across distance, rather than encouraging long(er) commutes. Building in the Old Milverton and Blackdown vicinity is not a solution to unsustainable commuting. On the contrary, it would lead to more people ‘leapfrogging’ over the suburbs into city centres. Instead, we need to do more to create jobs near where people live rather than far away from housing they can afford, especially as the houses outlined are targeted for dealing with Coventry City’s Council shortfall in housing requirements.

Alternatively, people need the tools to be able to work remotely when they choose to do so. The growth of digital technologies has reduced the impact of distance and allows appropriately skilled people to offer services from virtually any location in the country, provided there is a fast broadband connection.

‘Leapfrogging’ is also not inherently unsustainable if a good transport network exists. Transport is not about the distance in miles, but rather the speed of connecting links (between homes and

workplaces). Whilst it will be argued that not developing around Old Milverton and Blackdown will cause traffic problems around Coventry and in the Warwick District, I would argue that in these cases the Green Belt for the most part extends no further than 10 miles beyond the urban edge (and in many instances over a far smaller distance), and thereby adds little in itself to journey distances. Problems with the transport network in these areas are far better explained by an over-reliance on car travel, and conversely the poor quality of public transport, rather than by the presence of the Green Belt that is protected under the NPPF.

The principles of the Park and Ride Scheme as outlined by Warwick District Council contain proposals that also need to be reviewed not least the fact there will be no dedicated buses but instead a glorified car park where scheduled bus services will stop with users having to time visits to coincide with the bus timetable. If this is how the park and ride scheme is envisaged then its location needs to be carefully considered so that it can actually serve maximum benefit. Being located in Blackdown is not ideal as it will not serve the greatest benefit nor numbers of people. Instead, based upon other proposals a more suitable site would be the A46 roundabout that joins the A452. This has the benefit of serving a greater number of people from Leamington, Kenilworth and Warwick because of its central location.

Old Milverton and Blackdown is a dispersed settlement where development proposals should be considered very carefully as infilling could ruin the character of the village while estate development would overwhelm it. The protection of Old Milverton and Blackdown's visual, historic and archaeological qualities is protected under paragraph 64 of the National Planning Policy Framework which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

The benefits of preserving this land, and thus the Green Belt remain as vital as ever. By looking at other countries I can see that without the strong protection it offers against most forms of development, more valuable countryside would be consumed by urban sprawl – and the character of our towns and cities would be irreversibly eroded, in this instance Old Milverton and Blackdown.

For years, Green Belts have protected agricultural and other undeveloped land. By doing this they encourage the regeneration of previously developed or 'brown field' land in urban areas. I would contend that without the strong protection Green Belts offer against many forms of development, much more farmland and woodland would be consumed by urban sprawl, especially around large cities. Yet with the increasing global pressures from climate change and population growth, our farmland and woodlands will become more valuable in future, not less. With only 13% of the land in England designated as Green Belt we won't have a second chance to get this land back. The calls for more development in the Green Belt assume that this land is only valuable if built on, an assumption that is fundamentally flawed. Such higher value, quality land, is needed now more than ever and other more viable options need to be considered closer to Coventry.

A potential location in Coventry that has seemingly been discarded but should be seriously be reconsidered is King's Hill. With the land available there is the potential for 4,000 houses; the Coventry submission only includes development of 1,800. Apparently the reason for not further utilising this land is that it is not possible to build more than 200 houses per annum because it has never been done before in a local parish. I would suggest that in this ultra modern age in which we live it is not beyond the wit of man, nor his capability, or even that of the construction industry to build more than 200 houses per annum. To me, because it has never been done before is not a credible argument especially with so much at stake with decisions that will indelibly shape the future of local councils. The local plans of both Warwick and Coventry significantly underestimate the capacity of the land adjacent to Coventry to deliver Coventry's housing need.

Much of the integrity and therefore benefits of Green Belt would be lost if we build even on a small proportion of this land starting with 250 homes, including preventing sprawl, and towns joining up as per the NPPF which states that merging of communities is to be prevented, yet development of

these sites will lose the individual identities currently held between Old Milverton, Leamington, Warwick and Kenilworth.

The land around Old Milverton and Blackdown has a purpose, to prevent urban sprawl, but in doing so it provides countryside close to thousands of people. A huge proportion of it has considerable environmental value. In the face of climate change, it has an increasingly important role in storing carbon and preventing flooding and is a vital economic resource for food security and soil protection.

It would be disingenuous to argue that this agricultural land has no positive environmental value. In fact, the National Ecosystem Assessment recognises the huge value to society of agricultural land, both in terms of food production and in cultural services which is a more salient point for this tranche of land in question (such as the sense of wellbeing produced by seeing an agricultural landscape). The NEA also notes that biodiversity and some landscape features (particularly hedgerows) have declined in many agricultural landscapes. We should be working to protect this trend whilst finding a better solution to the required housing development.

Preventing sprawl, on to the land around Old Milverton and Blackdown will produce financial benefits to society by reducing the infrastructure and environmental costs associated with new development, this during a time of austerity when Councils are having to slash services. Preserving this high quality land and considering other lower value land and brown field sites closer to Coventry will prevent sprawl and all the negative costs associated with it. If this land is developed this will have a two-fold adverse impact:

- The loss of undeveloped land and all the services that this provides, particularly in relation to agriculture and reduced ecological services;
- More dispersed activity, including reduced accessibility, higher costs of public infrastructure (as would be incurred through the Park and Ride Scheme) and longer trip distances (for people working in Coventry who are living in Warwick District in houses to cope with their shortage)

Releasing just a small percentage of Green Belt sounds an attractive way of releasing land for housing. But once bits of the Green Belt are removed, the integrity is reduced and so its benefits begin to be lost. Permanence is also an important feature of Green Belt so people, businesses and the Government (through supporting environmentally sensitive farming on Green Belt land) have had the confidence to invest in the area on that basis. Conversely, the temptation is removed for people to buy Green Belt land in the hope that it will be de-designated and its notional value for development will increase.

Pressure for the development to envelope Old Milverton and Blackdown is considerable, mainly for housing Coventry city commuters, but has been successfully resisted in the past. The reasons for rejecting those schemes includes the inadequacy of the lanes to accommodate even small increases in traffic, and because road widening would destroy ancient field boundaries. In addition, I am concerned about the lack of reference to public transport through the village. This could limit opportunities for the residents of the new development to travel by public transport.

The proposed siting of the development is particularly ill-considered as it is on Green Belt land used by many villagers, local residents and tourists for recreation and walking dogs, and building here would both diminish the striking view into the centre of the village and be prominent from most angles within the village. The house designs are likely to be out of keeping with the village's strong historic character. While design issues might be solved by conditions or revised proposals, these could not remedy the siting problem.

Furthermore, there is no need for this kind of open market housing in Old Milverton and Blackdown. Warwick District has more than five years' supply of housing land to meet the requirements of its emerging Local Plan. As an alternative to this proposal, I would support the construction of a houses

built, if it was ensured that these were affordable homes for local people, in Leamington, but these homes are being developed to cope with Coventry's needs.

I believe that the proposed development of Old Milverton and Blackdown is a direct contravention of policy. The proposed development would significantly alter the fabric of the area and amount to serious 'cramming' by what is a low density road. The proposal allows very little space for landscaping and I believe that it would lead to gross over-development of the site. The proposed development would not result in a benefit in environmental and landscape terms, to the contrary it would lead to the loss of valuable green space.

The land for development that has been identified incorporates steeply sloping arable fields. Significant moisture, and drainage, in our garden, and those of neighbours during periods of sustained rainfall leads me to have concerns about the impact of the proposed development on surrounding properties in terms of drainage as well as ground stability. As climate change has demonstrated, through increasing incidents of flooding throughout England, developing these proposed sites is likely to accentuate the risk of localised flooding as the surface water will not have adequate land to drain in to, and man-made drainage systems have been proven to not cope with heavy and sustained rainfall. For some houses being located in a small gully at the base of the green belt land selected for development near Old Milverton where all the water would collect this would prove to be very damaging, having this natural defence taken away. In the face of climate change, this land is likely to have an increasingly significant role in storing carbon and preventing flooding.

The proposed site of development, as ear-marked in the (future) safe-guarded land, is at such an angle that the primary amenity area of our garden would be severely overlooked from the top rooms of the new development, likely to result in a serious invasion of our privacy.

On this latter point, I believe that the proposed development is a direct contravention of the District Wide Local Plan. The design of the proposed development does not afford adequate privacy for the occupants of our home or of adjacent residential properties, particularly with regard to their right to the quiet enjoyment of garden amenities. I would urge you to consider the responsibilities under the **Human Rights Act** in particular **Protocol 1, Article 1** which states that a person has the right to peaceful enjoyment of all their possessions which includes the home and other land. I believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our property. **Article 8** of the Human Rights Act also states that a person has the substantive right to respect for their private and family life.

In many cases there is likely to be a significant overlap between Article 8 and Protocol 1, Article 1. However, I perceive this right (Protocol 1, Article 1) to be wider than Article 8 in the sense that it applies to the peaceful enjoyment of all of a person's possessions and not merely to his home. This could include land (garden). The grant or refusal of planning permission will frequently affect the lives, homes and property of others. Notably the owners and occupiers of neighbouring properties, all of whom have the right to respect for their home and a right for the peaceful enjoyment of their possessions. This is the right that will be threatened through the proposed development of Old Milverton and Blackdown.

In practice, I expect it is likely that the interests of the community and those of the applicant will be balanced. It will be necessary for the local planning authority, the planning inspectorate (and potentially the courts) to ensure this balance is fair. The proposal as outlined for development of Old Milverton and Blackdown to resolve Coventry City Council's housing shortage does not qualify in this regard as the local communities interest is not being served by coping with another council's challenge.

Article 8 gives everyone the 'right to respect' for his or her home, for example for the prevention of disorder or crime, for the protection of health or morals and for the protection of the rights or freedoms of others. This last element provides scope for planning policy which may supersede the freedom of the individual in the interests of the public.

However, the legal precedent is set out in the case of *Britton vs SOS* whereby the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8 (2). Private and family life therefore encompasses not only the home but also the surroundings. In this instance, other sites within the boundaries of Coventry City Council and secondarily within Warwick District Council, which are deemed to be lower value land, should be considered, seriously considered, over the Old Milverton and Blackdown development. It should not bend to the pressure that is undoubtedly brought to bear, and lobbied for, by the interests of developers.

On this commercial point, I feel that much house price inflation is down to economic factors that increasingly treat houses as an investment opportunity rather than somewhere to live, something that appears unique to the UK. Green Belt policy only restricts house-building in the land that it covers. Suggestions that it is responsible for pushing up house prices are part of a wider critique of the planning system. For example, it has been claimed that the protection of land, such as that surrounding Old Milverton, explains why millions of young people can't afford to buy a home.

I would contend that due to simple economics that the significant factors that stimulate housing demand well beyond the capacity of the market to supply it, and so drive up prices, actually include:

- the ability of the major house-building companies to control the supply of land for house-building and trickle out new houses in order to maximise sales returns, essentially 'land banking';
- low interest rates, which make it easier to borrow more;
- a wide range of strongly marketed mortgage products;
- the relatively poor performance of rival investments, such as equities and pensions; and
- the growth in notional wealth tied up in people's houses, which has enabled many owners to enter the 'buy-to-let' market by borrowing against their current homes, or help their children to become home owners in the same way

If we loosened controls to develop on such high quality land, we would simply allow more land to be built on, where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Ireland and Spain. There is plenty of other, more suitable land that could be built on, and it could be used more effectively.

In 2014, a CPRE report found that there is enough suitable brown field land, available now, for at least one million new homes. Some of this land is within Warwick District Council. This report also demonstrated that brown field land is not a finite resource. It is constantly being replenished, and, usually, many more homes can be delivered on a brown field site than an equivalent area of green field land. Government land use change statistics show that, in every year since 2004, we have consistently built an average 50% or more houses on brown field sites than on equivalent areas of green field. We should use this land before even considering going into the Green Belt; the modified Local Plan, in conjunction with Coventry City Council does not do this.

Furthermore, research carried out in June 2015 on behalf of BBC Radio 4's *File on 4* programme by Glenigan, a leading provider of construction data, found a sharp increase in the number of houses securing full planning approval in the Green Belt. In 2009/10, 2,258 homes were approved. In 2013/2014, the number had risen to 5,607. By the following year, 2014/2015, it had more than doubled to 11,977.

Much like in the original plan where the land around Old Milverton and Blackdown was not included, Green Belt land should only be developed in exceptional cases, and that economic growth is not in itself an 'exceptional case'. In my view, these exceptional circumstances have still not been presented.

Continuing the references to policy, Government Planning Policy Statement PPS1, Paragraphs 17 – 19 states "Government is committed to protecting and enhancing the quality of the natural and



historic environment, in both rural and urban areas. Planning policies should seek to **protect** and enhance the **quality, character and amenity value of the countryside** and urban areas as a whole. A high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources." The proposed development of Old Milverton and Blackdown to cope with another council's (Coventry) housing shortage is counter-intuitive to this because:

1. It is contrary to Green Belt policies 1 (no 'very special circumstances') and 2 ('openness');
2. The proposed development will place extra burdens on the Old Milverton and Blackdown infrastructure, with the local infant school(s) already at full capacity and limited amenities or facilities within the immediate vicinity. Building a primary school does not address the future burden on secondary schools;
3. The site will increase traffic on an already busy road, near a sharp bend (Old Milverton Road), with no pavements or street lights, hence creating even more of a risk for pedestrians and drivers (an extra 2,500+ vehicles are planned for this site);
4. There are NO special circumstances for this proposed site in a green belt area

Going one step further, under the National Planning Policy Framework:

1. NPPF states that greenbelt is to be protected and requires exceptional circumstances to be built on. There is nothing exceptional about the council's plans to build on unspoilt land to meet their current housing target when there are other lower value sites that are not included in the plan. Warwick District Council, in cooperation with Coventry City Council, has assessed sites on the edge of Coventry as being of lower Green Belt value. Even if development at Old Milverton was acceptable as a sustainable location for development, there are sites with a lower Green Belt value that should be used in preference to the land in Old Milverton;
2. NPPF states that brown field sites are to be prioritised over the development of green field and certainly greenbelt sites, but these plans offer up greenbelt in advance of brown field site development or lower value greenbelt sites;
3. NPPF states that merging of communities is to be prevented, yet development of these sites will lose the individual identities currently held between Old Milverton, Leamington, Warwick and Kenilworth;
4. NPPF states that infrastructure must come first, yet the outline ideas to provide infrastructure are either not in place, or are not time-lined in advance of the proposed developments. There are currently no plans to develop new healthcare with these massive scale extensions of population;
5. NPPF now states that the target level of housing development within the plans should be capped in line with the capacity of brown field sites to accommodate it, to protect greenbelt - yet these plans significantly exceed it

There are some other considerations which I feel need to be taken in to consideration over the plan to build houses in the Old Milverton and Blackdown vicinity:

*Development Plan Policies:*

- I understand that it is only in exceptional cases that personal circumstances may be relevant to planning decisions. However, the Convention puts the rights of the individual first on the basis that the rights of the individual are paramount unless there is justification in the public interest. This justification, and the proof of exceptional circumstances, has not been provided to merit development upon the Green Belt between Old Milverton, Blackdown and the A452, and certainly not demonstrated to the benefit of the residents of Warwick District Council;
- The need for affordable housing will not be fulfilled by developing on these sites, as local property values in north Leamington are generally different to the rest of the area;
- The current housing target which drives the need to develop on the greenbelt is flawed and needs to be changed. It is based on outdated, over inflated housing targets and needs to be

brought in line to the latest 2014 figures (from the Office of National Statistics), which show a need significantly fewer new homes;

*Impact on highway safety and traffic:*

- This section of A452 near Blackdown is one of the most congested and dangerous between Kenilworth and Leamington; adding over a thousand extra houses will cause gridlock and increase accidents within this over-burdened area;

*Conservation of the natural environment:*

- The above sites are host to different species and an array of wildlife that will perish as a result of the proposed development;
- The site is used both as working agricultural land and as land for which exercise - which provide the community a meaningful way to connect with the natural environment;

*Effect on the landscape:*

- These fields are an integral part of the landscape of Old Milverton, Blackdown and Leamington. The site along Old Milverton Road and the A452 provides views of the natural landscape stretching through Old Milverton right up towards Blackdown and beyond. If developed on, this connection with the natural environment will be lost forever

Before concluding, I would also like to consider the Coventry City Council plan, and the contradictions within it as it impacts upon alternative Councils.

*Green belt and green environment:*

- The Local Plan will make sure Coventry keeps its beautiful parks, green belt and open spaces as the city grows;
- And the Council will continue to work with neighbours in Warwickshire to make sure greenbelt land is treated sensitively and the city and the surrounding county preserves its countryside and historic character;
- The Council will also work with its neighbours to ensure that appropriate land is retained in the green belt to prevent Coventry merging with adjoining towns and cities

I would venture that through protecting their green belt and their interest that it is at the expense of others. If they have a housing shortage then they need to look at the resources at their disposal first before others have to pick up their slack. Building houses in Old Milverton and Blackdown for Coventry's needs does not fulfill either points about preserving the countryside (of its neighbours) nor ensuring the green belt is retained to prevent towns merging. Building here would reduce the distance between Leamington and Kenilworth to approx 1.5 miles.

*Environment:*

- The Council would work with the Environment Agency to keep development away from areas at risk of flooding wherever possible;
- The city is a designated Air Quality Management Area, where pollution levels are closely monitored, and future development will be in areas where public transport is available and people can walk or cycle to reduce reliance on cars

The land ear-marked for development, especially the gully near Guys Cliffe Avenue has poor drainage during periods of heavy sustained rain. This is at odds with their plan but the land is deemed suitable by Warwick District Council! They also wish for people to walk or cycle to reduce reliance on cars, however, building homes in Leamington to cope with their housing demand would make this a very long walk and I certainly would not like to cycle down the A46 to get in to Coventry.

Whilst the concepts discussed above from the Coventry City plan are well intentioned, developing land closer to Coventry would be more beneficial in the achievement of such objectives. The Council are committed to health and well-being and encouraging active lifestyles. There can be no active lifestyle to enjoy if the green belt is developed upon or people are spending additional time commuting to work because they live further from work.

The recent debate in Parliament between Jim Cunningham and Brandon Lewis (Minister for Housing and Planning) reinforces a lot of what I am saying about the protection of the Green Belt.

Source: <https://hansard.digiminster.com/Commons/2016-03-15/debates/16031557000003/HousebuildingKing'SHillCoventry>

Some excerpts from the debate which support the case that the Green Belt around Old Milverton should not be used for housing development:

4.09 pm

**The Minister for Housing and Planning (Brandon Lewis)**

“local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the National Planning Policy framework.”

“The national planning policy framework—the NPPF—makes it clear that the purpose of planning is to deliver sustainable development, but that is not development at any cost or development anywhere. National policy sets out that planning must take account of the different roles and characters of different areas, recognise the intrinsic character and beauty of the countryside, and take into account all the benefits that an area has...Similarly, in preparing plans to meet development needs, the aim should be to minimise adverse effects on the local and natural environment.”

“The hon. Gentleman also mentioned the green belt. We are clear—and the NPPF makes it clear—that the green belt is a legitimate constraint on development.”

“I am sure that the hon. Gentleman will have heard this, and if he looks back at the record, he will see that we have regularly made the point that the green belt is a legitimate constraint. It is an important part of the country’s infrastructure and the Government attach the highest importance to its protection...The NPPF makes it clear that green belt boundaries should be established in local plans and can be altered only in exceptional circumstances.”

This comments from Brandon Lewis, the Minister for Housing and Planning, reinforces, ne emphasises, that development is consistent with policies set out in the NPPF – no exceptional circumstances have been proven and “planning must take account of the different roles and characters of different areas, recognise the intrinsic character and beauty of the countryside, and take into account all the benefits that an area has”. As Brandon Lewis says, it **“is not development at any cost or development anywhere.”**

In conclusion, the exclusion of development in the North Leamington Green Belt enables the plan to comply with the NPPF. Any attempt to re-introduce development in the North Leamington Green Belt would be unacceptable and be bitterly opposed as no exceptional circumstances exist; the land is a vital and immeasurable resource for the future of the district and is critical to its future sustainability.

The NPPF and the 2015 Conservative Manifesto stated clearly that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. In March 2015, the Prime Minister declared that protecting the Green Belt is ‘paramount’. Several of the sites identified in the plan are contrary to such policies and declarations. We are entrusted with doing the right thing for future generations; what we don’t have is the right to deny them the chance to enjoy the experiences I/we have had and make irreversible decisions.

Whilst I acknowledge that Warwick District Council has to develop, it needs to be developed in a structured fashion, and development needs to be in the right place. North Leamington, and the district as a whole, should not have to use its land to fulfil a significant proportion of the housing

requirements of Coventry City Council. There is significant opposition across the district as it currently stands to cope with its own housing requirements. To build a further 6,000 houses would be nothing short of inflammatory with the Green Belt being one of those significant interests and would also be in contravention of Article 8 of the Human Rights Act as upheld in Britton vs SOS.

To remind, as Brandon Lewis says, it “is not development at any cost or development anywhere.”

