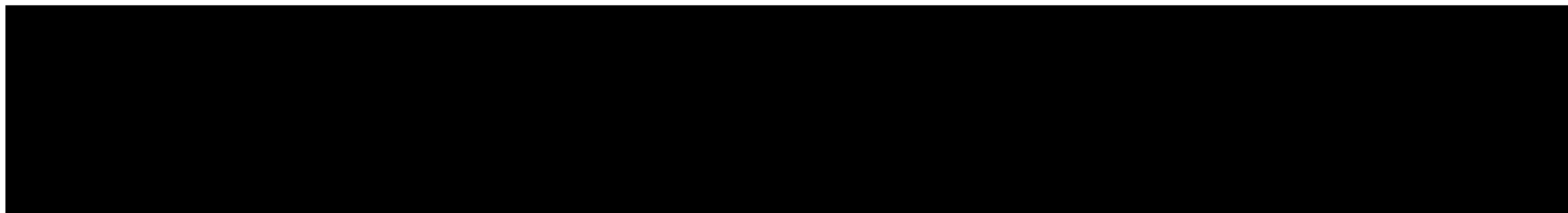


Warwick District Council Local Plan 2011-2029

Proposed Modifications to the Submission Plan

Personal details:

Mrs Jacqueline Webb



Please notify me of all the subsequent stages of the Local Plan

Modification : Removal of Land North of Milverton from the Green Belt.

Mod. Number: 16/ DS4 Spatial Strategy

Paragraph no: 2.81

Mod. Policies Map Number: H44

Dear Sir

I wish to make the following representation to the above proposed modification (no. 16) to the Submission Plan as I believe that the **Exceptional Circumstances** required by the National Policy Framework to remove the land north of Milverton from the Green Belt have not been demonstrated by Warwick District Council.

Therefore Modification No. 16 is unsound because it is not Justified, Effective or Consistent with National Policy

The proposed development is to support Coventry City's Housing need. There are suitable sites closer to Coventry that should be utilised in preference to the land North of Milverton which are close by to sustainable transport , existing road links, community facilities and employment opportunities.

With regard to the Green Belt, north of Milverton, which is there to protect against inappropriate development, the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. Once defined the LPA should plan **positively** to enhance beneficial use of Green Belt land with opportunity for access, outdoor sport, retain and enhance landscapes, improve visual amenity and create greater biodiversity.

Warwick District Council fails to set out any positive proposals and instead proposes to move the Green Belt boundary to reclassify the land as a Greenfield site outside the Green Belt.

The Green Belt serves 5 purposes:

- To check unrestricted sprawl of large built-up area
- To prevent neighbouring towns merging into each other
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns and villages
- To assist in urban regeneration by encouraging recycling of derelict and other urban land.

Warwick District Council's proposals seek to overthrow the 'Raison d'être' of the Green Belt north of Milverton in its subjective assessment of suitable sites to provide additional housing provision to meet the perceived Housing needs of Coventry.

The LPA is charged, where necessary, to identify areas of 'safeguarded land' **between the urban area and the Green Belt in order to meet longer term development needs beyond the plan period.** Safeguarded land ensures the protection of Green Belt within the longer time-scale by reserving land which may be required to meet longer-term development needs without the need to alter green belt boundaries.

Safeguarded land should be located where future development would be an efficient use of land, well integrated with existing development and well related to public transport and other existing and planned infrastructure so promoting sustainable development.

Warwick District Council (Source SHLAA 2015) identifies the land north of Milverton as 'Potentially suitable in part with some potential flooding problems! The assessment for achievability states that the site is understood to be achievable, subject to the market, although the scale of development will require significant contributions towards improved infrastructure and services including:

- Transport
- Education
- Health
- Parks
- Openspace
- Employment areas
- third party land and
- agreement of statutory bodies.

In all not much going for it – except that the owner is willing to release the site for mixed use development within 2 years which is not compliant with the requirement for longer term development outside the plan period.

Warwick District Council, by proposing to remove the land north of Milverton from the Green Belt is artificially creating an area of ‘Safeguarded’ land which is not compliant with the advice given through the National Planning Policy Framework.

On 6 October 2014 the DCLG published additional guidance to LPAs making it clear that once they have been established, Green Belt boundaries should only be altered in exceptional cases. Housing need does not justify harm to the Green Belt.

The broad conclusion contained within Government policy is that the Green Belt should be protected at all costs but recognises that consequently development needs (in particular for new housing) will have to be accommodated in sustainable locations in other areas including open countryside which is outside the specific designation of the Green Belt where planning policy imposes specific constraints.

Precedence for releasing land from the Green Belt requires the ‘value’ of potential sites within the Green belt to be taken into account and those with the least value to be removed from the Green Belt site first. Warwick District Council, together with Coventry City Council has assessed sites on the edge of Coventry as being of lower Green Belt value.

There is a presumption against LPAs changing the extent and erosion of Green Belt simply to accommodate an identified housing need whether for their own use or neighbouring Authorities. The inference is that any unmet need should be accommodated in less constrained neighbouring authorities or on land that may be a Greenfield site but is not within the Green Belt.

Warwick District Council’s proposals will cause potential harm to the Green Belt north of Milverton by reason of inappropriateness and other harm which is not outweighed by other considerations. The LPA’s proposals are contrary to the advice from the DCLG and no objective case has been made for exceptional circumstances for removing this area of land North of Milverton from the Green Belt.

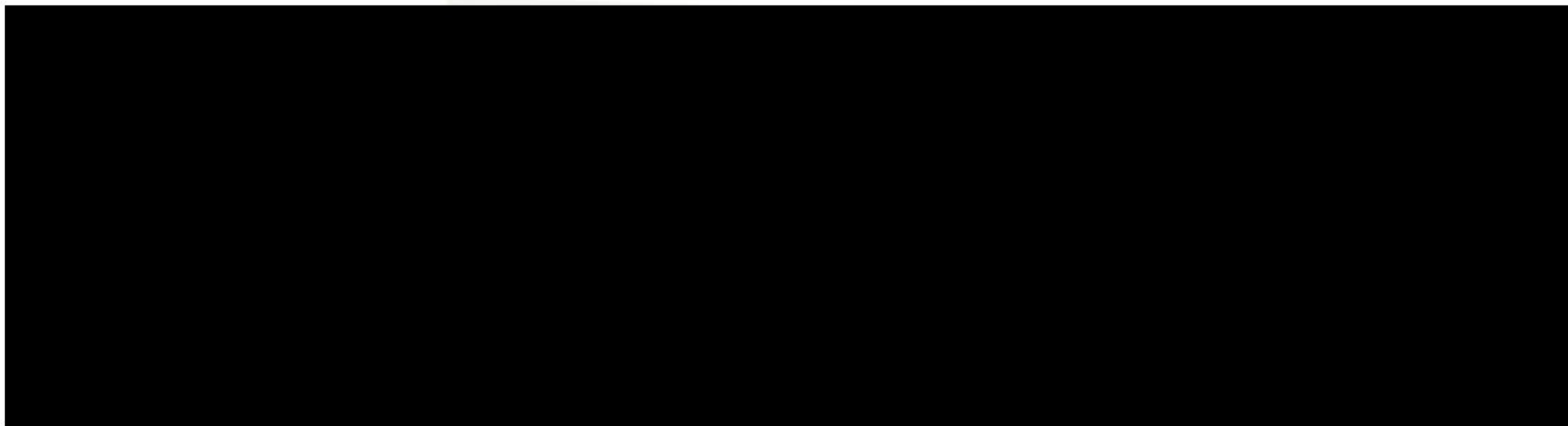
Indeed if the proposals put forward by Warwick District Council are accepted then other areas of Green Belt in the immediate vicinity of Coventry could be released and there would be no necessity for Warwick District to provide additional housing needs for other Authorities outside the District.

It is necessary to prevent development around Old Milverton Village primarily because of the important contribution which the open character of this historic village makes to the openness of the Green Belt.

I consider that in order for Modification No. 16 to become sound:

- **The land north of Milverton should remain in the Green Belt**
- **The development proposed on the land north of Milverton' should be reallocated to alternative sites closer to Coventry which have a lower 'Green Belt' value and are capable of delivering the required housing, at the right price and are closer to existing sustainable transport links, community facilities and employment.**

I understand that all comments submitted will be considered in line with this consultation and that my comments will be publicly available and may be identifiable to my name.



Mrs J M Webb

Date : 17 April 2016