



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

20 April 2016

Dear Sir/Madam,

Proposed modifications to the Local Plan

I enclose my comments on the following proposed modifications :

Mod Number 16 - Removal of land north of Milverton from the Green Belt
Paragraph 2.81 ; Map Number H44

and

Mod Number 14 - Allocation of land north of Milverton for development
Policy Number DS 15 ; Map Number H44

Yours faithfully,



C. P. Trye

Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title	MR	
First Name	CHRISTOPHER	
Last Name	TRYE	
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 No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes No

The adoption of the Local Plan.

Yes No

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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:

REMOVAL OF LAND NORTH OF MILVERTON FROM THE GREEN BELT

Mod. Number:

16

Paragraph Number

2.81

Mod. Policies Map Number:

H 44

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:

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.

PLEASE SEE ATTACHED COMMENTS re MODIFICATION 16

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 list you have identified at Question 5 above where it is related 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.

THE LAND NORTH OF MILVERTON SHOULD REMAIN IN THE GREEN BELT.

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.

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**Removal of Land North of Milverton from the Green Belt
Modification 16 Paragraph 2.81 Map No H44**

In my opinion Warwick District Council have failed to demonstrate the “exceptional circumstances” needed to remove this land from the Green Belt.

The land is suggested to be used to support Coventry City Council’s housing needs. Even if Green Belt sites are considered there are lower value Green Belt sites closer to Coventry which on the basis of planning precedent should be used in preference to considering the land north of Milverton.

Guidance for such developments is that sustainable developments should be geographically close to the area of need and not involve unnecessary commuting. The suggestion that Warwick District Council should promote commuting from Milverton to Coventry with inevitable congestion and further road construction is ill conceived, irresponsible and bad planning.

In practice people who want to live and work in Coventry will not buy houses in Old Milverton.

For these reasons, the proposed modification is unsound because (a) it is not justified (b) it is not consistent with National Policy and (c) it would not be effective.

**Allocation of land north of Milverton for Development
Modification 14 Paragraph Policy DS 15 Map No H44**

AS ABOVE and :

The urban separation between Leamington and Kenilworth would be reduced to less than 1^{1/2} miles. Much of the highly productive farming land would be lost together with well used areas of recreational benefit.

The suggestion of 250 houses to be followed by a further 1,100 houses is wholly impractical.

There is no history of development in this area and there is no infrastructure to support development. Most of the area is dependent on a single road, Old Milverton Lane/Road, which has a difficult T-junction with Rugby Road at one end and would add to the congestion on the A452 at the Blackdown roundabout at the other end.

It has been suggested that the proposal would “share the pain” to a degree with the developments on non-Green Belt land to the south of Leamington. This is not acceptable as a basis for planning policy.

For these reasons, the proposed modification is unsound because (a) it is not justified (b) it is not consistent with National Policy and (c) it would not be effective.

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 DS 15
Mod. Policies Map Number:	H 44

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.

PLEASE SEE ATTACHED COMMENTS re MODIFICATION 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.

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.

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.

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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:

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:

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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