

**Warwick District Local Plan**  
**Representations to Proposed Modifications**  
**Mr J Crocker**  
**Land south of Old Warwick Road, Kingswood**

1. An objection is submitted to Modifications 14, 16, 19 and 22 on the basis that inadequate provision has been made for the removal of land from the Green Belt to meet identified housing requirements and 'longer term development needs stretching well beyond the plan period'.
2. The District Council has found it necessary to review and redraw Green Belt boundaries on an exceptional basis - fundamentally to promote sustainable patterns of development.
3. It is noted that in New2.2 as part of Modification 23 *"The Council recognises that there is a limited amount of suitable land currently available outside of the Green Belt to meet long-term development needs, particularly those needs arising in Coventry. Therefore identifying 'safeguarded land' in appropriate locations may assist in meeting the long-term development needs of the functional housing and economic market area"*.
4. Therefore, it is clear that there is no realistically foreseeable planning strategy whereby development needs of the District in the next plan period can be met, other than requiring the use of land which is presently designated as Green Belt.
5. It is noted that at the first stage of the Local Plan Examination in May 2015, the Inspector did not consider the issue of Green Belt at all. However, now as further land is clearly required to meet additional housing needs it is necessary to review Green Belt boundaries as part of a revised Local Plan Strategy
6. The merits of excluding this parcel of land from the Green Belt are not dependent upon the exclusion of any larger area of land around Kingswood. It is clear that the Council considers that development at Kingswood is consistent with promoting sustainable patterns of development. Indeed, 5 small sites are identified in the Proposed Modifications (H29, H30, H31, H32 and H 33).
7. The land which is the subject of this representation (see attached Plan) has the ability to be accessed and serviced from Old Warwick Road using an existing access as a separate development site. The existing access serves the Tan House.
8. The provision of new homes is not dependent upon a comprehensive provision of services in conjunction with a larger development site. The land south of Old Warwick Road has the ability to be fully built out within 5 years and would be released for development immediately upon its exclusion from the Green Belt through the development plan process.
9. Fundamentally, the characteristics of this site are distinct to the open countryside to the west. The land south of Old Warwick Road is enclosed by established boundaries and relates well to

the existing pattern of built development. New housing on this site would not extend to land with an open characteristic.

10. The extent to which the release of this site would result in an encroachment into the open countryside is minimal. As such it is submitted that this site would provide a useful source of new housing in a sustainable location with very limited impact upon the Green Belt. The easy delivery of land for new housing to contribute towards the first 5 years supply - in the absence of any major new infrastructure be required - adds to the planning merits in allocating this site for new housing and its release from the Green Belt. The exceptional circumstance for releasing this site is to accommodate new housing in a sustainable location with minimal impact upon the purposes of the Green Belt.
11. The only impediment to the delivery of new housing is the inclusion of the site within the Green Belt.
12. Having regard to the above, we conclude that exceptional circumstances exist which justify the release of land south of Old Warwick Road, Kingswood from the Green Belt in the context of paragraphs 84 and 85 of the Framework.
13. Additionally, in the context of paragraph 85 of the Framework, we submit that insufficient provision has been made for safeguarded land , to meet development needs 'stretching well beyond the plan period' and that Green Belt boundaries will not need to be altered at the end of the plan period.
14. Furthermore, in terms of geographical provision of safeguarded land only two large scale sites are relied upon to meet future development needs , namely north of Milverton and south of Westwood Heath Road bordering the administrative area of Coventry.
15. The Council has concluded that it is 'necessary' to identify areas of safeguarded land between the urban area and the Green Belt to meet longer term development needs (Framework 85, third bullet point).
16. While the potential capacity of the two areas of land identified under Policy DSNEW 2 (Sites S1 and S2) are not identified, a reasonable assessment may be:

**S1: Land south of Westwood Road**

Circa 1000 dwellings (on basis the Safeguarded Land is about twice the allocated site H42 (capacity 425)).

**S2: Land north of Milverton**

Circa 700 dwellings (on the basis the area of Safeguarded Land is about two and a half times the allocated site H44 (capacity 250 dwellings)).

17. Some basic principles should apply in the identification of Safeguarded Land:

- i. While housing is the largest scale of development need in terms of land take, it should not be assumed that land is identified as Safeguarded Land solely for the purposes of accommodating future housing needs. Other spatial development needs, including for example provision for employment, education, health may require land beyond the limits of existing built up areas that are bounded by the Green Belt.
- ii. Paragraph 84 makes it clear that national planning policy expects a review of Green Belt boundaries to 'promote sustainable patterns of development. Paragraph 85, confirms that where necessary (as in Warwick DC's case) the LPA should identify 'safeguarded land', so as to meet longer term development needs well beyond the Plan period. As such, national planning policy seeks the safeguarding of a sufficient quantity of land to meet reasonable expectations as to development requirements for a period well beyond 2029.
- iii. The third bullet point of paragraph 85 is to be read with the fifth. Unless sufficient provision is made for Safeguarded Land, then there is a real risk that the boundaries of the Green Belt will need to again be reviewed at the end of the Plan period to accommodate future development needs.

18. While it is recognised that the allocation of land is to meet development needs in the Green Belt is contentious with local communities – often on a less than full comprehension of the Green Belt policy – confidence in the proper application of Green Belt policy is likely to be undermined to a greater extent with the local community if in the review of the Local Plan – which may be anticipated to commence within 5 years – proposes new proposals for redefining Green Belt boundaries.

19. As such, it is submitted that the public interest – and confidence in the plan-led planning system – is better served by excluding more land from the Green Belt and safeguarding, rather than making an inadequate provision which then requires further alteration of Green Belt boundaries on the first review of the Local Plan. In that way, provision for Safeguarded Land is made to meet longer term development needs 'stretching well beyond the plan period.'

20. The fact that the precise scale of development needs for the Plan period beyond 2029 cannot be determined – does not make ineffective the process of identifying adequate Safeguarded Land – and should not be considered 'consistent with the national planning policy' as a reasoning for not making further provision.

21. For the current plan period, the Plan proposes the alteration of Green Belt boundaries to make provision for residential development at the following locations:

<u>Location</u>	<u>Site Ref</u>	<u>No of Dwellings</u>
Red House Farm, Leamington Spa	H04	250
Rouncil Lane, Kenilworth	H12	130
Thickthorn, Kenilworth	H06	760
Southcrest, Kenilworth	H40	640
Warwick Road	H41	100
Westwood Heath	H42	425
Kings Hill	H43	1,800
North of Milverton	H44	250
Oak Lea Farm, Finham	H08	20
Baginton	H19	80
Burton Green	H24	90
Cubbington	H25, H26, H50	195
Hampton Magna	H27, H58	245
Hatton Park	H28, H58	120
Kingswood	H29, H30, H31, H32, H33	56
Leek Wootton	H37	5

22. This scale of necessary release of land from the Green Belt during the Plan period (including 5 sites that are identified at Kingswood) may be compared to the provision for Safeguarded Land of circa 1,700 dwellings.
23. It is submitted that this scale of provision of safeguarded land cannot reasonably be considered consistent with national planning policy to 'meet longer term development needs stretching well beyond the plan period'. If a basic proportionate assessment is made, this scale of provision would extend about 3 years into the roll forward of the Plan period.
24. A response to the plan – making adequate provision for longer term development needs is a claim that the land will be released unnecessarily for development, as though the notation Safeguarded Land weakens the management of development by the LPA. The fourth bullet point of paragraph 85 of the Framework dispels this fear.
25. Indeed, in research undertaken for the report 'The Effectiveness of Green Belts' [1993], this concern was examined for an evidential basis. The Report concludes:

*'Three further arguments against safeguarded land were put to us. It was suggested that safeguarded land would attract much extra speculative activity, and its maintenance would therefore be impossible. There was little evidence however to demonstrate this.'*

26. In conclusion, we consider that land at Kingswood should be released from the Green Belt either as a housing allocation for 5 -6 dwellings or to be identified as Safeguarded Land as part of the Local Plan process for the following reasons:

- WDC has that exceptional circumstances do exist in Kingswood which would justify the release of the land from the Green Belt. Development at Kingswood is evidently consistent with promoting sustainable patterns of development. These exceptional circumstances apply equally to the subject land, in the context of ensuring that the Green Belt boundary should be capable of enduring beyond the plan period.
- The Council has provided no evidence to demonstrate that it can be satisfied that the proposed Green Belt boundaries are capable of enduring well beyond the plan period. Indeed the disproportionate provision of Safeguarded Land suggests that Green Belt boundaries would need to be altered at the end of the plan period.
- The level of housing requirement in the district has been increasing consistently. There is no sign that this growth will tail off at the (contrived) end of the plan period in 2029. Thus, more land is likely to be required in the Housing Market Area beyond 2029.

27. Having regard to the above, we conclude that exceptional circumstances exist which justify the release of land south of Old Warwick Road, Kingswood from the Green Belt in the context of paragraphs 84 and 85 of the Framework. The land should be identified either as a housing allocation or as safeguarded land.