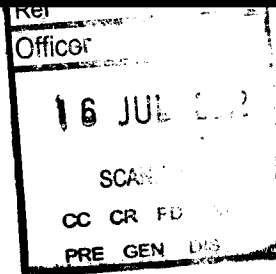


The Development Policy Manager,  
Warwick District Council,  
Leamington Spa, CV32 5QH.



6225

12<sup>th</sup> July 2012

Dear Sir,

I am writing to object to the proposed New Warwickshire Plan, and specifically to the proposed expansion of Leamington into the Green Belt North of the town.

The National Planning Policy Framework (NPPF) sets out five purposes for Greenbelt land, the first two being (1) to prevent urban sprawl of built up areas, and (2) to prevent neighbouring towns merging.

The proposed plan runs counter to both these objectives. It extends the urban sprawl from Leamington northwards; and together with the proposed southwards extension of Kenilworth it reduces the open land distance between the two towns from approximately 2.2 miles, to 1.5 miles – that is by almost a third (32%).

The Government's National Planning Policy Framework calls for "very special circumstances" to justify development in the Green Belt, and it requires that the harm caused to the Green Belt be outweighed by the benefit of the development.

In the previous plan adopted by Warwick District Council, land south of Leamington (not in the Green Belt) was identified for development as recently as 2009. That land is still available. However, the argument is now put forward that houses in that area would be less profitable and therefore less attractive to developers.

It is difficult to understand why, and for whose benefit, profitability for developers should be regarded as providing a sufficient "very special circumstance" to outweigh the Green Belt land at Old Milverton and Blackdown which in the Warwick District Council's own study has had a high value assigned to it. The land is indeed enjoyed by walkers, runners, and cyclists, let alone the existing residents on or near its borders.

If the plan is sanctioned and the long protected green belt land becomes available for planning consent, it must be assumed that developers would lose no time to establish their right to build on it; and as soon as development is started, it becomes irreversible and the land has been irrevocably lost. Providing strips of maintained parkland into a newly created urban sprawl would in no way replace it.

My own home is located at the bottom of Blackdown Hill and would not be directly affected by the proposed development; but I am raising this objection out of regard for the area as a whole, and as a former chairman of the local council.

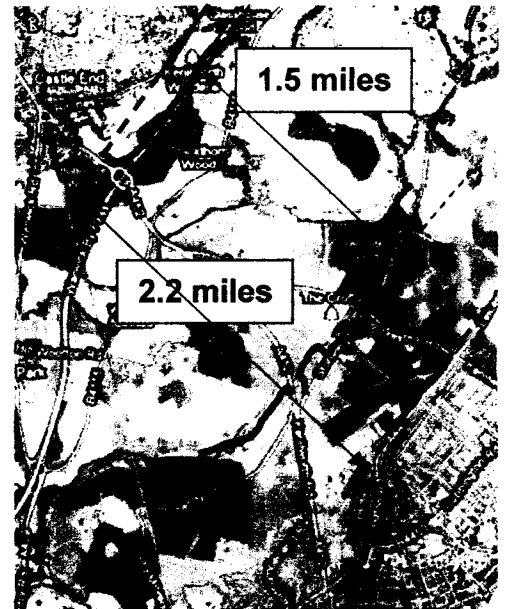
I have incidentally also been a director responsible for the forward planning of a group of Companies, and have had ample experience in that capacity of demand forecasting.

I have been advised that the forecasts on which the New Plan depends are unassailable, because they are based on an approved methodology used by local authorities for such projections. This methodology has been developed in stable conditions, and it gives good results where one year's figures are not too different from the next. Data taken from the WDC SHMA show that this is far from the case at present (see attached).

In summary, there seems inadequate justification for abandoning significant areas of the Green Belt even if there were confidence in the projected demand. The current economic uncertainties provide no basis for a confident projection. The only thing that could be reasonably assumed, is that planning permission offered on desirable Green Belt land would very quickly become irreversible fact. Please note my objection.

Yours truly

Robert Solt



**From WDC SHMA Report:-**

Forecast migration is a major component of the projected housing demand.

# 2.27 Housing need and demand is driven by growth in the population and the changing structure and age of households. Changes in the size and make-up of the population are driven by three main components: birth rates, death rates and net migration, which is the balance between in-and out-migration to an area.

# 2.33 Net migration levels to the district have been variable over the past fifteen years and so for our main projection we have taken migration levels for 2006-2010 .... The use of five-year trends is consistent with the approach taken by ONS when constructing sub-national population projections. ....

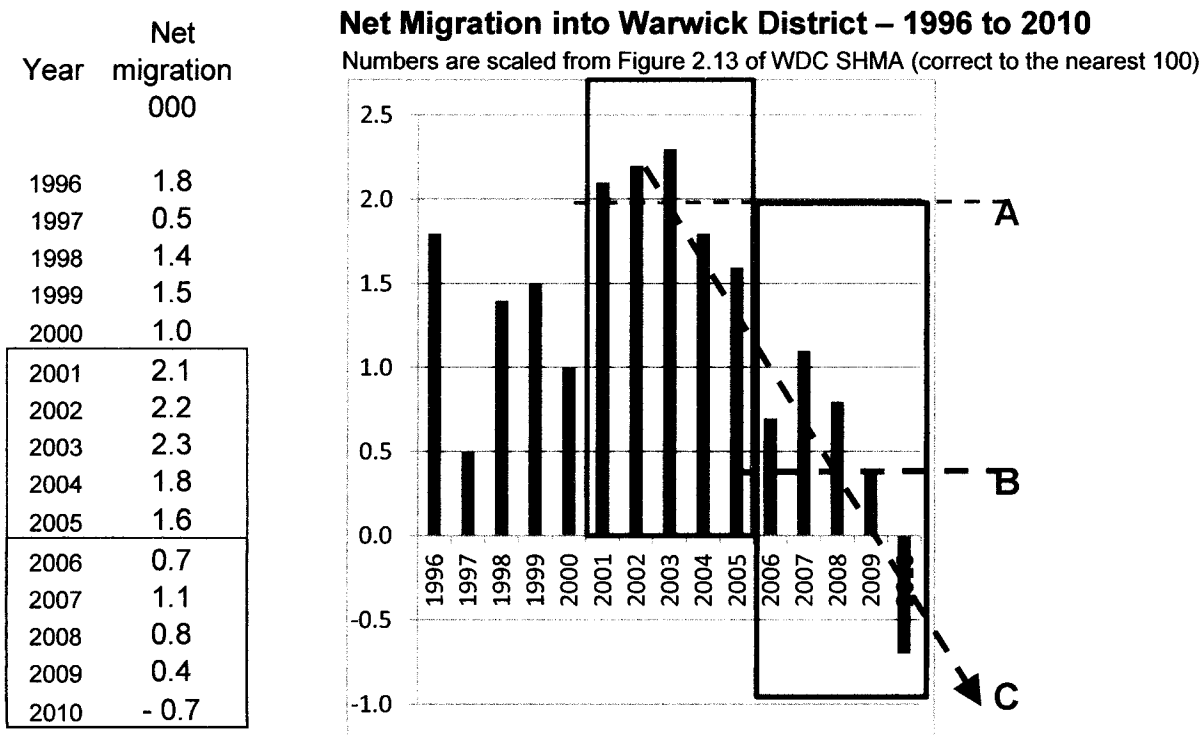
# 2.24 ... The Main trend based projection – based on projecting forward past population trends, assumes annual net in-migration of 460 per annum ...

Fig 2.22 shows total Population Growth for 2011 to 2031:

Main Trend Based Projection 1	18,289
Zero net migration Projection 4	<u>7,919</u>
Due to in-migration	<u>10,370</u>

The projected inward migration (10,370) makes up well over half the total population growth (18,289) for which the plan now claims that housing is needed.

The actual net migration figures for 1996 to 2010 are shown below.



**Comments:**

**A** Had the same methodology been applied five years earlier, based on figures from 2001 to 2005, it would have given an annual net in-migration of 2,000 per year – over twice what they have proved to be since then.

**B** The WDC Main Trend Based Projection is now based on the 2006 to 2010 average net in-migration, of 460 per year.

**C** There has in fact been an almost continuous downward trend in net migration since 2003, going negative in 2010.

*The recent migration trends do not offer a basis for making any reliable projections.*