

John Hammon

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From:
Sent:
To:
Subject:

J
Local Plan

Dear John Hammond,

As one of the residents in your ward I would like to register my objections to the New Local Plan with you as well as formally with the council. As a farmer who lives very close to the proposed encroachment on to Green Belt Land within your own ward I would like to ask you to reconsider your support for the new proposals.

My objections are based on that fact that I believe the Council is going against National Policy, its own Policy and the Joint Green Belt Study it itself commissioned in 2009.

I have set out my reasoning below and will be attending the meeting in Old Milverton this evening.

Re: Warwick District Council New Local Plan Preferred Options May 2012

I wish to register my objection to the proposed development in the New Local Plan of the Green Belt land referred to as Blackdown/West Hill.

1. **BLACKDOWN / WESTHILL:** The Joint Green Belt Study you yourselves commissioned in 2009 to form part of the evidence base to inform the respective authorities Core Strategies assessed the relative "value" of a number of parcels of Green Belt land around Warwick and Leamington.

The study concluded that the parcel of Green Belt land WL7 (Blackdown/West Hill) when measured against the five criteria for the purposes of Green Belt land as set out in *Planning Policy Guidance 2 : Green Belts ('PPG2')* was of such high value in terms of its contribution to the purpose of Green Belt that it should be retained as Green Belt land.

2. The Joint Green Belt Study 2009 also referenced the *Planning Policy Guidance 2 : Green Belts ('PPG2')* in para 2.3.5 where it states in relation to the uses of the land within Green Belts that:
"the extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt, or in its continued protection. For example, although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection. The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives". And further in para 2.3.7 "*Once land has been identified and allocated as Green Belt land, the boundary of the land should only be altered in exceptional circumstances and when all opportunities for development within urban areas contained by the Green Belt has been explored.*"

The recommendation that WL7 remain Green Belt was made on the basis of the purposes of Green Belt land.

3. The New Local Plan Preferred Options May 2012 in para 7.32 states:

“Assessment of Green Belt land to the north of Warwick and Leamington in the Joint Green Belt Study concluded that the land bounded by the A46 in the west, the River Avon to the north and Sandy Lane to the east was worthy of further study. This was largely because there were no other towns to the north, from which the Green Belt would provide protection from encroachment, but also because there were other physical barriers to the wider open countryside. The Green Belt assessment suggested that the land at Blackdown was not suitable for further study. However, the land has similar characteristics to land to the west in that there are no towns to the north, from which the Green Belt would provide protection from encroachment, and there are clear boundaries to the site to protect the open countryside beyond.”

The above paragraph is not correct. It misrepresents what was reported in the Joint Study The New Local Plan states *“The Green Belt assessment suggested that the land at Blackdown was not suitable for further study“* **in fact the study concluded: “We recommend WL7 is wholly retained within the Green Belt.”** The study then went on to exclude WL7 (which is the area of Blackdown/West Hill) from any further consideration.

This was not the case with the parcels of land bounded by the A46 in the west, the River Avon to the north and Sandy Lane to the east (includes WL6A and WL6B) where the study concluded *“We recommend that this area is considered for further detailed study, but that the majority of it is retained within the Green Belt.”*

Further the last sentence *“However, the land has similar characteristics to land to the west in that there are no towns to the north, from which the Green Belt would provide protection from encroachment, and there are clear boundaries to the site to protect the open countryside beyond.”* **Is not supported by the finding of the Joint Green Belt Study 2009,** which concludes in the case of Blackdown/Westhill WL 7 *“Our view is that the existing road system strongly defines the existing settlement pattern and urban expansion into this area would be difficult to justify. We recommend WL7 is wholly retained within the Green Belt.”*

Study Area	WL 7
Study Area Description	An area known as Blackdown Hill and West Hill to the north of Leamington, bounded by Sandy Lane to the west, the A4113 to the northwest, field boundaries beyond West Hill road to the north east and the A445 Leicester Lane (the urban edge) to the south.
Landscape Character	The area lies within the <i>Arden</i> character area and the <i>Arden Parklands</i> character type. The area is principally arable agriculture, but there are some substantial (former?) residential premises – most notably West Hill house.
Visual Issues	Visually diverse due to local topography, trees and hedges. The housing along Leicester Lane is quite visibly prominent and creates a strong edge to Leamington.
Historic and Cultural Issues	No historical information gathered. Some declining estate parkland noted. The manor of Blackdown held by the eminent royal gardener, Henry Wise, in the early eighteenth century. One

	footpath – to West Hill house.
Ecological Features	Woodland, hedges, hedge trees, permanent pasture.
Landscape Condition	Reasonably good.
Conclusion / Recommendation	Our view is that the existing road system strongly defines the existing settlement pattern and urban expansion into this area would be difficult to justify. We recommend WL7 is wholly retained within the Green Belt.
Score for Landscape Value	WL7 – 3 (High Value)

Study Area	WL 6A and 6B
Study Area Description	WL6a and 6b lie north of Leamington and are defined by the rail line to Kenilworth to the west, and Sandy Lane to the east, the urban edge to the south and the river Avon to the north. 6a and 6b are split by Kenilworth Road (A452).
Landscape Character	The area lies within the <i>Arden</i> character area and the <i>Arden Parklands</i> character type. The area is principally arable agriculture, but there are a variety of urban fringe land uses.
Visual Issues	The principal route through the area is Sandy Lane and from this road there is a fair level of enclosure from hedges and hedge trees. It is easy to miss that the Avon valley lies just over a crest. The existing urban edge seems well defined.
Historic and Cultural Issues	No historical information gathered. One east-west footpath noted north of the suburb of Milverton
Ecological Features	River valley, hedges, hedge trees, some pasture.
Landscape Condition	Some urban fringe degradation. A 'disc golf' course (Sandy Lane) may be on the remains of an area of parkland. Some 'horsiculture'. Arable agriculture quite intensive. Some new hedge and tree planting would benefit landscape character.
Conclusion / Recommendation	In general the transition from urban to rural is successful – with schools, playing fields and allotment gardens helping to create a successful transition to arable based agriculture. At Blackdown, adjacent Kenilworth Road, there is the Nuffield Hospital, 'Woodland Grange' conference centre and other large commercial premises – and there could be opportunities for additional development of this kind. We recommend that this area is considered for further detailed study, but that the majority of it is retained within

	the Green Belt. Public access routes might be improved.
Score for	WL6a – 2 (Medium Value)
Landscape Value	WL6b – 2 (Medium Value)

4. **The Council’s own reports and studies show that the case for WL7 Blackdown/West Hill Green Belt remaining as Green Belt is fully made out.**

5. **GREEN BELT**

There is overwhelming support from the local public consultations for Green Belt land to be protected. Extracts from *Warwick District Local Plan Key Issues Report, Report of public consultation September 2002* found:

3.3.3 *Managing our growing district*

- *We should strongly resist building on countryside and on open space within our towns.*

There was a very strong consensus that we should make best use of land with our towns before using green field land on the edge of towns. In the leaflet questionnaire, 91% of respondents either agreed or strongly agreed we should do this, and 89% said we should not build on Green Belt land or high quality farmland. Support was also given to protecting all green open spaces within towns (91%) and avoiding building on areas of wildlife value (92%).

*Respondents to the Key Issues Report were asked which of the major landscape designations in the present local plan (Green Belt, Areas of Restraint, Special Landscape Areas and open countryside) are most important for defending the countryside. Whilst several respondents felt all to be equally important, and several others highlighted more than one, **Green Belt came out as the most important**, followed by open countryside.*

3.3.6 *Employment*

- *Protecting the countryside and open spaces should also be a high priority. The Key Issues Report asked respondents whether they agreed that we should protect certain types of land from employment use. There was strong support for all the types suggested; Green Belt land, high quality farmland, open spaces within the towns and areas of wildlife value.*

6. **The Councils own policy documents and national policy documents all require non Green Belt land to be fully utilized before Green Belt land is considered.** The *New Local Plan Preferred Options May 2012* in para 7.29 states

“7.29 *In the case of meeting the housing needs of Warwick, Leamington and Whitnash, the SHLAA identifies a potential capacity within the urban area of 650 dwellings on sites of 50 or more. Outside of the built up area, and outside of the Green Belt, the SHLAA identified a capacity of 7,200 dwellings. These sites are concentrated in the area around Europa Way, Gallows Hill and Harbury Lane as well as to the south and east of Whitnash.*”

Given the Council has identified sufficient space to meet its development requirement, outside the use of the Green Belt land, the Council's own policy documents and National policy documents require the use of that non-Green Belt land before the use of Green Belt land.

The *New Local Plan Preferred Options May 2012* in para 7.27 further states:

"7.27 Exceptional circumstances can include the need to accommodate housing and employment growth to meet the needs of a community where there are insufficient suitable and available sites outside of the Green Belt. Where it can be justified to review the Green Belt boundary in order to accommodate development, it is necessary to assess Green Belt land in terms of its contribution towards the five "purposes" of including land in the Green Belt (NPPF Para 80). The Joint Green Belt Study carried out such an assessment of parcels of Green Belt land on the edge of Warwick, Leamington, Kenilworth and Coventry. "

In the event the Council seeks to establish exceptional circumstances then the *Joint Green Belt Study 2009* identified on the basis of "purposes" that WL7 (Blackdown/West Hill) should remain as Green Belt.

6. The *New Local Plan Preferred Options May 2012* in para 7.22 states:

" 7.22 The sites/ locations which have been identified would allow for the development of 8,360 new dwellings. This is over and above the balance of the requirement of 6,986 so would give an element of flexibility of about 1,370 dwellings. This flexibility allows for two potential courses of action:

- To enable some sites to be removed from the allocation proposed in the draft Plan depending on consultation and any further evidence that is provided, and/or*
- To provide housing to support a Regional Investment Site in the vicinity of the A45/A46 Junction close to Coventry Airport (the Coventry and Warwickshire Gateway) if further research demonstrates that this is a suitable location (see section 8)."*

The over allocation of the development requirement, gives the Council the flexibility to protect areas of the Green Belt and enable WL7 (Blackdown/West Hill) to remain as Green Belt without adversely impacting the Council's Local Plan.

Thank you

