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Mr ID Kemp
Programme Officer   Geoffrey Morris
Warwick District Council   ███████████
Milverton Hill   ███████████
Leamington Spa   ████████
CV32 5QH

26 August 2016

Dear Sir

Re: Written submission objecting to Warwick District Council Local Plan preferred options

In accordance with the procedure to receive my personal representation at the forthcoming public examination of the Warwick District Plan Preferred Options, please accept the following submission which will rehearse the points already made in my written objection and provide a personal perspective on the apparent obsession of Warwick District Council to build on higher value Green Belt land in the north of the borough rather than continuing the 2008 policy of development to the South of Leamington.

My wife and I are relatively new to Leamington Spa having moved 125 miles to the area six years ago. In 2011 we purchased Sandy Lane Farm, Old Milverton Lane Blackdown, a property which is currently enveloped by medium value Green Belt agricultural land. Prior to purchase we made informal enquiries to Warwick District Council Planning Department regarding future department plans for the land at North Milverton (now referenced as H44) and were assured that there were no plans to develop in the north of Leamington Spa and all development was scheduled to the south of the town.

In 2012, just eight months later after being given the assurance that no development would be proposed for North Milverton a revised plan was put forward that removed proposed housing development on available non Green Belt Land around Bishops Tachbrook and relocated the proposed development on Green Belt land at North Milverton. Locally there is a widely held belief that the reasons for this decision lay somewhere in the labyrinth of local politics. At local meetings objecting to housing development on Green Belt at North Milverton the attitude of executives of the council and local councillors representing the south of the borough was dismissive towards residents' concerns and one councillor went as far as stating that it was a fait a compli and wrongly asserted that our Member of Parliament had no interest in our concerns.

Fortunately the over whelming number of objections to the proposed development on North Milverton Green Belt resulted in WDC conceding that no exceptional circumstances existed to build on Green Belt land at Old Milverton and as a result removed proposed development at Old Milverton in the Local Plan submitted in 2014.

In 2015 WDC on learning that their plan had been rejected on the grounds that insufficient housing existed in Coventry City Development Plan, reinstated their development proposals for North Milverton Green Belt without engaging with the different councils comprising the wider Coventry and Warwickshire Housing Market Area to discover if more appropriate and compliant solutions existed. Had such a process been competently had been followed I believe they would have realised that

Planning Inspectorate Instruction Correspondence Ref PIN/T3725/429/5 regarding Duty to Cooperate has not been met.
The engagement between the six different councils comprising the wider Coventry and Warwickshire Housing Market Area could not be considered constructive. Specifically Warwick District Council and Covsentry Council have not taken sufficient account of available and lower value Green Belt. Doing so would negate the need to remove Milverton from the Green Belt.

A lack of consistent approach by the individual councils within the group
The Coventry Local Plan states
It should be clarified however that at the current time some of these sites are within the Coventry Green Belt and as such remain constrained by Green Belt policy until such time as the Local Plan is adopted. As such, these sites will not be considered readily available until such time as the land is removed from the Green Belt.
If WDC were to adopt a consistent approach with Coventry City Council then either Milverton would remain outside any consideration for removal from Green Belt, or Green Belt land within Coventry would be included and adopted into the Coventry Local Plan. In any event Milverton should be logically excluded from development if a consistent and cooperative approach were adopted.

The Joint Green Belt Study identifies Parcel RL1 (Milverton) as being of significantly higher value than other Green Belt land. More appropriate Green Belt land including BU3, BE1, BE4, BE5 and N6 in Nuneaton and Bedworth, C6 and LL2 in Rugby, KG3 in Warwick is identified by the JGB as being *effectively 'infill' and would be well contained by existing significant features and the landscape.*

Exceptional circumstances and planning conditions for developing the Green Belt at Milverton have not been met
As identified in Objection 1, the Coventry City Council has not taken into account available suitable Green Belt land when making its housing availability assessment. The Coventry City SLAA LP53 January 2016 identifies 29 different sites suitable for housing schemes greater than100 units which could provide 10,424 housing units in Coventry alone if taken into account. Considerable evidence exists to show that exceptional circumstances to remove Milverton from the Green Belt not been met and any attempt to do so would risk rejection of the modified Local Plan by the Planning Inspectorate.

Table 1: Potential additional housing availability in Coventry

Reference	Hectares	Housing potential (units)
Bab 2	9.38	247
Bab 8, 33	10.39	228
Bab 16	47.23	800
Bab 19	19.57	430
Bab 29	8.26	198
Bab 51a	10.0	225
Bab 51b	9.6	230
Bab 54	4.46	107
Bab 57	12.96	330
Bab 67	5.06	129
Bab 68	21.58	491
Bab 70	18.7	2250
Bab 29	8.26	198
BW 38	4.5	108
F54	18.25	450
H 8a and b	4.15	150
HE 14a, b, c	6	900
Ho10	30.1	790
Bab 29	8.26	198
L30	8.6	206
S4	2.96	110
S5	2.19	100
STM 27	1.56	300
STM 61	0.75	143
STM 64	1.99	440
STM 65	0.79	150
STM 41	0.75	143
WE 28	11.59	230
STM 41	0.75	143
TOTAL		**10,424**

The Joint memorandum of addressing unmet housing need of 14,000 homes in Coventry is unsound.
Coventry City Council's aspiration to improve the provision of the right quality housing to meet the needs of Coventry City's population *(Local Plan Policy H1, H2, H3) and sustainable development (Policy DS3)* would be better served by taking into account available low grade Green Belt and Green Field land shown in table 1 and reducing the burden on inappropriate development in more distant neighbouring areas. Doing so would sustain the functional link between housing and work thereby contributing to the wider aspirations of health and well-being of the population detailed in the Coventry's Local Plan.

Proposed building of houses in Leamington to meet the needs of Coventry people does not meet National Planning Policy Framework Guidance note 49
Whilst accepting the need to cooperate to meet unfulfilled housing need in the wider housing Market area, (modification 2, 15 Para 2.6) proposals must also comply with NPPF. The proposal to build at Milverton does not stand up to the test of presumption of sustainable development particularly when other more suitable sites exists. (See table 1).

Failure to comply with National Planning Policy Framework, Encroachment/Coalescence of Leamington Spa and Old Milverton
The development of East Milverton does not comply with *National Planning Policy Framework March 2012 guideline chapter 9, Paragraph 85, point 6* and *Planning Practise Guidance Section 9 note 80* as it its fails to provide clearly defined permanent boundaries for Green Belt and would enable and likely lead to the future coalescence of Milverton village, which would be in direct contravention of three of the five stated purposes of Green Belt. This view is upheld by the Joint Green Belt Study January 2016 which states:

The parcel RL1 prevents Leamington Spa adjacent to the southern edge of the parcel from merging with the small village of Old Milverton adjacent to the western edge of the parcel on the other side of the railway line which runs along this edge of the parcel. Although the railway line plays a separating role development along the eastern side of the line up to Sandy Lane would effectively merge these two settlements.

Developing East Milverton is not consistent with NLP objective (4.12.4). *help the public access and enjoy open spaces…reduce the risk of flooding; keep the effects of climate change (including the effects on habitats and wildlife) to a minimum, and support healthy lifestyles.*

The Strategic Housing Land Availability Site Assessment for Leamington Part 1 identifies North Milverton (L07) is a Green Belt site of medium value. Other assessment referred to within the Landscape Character Assessment for Land South of Leamington and Warwick show the North Milverton Green Belt as being of high value, in contrast, for example, to part of the Blackdown site adjacent to Sandy Lane (referred to as WL6a/b in this document and shown to be of medium value). The Milverton site is enjoyed by a wide section of the community, it is an important asset in supporting healthy lifestyles for residents and visitors of all ages – whether it be walking, running or cycling. The public footpath that transverses the site provides a valuable access point from Leamington to the Warwickshire country side and should be protected.

4.2 There are strong grounds for environmental concern regarding proposed development of the site.
The Strategic Housing Land Availability Site Assessment for Leamington Part 1 identifies that:

- a part of the site falls within a flood zone 3A and implicitly should not be developed;
- it contains a Water Source Protection Zone and an area of Groundwater Vulnerability, which would require consultation with and permission from the Environment Agency before any encroaching development. We know from a past pollution incident from the Nuffield Hospital, and related correspondence, that the Environmental Agency view this Zone/area with extreme seriousness.
- it would result in the extensive loss of Grade 2 agricultural land which both contributes to a sustainable economy and to the character of the landscape.

On a personal note, we moved to Sandy Lane Farm for the outstanding views and natural beauty of the area.. The current Green Belt at North Milverton provides highly valuable access to the wider countryside around Leamington Spa and acts as an area for many different types of leisure and recreation which supports the health and well-being of the local population.

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Hopefully from the objections and suggestions I have made, coupled with a further review of the WDC evidence base, you will recognise that there is no justification for developing East or West Milverton and should flexibility in the plan be required, other more suitable sites for development exist within the District.

Yours sincere

Geoffrey Morris