Matter 7A Written Statement – H44 North of Milverton – William Tansey (5601)

Dear Mr Ward,

I write regarding the ill-thought through planning proposal to develop land to the north of Milverton, in and near the parish of Old Milverton, Leamington Spa. The site in question is successful greenbelt which is used as an amenity by the residents of north Leamington. Removing it from the greenbelt is a poorly thought through approach, motivated by ease and profit rather than a demonstrably sustainable approach to current or future housing requirements.

By Successful, I mean that the green-belt designation in this area has so far met its fundamental purposes as defined in the NPPF (2012).

- It has demonstrably checked the unrestricted sprawl of large built up areas.
- It has prevented the neighbouring towns of Royal Leamington Spa, Kenilworth and Coventry Merging into one-another
- It has assisted in safeguarding the countryside from encroachment.
- It has preserved the setting of the Towns of Royal Leamington Spa, Warwick, Kenilworth and city of Coventry.
- It has assisted in urban regeneration in all of those by encouraging the recycling of derelict and other urban land.

It is incumbent upon planners to follow the NPPF, in which they are required to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

Developers have a history over the last decade or so of proposing that this land be developed. These have been rejected due to its designation as green-belt. This latest proposal represents nothing more than a concerted effort to achieve a long-term goal in terms of a cost effective land-bank which would be cheap to develop and reap high rewards in terms of unit resale value due to its desirable location for residents of Leamington Spa and those commuting to the south of the United Kingdom. This latest tack aims to use the guidance that green-belt boundaries should only be altered in (very) exceptional circumstances. No such circumstances exist in this case. Indeed, evidence being supplied to support this claim seems to have been generated after the fact and has obviously not contributed to the decision making process leading up to it. I consider it is therefore not 'positively prepared' so much as poorly excused.

A Development such as that proposed and the nominating of an even larger proportion of the existing greenbelt as 'safeguarded land' is of no benefit to the purpose of greenbelt or to the users of the area and the residents adjoining it. The NPPF contains the requirement for planners to be "Working with the support of their local communities......should consider whether such opportunities provide the best way of achieving sustainable development."

There is no support from the local communities, nor do these proposals represent the best way of achieving sustainable development. The proposals are at best irresponsible and at worst a shameless attempt to boost the profits of a national private sector developer at great cost to the community. Public transport links to Coventry are poor and will not be improved by the infrastructure proposals. Coventry is 9 miles away from the proposed site and people working in Coventry are unlikely to buy houses in this area.

In light of this, an appropriate sequence to identify other more suitable land appears to have been side-stepped. There are other areas of land outside the greenbelt which would be more appropriate which have not been considered. Even if this had been done and rejected, given that the proposed development is to meet Coventry City's housing needs, there are other areas of green belt closer to Coventry which would be more suitable. Whilst it pains me to accept that greenbelt boundaries may need to be altered from time to time, where they need to be adjusted due to *very* special circumstances, they should be done so with a view to removing that land which has not made best contribution to the purpose of green-belt. Such land of 'lower value' is sited closer to Coventry City, where the excess housing need has been identified. Such land may be of lower agricultural value, not contribute to public access and not open to people to 'Benefit of body and soul'. Benefit of such land could be regarded as making a positive contribution to a community by opening up access, providing housing close to where it is required, reducing journey lengths and thereby increasing the use of public transport and could therefore be regarded as sustainable.

To site this housing at the proposed site north of Milverton, Leamington Spa is not sustainable from either a social or environmental viewpoint. The land is currently of great value to local residents both adjoining and in the wider area. Development of it would remove the social and holistic health benefits of access to this open countryside and have a significant impact on the small local communities of Old Milverton and Blackdown. These are small hamlets within the green-belt which help maintain the rural character and nature of the approach to Leamington Spa and Kenilworth, thereby contributing to their nature and identity. The proposed development would remove a significant proportion of valued farm land. This land is farmed by a resident of Old Milverton and it is likely that the proposal would reduce the viability of a small family business of that size. This is the last remaining farm in a traditionally farming village and its closure would alter the character of the village and surrounding area forever. Currently the village of Old Milverton has no mains gas and no high speed broadband with no future intent of infrastructure for either. The proposed developments are situated where they are due to their proximity to existing infrastructure in Milverton and north Leamington such as power, communications and transport and waste/drainage.

The development of this land will bring no benefit to the residents of this small village in terms of this infrastructure as the development costs of these would be significantly higher than joining them to the existing updating infrastructure to the north of Milverton; again making the site far easier and more lucrative for a firm to develop with higher profit than other areas more suitable from a social, sustainable and planning enforcement perspective.

The laughable proposal to use a large section of the greenbelt in this area to build a scheme identifies as 'Park and Ride' is a fool's errand doomed to failure. It has no proposed dedicated bus service and serves only to supply a poorly placed car-park near to under-used and currently struggling bus services. It is unlikely to rescue these poor services due to its location and onward destinations. Parking is available and more is proposed in Leamington Spa; this flies in the face of the justifications used for this proposed scheme. The proposal is too close to Leamington to reduce traffic on the A452 and would likely compound existing problems. A more appropriate proposal servicing facilities from the south of Leamington is being made by stagecoach and whilst there are more of these schemes nationally which have failed and no funding is currently available as a result of this, that proposal would be more likely to succeed due to the transport infrastructure and facilities it would service to the south of the town.

In Summary, I would like you to consider that the proposed development is not properly supported, ill thought through, not positively prepared and possibly illegal for the following reasons.

- The site is unsuitable to meet the development needs of Coventry due to its location far from Coventry.
- The appropriate sequence for identifying sites for development has not looked at the greenbelt as a last resort, but as a first one.
- The green belt at old Milverton is particularly valuable in comparison with other areas and areas of 'lower greenbelt value' exist closer to Coventry which could be used after an appropriate identifying sequence has been used.
- The exceptional circumstances required by the National Planning Policy Framework to release land from the greenbelt have not been demonstrated in any way.
- The proposed park and ride scheme is impractical and will not be used to any positive effect.
- The area is of great social, economic and wellbeing value to local residents and those from further afield who access it for recreation such as experiencing nature, walking, riding, running and passing through to destinations bordering the area.
- The proposals are not in any way, sustainable development.

This proposal represents a quick and easy profit for developers and would be of no benefit socially, environmentally, economically or in terms of public health and wellbeing to the local residents of the area or the wider community who use it. It would change the nature of the areas it serves to protect from development in a disastrous and unrecoverable fashion. This proposal would allow developers to side-step a function of the NPPF which has served its purpose well and proved an inconvenience to them for many years. It would be to the benefit of nobody but the construction firms who have been seeking to develop this land for some time.

It should therefore be considered immoral, unsustainable, poorly prepared and made without the support or inclusion of the communities it affects. The proposals would not secure better lives for current and future generations providing no economic, environmental or social benefit to those who would be directly affected by it. It is not by any definition (especially that contained in the NPPF) 'Sustainable'. Attaching that word to the proposal is an underhand misrepresentation which distracts from the damaging long-term nature of the proposal.

I would hope you consider these points to be valid and ask that the Authors of this proposed plan apply some thought and appropriate process in future which stands up to public scrutiny and has public support. The existing proposals are a disappointing betrayal of the planner's duty to support and develop the communities which both they and I serve.

Yours Sincerely,

W. Tansey, MCPara