BAGINTON PARISH COUNCIL

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Our Ref: L122 Your ref

Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH

> 21st July 2013 By Email Only

Dear Sirs

Local Plan Revised Development Strategy, Community Infrastructure Levy, Draft schedule, Sustainability Appraisal and Gypsy & Traveller Site Options. Consultation.

On 19th June we received the new Local Plan Revised Development Strategy, Community Infrastructure Levy, Draft schedule, Sustainability Appraisal and Gypsy & Traveller Site Options.

We write regarding our OBJECTION to certain of the proposals in so far as they adversely affect our rural village community.

We remain strongly opposed to the onslaught of developer proposals adversely affecting the undisturbed rural Green Belt surrounding our lovely village. Parishioners are tired of this onslaught and ask that WDC look after the interests of our longstanding community and do not allow the Green Belt to be developed in this area.

We turn to each document separately thus:-

Local Plan Revised Development Strategy,

1. Gateway.

In report section 5.5.5 it states:-

"In the 2012 Preferred Options the Council committed to exploring the case for land at the Coventry and Warwickshire Gateway to be identified to provide a major employment site that could meet these needs. Since then, a planning application has been submitted. Although **this application has yet to be formally determined by the Council**, the evidence would support the identification of land in this area for a major employment use of sub-regional significance."

You have our letter L090 response to that consultation dated 18.7.12. Many of the points made in that letter remain applicable.

BPC remain wholly opposed to the Gateway development for all the legitimate planning reasons given in our extensive correspondence OBJECTING to the development and lodged on the WDC website along with over 800 other objectors against planning application W12/1143. All the matters therein should be considered as part of this consultation.

In summary, the Gateway is unsustainable and inappropriate development of the Green Belt with **NO** very special circumstances and is ruinous to the openness and rural character of our Parish. The open fields also act as a vital barrier against urban sprawl. The proposal will not support regeneration within the Coventry & Nuneaton Regeneration Zone, as it would directly compete with established underutilized sites with extant planning permission such as that at Ansty. There are many suitable alternative sites outside the Green Belt and no preferential sites within the Green Belt. Development can and should be carried out on existing sites with hundreds of acres of already available land.

We have written to DCLG requesting that this application be called in for determination by the SoS following a Public Enquiry, for the many reasons quoted in our separate correspondence of which you have a copy. We are aware that DCLG have written to WDC on 2.7.13 instructing WDC not to grant planning permission pending their further review.

Furthermore Stoneleigh and Ashow Parish Council have written to the DCLG in a joint Parish Council letter dated 10.7.13, asking that the Gateway be called in and amongst other things making a very strong case for the provision of suitable employment land in the Daw Mill area rather than the Gateway. BPC fully endorses the contents of this letter and asks that the letter be accounted for in your deliberations.

BPC and Parishioners vociferously OBJECT to any mention of Gateway in the Local Plan. BPC requests that the Local Plan should remove all references to the Gateway and amend all its projections accordingly.

If you insist on its retention BPC is of the view that the Strategy as stated must not be concluded until the SoS has completed his deliberations.

2. Housing.

Regarding housing policy, Baginton has a Housing Needs Survey & a Parish Plan and requests that the deliverables in these documents be accounted for by WDC in formulating the Local Plan. In particular please note the below comments:-

2.1. A Housing Needs survey was carried out on our behalf of a few years ago, which identified a need for social housing for 17 new properties. In 2012 the Baginton Parish Plan was published. BPC supports modest sustainable increases to housing in accordance with the output from the Baginton Parish Plan, a summary of which is provided in **Appendix 1** herein. In summary, almost 9 out of 10 respondents are in favour of supporting new houses for local people and most people support modest growth.

Having considered all the issues The Local Plan should include opportunity related to small scale sustainable development of this nature, to retain the nature and character of the village and help to support the many local rural businesses in the village. BPC is in favour of sustainable development to allow modest village growth, from a mix of social housing, market housing and sheltered accommodation, for up to 20 number new residences. Please note in particular that in all cases any housing shall be wholly in character with the village and be sympathetic to the amenity of existing properties/people.

Councillors believe the Housing Needs Survey and the Parish Plan outcome, together with their considerations as above, should be used in preference to the proposals in the consultation document.

2.2 BPC objects to the classification of villages generally. The Local Plan must not dictate the type of housing development to villages, but rather should take into account village desires under the Localism act and in the case of Baginton, our Parish Plan and Housing Needs Survey.

2.3 BPC are aware of responses to this consultation by the CPRE and WRW Forum, which give a clear and compelling case for the overall housing forecast to be reduced from 12300 to 5400 homes maximum, all on non Green Belt land. The 70-90 houses WDC propose for Baginton is an unacceptable increase for the village. This disproportionate growth will change the character of the village beyond recognition, without the necessary facilities such as a GP and schools to support it. If the local plan looked to provide 5400 rather than 12300 new homes, then there would be no need for anything other than the small number of affordable/retirement homes we have already identified as our requirement in our Housing Needs Survey and our Parish Plan in 2.1 above.

Community Infrastructure Levy Draft schedule,

BPC are opposed to the proposal not to provide a levy on industrial warehousing and believes developments such as the Gateway should not be exempt. There needs to be a consistent levy across the board to reflect the impact on communities.

Sustainability Appraisal " Final Interim Report" (SA)

The proposed Gypsy and traveller sites in Baginton ref G101 & G107, (referred to as GT01 and GT07 in the Options paper) are inappropriate development in the Green Belt and they are not sustainable development.

Sections 5.7 and 5.26 refers to both sites having wide pavements leading into the nearest village. There are no pavements to the village, and the grass verges referred to are not suitable for pushchairs, wheelchairs or use by the infirm.

Section 5.27 identifies potential negative effects on the historic environment, including the setting of the Baginton Conservation Area.

There is no GP in Baginton, there are no schools in Baginton and there is poor public transport provision to support these proposals. Noting this BPC believes appendix 4 on G107 misrepresents the truth and should have the item "Local services and community facilities "as a major negative red box. This would give the site three major negative scores hence eliminate it from further consideration.

Sections 5.9 and 5.28 identify a major negative effect on many of the Sustainability Appraisal objectives (including the prudent use of land, and air, water and soil quality) due the sites being located on Green Belt land (the report states no exception for gypsy and traveller development under PO16 - Green belt) and being adjacent to Coventry airport, industrial park and in the vicinity of several sewage treatment works (where the report states there will be noise, light and air quality effects). They also identify negative effects on the natural environment and landscape.

The site shown in G107/GT07 is vastly larger that that needed for the defined WDC need and BPC believes there is a much bigger hidden agenda to develop the whole area highlighted for housing. This is entirely unsustainable and inappropriate development of the Green Belt with <u>no</u> very special circumstances.

This document also clearly demonstrates that there are a number of far better suited sites elsewhere in WDC for such development.

Gypsy & Traveller Site Options

In addition to the above points on the SA, the below text lists further reasons why the sites numbered GT01 and GT07 (G101 and G107 in the SA) are unsuitable sites so should be omitted from the proposals.

 The proposed sites in Baginton parish are within the Green Belt and are not within easy reach of local facilities such as doctors, schools, hospitals etc. In addition, there is only a limited bus service making access to employment difficult. This means that these sites do not satisfy the following points in the document: -

Page 4 point 2.6 refers to 'areas of search' selected by officers within which: -

there could be potential for a Gypsy and Traveller site, **outside the Green Belt**, close to the road network and **within easy reach of local facilities (schools and doctors** etc).

Page 7 point 5.2 says the Government guidance is: -

- to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- that plan-making and decision-taking should protect Green Belt from inappropriate development

Page 9 point 7.3 refers to the Preferred Options of the Local Plan draft policy which contains the criteria by which sites would be assessed for suitability:

- The Council will bring forward site(s) under a Gypsy and Traveller Sites Allocation Development Plan Document, using the following policy criteria:
 - Convenient access to a GP surgery, school, and public transport;

In addition, under the Daily Mail headline of 2nd July 2013 "New rules ban gypsy camps from green belts", it was reported that Eric Pickles has stated "After seeing the trouble this has caused I've never felt it more important to protect our Green Belt land and the communities who live in and around it". The newspaper reports that "travellers will be barred from settling on green belt land" and that "local government Secretary Eric Pickles has acted because his advice to councils to only allow green belt developments in 'very special circumstances' is not being followed". He said "planning officials must give 'particular scrutiny' when letting caravan sites blight England's beauty spots and concentrate them in other areas".

In addition, in a recent announcement the Government has decided to change the appeals recovery criteria by adding proposals for Traveller sites in the Green Belt. That announcement was made by Local Government Minister Brandon Lewis in the Commons. He told MPs: "Having considered recent planning decisions by councils and the Planning Inspectorate, it has become apparent that, in some cases, the Green Belt is not always being given the sufficient protection that was the explicit policy intent of ministers. "The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for Traveller sites or for conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development in the Green Belt."

As such BPC believes both sites proposed for Baginton are entirely unjustifiable.

2. The proposed site at Stoneleigh Road is under the Coventry airport flight path. This does not satisfy the requirement to provide suitable accommodation: -

Page 7 point 5.2 says the Government guidance is: -

• to enable provision of suitable accommodation

3. There are already three traveller sites within a few miles of those proposed in Baginton at Siskin Drive, Brandon Lane and Oxford Road. Therefore the proposed sites do not satisfy the following points: -

Page 7 point 5.2 says the Government guidance is: -

 to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply

WDC's Local Plan Strategy sets out some specific principles relating to the key elements of Sustainable Development, which includes "**Distributing development across the District**" (Revised Development Strategy Document point 3.5).

- 4. Page 16 point 11.1 says the Council is prepared to consider use of its powers of compulsory purchase should this prove to be the only way to resolve the problem [of provision of suitable sites]. The proposed site in Stoneleigh Road is on private land, which includes part of the local nursery. It is unacceptable to adversely impact a rural business by forcing them to give up part of their land for such a development, when there are more suitable sites.
- 5. The alternative sites proposed to the south of the district are preferable options to the two proposed in Baginton parish as they are outside the Green Belt, have better access to facilities, would not have an adverse impact on a rural business and would not lead to an over-concentration of sites in one area.

In conclusion, your proposals MUST protect the openness of the Green Belt countryside which surrounds our rural village from urban sprawl of Coventry into Warwickshire and from inappropriate development with no special circumstances. The current proposals are contrary to these fundamental requirements and as such the proposals are wholly unsatisfactory.

Please amend your proposals by omitting the Gateway development, omitting the Gypsy/Traveller sites from Baginton Parish and by reducing the housing requirements to sustainable levels in keeping with the wishes of local people, determined at local level through local consultation and through both our Housing Needs survey and our Parish Plan.

Yours sincerely,

Steve Williams. Clerk to Baginton Parish Council. CC All Cllrs

PTO for Appendix 1.



