

## Warwick District Council Local Plan

### Consultation on Proposed Modifications (2016)

#### Modification 22

#### Land at Budbrooke Road, Hampton for Mr Andrew Butt

#### Question 7

1. An objection is submitted to Modification 22 in the context of its provision for Safeguarded Land. This Local Plan involves the defining of Green Belt boundaries (Framework 85). The Framework states:

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

It is clearly evident that in order to 'ensure consistency with the Local Plan strategy for meeting requirements for sustainable development' (Framework 85 first bullet point) that land is required to be released from the Green Belt to meet the housing needs for the Plan period to 2029.

2. The Council has concluded that it is 'necessary' to identify areas of safeguarded land between the urban area and the Green Belt to meet longer term development needs (Framework 85, third bullet point).
3. While the potential capacity of the two areas of land identified under Policy DSNEW 2 (Sites S1 and S2) are not identified, a reasonable assessment may be:

**S1: Land south of Westwood Road**

Circa 1000 dwellings (on basis the Safeguarded Land is there or thereabouts twice the allocated site H42 (capacity 425)).

**S2: Land north of Milverton**

Circa 700 dwellings (on the basis the area of Safeguarded Land is there or thereabouts two and a half times the allocated site H44 (capacity 250 dwellings)).

4. Some basic principles should apply in the identification of Safeguarded Land:
  - i. While housing is the largest scale of development need in terms of land take, it should not be assumed that land is identified as Safeguarded Land solely for the purposes of accommodating future housing needs. Other spatial development needs, including for example provision for employment, education, health may

require land beyond the limits of existing built up areas that are bounded by the Green Belt.

- ii. Paragraph 85 makes it clear that national planning policy expects sufficient area of land to be identified from the Green Belt (where as in the case of Warwick District it is necessary (Framework 85) to ‘promote sustainable patterns of development (Framework 84), so as to meet longer term development needs well beyond the Plan period. As such, national planning policy seeks the safeguarding of a sufficient quantity of land to meet reasonable expectations as to development requirements for a period well beyond 2029.
  - iii. The third bullet point of paragraph 85 is to be read with the fifth. Unless sufficient provision is made for Safeguarded Land, then there is a real risk that the boundaries of the Green Belt will need to again be reviewed at the end of the Plan period to accommodate future development needs.
5. While it is recognised that the allocation of land is to meet development needs in the Green Belt is contentious with local communities – often on a less than full comprehension of the Green Belt policy – confidence in the proper application of Green Belt policy is likely to be undermined to a greater extent with the local community if in the review of the Local Plan – which may be anticipated to commence within 5 years – proposes new proposals for redefining Green Belt boundaries.
  6. As such, it is submitted that the public interest – and confidence in the plan-led planning system – is better served by excluding more land from the Green Belt and safeguarding, rather than making an inadequate provision when then requires further alteration of Green Belt boundaries on the first review of the Local Plan. In that way, provision for Safeguarded

Land is made to meet longer term development needs 'stretching well beyond the plan period.'

7. The fact that the precise scale of development needs for the Plan period beyond 2031 cannot be determined – does not make ineffective the process of identifying adequate Safeguarded Land – and should not be considered 'consistent with the national planning policy' as a reasoning for not making further provision.
  
8. For the current plan period, the Plan proposes the alteration of Green Belt boundaries to make provision for residential development at the following locations:

Red House Farm, Leamington Spa	H04	250
Rouncil Lane, Kenilworth	H12	130
Thickthorn, Kenilworth	H06	760
Southcrest, Kenilworth	H40	640
Warwick Road	H41	100
Westwood Heath	H42	425
Kings Hill	H43	1,800
North of Milverton	H44	250
Oak Lea Farm, Finham	H08	20
Baginton	H19	80
Burton Green	H24	90
Cubbington	H25, H26, H50	195
Hampton Magna	H27, H58	245
Hatton Park	H28, H58	120
Kingswood	H29, H30, H31, H32, H33	56
Leek Wootton	H37	5

9. This scale of necessary release of land from the Plan period may be compared to the provision for Safeguarded Land of circa 1,700 dwellings – of land that may not be required only to meet residential development needs.
10. It is submitted that this scale of provision cannot reasonably be considered consistent with national planning policy to ‘meet longer term development needs stretching well beyond the plan period’. If a basic proportionate assessment is made, this scale of provision would extend about 3 years into the roll forward of the Plan period.
11. A response to the plan – making adequate provision for longer term development needs is a claim that the land will be released unnecessarily for development, as though the notation Safeguarded Land weakens the management of development by the LPA. The fourth bullet point of paragraph 85 of the Framework dispels this fear.
12. Indeed, in research undertaken for the report ‘The Effectiveness of Green Belts’ [1993], this concern was examined for an evidential basis. The Report concludes:

*‘Three further arguments against safeguarded land were put to us. It was suggested that safeguarded land would attract much extra speculative activity, and its maintenance would therefore be impossible. There was little evidence however to demonstrate this.’*