

The Planning Policy Manager
Warwick District Council,
Riverside House,
Milverton Hill
Leamington Spa
CV34 5QH



20TH April 2016

Dear Sir

MODIFICATIONS TO THE NEW LOCAL PLAN

We are writing to record our objections to the following proposed modifications to the New Local Plan:

Modification: Removal of land north of Milverton from the green belt
Mod Number: 16
Paragraph Number: 2.81
Mod. Policies Map Number: H44

Modification: Allocation of land north of Milverton for development
Mod Number: 14
Paragraph Number: Policy DS15
Mod. Policies Map Number: H44

In our opinion the Local Plan is unsound because it is not justified, effective nor is it consistent with National policy.

Warwick District Council has failed to demonstrate the EXCEPTIONAL CIRCUMSTANCES required by the National Planning Policy Framework to remove the land North of Milverton from the Green Belt and to permit the proposed development.

The development is for Coventry City Council's housing need. In practice people who want to live and work in Coventry will not buy houses on land North of Milverton and, therefore, this development will not support Coventry's housing need. There are sustainable sites closer to Coventry that should be used in preference to the land North of Milverton so as to reduce unnecessary commuting, inevitable congestion and further road construction. The proposed development is therefore not sustainable.

The initial development is a very small development, and equates to an annual build of only 19.2 houses over the remaining 13 years of the Plan period. These houses could be accommodated on other sites and, therefore, the harm caused to the green belt by this development by reason of inappropriateness outweighs any potential benefit.

The proposed park-and-ride scheme is unsustainable because:

- There will be no dedicated buses, so users will have to time visits to coincide with the bus timetable
- The site is too close to Leamington. It would be better if the site was focused on the A46 roundabout with the A452, which could form part of the Thickthorn development, and provide for Leamington, Warwick, Kenilworth, Warwick University and potentially Coventry.
- Much of the traffic using the A452 crosses to the south of Leamington where there are the major employers
- Shoppers are unlikely to use the park and ride when there is plenty of parking in Leamington
- Oxford appears to have the only park and ride scheme in the country which really works and this is because there is such limited parking in Oxford city centre.
- The proposal is predicated on a significant increase in car parking charges as an attempt to change behaviour and will have a detrimental effect on the Leamington as a Town Centre.

WDC has also said that the “safeguarded land” north of Milverton could be used in the future to support Leamington's housing need. There are other green field sites that are available, and deliverable which should be used in preference. Therefore, WDC has previously accepted that the Exceptional Circumstances necessary to remove this land from the Green Belt for Leamington’s housing needs do not exist. Nothing, in this regard has changed in this regard.

Precedence for releasing land from the Green Belt requires the "value" of potential sites to the Green Belt to be taken into account and those with the least value to be removed from the Green Belt first. WDC, in cooperation with Coventry City Council, has assessed sites on the edge of Coventry as being of lower Green Belt value. Even if development at Old Milverton was acceptable as a sustainable location for development, there are sites with a lower Green Belt value that should be used in preference to the land north of Milverton.

The proposed railway station is unviable because the railway line is in a deep cutting in Old Milverton making construction impractical.

The land North of Milverton is used by many people for recreation. If developed the residents of local towns will be deprived of an area which is highly valued and sustainable for walking, running, cycling, riding, bird watching and is also used by local schools for educational walks.

The land North of Milverton has performed the requirements of the Green Belt and it should continue to do so:

- It has stopped Kenilworth, Coventry and Leamington merging. If this land is removed from the green belt the “green lung” between Leamington and Kenilworth will be reduced to less than 1 ½ miles.
- It has stopped Leamington “sprawling”. Development stops at the green belt boundary
- It protects the historic setting for regency town of Royal Leamington Spa which will be destroyed if development is allowed.
- It has encouraged urban regeneration in the neighbouring towns
- It has safeguarded the countryside. If this land is removed from the green belt, highly productive farming land will be lost together with long established wild life habitat.

In order for the modifications to the Local Plan to become sound the land North of Milverton should remain in the Green Belt.

Yours faithfully



Dr Rachel Lander