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Dear Sir

LOCAL PLAN PREFERRED OPTIONS

I write to register my views on Warwick District Council's Preferred Options for its Local Plan published for public consultation on 1 June 2012. In particular I wish to record my objection to the proposal to redraw the green belt north of Leamington to permit the construction of:

- 1980 dwellings,
- out of town shopping facilities,
- light industrial units,
- schools
- park and ride facilities
- changes to the road network to cope with the increased traffic resulting from this development including the proposal for a "Northern Relief Road"

in the parishes of Old Milverton and Blackdown.

I have no doubt that there is a shortage of housing in the Country and that Warwick District will continue to expand, creating further need for housing and employment. However the current proposals are ill conceived and have no regard for the Council's previous planning policy. This policy was to direct expansion to the south of Leamington and Warwick where it has already invested in the necessary infrastructure and employment opportunities to support growth.

The elected Tory party majority has stated that its political ambition is to "spread the pain" of growth around our Towns. Such an ambition cannot be supported by sound planning policies and contravenes the National Planning Policy Framework which requires there to be "very special circumstances" to permit the development in the Green Belt proposed in the Preferred Option for the Local Plan.

National Planning Policy Framework requires "Very Special Circumstances"

- The fundamental aim of Green Belt policy as set out in the Government's National Planning Policy Framework is to prevent urban sprawl by keeping land permanently open.
- As well as "very special circumstances" The Government's National Planning Policy Framework requires the harm caused to the Green Belt by the development to be outweighed by the benefit of the development.

- From the various public meetings that I have attended, Warwick District Council's argument appears to be that the "very special circumstances" are that there is nowhere else for the homes to be built.
- However, in the "2009 Core Strategy" Warwick District Council identified land south of Leamington (not in the Green Belt), as being suitable for development. This land is still available. The assessment performed by Warwick District Council shows that this land is easier to develop and already has a substantial amount of infrastructure to support the development, and the new residents who will live there. It is close to the M40 and there are existing employment opportunities South of Leamington as well as existing out of town shopping facilities and good access to the Town centres.
- The 2009 Core Strategy is direct evidence that there are alternative areas for development other than the Green Belt and that the "very special circumstances" put forward by Warwick District Council are invalid.
- Warwick District Council argues that if the development is concentrated in a few geographical areas (for example to the south of Leamington) that lack of choice will depress demand for the houses. No evidence is offered for this statement. I have spoken to developers who do not support this argument. They point out that similar sized developments have been delivered in the past. They also state that in practice the development will be phased over 15 years, it will not be delivered by a single construction company (land will be on sold to different developers) and that competition, choice and demand will be created by different areas of the sites having different characteristics.
- Warwick District Council's argument about very special circumstances also ignores a fundamental economic fact that need for houses and demand for houses can be equalised by price. If the new houses are priced correctly demand will satisfy the need for houses. In taking the decision to create demand for house by building in the Green Belt north of Leamington, Warwick District Council is helping to maintain land owners' and developers' profits. Consideration of the land owners' and developers' financial gain is not a "very special circumstance" to permit unnecessary development in the Green Belt.
- The Preferred Options quite correctly makes much of the need to provide affordable housing and sets the requirement for 40% of the homes on new developments to meet the need for affordable housing. The Preferred Option is to build 45% of the new homes in the Green Belt. This land will probably be more expensive to acquire and together with the probable higher demand for houses in the Green Belt will result in these homes costing more. The Preferred Option to build in the Green Belt does not therefore support the preferred option for 40% of the new homes to meet the need for affordable housing.

The Green Belt

- The National Planning Policy Framework sets out five purposes for Green Belt land. In summary these are, to prevent urban sprawl of built up areas, to prevent neighbouring towns merging, to protect the country side from encroachment, to preserve the setting and special character of historic towns and to assist urban regeneration by encouraging the recycling of urban land.
- The proposal to develop in the Green Belt in Blackdown and Old Milverton contravenes each of these five purposes:
 - It encourages urban sprawl
 - It reduces the "green lung" between Leamington and Kenilworth to less than 1½ miles encouraging the merging of these two towns
 - It encourages encroachment the countryside
 - It will destroy the setting and the special characteristics of Kenilworth and Leamington each of which has great historic interest

- The Preferred Options ignore Warwick District Council's Joint Green Belt Study of the land at Old Milverton and Blackdown. The Study concluded that the land at Blackdown was not suitable for development and that the land at Old Milverton was only worthy of further study because "there were no other towns to the north, from which the Green Belt would provide protection from encroachment [and] there were other physical barriers to the wider open countryside." This conclusion on the land at Old Milverton has ignored the resulting coalescence with Leek Wooton and Kenilworth.

Recreation Value of Old Milverton and Blackdown

- The land at Old Milverton and Blackdown is enjoyed by many walkers, runners, riders, and cyclists. It provides a countryside environment close to the centres of Leamington and Warwick. Both the proposed building development and the "Northern Relief Road" would substantially reduce the amount of land that is available to be enjoyed and have a detrimental impact on the ambience and hence the amenity value of the land. Turning some of it into a maintained park land would detract from, rather than enhance its value.
- Old Milverton is one of the last surviving villages close to Leamington that has not been absorbed into the greater conurbation. If the proposals go ahead it is only a matter of time before it is also absorbed by Leamington.

Proposed New Roads

- Turning the A452 between Leamington and Kenilworth into dual carriage way will not help traffic flows. At peak times the delays on the A452 result from commuters wanting access to the Town centres.
- Building nearly 3000 houses north of Leamington will simply increase the congestion.
- The dual carriage way will have a detrimental effect on the picturesque northern gateway to Leamington and southern gateway to Kenilworth.
- A "Northern Relief Road" (budgeted cost £28m) is not required. Traffic flows tend to be north to south rather than east to west. The road will serve no purpose other than to take new home owners quickly on to the A46 and to jobs and shopping opportunities away from our Towns. If the development does not go ahead the road will not be required.
- A "Northern Relief Road" will form a natural barrier and encourage further development in the Green Belt up to this new road. It will need to be built across the flood plain (at considerable cost) and will violate an important nature corridor along the River Avon.
- The A46 already effectively provides a Northern Relief Road.
- If the proposed development is concentrated in the South of Leamington there is an existing road network that could be upgraded at considerably lower cost than the £28m allocated to construct a "Northern Relief Road". The resultant savings could be used to enhance other services such as improvements to Warwick Hospital.

New Out of Town Stores

- Warwick District Council's vision is to make "Warwick District a Great Place to Live, Work and Visit". A key element which already makes Warwick District a Great Place to Live, Work and Visit is the number of independent retailers and the pleasant and unique "feel" that this gives to our High Streets.
- The proposed "out of town" retail operations will be another blow to independent retailers in Leamington, Kenilworth and Warwick as further "out of town" shopping will take trade away from the Towns.

- More out of town shopping and the A452 dual carriage way between Leamington and Kenilworth will detract from the uniqueness of our Towns making them like any other in the UK and deter visitors.

Loss of Agricultural Land

- There will be a loss of a significant amount of high quality agricultural land in Blackdown and Old Milverton.

Number of Homes included in the Forecasts

- Warwick District Council has added nearly 1400 homes to the number that it anticipates will be required so as to include a “buffer” in the forecasts. If this “buffer” is removed from the forecast there is no need to include the land at Old Milverton and Blackdown in the proposals.
- Insufficient account has been taken of potential windfall sites in the forecasts. The model used to calculate the number of houses required appears flawed by using average data over recent years for demand rather than projecting on the basis of the current downward trends.

Alternative sites

- If the requirement is to “spread the pain” of development around Warwick and Leamington why is the preferred plan to concentrate development on a north, south axis rather than east, west? There are two sites west of Warwick that have been identified which are not in the Green Belt but are not included in the Preferred Options.
- In the 2009 Core Strategy land was identified to the west and east of Radford Semele outside the Green Belt. I understand that the land east of Radford Semele has been rejected in the current Preferred Options because of gas pipe lines. Why do the gas pipe lines rule out the entire site for development when the building constraints only prevent construction within 100 metres of the pipelines? Surely these resulting corridors could be used imaginatively to encourage wild life or as cycle routes.
- The area around Grove Farm to the south of Leamington (not Green Belt land) was included in the 2009 Core Strategy. I understand that this has been excluded from the Preferred Options because there are concerns that it would lead to coalescence with Bishops Tachbrook (also not in the Green Belt). The 2009 Core Strategy proposed an area of restraint to prevent coalescence with Bishops Tachbrook which could still be introduced. If preventing coalescence is so important why is Warwick District Council encouraging development in the Green Belt north of Leamington when one of the main purposes of the Green Belt is to prevent towns merging? It just does not make any sense.

Conclusions

The areas identified for development in the Preferred Options for the Local Plan issued by Warwick District Council simply fulfil the political aspirations of the majority of the Council’s members to “spread the pain of the development”. The Preferred Options are not based on sound planning principals. Very Special Circumstances to permit 45% of the development in the Green Belt and in particular in Old Milverton and Blackdown cannot be demonstrated. There are other suitable sites for development which are not in the Green Belt. The building of a new “Northern relief Road” and turning the A452 into dual carriageway will not address any of the existing traffic congestion. Developing the Green Belt in Old Milverton and Blackdown will deprive the community of an area of countryside close to Leamington and Warwick that is used by many for recreational purposes. The area of Green Belt between Leamington and Kenilworth is particularly important because it provides a narrow “green lung” between the two towns, preventing their coalescence and preserving their identities. It should continue to be protected. I therefore urge Warwick District Council to reconsider its Preferred Options to develop this area.

Yours faithfully Jonathan Lander