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

26th July 2012



Dear Sir,

I write to offer comments on the New Local Plan, for the development of new housing in the Leamington and Warwick District area.

I object to the proposed development in Old Milverton and Blackdown contained in Warwick District Councils' Preferred Options for the Local plan.

I do not believe the re-drawing of Greenbelt boundaries is either necessary or appropriate for housing development. I believe the Council has failed to adequately demonstrate the validity of their planning assumptions, and that the number of new houses required is significantly overstated.

The greenbelt land at Blackdown and Old Milverton fulfils all five objectives for Greenbelt, as laid out in the National Planning Policy Framework, to which Government attaches great importance. This should have been key to the Council's assessment of their proposals, yet appears to have been widely over-looked or purposefully ignored.

The maintenance of the existing greenbelt is essential, not only to prevent Urban Sprawl to the north of Leamington and the merging of the two distinct towns of Leamington and Kenilworth, but to prevent the destruction of the individuality and character of the hamlet of Old Milverton. This would be destroyed for ever if the development of land at Old Milverton were to be allowed, let alone the addition of the proposed relief road to be driven along the route of Milverton Lane to the A46. I have no confidence that, were such development to be allowed it would only be a matter of time before the suggested 'green wedge' to the west of the development would also receive planning permission, destroying forever the individuality of Leamington, Old Milverton, Leek Wooton and Kenilworth.

In its' current form, the plan also fails to safeguard the countryside from encroachment. The land in question at Old Milverton is Grade 2 agricultural land in productive use. As food security becomes ever more important socially, environmentally and economically, it is folly to allow development of productive farmland in the greenbelt when no extraordinary circumstances are present to warrant such action.

The greenbelt also helps to preserve the unique setting of Learnington, an historic Spa town of special character which has been preserved and nurtured until now.

The preservation of Greenbelt also promotes innovative regeneration of derelict and other urban land within the existing developed areas.

I am also concerned that the new plan differs widely from that proposed in the 2009 Core Strategy. In the 2009 proposals land to the south of Leamington was used, which is adjacent to existing infrastructure and not designated greenbelt. This land, identified as capable of sustaining more homes than those currently proposed for the Blackdown and Old Milverton greenbelt, is no longer utilised in the Council's 'New Plan'. Why not? The reason presented at a recent meeting I attended with planners and councillors was that it was not possible to re-route high pressure gas mains running through the area, and that we should 'spread the pain'. This is not a planning strategy. I find such justification shallow and completely unfounded.

The greenbelt land north of Leamington is also of huge local amenity value. I have used the land recreationally myself for over 30 years, and at present barely a day goes by when I do not traverse and enjoy the amenity of this land. Furthermore, even in the depths of winter, it is an unusual day if I do not encounter others using the land, watching and photographing the abundant and varied wildlife, walking, cycling, running, horse-riding and dog-walking.

The New Local Plan is ill-conceived, based on flawed housing requirement projections, and ignores the key principles of the National Planning Policy Framework in relation to the redefining of greenbelt boundaries.

The National Planning Policy Framework states that Greenbelt boundaries should only be altered in exceptional circumstances. There are alternative sites available to the Council, which are of a lesser amenity significance and are not designated greenbelt. For these and many further reasons, some of which I have alluded to in this letter, I suggest that there are no exceptional circumstances which outweigh the irreversible harm which would be caused to the whole area, and in particular to ancient and distinct towns and hamlets, by allowing the alteration of greenbelt boundaries in Old Milverton and Blackdown and by allowing development on this land.

I urge that this unwarranted destruction of greenbelt land be rejected outright.

The Council have failed to demonstrate the exceptional circumstances required to warrant the use of greenbelt land for development and the preferred options should be redrawn omitting the use of greenbelt land.

