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

16 July 2012

Dear Sir

Re: Objection to Warwick District Council Local Plan preferred options

I am writing to register my objection to the development of site identified as East Milverton within the proposed Warwick District Council (WDC) Development May 2012.

Whilst acknowledging the need for additional housing during the period 2014-2029 and the overall approach; the Preferred option in its current form, (i) goes beyond identified housing need at the expense of the Green Belt, (ii) ignores national planning policy guidelines for development of Green Belt, and (iii) does not recognise other development opportunities that are better suited to development and more consistent with WDC's own stated sustainable growth objectives and evidence base.

Objection 1: Housing requirement.

The New Local Plan (NLP) Preferred options May 2012 *Page 19 (7.22)* identifies a requirement for 6986 dwellings not including windfall sites over the period of the plan. In its current form the Local Plan indicates it would deliver 8360 dwellings, equal to an over provision of 1370 (19.6%) dwellings.

Objection 2: Exceptional circumstances and planning conditions for developing the Green Belt have not been met

2.1 As identified in Objection 1, the WDC plan overstates the need for housing development by 1370 dwellings during the period of the plan invalidating any exceptional need for the redrawing of the Green Belt.

2.2 The development of East Milverton does not comply with *National Planning Policy Framework March 2012 guideline chapter 9, Paragraph 85, point 6* as it fails to provide clearly defined permanent boundaries for Green Belt and would enable and likely lead to the future coalescence of Milverton village, which would be in direct contravention of three of the five stated purposes of Green Belt.

2.3 In the event that a policy of limited encroachment/coalescence to encompass East and West Milverton were to be considered, then this too should be rejected. Areas such as land adjacent to Bishops Tachbrook, not designated Green Belt, should be required to be developed prior to any redrawing of the Green Belt under the test of "exceptional circumstances".

2.4 The NLP page 9 (4.11.7) '*seeks to ensure that new developments are appropriately distributed across the district and designed and located to maintain and improve the quality of the built and natural environments, particularly historic areas and buildings, sensitive wildlife habitats and areas of high landscape value*'.

In the event that Green Belt land should be required, the current proposal does not rescind Green Belt on a lowest value first basis. East Milverton has been identified as possessing higher landscape value than other deliverable areas in the district such as the Kenilworth sites (K18 & K19) bounded by Glasshouse Lane and Crewe Lane (inc. Woodside Management Centre) where development is also more consistent with the National Policy Framework guidelines and WDC stated Local Plan objectives. These sites however are not included within the proposed Local Plan.

Objection 3: Failure to ensure new developments are appropriately distributed across the district
The NLP page 9 (4.11.7)

I broadly support Option 2 detailed in the Strategic Housing Land Availability Assessment but believe that this rebalancing growth towards a) Kenilworth and b) South Harbury Lane, Leamington Spa offers significant benefits compared to the proposed East Milverton preferred option.

3.1 The benefits of developing Kenilworth

A strategy of developing Kenilworth through the development of available, suitable, and deliverable sites at Glasshouse Lane/Crewe Lane (K18) and Woodside Training Centre (K19) would be beneficial as on the following grounds:

- Consistent with Broad Option for Growth Option 2 favoured by WDC
- Consistent with the identified need to greater diversify the demographic profile of Kenilworth
- Develops a better geographical distribution of housing (and business) in the district
- Offers the ability to develop clearly bounded (low value) Green Belt
- Offers greater sustainability for developing transport links to potential Site of Regional Importance for Employment at the Gateway, Warwick University and Stoneleigh.

3.2 The benefits of developing South Harbury Lane

South Harbury Lane offers significant advantages compared to the East Milverton preferred option.

- South Harbury Lane is non-Green Belt land and has been identified as the second most favourable site for development within WDC and significantly outscores East Milverton.
- The favourability report recognises significant benefits accruing to South Harbury Lane in particular:
 - the reduced need to travel
 - it better enables sustainable transport
 - is more favourable to health and well being
 - offers more favourable access to services

Furthermore the Strategic Transport Assessment Overview Report identifies that development of part of the South of Harbury Lane site (close to Europa Way) would have no impact on transport infrastructure needs beyond that already required by other development. Indeed, housing in this location would facilitate better access for those working south and north of Leamington (Jaguar Land Rover or Birmingham) and needing access to the M40. Not all residents of Leamington will choose to work within the locality, particularly if seeking to attract those working in high value industries with regional and national footprints.

Objection 4 Developing East Milverton is not consistent with NLP objective (4.12.4). *help the public access and enjoy open spaces...reduce the risk of flooding; keep the effects of climate change (including the effects on habitats and wildlife) to a minimum, and support healthy lifestyles.*

4.1 The Strategic Housing Land Availability Site Assessment for Leamington Part 1 identifies North Milverton (L07) is a Green Belt site of medium value. Other assessment referred to within the Landscape Character Assessment for Land South of Leamington and Warwick show the North Milverton Green Belt as being of high value, in contrast, for example, to part of the Blackdown site adjacent to Sandy Lane (referred to as WL6a/b in this document and shown to be of medium value). The Milverton site is enjoyed by a wide section of the community, it is an important asset in supporting healthy lifestyles for residents and visitors of all ages – whether it be walking, running or cycling. The public footpath that transverses the site provides a valuable access point from Leamington to the Warwickshire country side and should be protected.

4.2 There are strong grounds for environmental concern regarding proposed development of the site. The Strategic Housing Land Availability Site Assessment for Leamington Part 1 identifies that:

- a part of the site falls within a flood zone 3A and implicitly should not be developed;
- it contains a Water Source Protection Zone and an area of Groundwater Vulnerability, which would require consultation with and permission from the Environment Agency before any encroaching development. We know from a past pollution incident from the Nuffield Hospital, and related correspondence, that the Environmental Agency view this Zone/area with extreme seriousness.
- it would result in the extensive loss of Grade 2 agricultural land which both contributes to a sustainable economy and to the character of the landscape.

Hopefully from the objections and suggestions I have made, coupled with a further review of the WDC evidence base, you will recognise that there is no justification for developing East or West Milverton and should flexibility in the plan be required, other more suitable sites for development exist within the District.

Yours faithfully

