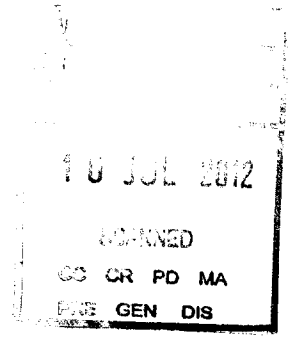


Development Policy Manager
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

6165



Dear Warwick DC development policy manager

Re: Expression of opposition to developmental proposals in Blackdown and Old Milverton

I would like to express my opposition to the newly proposed plans of development in the villages of Blackdown and Old Milverton due to several reasons, which I have listed below.

National Planning Policy Framework requires "Very Special Circumstances"

- The fundamental aim of Greenbelt policy as set out in the Government's National Planning Policy Framework is to prevent urban sprawl by keeping land permanently open.
- The Government's National Planning Policy Framework requires there to be "very special circumstances" for development in the Green Belt. It also requires the harm caused to the Green Belt by the development to be outweighed by the benefit of the development. According to Warwick District Council the special circumstances are that there is nowhere else for the homes to be built.
- However, in the "2009 Core Strategy" (the previous plan adopted by Warwick District Council) land south of Leamington (not in Green Belt), was identified and is still available, for development. The assessment performed by Warwick District Council shows that this land is easier to develop and already has a substantial amount of infrastructure (roads etc) 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.
- Therefore, the previous plan (the 2009 Core Strategy) is direct evidence that there are alternative areas for development other than the Green Belt and that the "special circumstances" put forward by Warwick District Council are wrong.
- Warwick District Council argues that the land in the South of Leamington is not as attractive to developers because concentration of development in that area may result in the developers making less profit. Consideration of the developers' financial gain is not a "very special circumstance" to permit unnecessary development in the Green Belt.

The Green Belt

- The proposals ignore Warwick District Council's study of the Green Belt land at Old Milverton and Blackdown, which concluded that these areas had high Green Belt value
- The National Planning Policy Framework (NPPF) sets out five purposes for Greenbelt 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 Greenbelt land identified for development in the Preferred Option does carry out these purposes and its development would therefore be contrary to the NPPF.

- The proposals will reduce the "Green Lung" between Leamington and Kenilworth to less than 1 ½ miles encouraging the merger of these two towns and their loss of independent identities.

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.
- 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".
- New Out of Town Stores
- The proposed "out of town" retail operations will be another blow to independent retailers in Leamington, Kenilworth and Warwick who make the area an attractive place to live. Further "out of town" shopping will take trade away from the Towns.

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

I hope you will take the above reasons into account and review your plans.

Thank you and best wishes

