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Development Policy Manager
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Warwick District Council - Local Plan - Preferred Options Response

Dear Sir/Madam

I am writing to express my strongly held view that "The Local Plan Preferred Options" document is not compatible with the Regional Spatial Strategy (RSS) for the West Midlands. In particular I am objecting to the inclusion of the fields between Northumberland Road and Old Milverton being included in the plan, for the reasons expressed below these must be removed and if the housing is still required, then that housing should be located elsewhere in the district.

When I examine the evidence base for your plan, and in particular the Strategic Housing Land Availability Assessment I note that almost all the suggested rural areas are discounted because they conflict with RSS policy point RR1. It is clear that overwhelming importance has been placed on the policies in this document. This must be balanced with the important policies expressed in the National Planning Policy Framework which rightly protect the vital importance of greenbelt land.

However this RSS document includes policy QE14 that states that "Development plan policies should create and enhance urban greenspace networks by ensuring adequate protection is given to key features such as parks, footpaths and cycleways, river valleys, canals and open spaces". It is not recorded in the Strategic Housing Assessment that a footpath crosses the land between Northumberland Road and Old Milverton, but there is most definitely one there, marked on OS maps, and heavily used as a local amenity to people living in urban areas including Leamington Spa; this provides important health and lifestyle benefits. In the Regional Spatial Strategy each policy is given equal standing and therefore this policy is as important as RR1 which you have already used to discount so much other possible development land. It only therefore stands to reason that this greenbelt land too (as QE14 protects more than just the physical path, but also the green land around it) should be removed from the preferred options plan. Indeed the proposed

sites L07 and even more so L03 are in my opinion some of the most highly used footpath and recreational natural green space areas in the district and must be protected as such.

The suggestion of ignoring QE14 and building on the greenbelt, yet leaving the footpath is logically unacceptable. The QE14 protects GREENSPACE, therefore there must be GREENSPACE around the footpath. (This is essential to it's use). The policy identifies that footpaths and parks are different and must both be protected. It is therefore unacceptable to put the footpath into parkland as this is entirely different. The footpath and the greenspace around it must be therefore be protected in their current form!

Furthermore the RSS also states in policy QE6 that; "Local authorities and other agencies, in their plans, policies and proposals should conserve, enhance and, where necessary, restore the quality, diversity and distinctiveness of landscape character throughout the Region's urban and rural areas by: protecting and, where possible, enhancing natural, man-made and historic features that contribute to the character of the landscape and townscape, and local distinctiveness." The greenbelt to the North of Leamington is quite clearly a natural feature of the landscape that contributes greatly to the character of North Leamington, Old Milverton and the surrounding area, and is essential to the local distinctiveness of these areas. This is clearly demonstrated in the huge number of signatures in petitions returned to the Council surrounding the proposed construction on these areas.

Furthermore the protection of villages under RR1 is quite inconsistent; land is being used incredibly close to Old Milverton for housing and particularly in the construction of the Northern relief road. It is been ignored that Old Milverton should be protected by RR1: "rural areas which are subject to strong influences from the MUAs and which are relatively prosperous and have generally good access to services. For these, the main priority will be to manage the rate and nature of further development to that which is required to meet local needs, whilst ensuring that local character is protected and enhanced." It is clear that Old Milverton is as strongly influenced as other Warwickshire villages from the key MUAs, it is relatively prosperous and the residents are quite contented with their access to services. Therefore just as development sites, for instance those neighbouring Radford Semele (and still contacting the Leamington Fringe), have been rejected on the basis of RR1 so should the developments between North Leamington and Old Milverton – neither these houses, nor the relief road, nor the infill that would surely follow the construction of these two things are meeting local needs, the character is certainly not protected nor enhanced.

In discussion with Daniel Robinson at Warwick District Council he informed us that the Old Milverton to Northumberland road site is labelled as "an extension of urban land that happens to come close to Old Milverton", not as a rural site in itself, this is not consistent with sites eg R46 which is equally an extension of urban land that happens to come close to Radford Semele but is protected by policy RR1 in the RSS document. These inconsistencies persist throughout the SHLAA.

A final point I would like to make is that development on the land between Northumberland road and Old Milverton is Green-belt land, which under the National Planning Policy Framework should not be built upon unless exceptional circumstances exist. I personally do not believe exceptional circumstances exist; for among other things because the 2009 Core

Strategy plan for the region did not involve development on this land, the fact that a £28 million relief road would be needed to make that land accessible, and that other land in the South is identified as suitable for development with less investment required than here to correct shortcomings. Therefore for this national policy reason in addition to the reasons stated under the RSS this land between Northumberland Road/Bamburgh Grove and Old Milverton should not be developed. Furthermore if such arguments are not sufficient then I firmly believe that the RSS being a regional policy document should not prevent some additional development in rural areas not in the greenbelt (and despite RR1) as this too does not warrant exceptional circumstances to allow construction in the greenbelt (a national policy). Indeed as 38% of the district population live in rural areas, yet only 10% of the development is located within rural areas then there is a strong argument that these areas are not meeting their local need for housing.

In conclusion the location of the Leamington to Old Milverton footpath must be included in the consultation and Strategic Housing Assessment. The New Local Plan is not consistent with the Regional Spatial Strategy for the West Midlands, due to policies RR1, QE6 and QE14, as well as the National Planning Policy Framework. For these reasons no land to the North of Northumberland Road and South of Old Milverton should be used as this would appear to demonstrate both cherry-picking and double-standards when it comes to the decision making process of the council, and result in the plans being rejected by the National Inspectorate.

Yours faithfully

A solid black rectangular box used to redact the signature of Eileen Robbins.

Eileen Robbins

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