Warwick District Council's Draft Local Plan: Land North of Milverton (H44)

Dear Mr Ward

I am a resident of Old Milverton. Whist I accept the need for development in Warwick District and the requirement to support Coventry's housing need, I am writing to you to:

- reinforce my earlier representations on Warwick District Council's ("WDC") Local Plan;
- explain why I believe that the proposals to allocate land for development north of Milverton (H44) are unsound and;
- request that you remove these proposals from the draft Local Plan.

PLANNING REASONS

The Exceptional Circumstances required by the National Planning Policy Framework to release land from the greenbelt have not been demonstrated.

The 2012 version of the Local Plan allocated land in Old Milverton and Blackdown to provide housing and commercial development to meet Learnington and Warwick's need. When challenged to justify the Exceptional Circumstances to do so, WDC withdrew these proposals admitting that the necessary Exceptional Circumstances do not exist.

The proposals to develop in Old Milverton were reintroduced in the latest (2016) version of the Local Plan. When District Councillors voted to adopt this version of the Local Plan, WDC had not published details of the necessary Exceptional Circumstances. Subsequently WDC has attempted to justify Exceptional Circumstances on the basis that such development is necessary to support Coventry's housing need.

It is irresponsible and unsustainable to build houses to meet Coventry's housing need on the greenbelt north of Learnington, some 9 miles from Coventry city centre.

- This will encourage increased commuting by car and further congestion on already over crowed roads.
- In practice it is unlikely that people who work in Coventry will want to buy houses in North Leamington.
- Initially only 250 houses are to be built to support Coventry's housing need. This allocation could easily be accommodated on alternative sites and does not of itself justify "Exceptional Circumstances".
- There are alternative sites, closer to Coventry, which should be used in preference to the land north of Milverton.

A substantial part of the site is to be "held in reserve" to meet either Coventry's or Learnington's future housing need.

- As stated above it is irresponsible to meet Coventry's housing need by building in north Leamington when there are alternative sites, closer to Coventry, which should be used in preference.
- If the allocation is to meet Learnington's need, the appropriate sequence for identifying sites for development should look at the greenbelt as a last resort
 - There are alternative sites, outside the greenbelt, that should be used in preference to the land north of Milverton
 - Further development north of Learnington can only be achieved by using more of the greenbelt

• In practice it is unlikely that this land will be "safeguarded" for future use. It is highly desirable and very valuable. Taylor Wimpey, who own the options over the development, are already calling for it to be allocated immediately for development.

The green belt north of Milverton is particularly valuable in comparison with other areas of greenbelt land

- It has been very successful in preventing the spread of Learnington and has stopped Learnington merging with Kenilworth
- It has encouraged urban regeneration
- It has safeguarded the countryside from encroachment
- It has preserved the setting of the historic, regency town of Royal Learnington Spa
- If the proposed development goes ahead the "Green Lung" between Learnington and Kenilworth will be reduced to less than 1.5 miles

The development of appropriate transport infra structure may be justified in the greenbelt, however

- The proposed park and ride scheme is impractical and will not be used:
 - No survey's of likely consumer use have been carried out to support the need for a north Leamington park and ride scheme
 - Funding does not exist, and it is probably impractical, to create the bus lane priority on the A452 that Stage Coach believes is vital to the success of the scheme.
 - The proposed site is too close to Learnington to reduce traffic on the A452 and will encourage commuting to this area
 - There will not be dedicated buses; the proposal is for a "virtual service" using the existing bus services. As a consequence it will be necessary for commuters to time usage in accordance with the bus timetable, making it inflexible
 - There is plenty of parking available in Learnington Spa. Indeed Warwick District Council is planning a new multi storey car park and appears to be increasing the amount of on street parking
 - Commuters are unlikely to use the park and ride service to cross Learnington to a similar scheme on the south of Learnington as envisaged by Stage Coach
 - Few park and ride schemes work in practice, Oxford being the only real example because there is so little parking in Oxford.
 - > The Stratford upon Avon park and ride scheme has been reduced
 - There is no funding presently available for the park and ride scheme and WDC and Warwickshire County Council will be severely affected by any associated reduction in revenue generated from parking in Leamington.
- The proposed railway station is a "flight of fantasy"
 - > The location is in a deep cutting
 - > There is no commitment from the railway companies
 - There is no funding

Some employment land is to be allocated on the site. However

- In practice this will be too small to attract any substantial development or employment opportunities.
- Employers have not been consulted about the attractiveness of employment land in Old Milverton.
 - > There is no evidence to support the need for employment land north of Learnington
 - Major employers would prefer to be south of Learnington close to other industry and close to the existing excellent road network provided by the M40

OTHER REASONS

The area, which is close to Warwick and Learnington has enormous amenity value for local residents. The parish of Old Milverton has only some 50 houses, however there have been many hundreds of objections to the proposals to develop the area, which demonstrates this value to local residents.

- Many walkers, horse riders, cyclists and runners use the area
- The area enables residents from the neighbouring towns to experience the open countryside and farm land
- Old Milverton is one of the last surviving hamlets on the outskirts of Learnington and its integrity will be destroyed by the proposals which will see it subsumed into Learnington.
- Valuable, productive farm land and important wild life habitat will be lost

The area has a rich cultural heritage as well as providing appropriate settings for the nearby towns of Royal Learnington Spa, Warwick and Kenilworth. A number of sites of particular interest are set out in the attachment to this letter.

The Parish Council has been frustrated in its efforts to establish a Neighbourhood Plan, being forced to await the preparation of WDC's Local Plan. In 2013 the Parish Council consulted with local residents and businesses and received overwhelming support for a draft Neighbourhood Plan which sought to preserve the parishes' heritage, the settings for these historic towns and to enhance the amenity value of the area for all to enjoy. The concept of large scale development was completely rejected.

SUMMARY

WDC's proposals to develop in Old Milverton do not comply with the National Planning Policy Framework to permit substantial development in the North Leamington green belt. The necessary Exceptional Circumstances do not exist. There are alternative, more sustainable, less valuable sites to support development to meet both Coventry's, and Warwick and Leamington's present and future needs. The need and viability of the park and ride scheme has not been justified.

The land has enormous amenity value. It is highly used and highly valued by local residents.

Please reject WDC's proposals for development on the basis that their inclusion makes the Local Plan unsound.

Yours sincerely

Jonathan Lander Holly Cottage Old Milverton 29th August 2016

Attachment to letter to Mr Ward dated 29th August 2016

HERITAGE SITES IN OLD MILVERTON

• Site of Mediaeval Village: Archaeologists have found flint tools, a possible prehistoric sherd together and a Roman British Coin dating from the 3rd Century A.D. in the fields in Old Milverton. There is also an old cropmark and a Bronze Age ring ditch within the Parish. Milverton is recorded in the Domesday Book (1066) as Malvertone.

- **Guys Cliffe House:** Although just outside the parish, Old Milverton provides an important setting for the site of Special Scientific Interest. The stone chapel was built in 1430 A.D. by Richard Beauchamp, Earl of Warwick. A Tudor framed house constructed, which was replaced by Samuel Greathead in the style of a Palladian mansion around 1751. The house had a significant influence on the surrounding area and in particular the hamlet of Old Milverton where estate workers lived.
- **Church of St James:** The church may have had Saxon origins but is known to have been of Norman construction until it was rebuilt in its present form in 1879/80. It is Grade II listed. Vera Brittain, writer, feminist and pacifist, is buried in the church yard as is Henry Jephson, who promoted the therapeutic benefits of Learnington Spa water and was instrumental in that town's initial success
- Village Hall: The village hall was provided by the Heber-Percy estate for the benefit of the social life of the village and village people, most of who worked directly for the estate or indirectly for the farm tenants in the Parish of Old Milverton. It has been used as a schoolroom reading room and continues to be used for social occasions. It plays a significant role in the life of the church of St James.
- **Historic Barn:** The timber-framed barn's construction dates back to 17th century. It is listed **under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.** A sign on the outside proclaims that *"Man Traps and Spring Guns on theife Premifes"*
- **Village Pound:** The pound (or pinfold) was created as a place where straying animals could be locked up until their owners paid a fine for their release. It was originally situated close to the village well on Old Milverton road and is a relic of the pre-enclosure days and the lax approach to the containment of farm livestock.
- **The Village Pump:** Mains water came late to Old Milverton, so villagers had to rely on their own wells and roof water collection cisterns. Those without such systems had to rely on the communal wells situated on Old Milverton road and at the village hall; and rain water butts
- **Parkhouse Farm:** A Grade II listed farm house built in the mid 18th Century in sandstone ashlar
- **Cottage Farm:** A farm **house** listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. It was constructed in the late 18th Century in brick.
- Saxon Mill: The Saxon Mill is located just outside the parish but has been very significant to the parish. It was originally called Gibbeclive Mill in the 12th century. It was the property of St Mary's Abbey and the Augustinian Canons until the Dissolution of the Monasteries. It was rebuilt in 1822 as a working mill until 1938 being part of Guys Cliffe Estate, and then known as Guys Mill. It was converted into a restaurant and bar in 1952.
- **Rock Mill:** Rock Mills is the second of 3 mills that have been important to the parish. It is believed to be the Milverton Mill listed in the Domesday Book which at one stage was a water mill used for milling grain and 'fulling' (treating and cleansing woollen cloth. Benjamin Smart a Leamington Quaker established a Cotton Spinning Factory in 1792; later in 1830 it was converted to a flour mill.
- **Blackdown Mill:** Is the final mill. It is a Grade II listed building Blackdown Mill was built in the 18th Century and has 19th Century additions.
- Avon Valley Viaduct: The viaduct was constructed in 19th Century as a key part of the Leamington to Coventry railway line It is a magnificent utilitarian structure which has become a greatly appreciated part of the landscape of the Avon Valley
- **Chesford Bridge:** This bridge on the Kenilworth Road is Grade II listed. Built in the 18th century it is a sandstone ashlar bridge over the River Avon.
- Blackdown Manor: Is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. Built in the early 17th

Century and remodelled in the early to mid 19th Century it was timber-framed, but largely rebuilt in sandstone ashlar.

• Stone Seat: Installed to celebrate Queen Victoria's Diamond Jubilee