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By email

Warwick District Local Plan Examination

Matter 4 The Spatial Strategy and Matter 7a: Policies DS11, DS15 and DSNEW2 Allocation and Safeguarded Land at Old Milverton (H44 and S2)

Dear Sirs,

Please find below my views regarding Warwick District Councils proposed Local Plan

I am totally opposed to the plans to allow development on the Green Belt to the North of Leamington Spa. There is no evidence or requirement to change any of these Green Belt Boundaries.

The Green Belt has been vital in maintaining the identity of the Warwickshire towns for many years and Government policy under NPPF is very clear regarding the importance of preserving Green Belt. Throughout the Local Plan process, Warwick district council (WDC) have consistently failed to demonstrate Exceptional Circumstances, or indeed a sound process of site selection, in order to justify development in the North Leamington Greenbelt.

The planning vision is to develop housing in appropriate locations and to ensure collaboration with surrounding districts. I believe that WDC have wasted a great deal of time and resources trying to reverse engineer the necessary Exceptional Circumstances to simply 'spread development around Leamington' in order to win political support. In doing so WDC have exposed a weakness in their collaboration with Coventry. Housing on the North Leamington greenbelt is contrary to the Coventry vision of developing sustainable communities close to the city.

Coventry's preference is for housing in close proximity to the city, not on the greenbelt north of Leamington 9 miles away. There has been a clear failure of process as the available more beneficial sites, demonstrated by planning experts Hunter Page, have not been brought forward in preference to the land North of Milverton. As a consequence, the exceptional circumstances required by the NPPF to release land from the greenbelt have not been demonstrated.

Public transport links to Coventry are poor and the proposal will only encourage increased commuting by car and further congestion on already congested roads.

The green belt at old Milverton scores highly in value in comparison with other areas because it has been very successful in preventing the spread of Leamington and has stopped Leamington merging with Kenilworth. The proposed development would destroy this "Green Lung" reducing it to an ineffectual zone of less than 1.5 miles.

This area is among the highest public amenity value of any rural space in Warwickshire providing highly used public footpaths from a number of access points directly onto open country side. It is also very valuable and productive farm land with important wild life habitat which will be lost without suitable justification or local support. The area enables residents from the neighbouring towns to also experience the open countryside.

In addition to the separation of Leamington and Kenilworth the Greenbelt also protect Old Milverton. This small settlement, unique as one of the last surviving hamlets on the outskirts of Leamington, will have its identity and integrity totally compromised by these proposals as it will be physically and socially subsumed into a sprawling Leamington / Warwick conurbation.

Park and Ride

The proposed park and ride scheme is impractical and will put additional pressure on the retail success of Leamington because it will actually have the impact of driving shoppers to other towns. The proposed site is too close to Leamington to reduce traffic on the A452 and without dedicated buses, and bus lanes, it will be necessary for commuters to plan their usage in accordance with the bus timetable, making it inflexible and redundant. At present there is plenty of parking available in Leamington Spa and perversely Warwick District Council is planning a new multi storey car park!

The poorly conceived vision, by Stage Coach, that commuters will use the park and ride service to cross Leamington to a similar scheme on the south of Leamington is also flawed because there is no significant enhancement to the commute in this way.

This proposal makes the mistakes of other park and ride schemes which have not worked in practice. Oxford is the only real success example and has the dual advantages that there is so little parking combined with the fact that the city has sufficient attraction, and lack of competition, to allow it to take an anti-car policy within the city.

The Stratford upon Avon park and ride scheme has been reduced because of its lack of success and WDC have not assessed the required funding and loss of WDC income that would result from a private sector company being able to take over the parking revenue currently going to the Council.

In summary

The site is designated to provide houses for Coventry. Clearly to comply with the Coventry Plan this needs to be closer to Coventry to avoid excessive travel, congestion and meet sustainability and air quality requirements. The Plan fails to provide balanced investigations of the available sites. It is clear, in my opinion, that this site has again (as with earlier Plans) been included as a last minute addition in an attempt to justify a politically motivated plan to 'share the pain'. I would request that the Inspector takes into account the level of previous public objection to removing this land from Green Belt. At the previous Consultation the level of objections were greater than for any previous Consultation by Warwick District Council.

It is vital that the significant combined benefits of strategic development and public facility are protected by removing the proposal to develop on the North Leamington and Milverton greenbelt.

Yours faithfully

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