

# OLD MILVERTON AND BLACKDOWN JOINT PARISH COUNCIL

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15th. July 2013

*Dear Sir,*

## **LOCAL PLAN REVISED DEVELOPMENT STRATEGY: CONSULTATION 14th JUNE TO 29th JULY 2013**

We write in response to the consultation exercise for the Revised Development Strategy for the emerging Warwick District Local Plan published on 14<sup>th</sup> June 2013 (“the Revised Development Strategy”). Old Milverton and Blackdown Joint Parish Council (“the Parish Council”) make comments on this emerging strategy in order to help provide a vision for new development and shape the District in an appropriate manner that delivers sustainable development and accords with the national planning policy objectives.

The Parish Council recognises the enormity of the task that faces Warwick District Council (“the Council”) in providing new growth whilst balancing environmental, planning and other objectives. It welcomes a Local Plan that is based on sound principles and robust evidence to ensure that it provides a solid framework upon which to guide future development.

The Parish Council does not seek to challenge the number of new houses included in the Revised Development Strategy. We understand that the Council has estimated future housing need in accordance with guidance issued by the coalition Government and that if the Local Plan contains too few houses there is a risk that it will be found unsafe at Public Enquiry. The Parish Council simply asks the Council to keep the housing requirement to a minimum.

A Joint Strategic Housing Needs Analysis is being performed with Coventry City Council. Should this review identify that it is necessary to increase the housing numbers above those included in the Revised Development Strategy, the Parish Council believe that there is sufficient non Green Belt land to accommodate this additional development.

The Parish Council believes that the Preferred Options for the New Local Plan published in June 2012 do not comply with the National Planning Policy Framework and that as a consequence a Local Plan based on the Preferred Options would be found unsound at Public Enquiry. The Parish Council is, therefore, pleased that the Council has recognised that the Exceptional Circumstances to develop the Green Belt to the North of Leamington do not exist and that as a consequence the risks of the Local Plan being found unsound at public enquiry are reduced.

The Parish Council believes that the Green Belt in Old Milverton and Blackdown serves all of the 5 purposes set out for Green Belt in the National Planning Policy Framework (“NPPF”) in that it:

- prevents the urban sprawl of built up areas from Leamington,
- prevents neighbouring towns (Leamington, Kenilworth and Coventry )from merging,
- protects the country side from encroachment from Leamington,

- preserves the setting and special character of the historic towns of Royal Leamington Spa, Warwick and Kenilworth; and
- assists urban regeneration by encouraging the recycling of urban land.

It is vital to preserve the limited green space between Leamington and Kenilworth. Otherwise there is a real risk Leamington and Warwick will merge with the West Midlands Conurbation.

The Revised Development Strategy considers Old Milverton to be a “Smaller and Feeder Village”. The population of Old Milverton Parish is small, 319 residents and 119 households (Source: Office for National Statistics March 2011). Nearly half of the population of Old Milverton Parish (126 adult residents (source: Electoral Register)) live on a modern housing estate which we understand will be transferred to Milverton Parish when the Parish Boundaries are reviewed in 2014. There are probably less than 50 adults living in the settlement of Old Milverton. Given its small and decreasing size, the Parish Council believes that Old Milverton should be regarded as a “Very Small Village and Hamlet”.

The Parish Council believes that new development should be concentrated where there are existing employment opportunities and infrastructure to support the development. It also believes it is essential for new development to be properly planned and controlled, and where necessary there is adequate investment in new roads and other infrastructure to support that development.

The Revised Development Strategy proposes that a substantial proportion of the new development is located close to where there are employment opportunities (to the South of Leamington & Warwick) providing an opportunity for people to live close to their place of work, reducing or eliminating commuting for many people, with a consequential positive impact on the environment and their quality of life. Furthermore there is almost unlimited green space to the south of Leamington where the nearest town is Banbury.

The Council is to be congratulated for preparing a Revised Development Strategy which, whilst providing a similar number of new houses for the District, removes the proposal to build 2,000 houses on the North Leamington Green Belt and, through the better use of Brownfield sites, results in only 325 further houses on Greenfield land South of Leamington.

The prospect of access to a good local workforce will help to encourage more businesses to set up and relocate to the area, helping to generate more jobs and prosperity for the local community.

The Revised Development Strategy provides for improvement to the road network South of Leamington to relieve the existing congestion and to cater for the new development. It is important that these road improvements are carried out as part of a coordinated plan. Traffic surveys show that road improvements can cope with the planned new development and that locating the majority of the development South of Leamington will reduce traffic movements, ease congestion and reduce pollution.

The Revised Development Strategy provides for the necessary schools and other infrastructure to support the new development.

The Revised Development Strategy has a fair distribution of new housing across the District. 16% of the new houses will be in the Green Belt North of Leamington, at Thickthorn and Lillington. 15% of the proposed development will be in Warwickshire Villages.

Although cycleways are mentioned in each phase of the Revised Development Strategy, detail is lacking for such a key proposal for components of traffic management, environmental improvement and recreation. The cycle ways need linking

together and cycleways to larger places of Work and Educational institutions ought to be detailed and feature prominently.

The outline for the proposed development South of Leamington includes a new country park. If the country park is sited next to the existing houses with new housing beyond it, the result would be to make the park more accessible, reduce impact of further development on the existing houses; it could be crossed by cycle-ways and would act as a green-lung to reduce air pollution.

**Conclusion**

For the reasons set out above, with the exception of the classification of Old Milverton as a “Feeder Village” and improvement to the cycleways, the Parish Council supports the Revised Development Strategy.

Yours faithfully,

*Graham E. Cooper*

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