



The countryside charity  
Warwickshire

## **SOUTH WARWICKSHIRE LOCAL PLAN PREFERRED OPTIONS (Regulation 18) – CONSULTATION**

### **CPRE Warwickshire Responses March 2025** (collated from on-line text into one document)

#### **Chapter 1 Introduction**

ID: 100570

Section 1: Do you broadly support the proposals in the Introduction? If you have any additional points to raise with regards to this chapter please include them here.

A (Full Text):

The Plan Summary states, "Primarily, the Local Plan sets out how we will grow the South Warwickshire economy and create jobs through delivery of the net zero carbon agenda. It will ensure that the necessary infrastructure and the right type and number of homes are delivered to support the level of jobs we want to see across South Warwickshire to 2050." The driver of the SWLP is not to grow the area's economy or create jobs, but to meet an imposed housing requirement. There is no need for a Plan for the area's economy. It is successful, providing full employment.

#### **Chapter 2 Have Your Say** p21 para 2.3 'Call for Sites'

ID: 100569

Section 2: Do you broadly support the proposals in the How to Have Your Say chapter? If you have any additional points to raise with regards to this chapter please include them here.

A (Full Text):

The 'Call for sites' is unnecessary and undesirable. The planning authorities have the knowledge to identify sites and locations for development which meet the draft Plan's objectives and should present them at consultation stage. The 'call for sites' results in landowners and holders of options having undue influence on the proposals. The presentation of these submitted sites then creates blight on areas, and concern and potentially distress for local residents where such sites are published. The call for sites for

commercial renewable energy (solar farms. wind farms and BESS battery complexes) is particularly damaging. This should be cancelled.

## Chapter 3 Vision and Strategic Objectives

Page 22-25

ID: 103896

Section: Do you broadly support the proposals in the Vision and Strategic Objectives: South Warwickshire 2050 chapter? If you have any additional points to raise with regards to this chapter please include them here.

Summary and Full Text:

The strategic objectives are mostly sound but Objectives 1 and 2 undermine the aims of the others. Objective 1 'Supporting an appropriate level of growth which is proportionate in scale' and Objective 2 'Meeting South Warwickshire's current and future housing need' actually mean high levels of new housing: 54,700 more houses during 2025 to 2050. This is wholly out of scale with the existing settlement pattern. This requirement has no link with current and future housing need; it is the area's share of a national target set by government. The scale of housing proposals prevents Objectives 7 to 12 being achievable.

## Chapter 4 Spatial Growth Strategy

Draft Policy Direction 1 (page 31) Meeting South Warwickshire's Sustainable Development Requirements

ID: 103809

Section: Do you agree with the approach laid out in Draft Policy Direction 1 - Meeting South Warwickshire's Sustainable Development Requirements? NO

Summary:

The Policy Direction is not supported. The scale of proposed development is much greater than is required. It is not required for natural change in the population and is almost wholly going to be occupied by people moving into the area. New housing around South Warwickshire's towns will harm their setting and generate harmful traffic. The numbers are not likely to be delivered in practice. Green Belt should not be undermined by development. New settlements in various rural locations would urbanise the countryside. Existing 'new settlements' (Long Marston Airfield, Gaydon-Lighthorne Heath, Kingshill) should be completed before any more are considered.

Full Text:

The Draft Policy Direction is not supported.

- The scale of proposed development is much greater than is required. The proposed annual housing target is a politically-generated figure imposed by the current government.
- The proposed housing numbers would require large areas of new housing around South Warwickshire's towns, harming their setting and making them sprawl and add to their traffic levels.
- The very high housing numbers (see footnote 1) are not likely to be delivered in practice, and political changes could result in very different housing numbers being issued within 5 years. The Local Plan should not provide for these huge numbers now: the scale of blight would be huge and developers would be able to choose the most profitable sites.
- This new housing is not required for natural change in the population, which will be small, and is almost wholly going to be sold to and lived in by people moving into the area.
- New settlements in various rural locations would urbanise the countryside, reducing farmland and overloading rural roads with traffic.
- There are three 'new settlements' in the existing Stratford and Warwick District Local Plans which have made slow progress (Long Marston Airfield, Gaydon-Lighthorne Heath, and Kingshill between Kenilworth and Coventry which has not started at all); these should be fully developed before any further such schemes are considered or commenced.
- The Green Belt should not be undermined by new development, and any change to Green Belt boundaries should be exceptional; there should be no new settlements in the Green Belt in either District

Footnote 1: The annual housing target is derived from the government's current policy to see 370,000 houses a year built in England; the share of this target number is 1,126 houses in Stratford District and 1,062 in Warwick District – total in South Warwickshire 2,188 per year. The Local Plan is proposed to run from 2025 to 2050 and the Councils set the total housing target as 54,700 houses to 2050. Of these, the Councils say that 26,500 can be provided by existing permissions or windfall sites in towns, and 28,250 will need to be delivered on new sites.

## Strategic Growth Locations

ID: 100576

Section: Strategic Growth Location SG04 South of Kenilworth

Do you support? NO

### Summary and Full Text

The land is in what was the "Forest of Arden Special Landscape Area", and retains the landscape character that justified SLA designation. The hill west of Rounds Hill is in the view from Kenilworth Castle. Housing on it would harm the Castle's setting. The land in SG04 is within the site of 'the Olde Parke', part of the deer park. Earthworks are still visible; housing development would destroy these and any other historical remains. The area includes a well-used footpath connecting Kenilworth to the countryside which would be lost. The land is good quality farmland which should be protected.

ID: 100577

Section: Strategic Growth Location SG05 East of Lillington

Do you agree with? NO

Summary & Full Text

This is sloping land facing SE which separates Lillington and Cubbington. It has footpaths and is much valued for recreation. It is Green Belt and meets the purposes of including land in the Green Belt. Developing it for housing would effectively extend Leamington's built-up area to include Cubbington. The construction of HS2 to the NE of Cubbington has already led to loss of valued local countryside. This would take away Cubbington's countryside on the other side of the village.

ID: 100581

Section: Strategic Growth Location SG06 North of Leamington

Do you agree with? NO

Summary & Full Text:

SG06 is much of the parish of Old Milverton & Blackdown. It is in the Green Belt and forms an essential part of Leamington's setting. It meets the purposes of Green Belt fully and its loss to housing would be damaging to the character of the town. Old Milverton is a small village that has retained very rural character despite closeness to Leamington and Warwick; this would be lost with housing close to it on site SG06. It is used for arable farming which can be continued next to the town. Public access is provided by footpaths.

ID: 100582

Section: Strategic Growth Location SG07 Wedgnock Park Farm (NE of Warwick)

Do you agree with? NO

Summary & Full Text

SG07 is open countryside which is immediately W of the A46 and in the Green Belt. It separates Hatton Park (now largely developed as housing) from Warwick and preserves the setting of the historic county town on its NW side. It is being suggested for warehousing (B8 use class) without any basis for there being a need for that type of employment in the Warwick/Leamington area. Wedgnock Park is former hunting park associated with Warwick Castle and has good rights of way - making it a valuable area for recreation for residents of the Cape and Woodloes area of Warwick.

ID: 100583

Section: Strategic Growth Location SG08 West of Warwick

Do you agree with? NO

Summary & Full Text:

SG08 comprises the fields between Warwick Racecourse and the Warwick Bypass. These fields are an important part of the setting of Warwick and are in the view from St Mary's Church tower and Guy's Tower. There are footpaths across these fields between Warwick and Hampton Magna.

The land around Warwick Parkway station, west of the A46, has lost its Green Belt role through development of extensive station car-parking. There are local authority uses of the land between the canal and the A4177 north of the railway. This would be a better location for housing, with direct access to the station.

ID: 100585

Type: No

Document: Preferred Options 2025

Section: Strategic Growth Location SG09 Land south of Europa Way

Do you agree with? NO

Summary:

SG09 is land south of Europa Way. It is rural land between the Banbury Road (A425) and the M40. It is beyond the limit of housing development in the Harbury Lane/Europa Way spread, and is farmed land of good quality. It appears to be an option for employment land. Red House Farm would effectively disappear. The WMSESS report on regional employment land potential has selected this location, though without any justification. It would not be easy for workers to reach and would depend on car access. As a location for B8 warehousing it would be wasteful of land.

ID: 100600

Strategic Growth Location around Bishops Tackbrook

Do you agree with? NO

Summary:

SG10 around Bishops Tachbrook would if developed absorb Tachbrook into the Leamington urban area, ending its village character and setting. The land SE of Europa Way is the last block left as rural land between Leamington and the A452. Making it a strategic growth location would mean building on Windmill Hill which has an ancient mound (Scheduled). There are limited services at Bishops Tachbrook and the school has no spare capacity.

ID: 100607

Section: Strategic Growth Location SG11 South East of Whitnash

Do you agree with? OTHER = not yes or no)

Summary and Full Text:

This is a very large area of farmland, 354 ha. It includes Tachbrook Mallory, the prominent wood on Highdown Hill and two farms. The land SW of Harbury Lane would not be a suitable strategic growth extension. The land between Harbury Lane and the railway is the site of the 1930s Leamington Airfield and includes a scrapyard and a container storage base. It lies in the area of Whitnash Town Council and part is suggested for a new settlement ('X2'). An urban extension here is possible, but that would depend on the future of the golf course.

ID: 103036

Section: Strategic Growth Location SG12 Southam

Do you agree with? NO

Summary and Full Text:

SG12 - development around Southam. Southam has already expanded beyond its natural boundaries (including beyond its bypass). The town is car-dependent with relatively poor public transport. Recent housing (on the north and south of the town) is some distance from the town centre and has limited services. Further housing areas would increase unsustainable development. Further housing will mean more traffic on the roads to/from the town with consequences of delays and reduced road safety. SG12 should not be proceeded with. Small infill sites within the town can deliver social housing to meet local need.

ID: 103095

Section: Strategic Growth Location SG13 Gaydon-Lighthorne Heath

Do you agree with? NO

Summary and Full Text:

SG13 Gaydon-Lighthorne Heath: this is a new settlement in the adopted Stratford Core Strategy. Development has been slow and will take years to complete to the size approved. GLH is not a sustainable location; it is dependent for access largely on the M40 through Junction 12, and the motorway's purpose is to carry national through traffic, not to provide for local journeys. The suggested locations including parts of the test-track (former airfield) would extend the settlement substantially while delivering no viable form of public transport. Gaydon - a conservation village - would lose its character. SG13 should not be included.

ID: 103128

Section: Strategic Growth Location SG14 East of Gaydon

Do you agree with? NO

Summary and Full Text:

SG14 East of Gaydon: This is across the M40 from Gaydon-Lighthorne Heath. GLH is a new settlement in the adopted Stratford Core Strategy. Development has been slow and will take years to complete to the size approved. GLH is not a sustainable location; it is dependent for access largely on the M40 through Junction 12, and the motorway's purpose is to carry national through traffic, not to provide for local journeys. The suggested location would extend GLH across the motorway and develop farmland and woodland, with no viable form of public transport. SG13 should not be included.

ID: 103177

Section: Strategic Growth Location SG15 North of Wellesbourne

Do you agree with? NO

Summary and Full Text:

SG15 North of Wellesbourne: Wellesbourne has already expanded beyond its natural boundaries. What was a village has already grown beyond its natural extent. It is car-dependent with some but not much public transport. SG15 includes very large areas of countryside north of Wellesbourne on both sides of the A429. This would take much BMV agricultural land, against planning policy. It would generate large traffic flows on what is already a busy road, with consequences of delays and reduced road safety. SG15 should not be proceeded with. Small infill sites within Wellesbourne can deliver social housing to meet local need.

ID: 103199

Section: Strategic Growth Location SG16 South of Wellesbourne

Do you agree with? NO

Summary and Full Text:

SG16 South of Wellesbourne: Wellesbourne has already expanded beyond its natural boundaries. What was a village has already grown beyond its natural extent. It is car-dependent with some but not much public transport. The two recent housing developments accessed off the A429 south of the original village are car-dependent and are beyond the bypass of the original village. Development at Wellesbourne Airfield should be limited to existing sites where there are buildings. The actual airfield should not be reduced in size further. Small infill sites within the older parts of Wellesbourne can deliver social housing to meet local need.

ID: 103273

Section: Strategic Growth Location SG17 Shipston-on-Stour  
Do you agree with? NO

Summary and Full Text:

SG17 Shipston-on-Stour: Shipston is an attractive town close to the Cotswold AONB. It has suffered new development to its west and at its southern entrance. SG17 would result in extensive development east of the Stour, destroying the setting of Shipston and the close-by hamlet of Barcheston, which has been carefully protected until now. The Stour itself is in a flood risk zone. SG17 would also extend the town up the slope to its southwest. The character of Shipston, set between hills to west and east, would be lost.

ID: 103379

Section: Strategic Growth Location SG18 West of Stratford-upon-Avon  
Do you agree with? NO

Summary and Full Text:

SG18 West of Stratford-upon-Avon: SG18 would extend the built-up area beyond the A46 Bypass, its natural limit, and beyond the Western Relief Road between A46 and B439 Bidford Road. A large part of SG18 is Green Belt. The part south of the A46 would result in Shottery, a historic village on the western edge of the town, being encircled by development. Developing this land would require extensive new provision of services and would lead to largely car-dependent housing. The part of SG18 within the bypass would be suitable for housing; the P+R car park is too large for actual need.

ID: 103442

Section: Strategic Growth Location SG19 East of Stratford-upon-Avon  
Do you agree with? NO

Summary and Full Text:

SG19 east of Stratford-upon-Avon: The larger part of SG19 would extend the town to the south, beyond the eastern extension of the Southern Relief Road, which should stay its boundary. That would result in housing in the Orchard Hill Farm area, too far from the town centre to be walk- or cycle-able. Some limited development north of the A422 Banbury Road may be possible without harming the character and setting of Stratford, though not on the scale shown for SG19.

ID: 103534



Section: Strategic Growth Location SG20 Bidford-on-Avon

Do you agree with? OTHER

Summary & Full Text:

SG20 Bidford-on-Avon: Bidford has suffered from localised sprawl northwards for several decades. There has not been a coherent plan that sets limits to the village's expansion; in each Local Plan more housing is added. SG20 would perpetuate this pattern. It would also add housing areas to the east of Bidford, extending almost as far as the conservation village of Ardens Grafton to the NE. Bidford is not a sustainable location for major development, with one bus service (Stratford-Evesham). Small sites on the north and west of Bidford to meet local need and provide social rented housing should be included.

ID: 103585

Section: Strategic Growth Location SG21 Alcester

Do you agree with? NO

Summary & Full Text:

SG21 Alcester: The suggested development location is in the Green Belt and lies west of the A435 Alcester Bypass. It is attractive landscape and productive farmland and provides part of the setting to the historic town.. The bypass is a clear and effective western limit to the town. Alcester is not served by rail and is largely car-dependent. Access to SG21 would appear to be from the A422 which runs through the village of Arrow, the estate village of historic Ragley Hall. The traffic generated by development of SG21 would be damaging to that locality. SG21 should not be pursued.

ID: 103655

Section: Strategic Growth Location SG22 West of Studley

Do you support? NO

Summary & Full Text:

SG22 west of Studley: SG22 is west of the A448 and in Sambourne Parish (the group of houses known as Middletown). It is in the Green Belt which performs an important function in containing the large town of Redditch. Studley is effectively contained by the A448 on the west and the A435 on the east. Sambourne is a village 'washed over' by Green Belt which has retained its separate character. SG22 if developed would have no natural boundary and would lead in time to further development towards Samborne. SG22 should not be taken further.

ID: 103731

Section: Strategic Growth Location SG23 Henley-in-Arden

Do you agree with? NO

Summary & Full Text:

SG23 Henley-in-Arden: Henley-in-Arden (with Beaudesert) is a very small historic town set in the Green Belt. It lies in a valley with open land either side; the railway is an effective western boundary. Beaudesert Park north of Henley is part of its setting. Crocketts Farm west of the railway, reached by a narrow private road, is a closed golf course. It could reopen or be returned to agriculture. Development there would be unsustainable, being car-dependent without services. Henley has a rail service, but that does not justify new development. Its historic character and tourist value require that it stays small.

ID: 103780

Section: Strategic Growth Location SG24 Hockley Heath

Do you agree with? NO

Summary & Full Text:

SG24 Hockley Heath: Hockley Heath is a village in Solihull which has Stratford District on its west, south and east. SG24 would add housing on all sides in an unplanned way around the small street-based settlement on the A3400. There are limited services in Hockley Heath which depends on Dorridge or Solihull for all needs. SG24 includes wooded land between the Stratford Canal and Cutthroat Lane. This is very rural, served by narrow lanes. It is not a sustainable location for development in any way. The whole area is Green Belt and meets its purposes. SG24 should not be pursued.

## Draft Policy Direction 2 - Potential New Settlements (page 39)

ID: 104687

Do you agree with the approach laid out in Draft Policy Direction 2 - Potential New Settlements?

NO

Summary:

The Policy Direction is not supported. The scale of proposed development is much greater than is required. It is not required for natural change in the population and is almost wholly going to be occupied by people moving into the area. New housing around South Warwickshire's towns will harm their setting and generate harmful traffic. The numbers are not likely to be delivered in practice. Green Belt should not be undermined by development. New settlements in various rural locations would urbanise the countryside. Existing 'new settlements' (Long Marston Airfield, Gaydon-Lighthorne Heath, Kingshill) should be

completed before any more are considered.

Full Text:

The Draft Policy Direction 2 is not supported.

- The scale of proposed development is much greater than is required. The proposed annual housing target is a politically-generated figure imposed by the current government.
- The proposed housing numbers would require large areas of new housing around South Warwickshire's towns, harming their setting and making them sprawl and add to their traffic levels.
- The very high housing numbers (see footnote 1) are not likely to be delivered in practice, and political changes could result in very different housing numbers being issued within 5 years. The Local Plan should not provide for these huge numbers now: the scale of blight would be huge and developers would be able to choose the most profitable sites.
- \* The housing requirement for Coventry has been reduced significantly in the table of annual housing targets by LPA issued with the Dec 2024 NPPF. Coventry now has a surplus of housing supply over need under the Dec 2024 policies, so the city can take some of the housing numbers currently specified for Warwick and Stratford Districts.
- This new housing is not required for natural change in the population, which will be small, and is almost wholly going to be sold to and lived in by people moving into the area.
- New settlements in various rural locations would urbanise the countryside, reducing farmland and overloading rural roads with traffic.
- There are three 'new settlements' in the existing Stratford and Warwick District Local Plans which have made slow progress (Long Marston Airfield, Gaydon-Lighthorne Heath, and Kingshill between Kenilworth and Coventry which has not started at all); these should be fully developed before any further such schemes are considered or commenced.
- The Green Belt should not be undermined by new development, and any change to Green Belt boundaries should be exceptional; there should be no new settlements in the Green Belt in either District.

Footnote 1: The annual housing target is derived from the government's current policy to see 370,000 houses a year built in England; the share of this target number is 1,126 houses in Stratford District and 1,062 in Warwick District – total in South Warwickshire 2,188 per year. The Local Plan is proposed to run from 2025 to 2050 and the Councils set the total housing target as 54,700 houses to 2050. Of these, the Councils say that 26,500 can be provided by existing permissions or windfall sites in towns, and 28,250 will need to be delivered on new sites.

## New Settlement locations

ID: 103828

Section: Potential Settlement A1 South of Tanworth—in-Arden  
Do you agree with? NO

Summary & Full Text

A1: Land south of Tanworth-in-Arden: A new settlement here would be wholly out of character with the rolling Arden landscape. The land is all Green Belt and has strong biodiversity, and recreational value. It is not a sustainable location. It would require much infrastructure and generate traffic on rural roads. Tanworth-in-Arden is a conservation village whose setting has been effectively protected through the Green Belt and Conservation Area status for many years. Location A1 should not be pursued further.

ID: 103888

Potential Settlement A2 north of Tanworth-in-Arden

Summary & Full Text:

A1 Land north of Tanworth-in-Arden (Wood End): A new settlement here would be wholly out of character with the wooded Arden landscape. The land is all Green Belt and has strong biodiversity, and recreational value. It is not a sustainable location. It would require much infrastructure and generate traffic on rural roads. Tanworth-in-Arden is a conservation village whose setting has been protected through Green Belt and Conservation Area status for many years. The valley north-east of Tanworth is a particularly attractive landscape and the best approach to the village, along the Umberslade to Tanworth avenue. Location A2 should not be pursued.

ID: 103869

B1 Potential Settlement at Hatton Question B1

Summary:

B1 Land at Hatton. A new settlement here would be wholly out of character with the Arden landscape. The land is all Green Belt and has strong recreational value. The land proposed is not a sustainable location. Hatton already has a large settlement, Hatton Park, is in effect a new settlement. It has been taken out of the Green Belt. Hatton railway station has minor road access and has limited services Additions to Hatton Park on the east side would be the least harmful way to add to existing development in the area, with a foot/cycle route to Warwick Parkway.

Full Text:

B1 Land at Hatton. A new settlement here would be wholly out of character with the rolling Arden landscape. The land is all Green Belt and has strong biodiversity, and recreational value. The Grand Union Canal with the Hatton staircase of locks is a Conservation Area. The land proposed is not a sustainable location. It would require much infrastructure and generate traffic on rural roads. Hatton is a dispersed village, composed of several groups of houses. Hatton Station, which is in Shrewley Parish, is a community itself, as is the village around the church and school. Hatton already has a large settlement, Hatton Park, the former Hatton and King Edward VII hospitals, which have been converted and have been surrounded by new housing. Hatton Park is in effect a new settlement. It has been taken out of the Green Belt. Hatton railway station has access along minor roads only, and has limited

services (compared to Warwick Parkway station) and these cannot be increased without detriment to the quality of service to other stations. The Leamington-Warwick-Stratford line is indirect and needs to operate without intermediate stops to be competitive with road. Its existence is not grounds for locating a new settlement at Hatton. Small additions to Hatton Park on the east side would be the least harmful way to add to existing development in the area, with a foot/cycle route to Warwick Parkway station, where the rail service is of good quality.

ID: 104176

Potential Settlement C1 Land south of Kingswood  
Do you agree with? NO

Summary & Full Text:

C1 Land south of Kingswood: This is open countryside between Kingswood (Lapworth Parish) and Rowington Green (Rowington Parish). The two canals, Grand Union (a linear Conservation Area) and Stratford, run through as does the Leamington-Birmingham main line. The M40 is to the west. The location is not sustainable. There are no main roads, shops or services in the general area. There is no access to the M40 and the one station, Lapworth, is 1.5-2km to the north. The canals make the area of recreational value which urbanisation would damage. Local roads are not suitable for more traffic.

ID: 104243

Section: Potential Settlement E1 Long Marston  
Do you agree with? YES

Summary & Text:

E1 Long Marston: Long Marston already has two half-settlements - Meon Vale and Long Marston Airfield. Confused decision-making during the preparation of previous Local Plans has resulted in areas of new housing development in both locations without an overall plan. A single settlement with reopened Stratford-Honeybourne railway line (alignment reserved in the SWLP) and a station at Long Marston (Depot) should be pursued. Without rail reopening Location E1 is not practicable as it would be unsustainable and dependent on car use. Long Marston Airfield (area developed) is too far from the line to be served by rail; it needs rethinking.

ID: 104288

Potential Settlement F1 Land west of Ufton  
Do you agree with? NO

Summary & Full Text:

F1 Land west of Ufton: This is a rural landscape east of the Fosse Way, a bowl of open countryside in which any major development would be prominent, notably from Ufton. It would not be sustainable development, being dependent on car use. Traffic to/from Leamington Spa would create congestion and dangers to road safety in Radford Semele. To the east, Ufton would be congested with additional traffic., Loss of farmland (366 ha) would be serious. F1 should not be pursued.

ID: 104411

Section: Potential Settlement F2 Land south of Deppers Bridge  
Do you agree with? NO

Summary:

F2 South of Deppers Bridge: new settlement proposals in the Felden area east and southeast of Leamington are in open countryside, would use valuable farmland (some BMV), are not near any existing large towns, and are not sustainable development. Proximity to the Banbury-Leamington (London-Birmingham) main line do not make such locations sustainable. No new stations are likely to be agreed as the line is full of fast passenger trains and intermodal and other freight trains. These locations should not be pursued further.

ID: 104429

Section: Potential Settlement F3 Land northeast of Knightcote  
Do you agree with? NO

Summary & Full Text

F3 Land northeast of Knightcote: new settlement proposals in the Felden area east and southeast of Leamington are in open countryside, would use valuable farmland (some BMV), are not near any large towns, and are not sustainable development. Proximity to the Banbury-Leamington (London-Birmingham) main line do not make such locations sustainable. No new stations are likely to be agreed; the line's capacity is used by fast passenger trains and intermodal and other freight trains. The land is overlooked from the Burton Dassett Hills (Country Park). A windfarm was refused permission on this location some 12 years ago.

ID: 104437

Section: Potential Settlement G1 Land west of Knightcote  
Do you agree with? NO

#### Summary & Full Text:

G1 West of Knightcote: new settlement proposals in the Felden area east and southeast of Leamington are in open countryside, would use valuable farmland (some BMV), are not near any large towns, and are not sustainable development. Proximity to the Banbury-Leamington (London-Birmingham) main line do not make such locations sustainable. No new stations are likely to be agreed; the line's capacity is used by fast passenger trains and intermodal and other freight trains. G1 location should not be pursued.

ID: 104463

Section: Potential Settlement X1 Land between Barford, Wellesbourne and the M40  
Do you agree with? NO

#### Summary & Full Text

X1 Land between Barford, Wellesbourne and the M40: This is open countryside east of the River Avon. It is farming landscape (some BMV land) with narrow roads. It would be dependent on cars unless costly public transport links were made with Warwick and Leamington. If M40 junction 13 were to be enlarged to handle more traffic (as is implied with this proposal) it would become a large, noisy and intrusive feature, which the present unlit one-direction interchange is not. Location X1 should not be pursued.

ID: 104502

Section: Potential Settlement X2 Land south of Whitnash west of Fosse Way  
Do you agree with? OTHER

#### Summary & Full Text:

X2 Land south of Whitnash west of Fosse Way: This is a very large area of farmland, 324ha. A new settlement is not supported; see instead response on SG11 Land SE of Whitnash. The land between Harbury Lane and the railway is the 1930s Leamington Airfield and includes a scrapyard and a container storage base. It lies in the area of Whitnash Town Council. An urban extension here is possible, though not extending as far south-eastwards as the Fosse Way. Much more work is needed to examine this; one factor would be the future of the golf course.

ID: 104595

Section: Potential Settlement BW Land at Bearley & Wilmcote  
Do you agree with? NO

#### Summary & Full Text

BW Land at Bearley and Wilmcote: The site (329ha) lies between the railway line and the

A3400 Stratford-Birmingham road plus some land around the village of Bearley. It is Green Belt, valuable farmland and crossed by footpaths. It forms part of the rural view on road and rail journeys to/from Stratford. It meets the purposes of including land in Green Belt. The A3400 is a busy road without bypasses (W-Wawen, Henley) so should not have more traffic. Trains on the railway need shorter journeys than now, so a stop at Bearley is undesirable. Location X1 should not be pursued further.

### Draft Policy Direction 3- Small Scale Development, Settlement Boundaries and Infill Development

ID: 104744

Section: Do you agree with the approach laid out in Draft Policy Direction 3- Small Scale Development, Settlement Boundaries and Infill Development? NO

#### Summary:

Policy Direction 3 is setting policies for rural villages. Under the strategy chosen, development will be in sustainable locations and not dispersed to villages. A review of the BUAB of villages which have them is not justified. Existing development control policies should be used to control development in villages. The '10% small sites' policy (NPPF) does not mean sites should be sought in villages to comply with it. Urban sites are at least as likely to provide that element of new housing that NPPF requires. This should be rewritten in the next version of the Plan.

#### Full Text:

Policy Direction 3 is setting policies for rural villages. Under the strategy chosen, development will be in sustainable locations and not dispersed to villages. A review of the BUAB of villages which have them is not justified. Existing development control policies should be used to control development in villages. The Policy states: "Consideration will be given to the need for the SWLP to identify a number of small sites in order to ensure provision of a 5-year housing land supply and meet the requirement in the NPPF for at least 10% of the housing requirement to be accommodated on sites no larger than one hectare." The '10% small sites' policy (NPPF) does not mean sites should be sought in villages to comply with it. Urban sites are at least as likely to provide that element of new housing that NPPF requires.

### Draft Policy Direction 4- Accommodating Growth Needs Arising from Outside South Warwickshire

ID: 104914

Section: Do you agree with the approach laid out in Draft Policy Direction 4- Accommodating Growth Needs Arising from Outside South Warwickshire?

#### Summary:



Policy Direction 4: This does not recognise that Coventry has a surplus of housing land supply and reduced annual housing requirement: under the NSM, an annual housing target 50% lower. It can now accommodate some of Warwick and Stratford Districts's housing requirements.

Change from the pre-Dec 2024 figures (DPA):

Warwickshire (all 5 Districts)	old SM 2315	NSM	3907	+1592
Coventry	old SM 3082	NSM	1388	- 1694

Coventry has an excess of supply over requirement of 7,900. SWLP requirement to 2040 can be reduced by 6-7.000. The LPAs should now negotiate for Coventry to accept some of the SWLP requirement.

Full Text:

Policy Direction 4: This as written at present does not recognise that Coventry has a surplus of housing land supply while having a much reduced annual housing requirement. There is no need to accommodate growth needs arising from outside the SWLP area. On the contrary, Coventry under the new Standard Method (NSM) has an annual housing target which is 50% of that in use before Dec 2024. Coventry can now provide for some of the higher requirement put on Warwick and Stratford Districts.

This table shows the change from the pre-Dec 2024 figures:

Dwellings per annum (DPA)

Warwickshire (all 5 Districts)	old SM 2315	NSM	3907	+1592
Coventry	old SM 3082	NSM	1388	- 1694

And Coventry has an excess of supply over requirement. Applying the new housing requirements, there is capacity for 7000 houses in Coventry to meet the needs of the Warwickshire districts - particularly Warwick and Rugby - which were forced in the last round of Local Plans (2016/18) ' to allocate land in their rural areas / Green Belt to 'meet the needs of Coventry' which have turned out to not exist.

We attach the report by policy consultant Gerald Kells of 28 Febuary 2025 to KOGG (Keep Our Green Belt Green) on the Coventry housing requirement and housing land supply.

The housing requirement to 2040 (the extent of the new Coventry Local Plan) for Warwick District can be reduced by 6-7.000 houses. (This allows for Coventry to accept some of Rugby's requirement which would otherwise be imposed on villages in the Green Belt in Rugby District.) The LPAs should now negotiate for Coventry to accept some of the housing requirement which the Dec 2024 NPPF has set for Warwick and Stratford Districts.

Draft Policy Direction 12- Locations for Employment Growth (Page 71)

ID: 105016

Section: Do you agree with the approach laid out in Draft Policy Direction- 12-Locations for Employment Growth? NO

Summary:

Policy Direction 12 - Employment Land: The case for more large-scale employment land allocations in South Warwickshire has not been made out. There is no requirement for B8 warehousing. The WMSESS recommends 75-125ha of land be allocated along the M40/A46 corridor for strategic uses (B2/B8 class uses). It has not been to public consultation. The two proposed locations would be damaging to the rural surrounds of Leamington + Warwick. The 'Red House Farm' site would extend the sprawl along Europa Way to south of Banbury Road. The 'Wedgnock Park Farm' location is in the Green Belt and separates Warwick and Hatton Park.

Full Text:

Policy Direction 12 - Employment Land: The case for more large-scale employment land allocations in South Warwickshire has not been made out at all. The SWLP area has full employment and there is no evident demand for more employment sites.

The amount of spare office space is considerable; any need for more B1 office floorspace is met by the market providing more in existing buildings.

There is no requirement for more B8 warehousing since the A5 corridor (northern Warwickshire, SW Leics, and Southeast Staffs) has a very large amount of B8 space.

The Preferred Options states (para 6.1) that WMSESS [West Midlands Strategic Employment Sites Study] (2024) recommends that 75-125ha of land be allocated along the M40/A46 corridor in South Warwickshire for strategic uses (B2/B8 class uses). There is no good ground for accepting this as requiring the Local Plan to allocate greenfield land, and at the upper level: "As per Section 4.1, we propose to plan for the upper limit of this (125ha) as recommended by the WMSESS (2024)".

The two proposed locations would be damaging to the rural surrounds of Leamington and Warwick.

1. The 'Red House Farm' site would extend the regrettable sprawl along Europa Way to south of the Banbury Road, as far as the M40. This is valuable farmland where a farm bridge was provided over the M40 in 1991.

2. The 'Wedgnock Park Farm' location is in the Green Belt and would in effect link Warwick with Hatton Park housing, removing the separation that exists today. It is listed as Strategic Growth Location SG07. As stated in response on SG07, Wedgnock Park Farm is open countryside which is immediately W of the A46 and in the Green Belt. It separates Hatton Park (now largely developed as housing) from Warwick and preserves the setting of the historic county town on its NW side. It is being suggested for warehousing (B8 use class) without any basis for there being a need for that type of employment in the

Warwick/Leamington area. Wedgnoek Park is former hunting park associated with Warwick Castle and has good rights of way - making it a valuable area for recreation for residents of the Cape and Woodloes areas of Warwick.

## Draft Policy D – Large Scale Renewable Energy Generation and Storage

ID: *(not recorded)*

Do you agree with the approach laid out in Draft Policy Direction D – Large Scale Renewable Energy Generation and Growth? NO

### Summary:

The draft Policy is incompatible with protecting the landscape of South Warwickshire, views from higher ground and viable agriculture. It places support for renewable energy (solar farms, wind farms) and battery storage over protection of the landscape and its character. Wind turbines, solar arrays in fields and BESS are industrial impositions. Solar arrays on industrial and commercial roofs should be supported instead; these are not mentioned in the Policy. Only by preventing solar on farm and open land will it be placed on roofspace. The Policy should be rewritten to give priority to roof solar and resist solar on farmland.

### Full Text:

Policy Direction D is incompatible with protecting the landscape of South Warwickshire, views from higher ground and viable agriculture. It places support for renewable energy (solar farms, wind farms) and battery storage (BESS) over protection of the landscape and its character. Wind turbines, solar arrays in fields and BESS are industrial impositions.

Policy D (c) states that proposals for renewable energy generation and storage will be supported where they ‘provide for a community benefit in terms of either profit sharing or proportion of community ownership or deliver local social and community benefits’. This is contrary to the law: community benefits, including financial or social benefits, are not material planning considerations and it is unlawful to take them into account or use them as justification for permitting a windfarm or solar farm. See Supreme Court 2019 Judgment: R (Wright) v Resilient Energy Severndale Ltd and Forest of Dean District Council [2019] UKSC 53

Solar farms have been permitted in parts of South Warwickshire. There is a group of solar farms southeast of Leamington, which take up good agricultural land and damage recreational value of footpaths. Their extent and the degree to which the countryside has been changed is shown on the OS extract map attached.

The draft Policy states that ground-mounted solar will be supported on ‘lower-quality agricultural land.... Grades 3b, 4 and 5’. There is little Grade 5 land in the SWLP area; most is Grade 3b. Grade 3b is not ‘lower-quality’ but the normal farmland of the Midlands, used for arable and stock. It should be protected from solar. Permitting use of farmland where it has ‘low biodiversity value’ will encourage conversion of arable land, since that has low biodiversity by definition,.

The draft Policy states that solar will be supported on Grades 1, 2 and 3a land if it ‘does not restrict the agricultural use of the land’. Solar arrays do restrict – indeed prevent – the use of land commensurate with its Grade – and apart from sheep grazing in some case from any agricultural use at all.

Solar arrays on industrial and commercial roofs should be supported instead; these are not mentioned in the Policy. Only by preventing solar on farm and open land will it be placed on roofspace. The Policy should be rewritten to give priority to roof solar and resist solar on farmland.

A similar policy wording is presented for windfarms, which restrict agricultural use if to a lesser extent.

The draft policy on wind energy includes no test of impact on landscape and views, only that the applicant must show that these have been considered. Wind turbines are industrial artefacts which by their form visually do not fit into rural landscapes; they draw the eye, and are intrusive. They are compatible with industrial locations and where there are groups of pylons (not single power lines).

The part of the policy that is supported is at (f): wind energy developers are to be required to demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal. This is a key safeguard, and it is important that it stays in the SWLP Policy. While this has been removed from the NPPF, the Local Plan can and should retain it.

BESS (Battery Energy Storage Systems) are industrial artefacts. They are not renewable energy, and are used for electricity trading in the electricity market by their operators. They are suitable for industrial estates and next to industrial and commercial buildings.

This part of Policy Direction D should be revised to state that BESS will not be permitted in open countryside or on any farmland; they should be located on or next to land in existing or proposed industrial or distribution use (Use classes B1 and B8).

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