



## Preferred Options 2025

Ended on the 7 March 2025

***Blue text = OMB parish council's response via the consultation portal. We have only included those questions to which we submitted a response.***

### 2. How to Have Your Say

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.

Although the consultation is carefully structured, it is very long, and to understand it fully it is necessary to read many more documents than just the 187 pages of the consultation paper itself. The number of supporting documents and the level of detail are too onerous for members of the public and other non-specialists (e.g. town and parish councillors) to be able to digest fully. The process therefore appears skewed towards planning professionals who are i) conversant with the terminology/issues and ii) have teams of people and resources to dedicate to it. Old Milverton and Blackdown Joint Parish Council (OMBJPC) feel that this should be acknowledged when considering the responses.

### 3. Vision and Strategic Objectives: South Warwickshire 2050

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. **Other**

OMBJPC supports the aims but notes that building on Green Belt land in SG06 would directly contradict two of the principles:

1) "A healthy, safe and inclusive South Warwickshire – enabling everyone to enjoy safe and healthy lifestyles..." SG06 offers 22m of footpaths per hectare which are well-used by people from all over Leamington and surrounding areas. It provides physical and emotional benefits as Supporting Document 4 shows.

2) "A biodiverse and environmentally resilient South Warwickshire." SG06 is high quality agricultural land, much of it Grade 2. The hedgerows and wildlife support biodiversity, as a WWT has found (see ombparish.org.uk/the-green-belt).

## 4. Meeting South Warwickshire's Sustainable Development Requirements

Table 5: Strategic Growth Locations

<u>Reference</u>	<u>Strategic Growth Location</u>
<u>SG06</u>	<u>North of Leamington Group</u>

Do you agree with proposed strategic growth location SG06 being considered for inclusion within the plan? **NO**

***Supporting Documents 1 to 4 outline OMBJPC's full position. Our 100 word summary is:***

1. Housing need can be met without building on green belt; exceptional circumstances not present.
2. Flawed analysis and reliance on removed paragraph 142 (NPPF) undermines Green Belt Review and future selection criteria.
3. SG06 not a 'sustainable location'; would promote car use.
4. SG06 fulfils the five purposes of Green Belt, contributing greatly to 'openness' and protecting the settings of historic settlements.
5. SG06 is high quality agricultural land, important for sustainability and security.
6. Planning Inspectorate rejected similar proposals in 2017.
7. SG06 already promotes the principles 'healthy, safe and inclusive' and 'biodiverse and environmentally resilient'.

## Draft Policy Direction 1 – Meeting South Warwickshire's Sustainable Development Requirements

The South Warwickshire Local Plan will make provision for the delivery of at least 1,679 dwellings per annum, in line with the HEDNA; with sufficient flexibility to accommodate up to 2,188 dwellings per annum, in line with the 2024 NPPF Standard Method. This equates to at least 41,975 dwellings over a 25-year plan period from 2025–2050, with sufficient flexibility to accommodate up to 54,700 dwellings.

After accounting for existing commitments, and an assumed windfall allowance, there remains a "to find" figure of 15,532 dwellings (HEDNA) or 28,257 dwellings (2024 Standard Method). This to find figure represents the scale of development to be accommodated by the SWLP.

In terms of employment need, the South Warwickshire Local Plan will plan for at least the following (in hectares) over the period 2021–2050. Note that in the table below, residual needs are shown in bold as negative figures; existing surpluses are shown in bold as positive figures:

	Stratford-on-Avon District	Warwick District	South Warwickshire
Residual (net) non-strategic industrial need (2021–50)	<b>-139</b>	<b>-78</b>	<b>-217</b>
Residual (net) office need (2021 – 50)	<b>-3</b>	<b>+14/-6.8<sup>[1]</sup></b>	<b>+11/-9.8</b>
Residual (net) strategic industrial site need (2021–45) <sup>[2]</sup>	-	-	<b>-75 to -125</b>

### Do you agree with the approach laid out in Draft Policy Direction 1 - Meeting South Warwickshire's Sustainable Development Requirements?

Old Milverton and Blackdown Joint Parish Council welcomes the preparation of the South Warwickshire Local Plan and its ability to accommodate the necessary development for the area and provide certainty. In particular:

- The Spatial Growth Strategy is supported.
- There is sufficient capacity at the Spatial Growth Strategy Option locations outside of the Green Belt to meet those dwelling and employment requirements.
- Exceptional circumstances do not exist for the release of Green Belt to meet the housing and employment needs of South Warwickshire.
- Any unmet needs of Coventry and Redditch must be met at locations adjoining those cities.
- In addition to making a strong contribution to Green Belt purpose 'checking the unrestricted sprawl of large built up areas' there are other constraints to development in SG06 including being least suitable for development in HELAA terms and significant areas of Grade 2 agricultural land.

Do you have any comments on a specific site proposal or the HELAA results? (please include site name and reference number as identified on the interactive map). **YES**

Various metrics applied to the potential sites indicate that SG06 should not be allocated for development. Much of SG06 was discounted from further consideration at HELAA Stage A, leaving just two parcels assessed in HELAA Stage B:

- SG06 (west side) scored 52 of a maximum of 82, putting it well into the top half of 'least suitable'.
- SG06 (east side) scored 69.14 of 82 and therefore in the top quarter 'least suitable' development locations.

In addition, much of the land in SG06 is Grade 2 agricultural land, defined as “Very Good Quality”. The development density between Coventry and North Leamington presented by sites SG01, 02, 03, 04, 06 and surrounding shaded sites risks joining these two historic settlements using Kenilworth as a bridge. They may represent sites for rapid and easy development, but this does not constitute ‘limited infilling’. Development on this scale is precisely what the establishment of the West Midlands Green Belt sought to prevent: a repeat of the huge concrete conurbation between Tettenhall and the Birmingham NEC. There has already been a recent increase in density of this vital rural gap with the development of Thickthorn and land to the west of the A46 following the last local plan.

## 4.2 Potential New Settlements

**Do you agree with the approach laid out in Draft Policy Direction 2 - Potential New Settlements? [Agree](#)**

The concept of new settlements intrinsically allows for better and more sustainable design. We would support any proposed site which does not over-urbanise the wider West Midlands area and which is not in the West Midlands Green Belt. New settlements should at all costs be avoided in narrow and restrictive parts of the Green Belt. The Green Belt is there precisely to prevent conurbation.

## 4.3 Small Scale Development, Settlement Boundaries, and Infill Development

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

The SWLP will identify Built Up Area Boundaries (BUABs) for settlements in South Warwickshire. This will include:

Reviewing, and where appropriate updating, existing adopted boundaries in the current Stratford District Core Strategy, Warwick District Local Plan, and Neighbourhood Development Plans;  
Identifying a suitable size threshold above which settlements should have a BUAB;  
Drafting boundaries for those settlements above the size threshold which do not currently have an adopted or draft BUAB.

The SWLP will review whether a revised settlement hierarchy classification is required to replace the current classifications in the Stratford District Core Strategy and Warwick District Local Plan.

The SWLP will support Neighbourhood Development Plans as an appropriate mechanism for making housing and employment allocations in smaller settlements.

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.

Small-scale development on unallocated sites will be supported in the following ways:

In Green Belt locations:

Limited infilling within Built Up Area Boundaries;

Limited affordable housing for local community needs, within or adjacent to Built Up Area Boundaries.

In non-Green Belt locations:

Housing, employment and other settlement related development, within or adjacent to Built Up Area Boundaries.

Where such sites are adjacent to Built Up Area Boundaries, a threshold site size will be established, below which such developments are likely to be acceptable. The threshold will be determined factoring in:

The scale of the settlement;

Whether the site falls into Spatial Growth Strategy Priority Areas 1-3 or outside these areas.

Where such sites fall within the Cotswold National Landscape, proposals will need to accord with other relevant policies in the SWLP.

**Do you agree with the approach laid out in Draft Policy Direction 3- Small Scale Development, Settlement Boundaries and Infill Development? Agree**

Old Milverton and Blackdown Joint Parish Council supports limited infilling within built up area boundaries within the Green Belt where it does not conflict with the five primary purposes of the Green Belt and where proposals contribute positively to the green/blue agenda.

## **4.4 Accommodating Growth Needs Arising from Outside South Warwickshire**

Under the Duty to Co-operate, the Council is obliged to engage proactively with certain prescribed bodies to address strategic cross boundary issues. There may be a need to look to accommodate 'unmet need' from the Coventry and Warwickshire Housing Market Area (HMA) and the Greater Birmingham and Black Country HMA. While both Stratford and Warwick districts are located within the Coventry and Warwickshire HMA, only Stratford lies within the Greater Birmingham and Black Country HMA.

It is yet to be established to what extent and what uses (e.g. housing and/or employment) there will be any unmet need from elsewhere within these housing market areas. Some of this need will be met by other constituent Local Planning Authorities within both HMA's; however, through Duty to Co-operate discussions; the Councils will commit to continually consider this need and work with those authorities on how this can be achieved.

### **What was said in the I&O**

The Issues and Options Consultation considered the need to meet housing needs (including unmet need arising from neighbouring authorities) within the vision however, it was felt that this should be given greater emphasis.

- Most respondents (62%) felt that the plan should not be contributing to addressing the unmet needs in the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) until 2031.
- Primarily developers and land promoters considered South Warwickshire should provide for neighbouring housing unmet needs, including beyond the proposed allocations in the Stratford-on-Avon District Council's Site Allocation Plan (SOADC SAP). They considered South Warwickshire has a responsibility to help address the unmet needs through the Duty to Cooperate (DTC). Some mentioned that, given South Warwickshire's size, it is acceptable to accommodate some unmet needs of other Local Authorities within the HMA.

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

The South Warwickshire Local Plan will be underpinned by a housing need and availability evidence base that considers the Coventry and Warwickshire Housing Market Area as well as the Greater Birmingham and Black Country Housing Market Area. This evidence base will consider a strategic approach that addresses any shortfall of land availability to deliver in full the Housing Market Area's Objectively Assessed Housing Need or other evidenced housing need arising outside South Warwickshire.

If evidence and the duty to co-operate process clearly indicates that there is a housing or employment need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within the South Warwickshire Local Plan, reserve sites will be released for this purpose, or when the relevant authority's 5 year housing land supply calculation falls below the thresholds set out in national planning policy guidance.

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

Old Milverton and Blackdown Joint Parish Council is aware that South Warwickshire is bounded by Coventry and Redditch and there may be unmet needs from those areas than have to be accommodated. However, it is clear from the previous Inspector's Report (2017) that addressed this matter, development to meet the unmet needs of Coventry will need to be located adjoining Coventry, rather than the edge of Leamington. The same principle would apply to Redditch.

In particular, land in the West Midlands Green Belt should not be used to accommodate housing need from other areas as this would defeat the purpose of the West Midlands Green Belt.

## 4.5 Infrastructure Requirements and Delivery

### Draft Policy Direction 5- Infrastructure Requirements and Delivery

Development proposals should be consistent with and contribute to the implementation of transport strategies set out in relevant strategies, including the West Midlands Rail Executive's Rail Investment Strategy, The Warwickshire Local Transport Plan, Warwickshire Rail Strategy, Cycling and Walking Infrastructure Plan, Bus Improvement Plan, Stratford-upon-Avon Transport Strategy and updates to these and other policy documents that may be prepared over the course of the lifetime of this Local Plan.

All new development must provide appropriate on- and off-site infrastructure. Development proposals of a strategic nature will need to contribute and help deliver infrastructure that is contained within the Local Plan and IDP.

In addition to strategic infrastructure requirements, the Local Plan will identify development requirements that will apply to each of the allocated sites. This will include requirements relating to e.g. ecology, flood risk, heritage, active travel, highways, education, healthcare, renewables and utilities.

### Do you agree with the approach laid out in Draft Policy Direction 5- Infrastructure Requirements and Delivery? **Other**

#### Summary:

The draft policy is not explicit enough. New development should only be allowed to commence once the necessary supporting infrastructure has been agreed, funded and planned for. Development should then take place at a parallel timescale to housing development and not kicked into the long grass. There is a genuine risk that new development at the scale required will overload or overlook infrastructure requirements. This is therefore perhaps the most important policy of all and should therefore be clear and watertight.

Full Text: The draft policy is not explicit enough. We support the notion that new development must provide appropriate infrastructure and that developers will be expected to provide / contribute towards it. However it should be a fundamental starting point that new development can only take place once the necessary supporting infrastructure has been agreed, funded and planned for. Development should then take place at a parallel timescale to housing development so that new housing developments have the appropriate

infrastructure in place from Day 1. There should be no opportunity for things to be kicked into the long grass, as has lamentably been the case on numerous previous occasions. There is a genuine risk that new development at the scale required will overload or overlook infrastructure requirements. This is therefore perhaps the most important policy of all and should therefore be clear and watertight. All development proposals should include a consideration of all necessary infrastructure (transport, energy, water, health, education) to support a truly sustainable place for people to live. They should also make it clear how these proposals will be funded and delivered on a parallel timeline to avoid isolated, unconnected or incomplete neighbourhoods which undermine the SWLP vision.

## 4.8 Safeguarding land for transport proposals

Local plans can use a statutory mechanism to safeguarding land for transport, preventing development from compromising the provision of future infrastructure projects. Safeguarding for transport infrastructure relates to the identification and 'saving' of land required to deliver transport infrastructure that may be required now or in the future. Where new and undecided planning applications either encroach or abut the area of land 'saved' by a safeguarded scheme, the local planning authority and local highway authority are required to consider the implications of the planning application on the future delivery of the safeguarded transport scheme.

An example would be if a proposed development encroaches or abuts a safeguarded transport scheme it will need to either provide a corridor to allow the safeguarded scheme to come forward or deliver (or partly deliver) the safeguarded transport scheme.

The Council or planning inspector can refuse the planning application if they believe that the development would prejudice the possibility of the safeguarded transport scheme coming forward, either through obstructing its route or restricting access for construction and maintenance works of the future infrastructure scheme.

### **What was said in the I&O**

The I&O document asked if the SWLP should include a policy to safeguard specific infrastructure schemes.

80% of respondents supported inclusion of a policy that safeguards infrastructure across the plan area. However, there was a view that Warwick district is being somewhat ignored in the current suggested infrastructure proposal.

### **Draft Policy Direction 6- Safeguarding land for transport proposals**

At this stage, the Preferred Approach is to carry forward existing safeguarding measures identified in the adopted Local Plans, where they relate to schemes that have not yet been implemented or completed. These may be amended as the evidence base is developed or supplemented by any additional measures that are identified through further work and consideration of reasonable alternatives. A revised policy would be subject to consultation at Regulation 19 stage.

Development within the areas safeguarded for the transport infrastructure highlighted in Figure 9 will not be permitted where it could inhibit the effective delivery of the infrastructure. The list below this policy direction represents an indicative schedule of protected schemes required to assist with the delivery of the overall spatial growth strategy for South Warwickshire, but this will be confirmed through consideration of any reasonable alternatives and transport modelling.



## Warwick District

Broad Locations for Park & Ride facilities to serve commuters travelling into Coventry and the Warwick / Leamington / Kenilworth areas including:

a Public Transport Interchange to serve Coventry South and the University of Warwick (including provision for Park and Ride and associated bus services, an active travel hub, very light rail and a new heavy rail station); and

A Park and Ride facility to serve the north of Leamington Spa (two areas of search are currently allocated on land near Bericote roundabout and Blackdown roundabout).

Safeguarding of land to deliver transport schemes to alleviate congestion and address deficiencies in sustainable transport provision in specific locations (e.g. potential delivery of a multimodal transport corridor to alleviate local road congestion and deliver modal shift in the south of Coventry area).

A proposed policy direction is to include the safeguarding of land to facilitate widening of rail corridors (e.g. to 'double track' the section of line between Coventry and Leamington).

## Both Districts

The Secretary of State for Transport issued revised safeguarding directions in relation to HS2 on 16 August 2016. It is not intended to reflect these on the policies maps but they can be viewed <https://www.gov.uk/government/publications/hs2-phase-2b-safeguarding-maps-warwickshire-staffordshire-leicestershire>.

Further land may be required for safeguarding where this can be justified, for example where latest Infrastructure Delivery Plans provide a more up-to-date list of programmed transport schemes.

**Do you agree with the approach laid out in Draft Policy Direction 6- Safeguarding land for transport proposals?** **OTHER**

This is a sensible principle, but the identified sites themselves may be inappropriately placed if they are identified prior to development areas being chosen.

## 4.9 Green Belt

Parts of South Warwickshire fall within the West Midlands Green Belt, whose fundamental aim is to prevent the sprawl of the West Midlands conurbation, by keeping land permanently open.

Some of South Warwickshire's most sustainable locations fall within the Green Belt. For example, all of our train stations are either in or close to the Green Belt. This means that to deliver a truly sustainable pattern of growth, the SWLP needs to consider all options, including Green Belt

options. A topic paper "[The Green Belt in South Warwickshire](#)" presents an introduction to the purposes of Green Belt, and choosing sustainable locations for growth.

The 24 strategic growth locations and 12 new settlement locations put forward in the SWLP Spatial Growth Strategy (sections 4.1 and 4.2 in this document) include a mixture of Green Belt and non-Green Belt locations. Further work will be carried out to determine which of these areas can be considered the most sustainable; and consequently, whether there is an argument that "exceptional circumstances" exist which would justify releasing some Green Belt land for development.

A key part of the evidence which will inform this argument is a Green Belt Review. This assesses the contribution that different areas of land make to the five purposes of Green Belt:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns; and
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

So far, Stage 1 of the SWLP's [Green Belt Review](#) has been completed, which assesses parcels of land around settlements which are adjacent to the Green Belt or "inset" within the Green Belt designation; and broad areas of land between these parcels. Stage 2 of the Green Belt Review will assess the performance of specific sites, where these are being considered for development. It will also assess villages which are currently "washed over" by the Green Belt designation to consider whether the built up areas of these villages should be removed from the Green Belt designation. Stage 2 will be available after the Preferred Options consultation.

The recently published 2024 NPPF has made some significant changes to how Green Belt is handled in national policy. One of the most notable changes is the introduction of the concept of "Grey Belt" land, which relates to areas of Green Belt which are previously developed and/or do not strongly contribute to Green Belt purposes a), b) or d) as referred to above. These changes were only just introduced prior to the Preferred Options consultation and so it is not possible to state with certainty how this will affect the SWLP's consideration of Green Belt.

### **What was said in the I&O**

At the previous Regulation 18 Issues & Options consultation, no specific question was asked around Green Belt. The following comments were made regarding Green Belt:

- Not enough emphasis on Green Belt at the Issues and Options stage of the Local Plan
- General opposition to development within the Green Belt.
- Green Belt is highly valued in the area, providing benefits for both physical and mental health.
- Developers see Green Belt as a significant material consideration, and it is likely that the policy-off approach will need to be revisited during the next stage of plan making.
- Landowner and developer/site promoter responses generally agreed with the necessity of a Green Belt Review in Part 1 (of the Plan).
- Some Parish Councils and individuals argued that the release of Green Belt land would be unjustified and in contradiction to recent government policy.

## Draft Policy Direction 7- Green Belt

The SWLP will apply national planning policy to proposals within the Green Belt.

Section 4.1 of this document sets out that after utilising suitable urban brownfield sites, there are 24 identified potential strategic growth locations outside of urban areas. These 24 locations include a mixture of Green Belt and non-Green Belt locations. Similarly, the 12 new settlement locations (section 4.2) include a mixture of Green Belt and non-Green Belt locations.

The SWLP will take a sequential approach to allocating strategic areas of growth and new settlements. Further evidence will be gathered on the relative sustainability of each of these areas. Some of this evidence will come from the Stage 2 Green Belt review, regarding the contribution an area makes to Green Belt purposes, and the impact on the wider Green Belt if an area was to be released. This additional evidence will enable a considered assessment of whether there are sufficient sustainable non-Green Belt locations to accommodate South Warwickshire's housing and employment land needs. If so, then there will be no requirement to release land from the Green Belt. However, if there are clear sustainability benefits to utilising one or more Green Belt locations, then this will form the basis of an argument that "exceptional circumstances" exist to justify releasing that land from the Green Belt.

The SWLP will review those villages which are "washed over" by Green Belt designation and consider whether there is justification for "insetting" any of these villages – i.e. removing the built up area of the village from the Green Belt designation.

The SWLP will also consider whether the Spatial Growth Strategy's patterns of development result in a justification for any new Green Belt. The SWLP will also need to consider whether any areas of safeguarded land should be identified in order to meet longer-term development needs beyond the plan period. Areas of existing safeguarded land such as the land at Westwood Heath designated in the adopted Warwick District Local Plan will also need to be revisited to determine whether they are suitable for development, based on the latest available evidence.

**Do you agree with the approach laid out in Draft Policy Direction 7- Green Belt? Disagree**

### Summary:

Our understanding is that Policy Direction 7 is flawed due to its reliance on Paragraph 142 of the old NPPF. This provided scope for authorities to take into account "the need to promote sustainable patterns of development". It was removed in July 2024. The current NPPF makes no provision for sustainability being the determining factor for whether green belt land can be used over non-green belt land. The legacy policy (old paragraph 142) is present in the Spatial Growth Strategy and in the Draft Policy Direction 7. It will therefore misleadingly inform the preferred option unless corrective action is taken.

Full Text: Our understanding is that Policy Direction 7 is flawed due to its reliance on Paragraph 142 of the old NPPF. This provided scope for authorities to take into account "the need to promote sustainable patterns of development". It was removed in July 2024. The current NPPF makes no provision for sustainability being the determining factor for whether green belt land can be used over non-green belt land. The legacy policy (old paragraph 142) is present in the Spatial Growth Strategy and in the Draft Policy Direction 7. It will therefore misleadingly inform the preferred option unless corrective action is taken. New

paragraphs 146 and 147 allows that green belt can be released if housing need cannot be met elsewhere, which is not the case in South Warwickshire. Sustainability is only mentioned in Paragraph 148, in the context of a green belt location needing to be sustainable if it is to be released. This can happen after all other sites / options have been considered. Paragraph 148 states: “where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”

## 4.11 Using Brownfield Land for Development

### **Draft Policy Direction 9 - Using Brownfield Land for Development**

The SWLP Spatial Growth Strategy will make full use of suitable urban brownfield land before development is considered in other locations.

Where available brownfield land is located outside of urban areas, decisions on its use will have reference to the sustainability of the location, with regard to the Spatial Growth Strategy priority areas 1-3; and/or whether its use would increase the sustainability of the area as part of a large-scale development such as a new settlement.

Where brownfield land is not considered to be in a sustainable location for residential or employment uses, consideration will be given to other potential beneficial uses. For example, environmental, leisure or agricultural uses.

**Do you agree with the approach laid out in Draft Policy Direction 9 - Using Brownfield Land for Development? **Agree****

## 11.10 Areas of Restraint

Areas of Restraint are currently a Stratford only designation that seek to protect sensitive areas within a settlement that make an important contribution to the character of that settlement.

### **What was said in the I&O**

The issues and options consultation asked whether we should remove Areas of Restraint across South Warwickshire, whether we should maintain them and introduce Areas of Restraint across all of South Warwickshire, or whether we should keep them within Stratford District and not introduce within Warwick. There was support for maintaining Areas of Restraint, and identifying areas within Warwick District.

Some developers felt that the areas could be captured in landscape and historic policies.

### **Draft Policy Direction-45- Areas of Restraint**

- Areas of Restraint will be utilised across the two districts, with Stratford designations being reviewed, and new designations being identified within Warwick where appropriate.

- Areas of Restraint will seek to protect areas that make an important contribution to the character of the settlement.
- The policy will seek to ensure that development does not harm the open nature of these identified areas, unless the scheme has demonstrable community benefits and contributes significantly the Local Plan's core objectives.
- Projects which enhance the character and visual amenity of Areas of Restraint will be encouraged, as will the promotion of beneficial uses such as public access, nature conservation and food production.

### Do you agree with the approach laid out in Draft Policy Direction-45- Areas of Restraint?

#### Agree

Land in between Kenilworth, Coventry and North Leamington would benefit from being designated an Area of Restraint. Developments over the last five years have led to the gap narrowing considerably. Designating it an Area of Restraint would ensure that the open nature is preserved and that the purposes of the green belt here are maintained. It would have an opposite, positive effect to that of possible development in SGs 1-6. SG06 in particular is agricultural land with leisure benefits offered by the rural footpaths. It therefore meets the criteria outlined in the draft policy.

## 11.14 Agricultural Land

The best and most versatile agricultural land should be protected from development. This is increasingly important in the view of producing more food locally to reduce overall greenhouse gas emissions and reduce reliance on other countries for imported food items that can be grown locally. Lower grade agricultural land may be used to cultivate non-food crops such as biomass.

The policy should aim to protect the best and versatile agricultural land and only allow development if the benefits of the developments outweigh the protection provided to the land.

#### What was said in the I&O

Issue B8- Agricultural land was included to get views on this issue. A question was asked as to whether to include a policy safeguarding the best and versatile land agricultural land, unless it can be demonstrated that the harm to the agricultural land outweighs the benefits of the development to the area.

90% respondents were in favour of including a policy that would safeguard the best and most versatile agricultural land.

### Draft Policy Direction-49- Agricultural Land

- Development outside the identified growth strategy sites/ settlements will be required to protect best and most versatile agricultural land.
- Any development that is put forward in the best and most versatile agricultural land will need to demonstrate that the benefits of the development outweigh the harm.
- The large-scale renewable energy developments will be prioritised on the poor-quality agricultural land (Grades 3b, 4 and 5).

## Do you agree with the approach laid out in Draft Policy Direction-49- Agricultural Land?

### Agree

We support these principles. It is important to remember that, where agricultural land exists within green belt land, it may be performing more than one important function. The valuable contribution of agricultural land should not be ignored in the face of nomination as green belt land; both statuses should be considered individually and with regard to their own distinct functions and purposes.

Do you broadly support the proposals in the A Biodiverse and Environmentally Resilient South Warwickshire chapter? If you have any additional points to raise with regards to this chapter please include them here. **Agree**

### Summary:

The land at SG06 represents some of the 'best and most versatile' agricultural land in the area. We are pleased that this consultation recognises the plans outlined in *A Green Future* and argue that, as part of this, the land at SG06 should be preserved as agricultural land. In addition we draw attention to a year-long study that we commissioned from Worcestershire Wildlife Trust which identified the wide range of wildlife in SG06. Further information on the area's biodiversity can be found at [www.ombparish.org.uk/the-green-belt](http://www.ombparish.org.uk/the-green-belt)

Full Text: The land at SG06 represents some of the 'best and most versatile' agricultural land in the area. In line with national policy we believe that the land at SG06 should be preserved as agricultural land. In addition we draw attention to a year-long study that we commissioned from Worcestershire Wildlife Trust which identified the wide range of wildlife in SG06. Further information on the area's biodiversity can be found at [www.ombparish.org.uk/the-green-belt](http://www.ombparish.org.uk/the-green-belt) . See also Supporting Document 4.

Land is a finite resource and any consideration of its status and contribution to planning goals (be they environmental, green/blue or recreational) should be thorough and wide-ranging. Whilst it may be correct to suggest that green belt is not an environmental designation in planning terms, it is also true that a green belt designation should not obscure other important contributions. Particularly, it should be recognised that green belt land can also have agricultural value, biodiversity value, social and welfare value and value in contributing to green/blue goals.