



Response to SWLP Preferred Options Consultation

Supporting document 1

Old Milverton and Blackdown Joint Parish Council strongly disagrees that SG06 is an appropriate area for inclusion in the South Warwickshire Local Plan. This document outlines why.

1. South Warwickshire's housing need can be met without building on green belt land.

The Local Plan's own Sustainability Appraisal shows that:

- Strategic Growth Locations which are NOT in the green belt have capacity for 48,500 dwellings (Table 5.1).
- New Settlements which are NOT in the green belt have capacity for a further 6,000 dwellings (Table 6.1).

This means that it is possible to meet housing need without building on green belt land. Sufficient capacity exists at sustainable Strategic Growth Locations outside the Green Belt to meet the Local Plan dwelling requirements to 2050. Therefore, exceptional circumstances cannot be met to release green belt sites to meet the housing requirements of Warwick District and Stratford on Avon District.

We are aware that South Warwickshire is bounded by Coventry and Redditch and there may be unmet needs from those areas that have to be accommodated. However, it is clear from comments on this matter in the previous Inspector's Report (2017), that 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 short, it is not necessary to remove green belt land in North Leamington from the West Midlands Green Belt for the purposes of the South Warwickshire Local Plan.

2. The Green Belt Review informing the Plan is flawed.

There are fundamental flaws in the Green Belt Review Stage 1 carried out by Arup in 2024 and published in September 2024.

i) Incorrect definition of 'large built-up area'

Supporting Document 2 sets out the view of an independent planning consultant commissioned by Old Milverton and Blackdown Joint Parish Council. It finds that the rationale for excluding Leamington Spa, Warwick and Stratford-upon-Avon from the definition of 'large built-up area' is

fundamentally flawed. The Green Belt Review posits that these towns ‘...sit on the edge of the Green Belt, rather than within it’. This leads the Green Belt Review to the presumption ‘...that the Green Belt was not intended to prevent their growth, and thus it does not seem appropriate to consider them as part of the “large built-up area”’.

This ‘presumption’ does not stand any logical scrutiny. If land on the northern edges of Leamington, Warwick and Stratford-upon-Avon was not intended to prevent their outward ‘sprawl’ it would not have been designated as Green Belt. Their growth was to be accommodated to the south and constrained by Green Belt to the north.

Government Planning Inspectors have found other West Midlands towns of a similar size to Leamington to be ‘large built-up areas’, most recently at a planning appeal at the start of this year [APP/E1855/W/22/3310099]. In Kidderminster (population 57,000) the Planning Inspector denied planning permission, finding that a site on the edge of the town makes a major contribution to Green Belt Purpose A. Leamington Spa’s population is 54,000.

The definition of ‘large built up area’ should be revisited in the light of recent judgements.

ii) Green Belt Review based on outdated NPPF

The SWLP’s approach to the Green Belt was explained in [The Green Belt in South Warwickshire \(October 2023, page 17\)](#) which references [archived NPPF Paragraph 142](#). Paragraph 142 provided scope for authorities to take into account “the need to promote sustainable patterns of development.”

This emphasis has shifted in the current NPPF, as paragraphs 146 and 147 show. Under current policy, the only referenced consideration for releasing green belt is if housing need cannot be met elsewhere. 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. However, as South Warwickshire’s housing need can be met by non-green belt sites, the circumstances provided for in paragraph 148 do not arise.

These provisions have been in place since July 2024. However, the SWLP Spatial Growth Strategy paper (November 2024) gives itself permission to take land out of the Green Belt using the outdated criteria:

Section 6.11: “If the additional evidence suggests that there are sufficient sustainable non-Green Belt locations to accommodate South Warwickshire’s housing and employment land needs, 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 existence of ‘clear sustainability benefits’ is no longer relevant or appropriate as this is not a criteria in the new NPPF. This is a very important change which we believe undermines the Green Belt Review and certainly undermines any attempt to remove SG06 from the green belt.

In addition, paragraph 148 goes on to say that “*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.*”

So in the latest NPPF guidance there is no provision for sustainability to determine whether green belt land can be used over non-green belt land but this legacy policy is present in the Spatial Growth Strategy and will therefore inform the preferred option unless corrective action is taken.

iii) Inaccurate assessments of SG06

We would have welcomed more time to study the Green Belt Review, particularly since it was produced and submitted to the SWLP team some time ago. We are still considering this document but one initial observation is that the assessments are not grounded in any detailed knowledge of the area.

Of the four parcels of land at SG06, three are assessed as making 'a moderate contribution' to the purposes of the green belt, and one 'a weak contribution'. These scores seem particularly low given the degree to which the parcels meet the five green belt criteria (see **Supporting Document 3**). We believe that the low scores may have arisen because the assessment was primarily desk-based and carried out by consultants who do not have a detailed knowledge of the area and did not speak to anyone who does.

There was just one visit to a single viewing point at each site. The viewing points were: the entrance to the footpath off Bamburgh Grove; the lay-by north of North Leamington School; the entrance to the footpath off Leicester Lane; the entrance to private fields off Westhill Rd, described in the report as 'a derelict site'. The essential characteristics of Green Belts are their openness and their permanence, and at least three of these viewing points give no sense at all of the openness of each location.

This continues the practice of relying on desk-based judgements without an understanding of the local area. The same thing happened in 2023, when assessments for the North Leamington Green Belt, tucked away in a 477 page appendix to the Sustainability Appraisal, made inaccurate judgements such as: development at these locations would be "unlikely to lead to coalescence of settlements"; development would give rise to "a minor negative impact on the recreational experience associated with these, and surrounding, footpaths".

Legal precedent makes it clear that green belt land to the north of Leamington Spa makes a strong contribution to Green Belt Purpose A. We strongly believe that there needs to be a more informed analysis of the contribution of green belt land at SG06.

3. SG06 is not a 'sustainable location'.

The Local Plan puts sustainability at its heart and wants new developments to be "20-minute neighbourhoods", where local services, including train stations and bus routes, are within a 10 minute walk. SG06 is not a sustainable location. It is a 30 minute walk (1.5 miles) to Leamington train station from the closest point and a one hour walk from the furthest (2.7 miles). At the same time, the SWLP's Housing and Economic Development Needs Analysis notes the short distance to the M40/A46 junctions (paragraph 4.52). This suggests an underlying acceptance of a continued reliance on cars, which in turn would exacerbate already unsustainable levels of traffic.

Comments have been submitted by Taylor Wimpey suggesting that further extensive development of infrastructure in SG06 would strengthen the case for development. This confirms that the area, as it stands, is not a sustainable location for development. The enormous levels of financial

investment that would be required to make it so have not even been acknowledged in the Preferred Options Consultation.

The original layout of Leamington Spa and the subsequent development in the 19th and 20th centuries precludes the construction of major new cross-town access routes. This would be an issue if more houses were built north of Leamington because they would need to access the retail and employment sites which lie predominantly to the south of the town alongside all of the major transport infrastructure access points.

Building houses in SG06 would promote car use rather than reduce it.

4. The Green Belt around North Leamington continues to fulfil the stated purposes of Green Belt land.

The five purposes of Green Belt land are to:

- A. check the unrestricted sprawl of large built-up areas
- B. prevent neighbouring towns merging into one another
- C. assist in safeguarding the countryside from encroachment
- D. preserve the setting and special character of historic towns
- E. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

An analysis commissioned by Old Milverton & Blackdown Joint Parish Council at the last round of consultation shows how SG06 meets all five of the above criteria (sent as an attachment). We would like to highlight:

Purpose A: The conjoining of North Leamington through SG06 to Kenilworth using other sites to the south and north of Kenilworth would see a corridor of urbanisation between Walsgrave in Coventry and Whitnash, south of Leamington.

Purpose A: By clustering so many Strategic Growth areas along the A46 between Coventry and the M40 the councils are risking creating one large linear development in an area already affected by HS2 and recent housing developments.

Purposes B and D: SG06 currently defends the individuality and distinctness of the historic settlements of Kenilworth, Leamington and Coventry. 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.

Purpose C: In addition to SG06, numerous other sites along the A452 were put forward in the Call for Sites. Once land is removed from the Green Belt for development this cannot be undone and a precedent is set which makes it easier for adjoining swathes of land to be built on. Therefore, were development to go ahead, the amount of countryside ultimately encroached on could be far greater than just the 360 acres of SG06.

These outcomes are precisely what the West Midlands Green Belt exists to prevent. The new National Planning Policy Framework (NPPF) reaffirms the importance and the purpose of the Green Belt. The land at SG06 fulfils all of these purposes.

5. The farmland is high quality agricultural land and makes an important contribution to sustainability and security of food supply.

National policy remains clear that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality should be preferred to those of a higher quality (NPPF, 2024). The highest concentration of ALC Grade 2 land around Leamington Spa and Warwick is to the north and east of Leamington Spa. The land making up these sites is, therefore, considered to be a scarce resource of high value for sustainable food production. The Government seeks to protect against the loss of such land from non-agricultural development. This policy will continue to grow in significance as the cost of imported wheat and grain drives up domestic food production needs.

6. Similar proposals were rejected by the Planning Inspector in 2017 and substantial changes in justification have not been made.

The Planning Inspector's 2017 response to the existing Local Plan for Warwick District states that there is a need "to maintain the separate identity of surrounding villages such as Leek Wootton and Cubbington and avoid significant reductions in the gap to Kenilworth" (p. 18, para 91). It also states that: "Development of the land in question would involve a substantial expansion of the built up area into currently open countryside to the north of Leamington Spa. It would have a significant adverse impact on the openness of the Green Belt and the character and appearance of the area" (p.34, para 201). This area has already suffered significant damage to openness and character with the construction of the HS2 railway line causing interruption of farmland and wildlife habitat. Further adverse development in the area would compound the significant adverse impacts that the Planning Inspector referred to in 2017. If anything, arguments for maintaining the Green Belt's contribution to the openness of the countryside, food production and biodiversity are stronger now than eight years ago when these comments were made.

7. SG06 contributes to two of the stated overarching principles of the South Warwickshire Local Plan: 'healthy, safe and inclusive' and 'biodiverse and environmentally resilient'.

i. A healthy, safe and inclusive South Warwickshire:

In surveys residents say that the open Green Belt location is the thing they value most about living in this area, with benefits for both physical and mental health. Use of the public footpaths increased markedly during the Covid 19 pandemic lockdown and has continued since. Area SG06 is distinctive green belt land because it is traversed by two miles (3.2km) of rural footpaths. Calculating this in terms of metres of footpath per hectare, we see that SG06 has a higher proportion of footpaths than the West Midlands Green Belt as a whole:

Land in the West Midlands Green Belt overall = 16m of footpaths per hectare

Land in SG06 = 22m of footpath per hectare

This makes it much more than fields providing openness and views. It makes a direct contribution to the health and wellbeing of the thousands of people who use the area each year. The views of some of them are summarised in **Supporting Document 4**.

ii. A biodiverse and environmentally resilient South Warwickshire:

A year-long local study, carried out by Worcestershire Wildlife Trust for Old Milverton and Blackdown Council over the course of 2023-2024 has observed a diverse range of plant and wildlife in SG06. The hedgerows, field margins and managed meadows provide habitats for:

- roe deer, Reeves muntjac deer, badgers, rural foxes and otters
- birds on the RSPB 'red list' including skylarks, swifts, fieldfares, house sparrows and starlings
- birds of prey such as sparrowhawks, peregrine falcons, kestrels, buzzards and red kites
- butterflies, dragonflies and damselflies
- plants which are vital for conserving the wildlife chain, for example musk mallow, bush vetch and yellow archangel.

The high quality agricultural land is now farmed by a single modern, established farming business. The land continues to provide rural employment and undergo diversification of farming techniques. Its use for modern arable, grazing and wildlife refuge benefits the environment as well as helping to preserve the characteristics of a rural Victorian village in Old Milverton.

Allowing development on SG06 would therefore undermine important principles that the Local Plan is elsewhere seeking to follow.