

**Comments on South Warwickshire Local Plan
Regulation 18 Preferred Options**

**Prepared for Old Milverton and Blackdown
Joint Parish Council**

January 2025

1. Introduction

- 1.1 Howard Cole has been instructed by Old Milverton and Blackdown Joint Parish Council (OMBJPC) to consider and comment on the Regulation 18 Preferred Option South Warwickshire Local Plan. The consultation period runs from 10th January to 7th March 2025. These comments are based on:
- 1.1.1 the Regulation 18 Preferred Option South Warwickshire Local Plan;
 - 1.1.2 the supporting evidence base (HELAA, Green Belt Review, Sustainability Assessment etc);
 - 1.1.3 the National Planning Policy Framework (NPPF) published in December 2024; and
 - 1.1.4 National Planning Practice Guidance.
- 1.2 Whilst supportive of the preparation of the South Warwickshire Local Plan, Old Milverton and Blackdown Joint Parish Council is particularly concerned with the identification of land north of Leamington as a potential Strategic Growth Area.

2. Regulation 18 Preferred Option South Warwickshire Local Plan

- 2.1 OMBJPC recognises that the Preferred Option Local Plan was agreed for consultation prior to the publication of the NPPF in December 2024. The NPPF expects plans to use the standard methodology to define the level of housing required over the plan period. Therefore, the annual housing requirement would be 1,126 for Stratford on Avon and 1,062 for Warwick (2,188 combined) giving a plan total of 54,700 for the period 2025-2050 (28,150 and 26,550 respectively).
- 2.2 The current Preferred Options Plan makes allowance for 54,450 of which 26,443 comprise existing commitments and windfalls leaving some 28,257 to allocate to meet the standard method. The Preferred Options Plan seeks sites for 28,000, so additional allocations to accommodate a further 3,000 dwellings will be needed if a reasonable 'flexibility buffer' is to be included giving a total of 31,000 additional allocations.
- 2.3 The Preferred Option Local Plan identifies a hybrid spatial development strategy based on the Sustainable Travel and Economy Spatial Growth Strategy with the existing urban areas being Priority 1. It is stated that there is insufficient urban brownfield land capacity to accommodate South Warwickshire's housing and employment needs and the Urban Capacity

Study 2023 identifies potential for some 1,254 additional dwellings [including implementation allowance] and a further 3,400 dwellings if public car parks were to be redeveloped. It is clear, however, that the NPPF expects ‘significant uplift’ in densities to be delivered in ‘city and town centres and other locations that are well served by public transport’¹

- 2.4 Taking the lower figure, allocations will need to be made for some 30,000 additional dwellings.
- 2.5 The Preferred Options Plan identifies 24 potential Strategic Growth Locations as well as 12 Potential New Settlements that conform to the Sustainable Travel and Economy Spatial Growth Strategy.
- 2.6 It is also stated that not all of these will be required to meet the identified housing and employment land needs over the plan period to 2050 and the consultation seeks views as to which sites should be selected.
- 2.7 The Sustainability Appraisal identifies capacity for 74,500 dwellings at the Strategic Growth Locations and 82,000 dwellings at the new settlements.
- 2.8 The NPPF is clear that where an authority cannot meet its identified need for homes, commercial or other development through other means, exceptional circumstances may exist for Green Belt release.
- 2.9 The Table below identifies those Strategic Growth Locations that are not in the Green Belt and their residential capacities.

Table 1

Strategic Growth Locations	Green Belt Status	Dwelling Capacity ²
SG08: West of Warwick	Non Greenbelt	1,696
SG09: South of Europa Way	Non Greenbelt	823
SG10: Bishop’s Tachbrook	Non Greenbelt	4,024
SG11: South East of Whitnash	Non Greenbelt	7,071

¹ NPPF paragraph 130

² Sustainability Appraisal Table 5:1

SG12: Southam	Non Greenbelt	3,464
SG13: Gaydon Lighthorne Heath	Non Greenbelt	4,539
SG14: East of Gaydon	Non Greenbelt	1,373
SG15: North of Wellesbourne	Non Greenbelt	9,221
SG16: South of Wellesbourne	Non Greenbelt	2,479
SG17: Shipston-on- Stour	Non Greenbelt	3,003
SG19: East of Stratford-upon-Avon	Non Greenbelt	5,469
SG20: Bidford-on-Avon	Non Greenbelt	5,361
Total dwelling capacity at Strategic Growth Locations located outside of the Green Belt		48,523

- 2.10 It is clear therefore that sufficient capacity exists at Strategic Growth Location outside the Green Belt to meet the Preferred Options Plan dwelling requirements to 2050 and that exceptional circumstances cannot be met to release green belt sites to meet the housing requirements of Warwick and Stratford on Avon.
- 2.11 On that basis SG06: North of Leamington should not be included in the Regulation 19 South Warwickshire Local Plan.
- 2.12 In addition, the Preferred Option South Warwickshire Local Plan also considers the potential for new settlements with X1: Land South of Leamington/North of Wellesbourne/east of Barford (indicative capacity 6,520), performing best in sustainability terms. This site is also outside the Green Belt.
- 2.13 OMBJPC 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 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).

- 2.14 In terms of the Green Belt Review, OMBJPC believes this to be fundamentally flawed, notwithstanding the evidence above that there are no exceptional circumstances to justify Green Belt releases to meet the housing and employment needs of South Warwickshire.
- 2.15 In particular, the rationale for excluding Leamington Spa, Warwick and Stratford-upon-Avon from the definition of large built-up area on the basis that they '*...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"*'.
- 2.16 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. In terms of being large built-up areas, Inspectors have found other similar sized towns in the West Midlands³ Green Belt to be large built-up areas.
- 2.17 On the basis of the above it is clear that the parcels to the north of Leamington Spa make a strong contribution to Green Belt Purpose A 'checking the sprawl of large built up areas'
- 2.18 There are also various metrics that are applied to the potential sites which further indicate that SG06 should not be allocated for development. These include the fact that much of SG06 was discounted from further consideration at HELAA Stage A. Leaving just two parcels assessed in HLAA Stage B. the HELAA assessment scores all of the sites across various criteria with the highest scoring being the least suitable. The land south of Sandy Lane, west of Kenilworth Road scored 52 of a maximum of 82, putting it well into the top half of 'least suitable'. Land east of Kenilworth Road, north and south of Sandy Lane scored 69.14 of 82 and therefore in the top quarter 'least suitable' development locations.
- 2.19 In addition, much of the land south of Sandy Lane and that north and south of Sandy Lane is Grade 2 agricultural land.

3. Summary and Objections to South Warwickshire Local Plan Regulation 18 Preferred Options

³ APP/E1855/W/22/3310099 site on edge of Kidderminster (popn 57,000 – Leamington Spa popn 54,000) makes major contribution to Green Belt purpose (a).

- 3.1 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.
- 3.2 In particular:
- 3.2.1 The Spatial Growth Strategy is supported;
 - 3.2.2 There is sufficient capacity at the Spatial Growth Strategy Option locations outside of the Green Belt to meet those dwelling and employment requirements and we support the allocation of the Spatial Growth locations identified at Table 1 above;
 - 3.2.3 Exceptional circumstances do not exist for the release of Green Belt to meet the housing and employment needs of South Warwickshire;
 - 3.2.4 Any unmet needs of Coventry and Redditch must be met at locations adjoining those cities; and
 - 3.2.5 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 SGO6 including being least suitable for development in HELAA terms and significant areas of Grade 2 agricultural land.