



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)

SELECTION OF RESPONSES RELEVANT TO HATTON AREA, WARWICK DISTRICT

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 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.

Section: B1 Potential Settlement at Hatton Question

Do you agree with? NO

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, 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

Section: 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: 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.

ID: 100582

Section: Strategic Growth Location SG07 Wedgnoek 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. 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 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.

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 February 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. 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 areas of Warwick.