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Response to SWLP Issues and Options Consultation

I set out below tailored responses to the Issues and Options Consultation:

Q-V3.1 & 3.2 – Vision and Strategic Objectives: there is still a national presumption that development will not be undertaken on greenbelt land. This is not reflected in the Vision and Strategic Objectives. The current wording appears to do the opposite. It should state that: 'avoiding development on greenbelt land will be prioritised at all stages of the plan development'.

We consider this is of vital importance because the green belt, generally but particularly in this area, plays a key role in (1) protecting the environment and cultural landscape, both now under great pressure partly through the development of HS2 and (2) in preventing urban sprawl (especially the creeping sprawl which appears to be occurring in and around Cubbington).

The other effect of privileging the protection of the green belt is that it forces planners and developers to think more carefully about urban regeneration, and using brownfield sites for housing development. Far better to concentrate housing in already built up areas than allowing low density urban sprawl to engulf rural areas.

Q-S3.1 - Urban Capacity Study: use of brownfield sites should be prioritised; green belt development should only be allowed where there is no other alternative. Have brownfield sites been proactively sought? Why does the urban capacity study appear to be biased to developing green belt land north of Leamington? This will go to the issue as to whether exceptional circumstances apply to green belt development (anywhere but particularly on the site between Weston and Hunningham) and in particular whether the WDC is able to demonstrate that it has “examined all the other reasonable options for meetings its identified need for development, including making use of brownfield land, increasing the density of existing settlements...” (NPPF).

QS4.1 Growth of Existing Settlements: there is sense in extending existing settlements but NOT where the extending development uses green belt land and NOT where the extending development radically alters the character of the existing settlement.

Q-S5.2 - New Settlements: it is wholly unacceptable to consider the development of a new settlement within green belt land. There are no exceptional circumstances for doing so. It is unacceptable that the NPPF principles are NOT being adhered to, as multiple new settlement locations, in green belt land, are apparently being considered in the current consultation document. If a new settlement is to be considered, this should only be in non-greenbelt land. There are ample non-green belt options for new settlements. A new settlement in non-green belt land should be prioritised over any other development options in green belt land. New infrastructure can be developed to support such a non-green belt site.

Q-S5.3 – Rail Corridors: I consider that the prioritisation of rail corridors may offer a sensible option for development. There is substantial scope to include development alongside rail corridors outside of the greenbelt. I would be supportive of development alongside rail corridors to the south of the region, avoiding the use of green belt land, should be supported.

The plan outlines that an indicative 6,000 new homes would be sufficient to support a new rail station, and there are ample geographical options to achieve this outside of the green belt. Additionally, this would reduce the likelihood of overcrowding existing stations. Further development north of Leamington is likely to see an increase in the demand for Leamington train station. This will inevitably increase traffic along the one connecting route (from Weston through Cubbington) to the station and in the already congested roads in the centre of Leamington itself.

The Climate Emergency is of course of grave concern but it is NOT in itself a justification to develop on green belt land. Higher density housing, brownfield development or the equivalent, energy efficient or passiv haus standard housing, non-car use neighbourhoods are the way to remove the need for communities to use fossil fuels. Green belt development and relying on “mitigating measures” is, rationally, not the way.

Q-S7.2 – Dispersed Development: I am opposed to the “dispersed” development option which involves frequent development in the green belt. I am particularly opposed to large developments in small green belt villages such as Weston Under Weltherley and Hunningham. Excessive ‘Dispersed developments’ constitute a form of suburbanisation in or near small villages in Warwickshire. They erode or change the character and rural nature of these villages. They increase car use; they create large amorphous dormer villages.

The area around Weston and Hunningham has an ancient character (viz the 12th century church at Hunningham, the centuries-grazed land down to the River Leam, the beautiful one track bridge over the Leam by the Red Lion, etc). Parts of this area are also ecologically of great importance (see the Dunsmore Living Landscape project run by Warwickshire Wildlife Trust which touches on or is near the areas proposed for development). The kind of dispersed development potentially envisaged in this area would irretrievably destroy the historical, cultural and ecological importance of these places.

For the remaining spatial growth options, it is important that the first priority is to avoid developing green belt land. So, in order to follow the decision making process set out in case

law the first consideration should be the need to protect green belt land in each spatial option and only then should a specific option be looked at for its relative benefits per se.

Q-B8.1: Agricultural Land: there are good reasons for trying to avoid development on agricultural land, being (1) the character of this particular area is agricultural; the development envisaged will heavily erode that (2) the land in question is - according to the Lepus report - of good quality - why then destroy it by development (3) the particular site envisaged would destroy tenanted farmland, held in the WCC Smallholdings estate, which is extraordinary given the current pressure on small farms and the difficulties for local and young people to get into farming (4) good quality land should be retained for growing food, and growing the kind of food that reduces our reliance on long and/or foreign food supply chains (for all the obvious reasons and highlighted recently by the government's own food tsar) - continued development on green belt and/or good agricultural land flies in the face of the pressing need to increase home grown food.

Q-C12: Flood Risk: the site proposed is near to an area that regularly floods. Part of the site itself is also subject to periodic flooding. As a general principle, flood plains or those areas that have a direct impact on them, should not be developed. Houses built on such sites usually have long term damp, mould and health issues.

Yours faithfully

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