



Planning Policy Team
South Warwickshire Local Plan
Warwick District Council
Town Hall
Parade
Royal Leamington Spa
CV32 4AT

6 March 2025

Dear Sir/Madam,

Re: South Warwickshire Local Plan

As Member of Parliament for Kenilworth and Southam, I am writing to respond formally to the consultation on the South Warwickshire Local Plan (SWLP) Preferred Options. While I acknowledge the need for strategic growth, I have serious concerns regarding the methodology underpinning this consultation, its conclusions on new settlements, and the broader implications of the proposed strategy.

New Settlement Strategy

The consultation's justification for relying on new settlements as a primary growth mechanism is weak. Preliminary analysis of their alignment with Sustainability Appraisal (SA) objectives indicates that multiple proposed settlements face significant sustainability barriers, reliance on unconfirmed infrastructure, car dependency and a lack of local employment provision. The Plan provides no clear evidence that new settlements are more sustainable than urban extensions or brownfield development, nor does it justify why this approach has been preferred over enhancing existing settlements.

Objection to Site B1 (Hatton) Designation as 'More Suitable'

The classification of Site B1 (Hatton) as 'more suitable' is inconsistent with sound planning principles. This site has:

- Severe infrastructure constraints – The A4177 corridor and key junctions, including A46 Stanks and M40 Junction 15, are already at or near capacity, with peak congestion and limited scope for expansion. Traffic rerouting through Warwick, Leamington Spa, and rural communities is already a concern, and the consultation provides no clear evidence that necessary upgrades will be deliverable or funded within a viable timeframe.
- Green Belt designation – The site's removal from Green Belt protection lacks clear justification. The NPPF states that Green Belt release should only occur in exceptional circumstances and where no reasonable alternatives exist. This consultation does not provide sufficient evidence to justify this.
- Reliance on an inadequate rail link – Hatton Station's current service level is insufficient to support a major new settlement, requiring a substantial upgrade to at least an hourly (ideally half-hourly) service. However, the consultation provides no confirmed mechanism or funding to ensure these service improvements will be delivered. Concerningly, further work is still required to determine how enhancements would be

secured, including whether developers may be expected to subsidise rail operations – an approach with significant feasibility and financial uncertainties.

Given these issues, the conclusion that B1 is ‘more suitable’ should be reconsidered.

Infrastructure-Led Development

The assumption that large infrastructure projects – many in early planning stages – can justify these new settlements is questionable. The consultation assumes that development in the vicinity of the M40 corridor will be supported by the rationalisation of Junctions 13 and 14. However, this project remains speculative, lacks confirmed funding, and is years from completion. Basing large-scale development on this assumption is unwise. Moreover, multiple new settlements rely on the construction of rail stations that remain unfunded and lack approval from Network Rail. Discussions between rail operators indicate a lack of commitment. This uncertainty raises serious doubts about the feasibility of these stations. If they do not materialise, these settlements will become permanently car-dependent, fundamentally undermining their claimed sustainability.

Employment Strategy

The consultation does not align employment growth with housing provision, resulting in settlements that will function as commuter estates rather than self-sustaining communities. SG15, as a Strategic Growth Location, along with several proposed new settlements, lacks proximity to major employment hubs. There is a lack of evidence that residents will find sufficient local jobs, meaning large-scale commuting will be unavoidable. The assumption that business hubs will emerge to support these settlements is unsupported by market evidence. The consultation lacks at present a credible employment growth strategy. There is an absence of a clear policy framework incentivising employers to locate in these areas, creating a significant risk that these settlements will add pressure to transport networks rather than creating balanced communities.

Coalescence

The consultation fails to address the irreversible loss of village identity that will result from these proposals. Many of the new settlements, including those near Hatton and Wellesbourne, will erode the distinctiveness of existing communities by merging them into larger urban areas. The SWLP acknowledges the risk of strategic coalescence but does not propose meaningful safeguards. The assumption that village identity can be sacrificed for the sake of housing targets is of great concern. The Local Plan must include defined buffer zones to prevent settlements from merging, clear design principles to maintain the character of existing villages and Green Belt protections that are respected rather than eroded. Without these safeguards, these developments will permanently alter South Warwickshire’s landscape and communities.

Duty to Cooperate

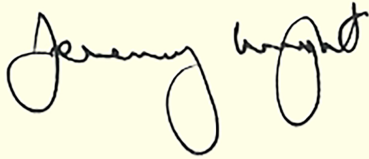
The assumption that South Warwickshire must continue absorbing Coventry’s housing overspill is no longer justified. The 2024 revisions to the National Planning Policy Framework (NPPF) significantly lower housing targets for Coventry and Birmingham, while substantially increasing South Warwickshire’s targets. The duty to cooperate should not create an ongoing automatic expectation that rural districts must absorb urban expansion. South Warwickshire’s assessed housing need has increased, and much new housing has already been built or approved. It should not be further burdened with an outdated overspill requirement.

Consultation Process

Concerns have been expressed to me that the consultation process has not met the expected standards of transparency or public engagement for a plan of this magnitude. Many of my constituents were unaware of the consultation until late in the process, limiting their ability to respond. The timeframe for submissions was unduly short given the complexity of the proposals. Given the scale of development proposed, a robust and accessible consultation process is essential.

I urge the Council to reconsider its approach and ensure that planning policy is grounded in deliverable, sustainable and justified development.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jeremy Wright', with a stylized, cursive script.

RT HON SIR JEREMY WRIGHT KC MP
Member of Parliament for Kenilworth and Southam