



planning development architecture



# REPRESENTATIONS

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in respect of  
SWLP Regulation 18 Preferred Options Consultation  
on behalf of  
**Rowington Parish Council**

7 March 2025  
Client Reference: RCA01068a  
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# QMS

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# 1. INTRODUCTION

- 1.1. This representation has been written by RCA Regeneration Ltd on behalf of Rowington Parish Council, for submission to the South Warwickshire Local Plan Preferred Options (Regulation 18) Consultation, which is running from 10 January to 07 March 2025.
- 1.2. The consultation is the third stage of Local Plan preparation, following earlier stages for Scoping, and Issued and Options. Late stages including Publication consultation, Examination and Adoption are anticipated to run until at least the end of 2027.
- 1.3. A document has been published which contains a number of draft policies and policy directions, as well as a proposed Growth Strategy. An interactive map has also been published.
- 1.4. The consultation document contains a series of questions. However, the Parish Council wish to comment only in respect of the potential new settlement C1 - Land South of Kingswood. Therefore, the Parish Council has prepared this detailed statement for submission by email, rather than reply to individual questions using the webform on the consultation portal.

## 2. REPRESENTATIONS

- 2.1. The Parish Council wishes to express its strong objection to the potential new settlement C1 at land south of Kingswood, entirely within the Green Belt. These comments all relate to **Draft Policy Direction 2 - Potential New Settlements**. The Parish Council OBJECTS to the approach laid out in Policy Direction 2 and also OBJECTS to proposed New Settlement Location C1 being considered for inclusion within the plan. The comments below should be taken in their entirety as submissions for both relevant questions on the consultation document.
- 2.2. Draft Policy Direction 2 sets out that new settlements will be *“considered for strategic site allocation in the most sustainable location(s) where they can be developed to a suitable minimum size to provide the required infrastructure for substantial internalisation of trips.”*
- 2.3. In the first instance, given the introduction of the definition of Grey Belt land in the NPPF December 2024, the Parish Council considers that all potential allocations should be reassessed, so that Grey Belt land can be prioritised for release above more highly performing Green Belt land.
- 2.4. Turning to the assessment as currently presented, it is noted that the consultation document at *Table 6: Potential new settlements and their suitability* sets out that the potential new settlement C1 is ‘less suitable’ than others proposed. The Parish Council therefore request that it is not considered any further.
- 2.5. The New Settlements Assessment (November 2024) provides further detail on the assessment of the suitability of the site. It scored ‘red’ in 5 categories.
- 2.6. Poor transport links have already been noted above. The high landscape sensitivity of the location is also raised in the assessment. The open countryside contains many footpaths and canals, the character of which would be destroyed by a new settlement. The Council does not appear to have carried out a detailed LVIA to catalogue the likely harm, but have recognised the sensitivity of the landscape. In addition, the area contains several local wildlife sites and an area of ancient woodland. The Parish Council is also concerned about the number of listed buildings within the proposed new settlement area or the vicinity, including National Trust properties at Packwood House and Baddesley Clinton. A large area around the canal is also designated as a conservation area.
- 2.7. The potential alternative use for renewable solar energy also weighs against the proposal for residential development in the assessment.
- 2.8. The final two red scores are for ownership and deliverability. The proposed settlement is spread across more than 10 land ownerships and none of the land included in the potential new settlement has been submitted to the Call For Sites. It is absolutely baffling to the Parish Council that the Council would propose a new settlement in such circumstances, as it appears highly unlikely to be deliverable in any case, despite the other three red categories identified.
- 2.9. Furthermore, no detail is given about how the potential new settlement would *“provide the required infrastructure for substantial internalisation of trips”*.
- 2.10. The Justification test sets out that new settlements should accommodate approximately 6000-10000 dwellings as a minimum. Yet the New Settlements Assessment for C1 sets out a site size of 2.48 hectares with an estimated capacity of 4960 dwellings. It is unlikely that a development of 5000 homes would be effective or truly self-sustaining, on the basis that the settlement would

not be large enough to meet its own daily needs. The area is open countryside, in the Green Belt. The potential new settlement is located between the rural villages of Lapworth and Rowington, which both have only limited amenities and transport connections. The Parish Council is aware of the lack of capacity and availability of local infrastructure, with only a GP surgery, small shop/post office and village primary school, therefore any new development would need to be able to deliver infrastructure and be self-sustaining. The proposal is not consistent with the stated aims of the policy and should not be progressed further.

- 2.11. The Parish Council is also concerned about local utilities such as water supply, sewerage and electricity infrastructure, which would need significant investment to accommodate new development of the scale proposed. Surface water flooding from the surrounding fields is also an issue, with no highway drainage on the rural roads - installing such infrastructure would be another financial burden on the proposal. The Parish Council is concerned that the cost of these necessary infrastructure works has not been factored in and that a potential new settlement has been proposed that would not be financially viable to deliver.
- 2.12. In terms of the sustainability or otherwise of the location in transport terms, C1 appears to have been identified as a potential location based on the proximity to Lapworth Railway Station. This is a small rural station. It has only 18 parking spaces and two platforms, with no obviously available expansion land around it. It also has to be accessed via a height-restricted road by virtue of the low railway bridge. The Parish Council does not consider this station suitable for servicing an additional 5000 homes. The public bus service is very limited and would need significant investment to be able to run regular services throughout the day, every day.
- 2.13. The Parish Council has also seen no evidence of transport modelling to demonstrate that the road network could accommodate an additional 5000 dwellings and increased bus services.
- 2.14. There are also a number of problematic junctions in the local area in terms of road safety that the Parish Council is concerned about, such as the B4439 Old Warwick Road which is the only road travelling through the centre of the proposed settlement. It is narrow and undulating with many blind spots/bends and no pavements.
- 2.15. A recent application to the County Council to make a provision for a school bus stop at the Rowington Green end of the settlement area was rejected due lack of visibility for children crossing the road and insufficient space at the side for the school bus to leave the road for collection/drop off.
- 2.16. The steep hill and sharp bends around Rowington Church on the B4439 Old Warwick Road leading to/from the proposed settlement to the south has been a source of concern from residents for many years, with Rowington Parish Council only recently securing signage to slow traffic down.
- 2.17. The rest of the local roads off the B4439 Old Warwick Road surrounding the proposed settlement are all narrow country lanes with many sections not wide enough for two cars to pass. However, attempting to widen any roads would result in removal of long-established hedgerows and trees, which would have a further detrimental impact on the character of the area.
- 2.18. The significant scale of highway improvements required to support the proposal would appear to be another large amount of infrastructure costs that have not been factored into the deliverability of the proposal.
- 2.19. Given the conclusions of the Sustainability Appraisal, the Parish Council considers that it should be possible to meet housing need to 2050 without allocating Green Belt land.

2.20. The Parish Council requests that potential new settlement C1 be deleted, on the basis that it would be inappropriate development in the Green Belt, significantly harmful to the visual amenities and rural character of the local area, cause harm to both natural and built heritage assets, and would represent unsustainable development. It also appears to be undeliverable, and its viability has not been demonstrated.

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