# **Draft Green Party response to the preferred options consultation**

## **Introduction**

Below are draft key Green Party responses to the current consultation on the south Warwickshire local plan, which is at [South Warwickshire Local Plan - Preferred Options 2025](https://southwarwickshire.oc2.uk/document/148/4584#d4584) and closes on 7th March 2025.

# **Chapter 4: Meeting South Warwickshire's Sustainable Development Requirements**

## Draft Policy Direction 1 - Meeting South Warwickshire's Sustainable Development Requirements

Other. We do not agree with the government’s mandate to require 2188 houses every year to be built in south Warwickshire. This will not happen because developers will not be able to maintain high profit margins if they sell at that rate, but will mean these developers cherry pick the most profitable sites, often without suitable infrastructure. However, we accept that this local plan must follow the government’s mandate.

The most effective way to reduce the number of green fields to be allocated in this local plan is to shorten the plan period so that it would end in 2042. This would mean that only about half as much new green belt or other green field land would be scheduled for concreting over. Making only about half the new land available for development would put the Council in a much stronger negotiating position with developers and will make it easier to enforce timely infrastructure, tough Carbon-reduction measures, etc.

Note that Greens proposed 2042 as the end date; unfortunately, Lib Dems, Labour and Conservatives did not support this proposal.

The absurdly high number of houses to be built is due to the government’s formula which is based on the fact that houses prices are so high that they are unaffordable for most people. To address this problem, there must be a massive increase in state-funded social housing provision, to bridge the gap between what the market considers profitable to build and the level of need (the housing crisis).

## Draft Policy Direction 2 - Potential New Settlements

Yes. We strongly agree with the aim of new settlements where residents can fulfil most of their day-to-day needs within the settlement itself. For this to succeed, 20-minute neighbourhood principles are required: minimum size of 6000 homes, high density in the centre, primary and secondary schools, shops and other community infrastructure. This reduces congestion compared with urban sprawl and reduces the number of green fields allocated to housing.

The current criteria for assessment of sites does not include a climate change assessment. The 36 sites should each have a carbon modelling process to determine the highest and lowest.

## Draft Policy Direction 7- Green Belt

Other. Unfortunately, this draft Policy Direction 7 is relatively vague as the government’s new grey belt definition is omitted and only the first stage of the green belt review has been included.

We agree with the opposition to development within the green belt expressed in the previous consultation, which means that the "exceptional circumstances" to justify such development would need to be truly exceptional. The green belt in Warwick district is vital to “to check the unrestricted sprawl of large built-up areas” from the Coventry conurbation, but increasingly from Kenilworth, Warwick and Leamington as well. It is particularly important that what is left of the green belt between Coventry and Kenilworth is preserved.

Weakening green belt protections is a short-sighted and ineffective response to the housing crisis. Too much of the building on green belt land and other green fields primarily benefits developers, delivering high-value homes rather than the affordable housing people need. It destroys vital agricultural land, biodiversity, and carbon sinks while encouraging car dependency and urban sprawl.

Instead, we need creative, sustainable solutions: regenerating brownfield sites, building higher-density housing in towns, and maximizing existing infrastructure. Well-designed apartments and mixed-use developments can provide affordable, high-quality homes for younger people and accessible options for older generations, creating vibrant, walkable communities.

Protecting it is not about resisting change; it is about advocating smarter, greener urban planning for future generations. Please see the attached document that develops these arguments further.

Much of the green belt in south Warwickshire is the “best and most versatile agricultural land”; greater attention needs to be paid to the opportunity cost, including loss of food production, carbon costs of importing food, and ensuring security of supply. The plan aims to locate developments near public and active travel. This is in principle positive, but must be accompanied by full awareness of the capacity of travel options. In particular, railway travel in the district is currently operating 'at capacity' (as stated in the infrastructure delivery plan, IDP). As such, any developments that are justified based on their location near a railway station need to have evidence that the station can provide sufficient additional capacity before decisions on these sites are made. Any such expansion needs to be seen as Critical or Essential (c.f. IDP, Table 3.2) and occur before development. This point is included here because 'sustainable travel' is a key reason stated for siting development in the Green Belt; it is also relevant for Infrastructure Requirements and Delivery (Draft Policy Direction 5).

Green belt should have much greater importance in decisions where to allocate housing and employment land to sensibly address these points. Of course, the council needs to distinguish between grey belt and other green belt land.

## Draft Policy Direction-8- Density

Yes. It is not surprising that developers don’t want minimum densities as their focus is on profit maximisation, rather than what is good for residents overall. Specifying suitably high densities in urban areas and the centre of new settlements is crucial for effective 20 minute neighbourhoods and reducing the space required for housing. Advantages include making it feasible for most children to walk or cycle to school. Serious consideration must be given to reducing S106 and CIL contribution, as well as car parking requirements in suitable high-density locations.

The Local Plan provides an opportunity to radically re-design and re-provide housing in our towns, through much higher densities and the provision of multi-level living i.e. apartment provision. This is the only practical way to meet housing need where the demand is, making use of existing infrastructure. There is insufficient funding for the new infrastructure needed to create thriving communities other than in town centres.

## Draft Policy Direction 9 - Using Brownfield Land for Development

Yes. This local plan needs to very strongly promote use of urban brownfield land, because it preserves green field land for agricultural and leisure purposes, as well as adhering to 20 minute neighbourhood principles as brownfields are almost always close to local amenities (see response to draft policy direction 1).

As above, brown field sites often contain infrastructure and are close to amenities. We need to maximise the potential of the brownfield sites. There must be a commitment to focusing on building affordable housing in the cities and towns where the housing is needed and infrastructure exists, rather than building on the peripheries of our towns and villages, where the infrastructure is weakest.

# **Chapter 5: Providing Custom and Self-Building Housing Plots**

## Draft Policy- B- Providing Custom and Self Building Housing Plots

Yes. However, time scale must be much quicker. Currently in Kenilworth development has been taking place for some 2 years and there are as yet no serviced plots available, we are told until circa 2027. There should be an ongoing supply available each year. There needs to be a strong marketing process to assess demand. The purpose of these Custom and Self Building Housing Plots is for bespoke, innovative homes. Therefore, the design code must rule out the ‘anywhere’ house types that are widely available, and gas should not be provided to encourage low carbon designs.

# **Chapter 7: A Climate Resilient and Net Zero Carbon South Warwickshire**

Wider context: The chapter starts with “The Government's target is to reach net zero by 2050…” but it’s clear that this local plan falls way short. In this chapter, embodied energy produced during construction and unregulated energy in use will both be present: both these issues are acknowledged in the consultation.

## Draft Policy D: Large Scale Renewable Energy Generation and Storage

Yes. We particularly support solar farms on lower-quality agricultural land (grades 3b-5). Energy storage should be co-located with renewables.

## Draft Policy Direction-22 -Net Zero Carbon Buildings

Yes. However, the proposed standards should be tightened considerably, for example:

Residential buildings

Criterion 3: A figure is needed; please use 0.6 air changes per hour which is the PassivHaus level, and mandate mechanical ventilation with heat recovery which is essential below 3 air changes per hour.

Criterion 4 needs to be strengthened from “to be considered” to 4kWp rooftop PV is required per home, except in exceptional circumstances. As an alternative, renewable energy generation at or above this minimum could be produced via a smart micro grid.

Criterion 6: Consideration of site density, layout, and coverage: specific recommendations are needed here e.g. how much north facing windows need to be smaller than south facing windows.

Criterion 7: Cool and Green roofs – runoff flooding risks and overheating. Whilst these are often desirable for commercial and civic buildings, they are not usually practical in domestic properties and conflict with the rooftop PV requirements.

Non-residential buildings

Criterion 1: Carbon reductions should be mandated by Passivhaus or equivalent standards. We welcome the use of stringent requirements based on energy use intensity (EUI).

Criterion 6: Sustainability performance certifications. At least BREEAM Excellent is required, but preferably Passivhaus or equivalent standard.

This policy direction and others such as Biodiversity Net Gain (Draft Policy Direction-38) can be undermined if developers claim their schemes are not viable. Therefore, any such viability assessments must be independent, robust, and ensure that developers fulfil their responsibilities.

## Draft Policy Direction- 24- Embodied carbon

Other. Building 54,700 new homes will have massive implications in terms of embodied carbon. Building regulations say almost nothing about embodied carbon, so it is good to see that the intention is to go beyond building regulations for this. RIBA 2030 targets rather than 2025 must be used, and there need to be actual requirements in this local plan to reduce embodied carbon in construction.

## Draft Policy G- Climate Resilient Design

Other. Must of this is suitable. However, new buildings should have air tightness of <0.6 air changes per hour (see Draft Policy Direction-22) which necessitates mechanical ventilation with heat recovery.

# **Chapter 11: A Biodiverse and Environmentally Resilient South Warwickshire**

We support the direction of travel implied in all the draft policy directions in this chapter. However, effective implementation will be challenging. Here are a few of the key areas. Further thoughts and explanations provided by Cllr James Kennedy are at {link to James’ doc}

## Draft Policy Direction-36 - Protection of Sites, Habitats and Species

Yes. The mandate to protect, conserve and enhance must be non-negotiable and in no circumstances should offsetting be allowed. The importance of protected sites for natural flood management where appropriate should be highlighted, cross-referenced to draft Policy J in chapter 7 on flood risks. A green / blue map identifying all existing sites, options for new sites and connectivity should form part of the plan. For example, Finham Brook in Kenilworth from upstream of the castle across Kenilworth down to the wetland area to be created under the HS2 bridge over the Brook.

## Draft Policy Direction-37- Local Nature Recovery Strategy

Yes. As the LNRS is a statutory requirement this is non-negotiable. However, LNRS for the Warwickshire, Coventry and Solihull is still in preparation. The next iteration of the draft of the plan should take account of the emerging strategy and ensure that its provisions are hard-wired into the plan. This draft policy direction should also build on the WDC Biodiversity Action Programme and the Warwickshire Wildlife Trust Strategy

(<https://www.warwickshirewildlifetrust.org.uk/sites/default/files/2022-08/WWT%20Strategy%202030_final.pdf> )

## Draft Policy Direction-38 - Biodiversity Net Gain

Yes. In looking at whether BNG in excess of 10% is desirable the plan should draw on the experience of other local authorities where a higher rate has been approved. Measuring BNG is a process involving both evidence and judgement, and the authorities need to be confident that they have the resources and expertise to review and interrogate BNG plans put forward by developers. There is otherwise a danger that this becomes another box-ticking exercise rather than a genuine commitment to enhance biodiversity. SDC and WDC should start now to develop a scheme of offsite biodiversity units within their areas.

## Draft Policy Direction –39- Environmental Net Gain

Yes. This emerging policy feels like work in early progress. Research needs to be done on other authorities that have introduced similar policies. It will be important to avoid overlap with DPD 38 (BNG) so as not to increase the burden on developers through duplication. A clear definition of how ENG goes above and beyond BNG is important as is how ENG will be measured.

## Draft Policy Direction-49- Agricultural Land

Yes. Following recent controversies over planning for solar farms this direction is to be welcomed. Combined with a strong mandate elsewhere in the plan to support rooftop solar PV on all new residential and other buildings this should provide a strong framework to drive forward local renewable energy generation in the most appropriate places.