

South Warwickshire Local Plan: Consultation Report

Strategic Growth Locations: - West of Studley Parcel SG22

Representations on behalf of Sambourne and Studley Parish Councils

The Councils wish to make specific representations on the potential inclusion of this land as a Preferred Strategic Growth Location in the draft SWLP. This does not imply that they support others and/or other policies or proposed allocations in the draft plan.

Introduction

1. The Government has recently indicated it wishes to free up the planning system and has published revisions to the NPPF. Specifically, it looks to review the restrictions placed on land currently in the Green Belt and to introduce a new category of 'Grey Belt'. This 'Grey Belt' category would be land that is not in the Green Belt but which, because of its degraded character or previous use, could be considered suitable and appropriate for development. Largely, the intention is to facilitate the development of 1.5m new homes over the life of the current parliament.
2. The Council does not take issue with this philosophy, but observes that the 'quantum' of such land, especially in areas such as South Warwickshire, is modest and unlikely to make a significant contribution to the housing targets.
3. It is clear that some further reviews of Green Belt are inevitable. It is accepted that GB boundaries were set many years ago and that there is land where release would not prejudice the essential functions of the green belt – viz: to prevent urban sprawl and coalescence of towns and to protect the openness of the countryside.
4. The village of Studley is 'inset' within the (1975) West Midlands Green Belt. Within its boundaries development is permitted. However, to the north there is (GB protected) separation between it and the much larger town of Redditch. In addition, to the southwest the A448 road provides physical separation along its boundary from the A435 junction to the Crabbs Cross roundabout (A441/B4504). See below. With the exception of a small amount of pre-1975 development, there has been absolutely no new building on the south side of the A448.

SG22 Proposal.

1. This Preferred Location extends to some 49.33 ha (122 acres). It comprises an area of very open and prominent agricultural land, rising up from Middletown Lane to its peak, then down towards Jill Lane. It has no significant boundary features on its southwest side. It fronts onto Middletown Lane and (somewhat curiously) extends across that road to the southeast, behind some existing houses in the hamlet of Middletown. It would provide a large residential 'urban extension' to the village of Studley. It would also effectively take into that urban area the existing rural hamlet of Middletown. All the land falls within the parish of Sambourne.
2. Middletown is a rural hamlet, washed over by the green belt, and in the Parish of Sambourne. Although not a town, it would be merged with, and by, the urban sprawl of Studley, thus losing its distinct identity. The present idyllic environment of the hamlet, enjoyed by its residents, would potentially be lost. It would be transformed from a rural to an urban community. The hamlet would lose its high degree of security and privacy and, furthermore, it would be exposed to higher levels of noise and air pollution. The energy, sewage and surface water disposal infrastructures would need

to be modified to cope with the vast additional demand, negatively affecting the community during the works.

3. The Sambourne Parish Plan 2014 strongly opposes further housing developments within the parish.
4. *The Interim Sustainability Appraisal of the SWPL* prepared by *Lepus Consulting* suggests this land has a capacity of 1046 houses. This equates to an average density of only 8.5 dwellings per acre. It is suggested this is unrealistic and a considerable underestimate, even allowing for provision of infrastructure, open space etc. A more realistic figure for housing would be around **1525 units**. However, the NPPF is suggesting that developments on 'grey belt'/'green belt' should provide affordable housing at up to 50% of total numbers and the densities of such housing are usually considerably higher than for private housing for sale. It is possible that the ultimate capacity could be nearer 1800 homes.
5. Site SG22 has no streams or rivers, all excess water is piped across adjacent land. To the north, water runs over the surface of local fields, which causes water logging. Water run-off from site SG22 to the south has been a major issue for many years, causing flooding in Middletown Lane. Whilst the upgrading of road culverts has improved the situation, the problem remains that the southern area of the 120-acre site feeds into a restrictive ditch. In addition, if the area is developed, the additional housing could exacerbate the situation to a critical threat of flooding.
6. The lanes through Sambourne parish are narrow and significant damage to road edges and verges has been caused by the volume of traffic. The development of site SG22 would further increase the amount of traffic through the roads in Middletown and Sambourne. As most of the lanes in Sambourne do not have footpaths, the safety of pedestrians is a further cause for concern.

Green Belt considerations.

1. This land is admitted by Lepus in their SA (see 5.5.4) to be the '*worst performing*' option of all the SG Locations included in the SWLP draft for 'Landscape Impact'. Safeguarding the Countryside from Encroachment is one of the 5 main purposes of Green Belt.
2. It is suggested that permitting development on SG22 would not only be an unwarranted encroachment onto an area of considerable 'landscape value' but would, in the longer term, also potentially lead to 'unrestricted sprawl'. The development would take in the hamlet of Middletown and then (logically) fill in the open area between the A448, Astwood Bank and Sambourne. Effectively, this would create a 'Greater Redditch' urban area.
3. The community of Studley, albeit with a population of c.6000, is a self-contained village with an established centre and facilities, and its inhabitants regard it as being entirely distinct in character from its (very much) larger neighbour, Redditch. Increasing the population by potentially 40%, with the added consequence of further development within Studley, would significantly change the character of the village, as well as placing additional strain on its facilities.

'Grey Belt'

There is no suggestion that the land could be considered to qualify as 'Grey Belt'.

Visual Impact and Landscape Value

The land is very open and prominent; construction of considerable numbers of 2 and/or 3 storey houses would cause a massive visual intrusion and the development would be highly visible from, and have major impact on, an area of landscape value (as indicated in the Lepus Report). Land with high landscape value (and in the Green Belt) should not be considered for development.

Lepus 'High Level' Report

1. Lepus categorise all the SG Locations against their Sustainability Assessment Framework. Their report admits (indeed cautions) that this relies on very 'high level' assessments and outputs (derived largely from desktop investigations). In Figure 6.2 we find the Land West of Studley (SG22) reaching an overall ranking of 'third best performing' against the Framework (out of a total of 24 such locations).
2. Clearly, the 'high level' nature of these assessments misses essential features, which must be considered in judging whether a site is suitable for development.
3. We have, therefore, looked at a number of these, viz:
 - **Education:** Lepus scores SG22, the highest of 24 locations listed for education. This is based on the (undisputed) fact that the site is within 800m of a primary school and 1.5km of a secondary school. However, this 'positive' needs to be judged against the question of whether either Studley High School or St Mary's Primary School can (or could) accommodate any of the pupils which the 1000 – 1800 new homes would generate.
 - St Mary's School is known to be full, with a waiting list.
 - Studley High School has grown from c**440** pupils to a capacity of **780** through a considerable building program but is currently educating **847** pupils, with a waiting list. So, there is no capacity to accommodate any secondary pupils. The Alcester secondary schools are also heavily over-subscribed and, moreover, the SWLP is considering the potential development of several thousand new houses in Alcester, so all capacity will be required locally.
 - It should be pointed out that, historically, parents in Studley have been highly reluctant to send their children to Redditch schools.
 - Sixth form education in Warwickshire locally is also limited, due to demand - the nearest being 4.5 miles from SG22, via a heavily congested route.
 - **Health:** Lepus score the Studley site as 'best' of 24 for health. However, the impact of some 2500 – (possibly) 4000 new residents is not factored in. GP facilities in Studley are already over-extended and there is no NHS dentistry available. The value of proximity to the Alexandra Hospital in Redditch must be tempered by the repeated NHS downgrading of facilities on site. Studley patient referrals are sent to Warwick Hospital.
 - Studley has relatively few leisure facilities. The SG22 area provides a much-used area for walking and access to the countryside for many Studley residents. Walking has been shown in many studies to be highly beneficial for well-being.

Accessibility (and Transport): Despite the Plan's ambition to reduce car usage, it is inevitable that a large development at SG22 will generate a car population of at least 1,500 vehicles and those vehicles will use the A448 for almost all destinations. The Lepus report does not consider transportation specifically but rather scores sites on accessibility

to bus stops and train stations and closeness to a food store. However, it curiously states that sites which are more than 800m from a food store will contribute to positive effects. It, therefore, considers the Studley site, being well over 1km from a food store, to 'have a positive impact on connectivity' – a dubious assumption. Whilst Studley does have bus services, train services are limited to Redditch station, where the cross-city line runs only across Birmingham, albeit with connections available in the city centre.

- When considering the additional load placed upon the local road network, a number of problems arise. It is presumed that significant improvements would be funded by the developers to provide new junctions from the site onto the A448. The need to access local rail stations would be via the Slough and Crabbs Cross roundabout. These routes are already heavily congested with traffic (24 accidents officially recorded in 5-year period, of which 4 were listed as serious). Alternative mainline railway stations are between 30 and 45 minutes away
- The existing peak time traffic, though heavy, is manageable but would inevitably increase if many more houses are built – at SG22 and to the east of Redditch.
- Local employment in SG22 is limited, necessitating commuting for new residents with the concomitant exacerbation of transport issues, already referenced.
- The major problem which SG22 will cause is traffic discharging at the Crabbs Cross roundabout at the NW end of the A448. This is the principal route into Redditch and the roundabout junction is already seriously over capacity at peak times, with queues of several hundred metres approaching the A448 and A441. The roundabout is acknowledged to be substandard with 5 legs, but the physical constraints make it completely impossible to improve. This would prove a serious constraint to a major development. It would also exacerbate the existing problem of 'rat-running' through the village of Sambourne, which the Parish Council has attempted to address, though with limited success.
- Lepus scores SG22 as having a positive effect on connectivity. This is disputed.

Agricultural land loss

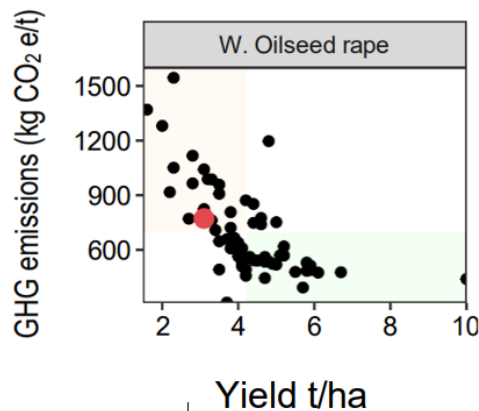
Unusually for this part of Warwickshire, the majority of SG22 is a single well-shaped and drained parcel, locally known as the '100-acre field', ideal for cultivating and cropping and (according to the local NFU representative) with above-average fertility for typical grade 3(a)/(b) land. The coronavirus (COVID-19) pandemic and current turbulence caused by the invasion of Ukraine, US-threatened tariffs and global climate change uncertainties are reminders of the crucial importance of domestic food production to UK national resilience. Reducing rather than increasing reliance on Global Supply Chains is essential for food security with an expanding population.

The 2019 amendment to the existing Climate Change Act 2008 meant the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target will require the UK to bring all greenhouse gas emissions to net zero by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

The UK's 2050 Net Zero target — one of the most ambitious in the world — was recommended by the Committee on Climate Change, the UK's independent climate advisory body.

One large study of 500 wheat crops, for example, showed an average of around 360kg CO₂ e/t, with only a small number of the studied crops at the extremes. Two factors interact with

each other to drive greenhouse gas emissions in arable crops – the rate of nitrogen fertiliser use versus the yield. The lower the nitrogen use, the lower the embedded emissions from fertiliser manufacture and the direct and indirect emissions from soil, whilst a higher yield lowers the emissions intensity by factoring these emissions across a greater crop weight. The simple upshot of this interaction is that farmers who focus on resource efficiency will deliver the greatest emissions reductions. Multiple report findings show the industry should focus on optimising yields through precision techniques, while minimising nitrogen use, and maximising nitrogen use efficiency.



52% of a wheat crop emissions come from fuel and Nitrous Oxide emissions directly and indirectly from soil denitrification. Smaller fields use more fuel due to greater time turning on headlands (turning areas around field edge) etc. Many studies have shown that small fields(1-5ha) tend to have a machine field efficiency of 40% compared to larger fields(20-50ha) of 70%. And corresponding fuel use etc. Small fields with their greater percentage areas of the field that is needed for turning results a bigger percentage of areas becoming compacted (resulting in water logging and denitrification), resulting in lower yields as a whole field tonnage. Smaller fields also result in a greater use of pesticide due to overlapping because of the great number of headland turns.

The large arable field that is the majority of SG22 is unlike many fields surrounding Studley. It has relatively modern drainage compared to many and is well capable of exceeding ten tonnes per ha of winter wheat - the national average is eight tonnes per ha. Therefore, the wheat from the field located in SG22 yields higher than average and consequently has a lower carbon footprint than the national average.

To achieve the UK's legal commitment to Net Zero we will need fields such as in SG22 to meet the UK's legally binding targets. Therefore, converting highly productive agricultural land to building is to be avoided and this is an important consideration in rejecting this land as a preferred location.

Conclusions:

1. The projected capacity of the land for housing is stated as 1046, This density is unrealistic, and the numbers are likely to be in the range of 1500 to possibly 1800.
2. The land performs a valuable Green Belt function in preventing urban sprawl. Release of a large area of Green Belt would potentially lead to further extensions of development and infilling. The land performs a valuable Green Belt function in safeguarding the Countryside.

3. Development on this elevated and prominent land with 2 and 3 storey buildings would have a major impact on an area with high landscape value. This is admitted in the Lepus Report.
4. While Lepus ranks the site highly for educational provision, the local schools are over-subscribed and with no possibility of further infrastructure development.
5. Increasing the population of Studley by 40+% would significantly change the character of the village of Studley. The hamlet of Middletown would effectively be transformed from a small rural settlement to a suburb of Studley-cum-Redditch.
6. Lepus score the site as 'best' in terms of health provision. However local GP facilities are over-stretched; there is no NHS dentistry and the Alexandra Hospital in Redditch has been under threat for some years.
7. Accessibility to facilities, which are insufficient, makes a nonsense of a claim in the Lepus Report. The claim that the SG22 site would have a positive effect on connectivity is incomprehensible.
8. Transportation is limited and specifically the crucial A448 junction connecting to Redditch is overloaded and not capable of being improved to provide greater capacity.
9. Development of the site would lead to more extensive 'rat running' through the village of Sambourne, exacerbating an already acknowledged problem.
10. The land is valuable and productive for agriculture and should not be lost to development.

Scoring

The Lepus Report scores the SG22 West of Studley site as third best out of 24. However, the methodology is clearly inappropriate as a tool to 'rank' sites suitable for development and Lepus themselves 'caveat' the conclusions drawn from 'high level' data.

Quote: - "The West of Studley SGL performs relatively well overall. This SGL has been identified as the best performing for health (SA Objective 10) and education (SA Objective 12), whilst also being in the top five best performing for flooding (SA Objective 2), cultural heritage (SA Objective 5), natural resources (SA Objective 7), and economy (SA Objective 13). It is expected to result in the most positive impacts (including both major and minor positive) overall of all the SGLs. However, this SGL emerges as the potentially worst performing against landscape (SA Objective 4); further evidence will be required to determine the relative performance of SGLs against landscape and potential for mitigation."

Stratford District Council commissioned White Consultancy to undertake a landscape sensitivity appraisal for housing development. Studley Parish Council incorporated the high sensitivity result in its Neighbourhood Plan 2018. **Quote:** "Landscape sensitivity to housing development is high. The zone lies on land gently rising to a small hilltop with medium to large regular arable fields. Hedges are generally low although there are some trees in larger hedgerows along the dismantled railway to the west. The area is exposed to views to the southwest and from Bromsgrove Road. As open countryside it also separates the settlement from Middletown. The zone's sensitivity lies in its character of open countryside and its role as buffer between the settlement and Middletown. It is the most sensitive of the three zones on this side of the settlement. Housing development would close the gap between the settlements or increase the visibility of the settlement from the southwest and therefore is inappropriate."

It is evident that SG22 is neither the best performing for health (SA Objective 10) and education (SA Objective 12), nor economy (SA Objective 13) as stated. SA Objectives 10 and 12 should both be red, whilst SA Objective 13) should be pink. The reason being that the 41% increase (as a minimum) in Studley's population and pressure on existing facility and service resources has been completely overlooked, providing a distorted and therefore, meaningless result. In fact, SG22 would be one of the worst performing options.

The Lepus Consulting report fails to draw attention to, or even consider, the significantly large percentage increase (41%) of population that the housing development would add to Studley. The village, as it exists, could not cope with the facility and service demands that would be placed on it.

In no respect are we able to agree that the SG22 Land West of Studley site should be ranked within the 'top 10' under the Sustainability Assessment.

5th March 2025