

Four reasons why LEA 1 and LEA 2 should be removed from the South Warwickshire Local Plan

Old Milverton and Blackdown Joint Parish Council is calling on the SWLP team to remove LEA1 and LEA2 from the South Warwickshire Local Plan. Our position is based on a number of serious concerns, including clear conflicts with Government policy on protecting green belt and agricultural land.

1. Due process has not been followed

A key requirement in national planning policy has not been met. No Sequential Test has been provided to justify the release of green belt and best-quality agricultural land.

National policy makes clear that development on such land should only occur as a last resort, and this must be properly evidenced. In this case, that justification has not been demonstrated.

2. Evidence has not been properly brought together

While several technical assessments have been carried out, their findings have not been considered as a whole. The key studies relating to these sites include:

- Heritage and Settlement Sensitivity Assessment (September 2022)
- Sub-Regional Green Infrastructure Strategy (August 2024)
- Local Nature Recovery Strategy (April 2026)
- HELAA (January 2026)

We commissioned an independent review of these reports. It found:

- Gaps in the evidence, including the fact that much of LEA1 has not been assessed in the HELAA.
- Significant constraints to development, including impacts on Green Belt function, heritage assets, agricultural land quality, biodiversity, flood risk and landscape character.

Taken together, this evidence raises serious doubts about the suitability of these sites for development.

3. This is Green Belt, not “Grey Belt”

The land in question clearly performs a strong green belt function.

An independent review by Land Use Consultants, using the latest Government methodology, concluded that both sites make a strong contribution to Green Belt purposes. This directly challenges any suggestion that the land could be considered lower-value “grey belt”.

4. No “exceptional circumstances” have been demonstrated

Removing land from the Green Belt requires clear and robust “exceptional circumstances.” These have not been established. The SWLP evidence relies heavily on the concept of “sustainability” as a justification. However, independent legal advice found that:

“Sustainability is not a test for releasing land from the Green Belt, and the draft policy is clearly wrong to suggest that it is.”

This advice has been shared with the SWLP team. We are continuing to pursue this issue.

Summary

The allocation of LEA1 and LEA2 is unsound because it is not supported by proper process, robust evidence or national policy. For all of the above reasons we strongly believe the sites should be removed from the South Warwickshire Local Plan.