Regulation 18 Representation

Warton Residents Association
North Warwickshire Local Plan

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The Text of this submission was agreed at meeting of Warton Residents Association on 5th January 2026.

1. Introduction and context

The Warton Residents Association submits this representation at Regulation 18 of the emerging North Warwickshire Local Plan in response to the proposed spatial strategy, settlement distribution and identification of potential development sites affecting Warton.

This representation is made in the context of a live and undetermined planning appeal for land south of Warton Recreation Ground (APP/R3705/W/25/3371526). That proposal was formally opposed by North Warwickshire Borough Council and by the Warton Residents Association as a Rule 6 Party, with extensive evidence tested at Inquiry.

The matters examined through that appeal are directly relevant to plan-making. They concern not a single site, but the inherent capacity, sustainability and appropriate role of Warton as a settlement. The Regulation 18 consultation must therefore be informed by this recent evidence.

2. Settlement hierarchy and the role of Warton

Warton is designated as a Category 4 settlement in the adopted Local Plan. This designation reflects long-established and enduring constraints, including a limited service and employment base, restricted public transport provision, and a rural form and setting unsuited to strategic expansion.

At the recent appeal, the Council reaffirmed that Category 4 settlements are intended to accommodate only small-scale, proportionate development, typically no more than around ten dwellings at any one time. This interpretation has been consistently endorsed by Inspectors, including in the Curlew Close (2023) and Fox and Dogs (2020) appeals.

Any Regulation 18 approach that seeks to reposition Warton as capable of accommodating large-scale growth, multiple site allocations, or strategic expansion would represent a fundamental departure from the examined settlement hierarchy, without justification and in direct opposition to what the council has already argued.

3. Cumulative growth and proportionality

Evidence presented at Inquiry demonstrates that Warton has already experienced exceptional cumulative growth. Approximately 310 additional dwellings have been delivered since 2016, representing greater than 60% growth in under a decade, without any corresponding enhancement of services, facilities or transport provision (see Figure 1).

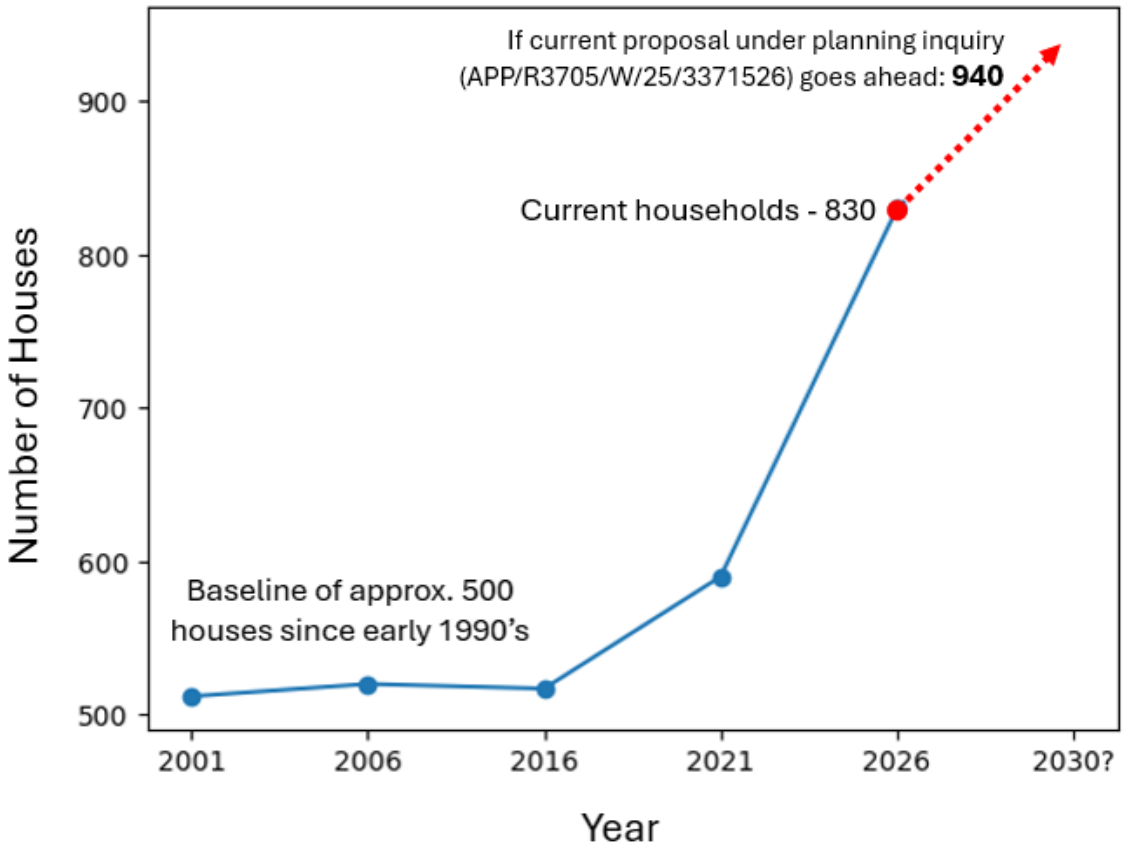


Figure 1: Graph showing growth in houses in Warton 2001 to 2030 (projected)

Both the Council and the Warton Residents Association argued that Warton now requires time to absorb recent development rather than being subject to further expansion. This evidence was not meaningfully contested.

The Regulation 18 site options affecting Warton fail to acknowledge this cumulative context. Further allocations would not represent organic or incremental growth, but a step-change in scale that would undermine proportionality and directly conflict with the intended role of the settlement.

The Map presented below of Warton (Figure 2) and used by NWBC for the purpose of the consultation fails to show the developed land since 2016.



Figure 2: Map of proposed development sites in Warton omitting existing developments since 2016

Actual development that has taken place and been omitted from maps used in the consultation is show below in red (Figure 3).

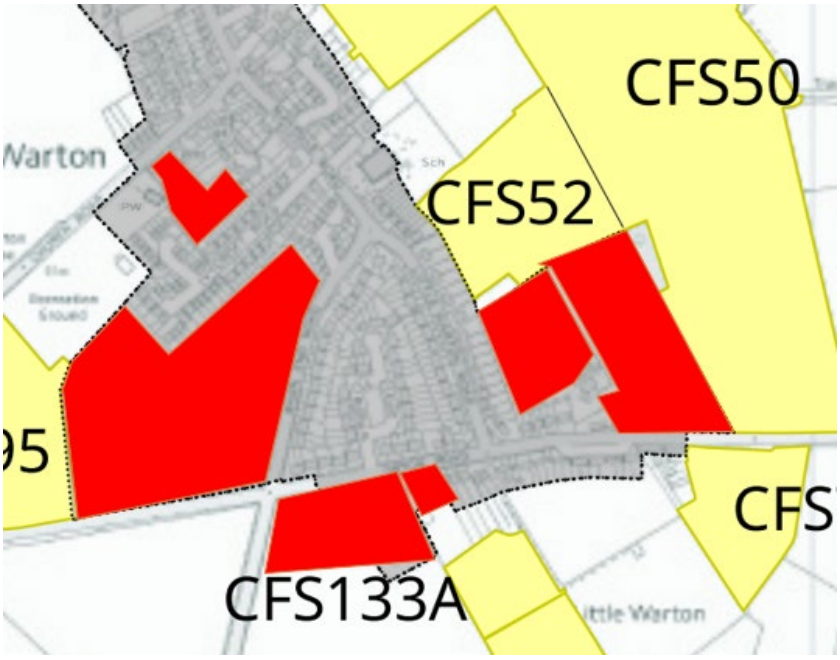


Figure 3: Map of actual development sites (red) in Warton since 2016

The maps above represent a 60% growth of Warton. From 500 homes in 2016, to in excess of 800 in 2025 (many of the new builds remain vacant).

4. Sustainability, transport and access to services

The appeal evidence establishes that Warton is not a sustainable location for significant further housing growth. Local services are insufficient to meet daily needs, residents are heavily reliant on the private car, and public transport provision is infrequent, poorly timed and indirect.

Walking and cycling routes to neighbouring settlements, including Polesworth, are undulating, lack surveillance and are unattractive, even with proposed improvements. As a result, residents do not have a genuine choice of transport modes, engaging paragraph 110 of the National Planning Policy Framework.

Allocating additional housing sites at Warton would therefore embed structural unsustainability into the emerging Local Plan.

5. Character, landscape and village form

Inquiry evidence confirmed that outward expansion at Warton causes harm to landscape character, even where impacts are described as localised. Development at the village edge produces spatially detached, appendage-style development that undermines Warton's nucleated form and rural setting.

Residents' evidence describes the emergence of a peripheral belt of estates, weakening the physical and social coherence of the village. These effects are cumulative and intrinsic to further edge-of-settlement development. They are not capable of resolution through layout, landscaping or reserved matters and must therefore be addressed at plan-making stage.

6. Community and social sustainability

The Regulation 18 consultation must also address social sustainability, as required by Local Plan Policy. Evidence presented at Inquiry documented pressure on roads and perceived safety, declining community cohesion, erosion of village identity, and social impacts associated with the pace of recent growth.

These impacts arise not from opposition to development in principle, but from growth occurring at a scale and speed beyond the village's capacity to absorb change. Further allocations at Warton would exacerbate these pressures and conflict with the objective of creating strong, inclusive and healthy communities.

7. Best and Most Versatile agricultural land and the planning balance

In support of this objection, the Association draws directly upon the evidence of Andrew Collinson, Head of Planning at North Warwickshire Borough Council, provided in the recent appeal proceedings.

Mr Collinson confirmed that development of the high-grade agricultural land surrounding Warton would result in unacceptable permanent harm:

“This development would likely lead to significant permanent loss of BMV agricultural land as a resource for future generations because the development is irreversible.”

He further emphasised that the land’s value is not abstract but demonstrably productive:

“Albeit the loss of 5.7 hectares of BMV is small, the sites’ flexibility for crops and proximity to agricultural farmsteads and more urban areas for sale of goods make the land important as an agricultural asset. It is clear the current farmer still harvests the land as a commercially viable asset.”

Land proposed in the consultation around the village, specifically CFS50, CFS52, CFS95, CFS112, CFS133a, CFS133b are fields that are of the same quality that Mr Collinson argued were BMV and commercially viable assets, and must be preserved. In addition, CFS7 is a tenant farm operated for 3 generations and is a successful local farm business.

8. The planning balance under the draft NPPF

The Regulation 18 consultation must reflect the fundamental shift in national policy set out in the draft National Planning Policy Framework (December 2025).

In particular:

- Draft Policy E2 requires substantial weight to be given to benefits for domestic food production.
- Draft Policy N1 introduces a clear expectation that plan-making should avoid the use of higher-quality agricultural land where poorer quality land is available.

Given that almost all soils around Warton are high-grade, the Council’s spatial strategy should actively steer growth away from these high-performing agricultural resources. This applies in particular to land parcels including CFS7, CFS50, CFS52, CFS95, CFS112, CFS133A and CFS133B.

9. Impact on Wildlife

The farmland, field margins and hedgerow networks surrounding Warton support a diverse assemblage of wildlife that is characteristic of lowland agricultural landscapes and increasingly vulnerable to incremental development pressure. These areas are regularly used by badger, brown hare and deer, all of which depend on large, contiguous tracts of open countryside, established hedgerows and relatively undisturbed field margins for foraging, breeding and movement. Badgers are particularly sensitive to habitat fragmentation and disturbance, while brown hare populations are in long-term national decline and are strongly associated with open, lightly managed farmland such as that found around Warton. The loss or severance of these habitats through edge-of-settlement development would disrupt established movement corridors and result in

cumulative ecological harm that cannot be adequately mitigated through site-level measures alone.

In addition, the same farmland mosaic supports a range of Birds of Conservation Concern Red List species associated with arable and pastoral landscapes. These include ground-nesting and farmland birds such as skylark, lapwing and yellowhammer, alongside hedgerow- and scrub-dependent species including linnet and house sparrow, all of which have experienced substantial national population declines. These species rely on open fields, rough grassland, hedgerows and uncultivated margins for nesting, feeding and shelter and are highly sensitive to habitat loss, fragmentation and increased disturbance. Incremental development around Warton would lead to the permanent loss and degradation of these habitats, disrupting breeding territories and weakening the wider ecological network. Taken cumulatively, such impacts should be afforded significant weight at plan-making stage and would conflict with Local Plan Policy LP1 and national policy objectives to protect and recover priority species and biodiversity.

10. Consistency with Local Plan Policy

The Council has previously argued that protection of agricultural land is already embedded within the adopted plan. This position was clarified in the appeal summation, which confirmed that the reference to the natural environment in Policy LP1 is sufficiently broad to encompass agricultural land, and that national policy on Best and Most Versatile land is directly engaged.

The emerging Local Plan should therefore strengthen, not dilute, this policy direction.

11. Objection to growth options and specific sites

Dispersal strategy (Option 4)

A dispersal strategy would result in the piecemeal destruction of Warton's best agricultural land. It would facilitate what was described at Inquiry as a permanent change, not a temporary loss, of an irreplaceable resource across multiple village edges. This approach is fundamentally inconsistent with the draft NPPF and with sustainable plan-making.

New village west of Warton / Site CFS168

The Association objects to any proposal for a new village west of Warton or strategic development. A development of around 1,200 dwellings would obliterate extensive areas of Grade 2 agricultural land and contradict the settlement hierarchy by placing strategic growth adjacent to, and functionally reliant upon, a Category 4 settlement.

Whether delivered as a single proposal or incrementally through multiple allocations, the outcome would be a strategic urban extension without the rigorous testing required for a genuine new settlement. This would amount to growth by stealth and is inconsistent with

the Council's own appeal position that housing shortfalls require strategic solutions elsewhere.

Sites CFS133A and CFS133B (Land south of Warton Mill, Orton Road)

These sites lie within the same landscape and settlement-edge context examined at the recent appeal. Development would represent further outward expansion of a settlement that has already experienced exceptional cumulative growth.

The appeal evidence demonstrates that this area is poorly related to the village centre, with unattractive pedestrian connectivity and structural car dependency. Development would erode the rural edge, reinforce detached estate-style growth and extend Warton into open countryside. These impacts cannot be mitigated and must be addressed through site selection.

Sites CFS7, CFS50 and CFS52 (Orton Road / Little Warton Road cluster)

These sites must be considered collectively. Together, they would create a continuous or near-continuous belt of development, reshaping the southern and eastern edge of Warton and resulting in incremental strategic expansion by accretion. Regarding CFS7 it would also mean the loss of a viable farm in direct contradiction to the draft NPPF.

Their combined scale would far exceed what can reasonably be considered proportionate for a Category 4 settlement. The Inquiry heard detailed evidence of traffic stress, safety concerns and car dependency along Orton Road and Church Road, which would be compounded by multiple allocations.

These sites would also cause cumulative landscape harm and further erode the village's rural setting.

12. Where should Development Happen?

At the Warton Residents Association meeting on 5th January the issue of the council 5 year housing supply was highlighted as a key issue for the council to accommodate in the new local plan. Having looked at available options the meeting agreed that we would suggest that site CFS71 (Thorpe Constantine) represents a more sensible strategic location for a "new main settlement" because it allows for growth to be "planned to be sustainable from the start," avoiding the issues of "piecemeal and speculative" development seen in overstretched Category 4 villages like Warton. Unlike smaller windfall sites, a new settlement at CFS71 can provide "clear and focussed" infrastructure delivery, ensuring that essential services such as primary schools, health facilities, and community buildings are integrated directly into the development rather than placing "unacceptable pressure" on existing, oversubscribed village resources.

In terms of access, CFS71 offers the opportunity to implement a "vision-led approach" to transport, providing direct access to the strategic highway network and fostering a "genuine

choice of transport modes," including high-quality walking and cycling networks that are currently "functionally absent" in more isolated rural clusters. Furthermore, under Draft Policy HO4, such a large-scale proposal is recognized as the most effective way to support a "sustainable community" with sufficient on-site employment opportunities, thereby reducing the "car dependency" and "structural inequity" that arise when placing new residents in locations without local jobs or reliable public transport. While the development represents a long-term project, it provides the Borough with a reliable forward plan for housing delivery that is "commensurate with the level, type and quality" of the modern infrastructure it will create.

13. Conclusion and requested outcomes

The Warton Residents Association requests that the Council reaffirm Warton's role as a small rural settlement, not a growth location. Furthermore, we request that a housing cap should be applied to Warton to reflect its established role as a Category 4 settlement and to ensure that development remains proportionate, sustainable and consistent with the settlement hierarchy. Evidence tested at recent Inquiry demonstrates that Warton has already experienced exceptional cumulative growth of approximately 60% since 2016, without improvements to services, infrastructure or public transport provision. Further unrestrained growth would entrench car dependency, exacerbate pressure on the local road network, erode community cohesion and undermine the village's rural character and nucleated form.

A defined housing cap would provide policy certainty, prevent incremental strategic expansion by accretion, and allow time for the settlement to absorb recent development. It would also ensure alignment with national policy objectives by directing housing growth towards genuinely sustainable and strategic locations, rather than disproportionately burdening a constrained rural village beyond its environmental, social and infrastructural capacity.

This submission was agreed at meeting of Warton Residents Association on 5th January 2026.