



# **WILMCOTE ACTION GROUP'S SUBMISSION IN RESPONSE TO THE SOUTH WARWICKSHIRE DEVELOPMENT PLAN FOR THE PROPOSED BW NEW SETTLEMENT SITE.**

**7TH MARCH 2025**



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## INTRODUCTION

Following a public meeting when the South Warwickshire Local Plan (SWLP) was presented to residents on the 8<sup>th</sup> February 2025; a show of hands determined that the majority of the residents were against the proposed plan to build 6,700 houses between Wilmcote, Pathlow and Bearley (BW). Over 200 residents attended out of which only 2 voted for the development.

As 4 members of the Parish Council have declared a pecuniary interest and the remaining 3 did not commit to oppose the plan until 25th January 2025. In the interests of the village a Wilmcote Action Steering Group (WASG) was set up.



At the meeting the view of residents was that the availability of land was the main reason why BW has been chosen as a location. The WASG feels that land availability should not predicate the siting of such a large settlement. The decision should be based entirely on planning considerations.

## OPPOSITION TO THE SWLP

We intend to prove that this plan has been a desktop exercise and has not taken into account the impact BW will have on Wilmcote and the wider area including the historic market town of Stratford upon Avon.

We intend to focus on the following 5 key areas:

1. Transport Infrastructure
2. Flood Risk
3. Green Belt Land
4. Heritage
5. Habitat and Biodiversity

Appendix 1: New Settlements HELAA (PartA) Assessment Results (RAG)

		Green Belt	Area of Outstanding Natural Beauty (AONB)	Registered park and Gardens	SSSI	Local wildlife sites	Ancient woodland	Flood Zones 2 and 3	Air Quality	Flood Risk surface water	Brownfield /Greenfield	Minerals Sites and Safeguarding Areas	Listed Buildings	Conservation Area	Scheduled Monuments	Registered battlefields	Ownership	Viability and deliverability
What the desktop survey says	BW- Bearley and Wilmcote	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber
What we say it should be	BW- Bearley and Wilmcote	Red/ Amber	Green	Green	Green	Amber	Green	Red/ Amber	Green	Red/ Amber	Red	Green	Red	Red	Green	Green	Green	Red/ Amber

Appendix 2: Bespoke New Settlement Analysis - RAG Rating Results

		Sufficient space for growth	Employment	Land Ownership	GreenBelt	Proximity to Settlement	Transport	Utilities	Air Quality	Habitat mapping	Carbon Sequestration	Renewable Energy	Flood Zones	Surface water Flooding	Landscapes	Heritage	Call for sites coverage	Call for sites coverage as a % of the proposed area
What the desktop survey says	BW- Bearley and Wilmcote	Green	Amber	Green	Amber	Amber	Red/ Amber	Amber	Green	Green	Green	Amber	Green	Green	Amber	Amber	Green	Green
What we say it should be	BW- Bearley and Wilmcote	Green	Red	Green	Red/ Amber	Amber	Red	Amber	Green	Red/ Amber	Green	Amber	Red/ Amber	Red/ Amber	Amber	Red	Green	Green

The table above shows HELAA's ranking for BW. We have adjusted these to represent a more accurate version.

The HELAA report contains inaccuracies and is therefore an unreliable source for making such far reaching decisions for this settlement.

## TRANSPORT INFRASTRUCTURE

This section outlines why the overall RAG rating for transport cannot be justified at anything other than **RED**.

The arguments presented within this section highlight the impracticality and exorbitant costs of necessary infrastructure upgrades required to make the new settlement viable. It showcases the required road upgrades, the limited capacity of the existing rail network, the lack of an adequate cycle route and bus routes, and the dangers posed to cyclists and



pedestrians by increased traffic. The key sources for this section are the South Warwickshire Local Plan Strategic Transport and Education Assessment (STA) and recent government statistics from the Department of Transport.

## ROADS

The STA states that the cost of upgrading the A46 and associated roundabouts to allow for the increased traffic flow will be in excess of £250 million, which equates to £37000 per dwelling. This does not make economic sense when considering both the financial burden and the limited benefits such an investment would bring. Furthermore, the required upgrades would disrupt local residents and businesses, adding to the overall impracticality of the proposal. The financial implications combined with significant logistical challenges underscore the argument that the proposed development is economically unfeasible. The A3400 already has some planned upgrades but would need considerable further investment to cope with the increased traffic. Although the A3400/Featherbed Lane junction has not been mentioned, this is currently a dangerous junction, with increased traffic, it would require traffic lights or a roundabout to make the entrance to the new settlement and the existing village safe. We estimate these further upgrades at an extra cost of £15 million.

The rating of **RED/AMBER** already indicates the severe impracticality and exorbitant costs associated with the new settlement making it unviable.

The current traffic volume on the A3400 and A46 has already led to local village roads being used as shortcuts, posing significant risks. Increased congestion on the main roads will cause road users to find alternative routes on C roads, the STA admits that there is '**no way of mitigating this**'. These roads will become rat-runs posing a significant road safety risk.

The Henley junction on the A3400, along the route from the planned settlement towards Birmingham, is already at maximum capacity. According to the latest government statistics [1], the average daily vehicle flow past the BW site in 2023 was 9,732 motor vehicles. Each dwelling is likely to have 1.6 cars on average as per the latest available census data for Stratford upon Avon [2]. Therefore, the traffic flow onto the A3400 (and surrounding shortcut routes) can be expected to more than double the existing volume of traffic. This does not account for ancillary delivery/trade vehicles travelling to and from the new settlement and the commercial/industrial units.

Not only will the Henley junction prove to be a bottleneck, gridlock in Stratford upon Avon will start at the Bishopton roundabout and continue on to the Maybird Shopping centre and beyond into the centre of Stratford upon Avon. Traffic trying to navigate to the southern exit of Stratford across the river Avon on the Clopton bridge will come to a standstill. This will have a knock-on effect on other artery roads, which will also come to a standstill. This desk-based plan does not take account of real-life experience.

The increased traffic volume will exacerbate road safety issues, particularly for vulnerable road users such as cyclists and pedestrians. The BW settlement is the only site to be split into two parts by a busy main road (A3400), this will necessitate school children having to navigate this road at peak traffic times to get to the new settlement's schools. Traffic lights or tunnels to mitigate this will be ignored and serious injuries and fatalities will be inevitable.

Based on this evidence, the Highway (local) rating should be classified as **RED**.

RAIL- RAG Rating **GREEN** should be **RED/AMBER**

The SWLP Emerging Spatial Growth Strategy highlights the limited capacity of the existing rail network, rating both Bearley and Wilmcote Stations within Group D, the lowest rating deemed viable for passenger transport within this report. Both stations would be unable to accommodate the influx of new passengers without substantial investment in infrastructure and services.

#### Wilmcote Station

- Existing facilities for disabled/pushchair passengers are inadequate as only the northbound platform is accessible
- The bridge is grade 11 listed and would be challenging and costly to modify
- Rolling stock capacity and single-track provision is inadequate
- Hourly services to Birmingham and 2 hourly services to Leamington Spa are inadequate for commuters
- No waiting room or toilet provision available
- No parking provision available
- Unstaffed with digital ticketing, unsuitable for passengers without computer proficiency
- Third party commitment to invest may not be forthcoming

To upgrade Wilmcote Station would be both costly and challenging. It would take years to implement, leaving the new settlement's residents and the existing Wilmcote residents reliant on inadequate transport options in the interim. This contrasts with the objectives of sustainable growth and timely infrastructure development.

#### Bearley Station

The new developments map has a fundamental error in that it shows a rail line from Bearley to Earlswood. Given that the SWLP Issues and Options (I&O) consultation, which took place in March 2023 decided to focus development on rail corridors, the fact that it has made a fundamental error on the existence of a rail line raises very serious questions about whether the BW site should even have been included in this consultation round.

- Bearley Station is characterised as a “Rural Halt” –not a station– according to ‘the trainline.com.’
- It is believed to have begun as a halt for local farming activities and it is now a request stop twice a day (not at main commutable times)
- It is unstaffed with no ticket office.
- It is known locally as a bus stop on a bridge, rather than a railway station.
- It has a single platform and only four parking spaces.
- There have also been questions about the need to reinforce the bank at the side of the railway line here.

Therefore, the **AMBER/GREEN** rating for Rail should be revised to **RED/AMBER** to better reflect these significant challenges.

**CYCLE WAY – RAG rating – **AMBER/RED** – should be **RED****

There is no viable cycle way along the A3400. The STA acknowledges that locations at the north of the proposed settlement would be at the extreme of the distance people could reasonably cycle and the only off-road cycle route to Stratford upon Avon would be along the canal towpath, which would need significant upgrading and lighting. This would involve considerable investment to re-surface and widen the path and at some locations hedgerows would need to be removed and private ditches diverted and then back filled to accommodate this.

It is suggested that the cycle way should be lit, this would seriously affect nocturnal wildlife. These upgrades would be a costly and disruptive exercise. With a combination of cyclists, runners and dog walkers next to deep water, safety is a serious concern and renders this option unviable.

The STA admits that it is unclear whether the canal towpath could be upgraded to be suitable for all year-round cycling. Furthermore, the towpath is owned by a third party and there is no guarantee that they would agree to this upgrade.

The STA also references National Cycle Network route 5 without conceding that the route southwards is along the unsuitable towpath and the route northwards is exclusively on roads with no cycle ways. There are no other routes for cycling. Not having an Active travel route would result in new residents reverting to the car as the main mode of transport. This would cause increased air pollution and would not comply with SDC’s Net Zero policy.

The rating for active travel should be **RED**.

## **BUSES**

The current X20 and 229 bus services that serve Wilmcote and surrounding villages would not cope with an increased population of 800%. The SWLP STA states that the service could be upgraded by ‘...funding provided by the developer [which] would function as a “kickstart” to position the X20 towards being operated on a fully commercial basis by the time the support funding ended.’ The report states that there would need to be a marketing

**campaign and fare incentives to make it work. A huge assumption is being made that the bus services will ever be profitable! In the likely case that it doesn't become profitable and cannot be commercially run, it will mean that the car will be the main mode of transport, which will not comply with SDC's Net Zero policy.**

The councils' New Settlement Assessment [4], referencing data from the Lepus sustainability report [5], ranks the site at Wilmcote and Bearley 8th out of 12 for sustainability. Stratford District Council has declared a climate emergency. According to Warwickshire County Council's Strategic Transport and Education Assessment [3], the proposed new settlement would likely necessitate residents to drive rather than walk or cycle to nearby locations. In view of this, the selection of the site at Bearley and Wilmcote is in direct conflict with the council's objectives to deliver sustainable developments.

**Considering these concerns, the overall assessment rating for transport infrastructure should be revised from AMBER/RED to RED to reflect the true economic and logistical challenges posed by the proposed development.**

**FLOOD RISK - RAG rated GREEN Should be rated RED/AMBER**

### **Surface Water Runoff**

**The proposed housing development poses significant risks due to increased surface water runoff, inadequate natural water absorption, and an overburdened drainage system, thereby making it an unsustainable project for the area.**

#### **3.1. Geological Setting & Current Land Use**

**Impermeable Geology:** The site is underlain by Mercia Mudstone, a formation that naturally retains water and limits infiltration unless the land is actively maintained as farmland.

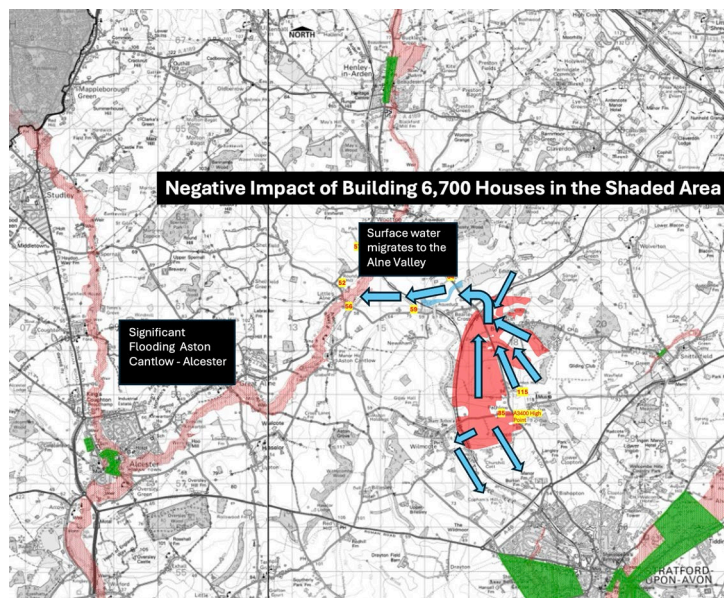
**Role of Existing Farmland:** The well-managed agricultural land currently absorbs rainfall effectively, reducing surface runoff and protecting downstream areas from flooding. This natural function is essential for maintaining the hydrological balance in the region.

#### **3.2. Impacts of Urban Development**

**Creation of Impermeable Surfaces:** The conversion of this farmland into an urban area—with 6,700 houses and an industrial park—will result in extensive networks of roads and buildings. These structures create large impermeable surfaces that drastically reduce the land's ability to absorb water.



**Increased Surface Runoff:** With reduced soil infiltration, rainfall will generate significantly more surface runoff. Given the natural drainage pattern, this excess water will flow toward the river Alne valley, further burdening an already flood-prone system.



### 3.3. Flood Risk & Infrastructure Concerns

**Exacerbated Flooding:** The River Alne has a long history of overtopping its banks. The increased runoff from the development is likely to worsen this situation, elevating the risk of flooding.

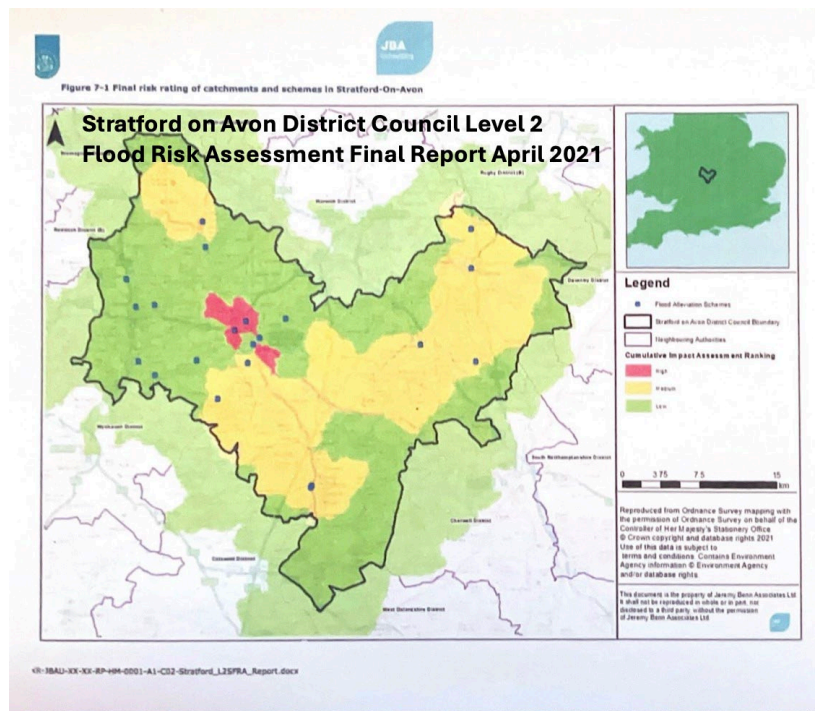
**Threat to Downstream Communities:** Communities such as Aston Cantlow, Great Alne, and Alcester face heightened flood risks due to additional water volumes. Local drainage systems, designed for low-density rural areas like Wilmcote and Bearley, are ill-equipped to handle the surge in runoff that a high-density development would produce.

**Erosion & Water Pollution Risks:** Accelerated water flow will intensify soil erosion along natural drainage paths. Increased sedimentation in the river Alne will deteriorate water quality and harm local ecosystems. Urban pollutants—including oil, chemicals, and heavy metals—are likely to be carried into the river, posing serious risks to wildlife.

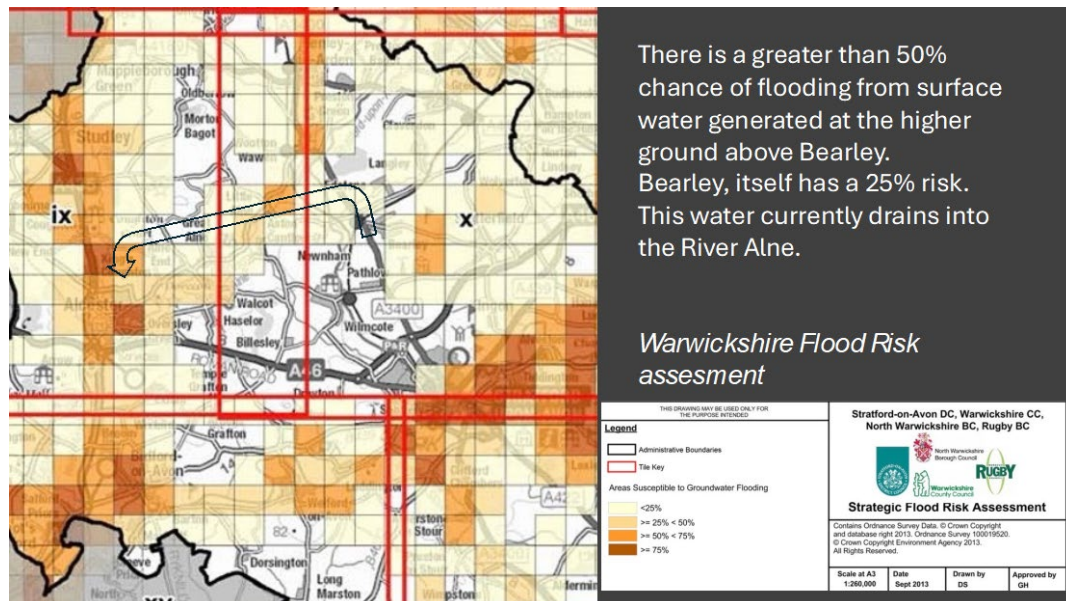
**Feasibility of Mitigating Runoff:** While Sustainable Urban Drainage Systems (SUDS) such as swales, ponds, and permeable surfaces can mitigate some runoff, they are unlikely to fully compensate for the massive increase in impermeable areas. Large-scale flood defenses and drainage upgrades would be required, necessitating significant investment, and may still not prevent the substantial flood risks.

**Flood Risk Probabilities:** Studies indicate more than a 50% chance of flooding from surface water generated at the higher ground above Bearley, with Bearley itself facing a 25% risk. This water naturally drains into the river Alne, compounding the flood risk for downstream communities.

This submission and the Stratford Upon Avon District Council Level 2 Flood Risk Assessment Final Report April 2021 clearly demonstrates that the proposed housing development poses significant risks due to increased surface runoff, inadequate natural water absorption, and an overburdened drainage system.



The report outlines that the aim of the Level 2 assessment is to build on identified risks from Level 1 for proposed development sites to provide a greater understanding of fluvial, surface water, groundwater and reservoir related flooding risks to the site. From this the Local Council and Developers can make more informed decisions and pursue development in an effective and efficient manner.

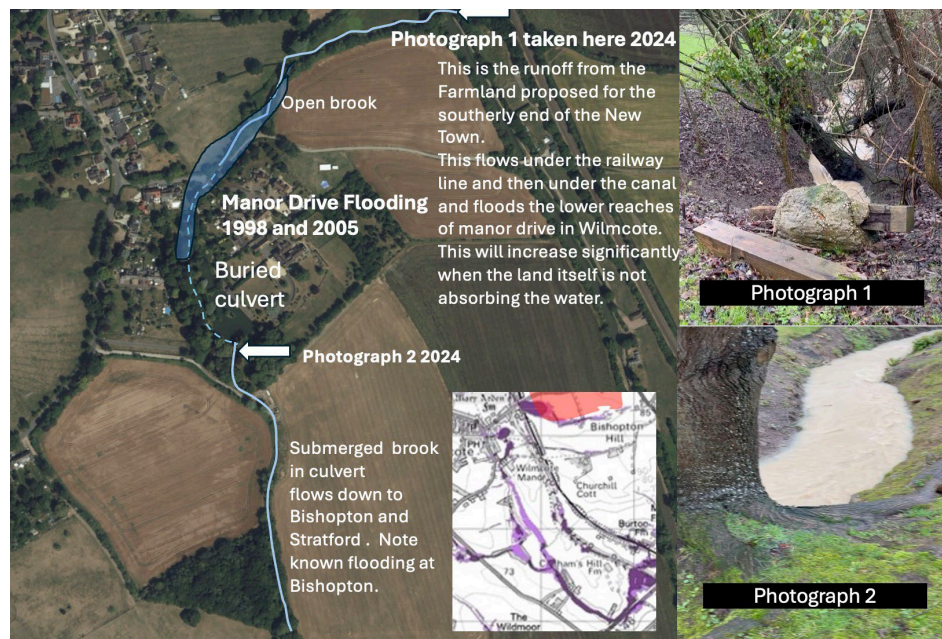


## Flood Risks 2 & 3

The proposed 6,700-house and industrial estate development north of Stratford-upon-Avon faces significant risks from type 2 and type 3 flooding. Although the current managed farmland mitigates minor flooding by absorbing excess water through crop growth and biological evaporation, the transformation of the site into tarmacked surfaces will greatly increase surface runoff. This additional runoff is expected to worsen the regular type 3 flooding along the A3400 adjacent to Edstone Brook as it makes its way toward the river Alne. Consequently, flooding on Salters Lane beneath the railway bridge will likely intensify—disrupting commuter routes between Aston Cantlow, the A3400, and further afield to Birmingham, Coventry, Leamington, and Warwick. The increased water flow could also isolate Aston Cantlow at Alne Bridge near Little Alne and on the village's southern side, as overflowing ditches cut off access, with floodwaters continuing downstream toward Alcester.

Adding to these concerns, the proposed development may also trigger similar flooding issues at Bishopton. As surface water flows down the steeper incline of Bishopton Hill, it will likely overwhelm the well-known flood area at Bishopton Top, north of the A46. Presently, water from the farmland at the southern end of the development site flows under the rail line and canal, then through Manor Drive in Wilmcote, before entering a submerged culvert and open ditch leading to Cadle Pool Farm, and finally down to Bishopton as the evidence below shows.





Notably, Manor Drive Wilmcote has experienced Class 4 flooding on two occasions in the last 25 years—a situation that is projected to worsen significantly under the new development. Such an escalation will undoubtedly attract scrutiny and potential intervention and compensation required from South Warwickshire District Council.

Overall, without comprehensive mitigation measures—such as the widening and excavation of existing drainage channels—the combined impacts on both the Alne valley and Bishopton flood areas render the development untenable. Addressing these risks is imperative before final planning can proceed, ensuring that local communities and transport links are safeguarded against increasingly severe flooding.

RAG Ranking **RED/AMBER**

## GREEN BELT

There is no reason for locating a new settlement at BW on green belt land as there are viable alternatives and it contravenes the NPPF current regulations.

Furthermore, NPPF states in 'exceptional circumstances' (para 145/146) the boundaries of the Green Belt can be moved to allow development so long as the parcel of land it relates to does not contribute strongly to purposes:

- a) To check the unrestricted sprawl of large built-up areas
- b) To prevent neighbouring towns merging into one another
- d) To preserve the setting and special character of historic towns

**NPPF (para 146) states ‘exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means**

**The BW Site falls entirely within the Green Belt. Seven of the proposed new settlement sites are outside the Green Belt, six of which have better transport infrastructure – the authority can meet the land requirement elsewhere.**

- Site E1 is outside the Green Belt and Level 1-2 priority**
- Site X1, X2, F1 are all outside Green Belt and Level 3 Priority**
- Sites F2, F3, G1 are all outside the Green Belt**
- Site A1 B1 is in the Green Belt but fully in Level 1 Priority**

**The plan outlines areas for Commercial/Industrial development and yet planning permission has already been granted on land close to the Wildmoor roundabout on the A46 for 65 acres of Commercial/Industrial Development. Surely this vast area allows enough capacity for future development without the need for using Green Belt land in the BW proposal.**

**The Arup report suggests SDC also has moderate Brownfield sites available.**

**The proposed site, Land at Bearley and Wilmcote, is situated within the West Midlands Green Belt. We understand that the Local Authority has previously refused outline consent and planning applications across Bearley and Wilmcote due to the limitations of ‘infill’ development. We consider that the proposed site does not constitute ‘infill’ development, given its specific location and surrounding land uses. Consequently, the proposed development does not meet the exceptions outlined in paragraph 154 of the National Planning Policy Framework (NPPF). We believe this would result in inappropriate development within the Green Belt, causing considerable harm to its openness. There are no special circumstances to outweigh this harm. Therefore, the proposed development fails to comply with Section 13 of the NPPF and the Local Plan.**

**The primary aim of Green Belt policy is to prevent the unrestricted sprawl of large built-up areas, thereby maintaining the openness and permanence of the countryside. The proposed development would contravene this aim. Additionally, Green Belts act as buffers to prevent neighbouring towns from merging, preserving their distinct identities. The proposed development would effectively create a ‘ribbon development’ encompassing Wilmcote, Bearley, and Pathlow, sandwiched between Henley in Arden to the north and Stratford upon Avon to the south. Preserving our Green Belt in this area helps maintain the setting and special character of our historic villages, which are an important part of our cultural**



heritage. Furthermore, this Green Belt helps protect the countryside from encroachment, ensuring that rural areas remain unspoiled.

The NPPF emphasizes that any changes to Green Belt boundaries should only be made in exceptional circumstances and must be fully justified. This ensures that the Green Belt continues to serve its intended purposes effectively. We consider the scope of the proposed site, along with the considerations within this document, to lack exceptional circumstances or justification. The erection of the proposed development and the accompanying infrastructure would disregard all principles of the Green Belt.

The LEPUS report states that site X1 is 'anticipated to perform well for a number of objectives...relative to the other new settlement options.'

For the reasons outlined above, we consider the proposed site to be detrimental to the preservation of the Green Belt.

The magnitude of the proposed settlement and the ensuing urbanisation would drastically alter the character and aesthetic of the landscape and the surrounding area. Nestled between the Avon Ridgelands (Wilmcote) and Ancient Arden (Bearley) as defined in the Stratford on Avon District Character Map, both villages boast their own distinct identities.

The essence of rural settlements lies in their separation, with the open, undeveloped lands at their peripheries forming an integral part of their character. This proposed development would merge the two villages into a single entity, creating a ribbon development and irrevocably transforming their unique character and destroying their heritage. The very reason that people want to visit and live in these areas is their unique rural idyll. 6700 high-density houses will destroy what residents and visitors alike love to see. SWLP serves to destroy Wilmcote, which is mentioned in the Domesday Book and Bearley, another ancient settlement with the remains of a fort dating back to Roman times.

The RAG rating should be **RED/AMBER**

#### **HERITAGE - RAG Rating **AMBER** should be **RED****

We agree with the Lepus report that Heritage for BW should be rated RED for Wilmcote

The LEPUS report says, 'if the development proposal coincides with, is located adjacent to, or significant impacts on the setting of a Grade 1 listed building it should be ranked **Red**'.

Wilmcote is home to Mary Arden's House, a grade 1 listed property with significant connections to Shakespeare. The integrity of its historical setting, nestled within the local countryside, would be irreparably damaged if it became accessible through a sprawling new settlement, which will be approximately 482 M/528 yd from its curtilage. The potential

damage to such a vital cultural landmark must not be underestimated. Furthermore, the increased traffic from 6700 new homes, the increased bus services and rat-run traffic will cause vibrations affecting the structure of the building and air pollution, which will destroy the fabric of the building.

Mary Arden's House is William Shakespeare's motherland and links to his legacy with the other Shakespeare properties in and around Stratford upon Avon. It is of global significance and is set in the conservation area of Wilmcote surrounded by other listed timber framed dwellings. This adds to its historic rural charm in the village and the development will consume this setting, making it an integral part of a high-density housing development. It will irrevocably destroy the setting of this most important historic building, which is part of the narrative of the Shakespeare story. The Tudor farm and house are currently used for educational purposes, however, the Shakespeare Birthplace Trust plans to re-open the house for the general public again in the summer of 2025. At its peak in 2014, prior to the pandemic, tourism revenue from the house was estimated at 80K. A tourist attraction of this calibre brings a substantial contribution to the economic health of the whole Stratford upon Avon area.



**Mary Arden's House and Tudor Farm, Wilmcote, Warwickshire known latterly as Palmer's Farm.**

**The interim CEO Rachael O'Connor-Boyd endorses our argument in the following extract form her email:**

'I have members of our team working on our submission also and we do expect to make a comment about the vital need to protect rural landscapes and assets, such as those which surround Wilmcote. I should say, on behalf of the whole Trust, thank you for continuing to argue for the importance of heritage assets, views and vistas. As the Interim CEO of a conservation charity, this is something I feel that we should be striving hard to preserve for future generations.'

**The following testimonial is written by the well-known Professor and Fellow of Shakespeare studies at Birmingham university.**

I write both as a long-term resident of Wilmcote and in my professional capacity as Chair, Professor and Fellow of Shakespeare Studies at the Shakespeare Institute of the University of Birmingham: the world's most important and renowned centre for the study of Shakespeare's life, time and works. I feel it is my duty in both respects to emphasise the irreparable damage which the enormous proposed housing development would do to the historic environment of what is, quite literally, Shakespeare's motherland. Shakespeare's mother, Mary Arden, lived in the handsome farmhouse in the middle of the village. His father, John Shakespeare, 'married up' so their son, William, had particular reason to be proud of his maternal heritage. That he was especially proud of it is signalled by the fact that he mentions the village in one of his plays, *The Taming of the Shrew*, a work which is not coincidentally full of references to animal and country life. What makes Shakespeare's reference to Wilmcote even more striking is that he does not specifically mention Stratford-upon-Avon in any of his works.

Wilmcote's Shakespearean associations are a cause of significant pride to the people who live here and that is the reason that the only pub in the village is called Mary Arden's Inn. But the Shakespeare heritage of Wilmcote is also of national and international significance. Across the centuries, people from all over the world have come to Wilmcote in search of Shakespeare. When I was researching the development of Shakespeare's reputation after his death for a book I was writing in 2016, I came across a particularly touching nineteenth-century account of a Hungarian Shakespeare lover who had travelled to the village in search of the playwright's roots. As Stratford has become more commercialised, many more international visitors have felt able to make especially authentic contact with Shakespeare in Wilmcote and the peace of its surrounding countryside. I know this for a fact because, over the last fifteen years, my family and I have hosted international Shakespeareans who have travelled from, for example, Berlin, Belgrade, Salerno, Munich, Verona, Bangladesh, Brisbane, Sydney, Minnesota, Austin, El Paso, and Washington D.C.

Shakespeare is the world's most valued writer. It is frankly risible that the home village and environment of his mother is only amber rated for heritage when other potential sites have been designated as red no-go zones on grounds of their historic importance. The hero of one of Shakespeare's later plays is persuaded not to sack his home city by the argument that this would be to tread upon his mother's womb. Like the reference to Wilmcote in *The Taming of the Shrew*, it is a powerful indication that not just his mother but his mother's home mattered to Shakespeare. I feel sure that he would urge the Council not to tread on his mother's womb and bulldoze and concrete over his motherland. I'm even more convinced that it is our duty to protect this unique, world-significant piece of Shakespeare country for locals, visitors and the future.

Professor Ewan Fernie

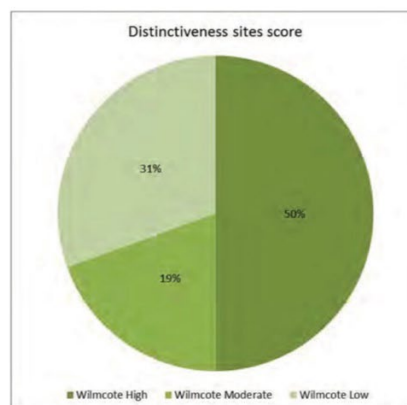
Aston Cantlow Road, Wilmcote and The Shakespeare Institute, University of Birmingham



## HABITAT AND BIODIVERSITY - RAG rating **GREEN** should be **AMBER/RED**

The HELAA Assessment has rated the site at Bearley and Wilmcote as green for SSSI and local wildlife sites [3]. However, this assessment conflicts with the Lepus sustainability report [4]. This report identifies the proposed settlement in Bearley/Wilmcote as the worst-performing new settlement in terms of biodiversity protection. The development is anticipated to significantly increase the risk of recreational and traffic disturbances and cause other detrimental impacts, such as air and water pollution.

These adverse effects are likely to considerably harm various biodiversity assets, including the 'Snitterfield and Bearley Bushes' SSSI, which contains the most northerly maternity roost of the Horseshoe bat and is situated adjacent to the proposed development. Wilmcote also hosts protected species as listed in Stratford upon Avon District Council's own Ecological and Geological Study of local Services Villages (see below). In addition to this list, the protected Otter has returned to the canal in Wilmcote, along with red kites; and lap wings that live on the margins of the green belt fields earmarked for commercial/industrial development. Encroachment on this sensitive area could lead to irreversible damage to the habitat, posing a threat to the flora and fauna reliant on this crucial ecological site. Therefore, the rating should be revised to a **RED**



### Geological Description

Wilmcote has much potential for its late Triassic – early Jurassic geology (Penarth Group and basal Blue Lias Formation including the Wilmcote Limestone) with considerable potential for important palaeontological discoveries. Any excavations into natural geology would be of potential interest for purposes of recording and/or museum collecting.

### Protected Species

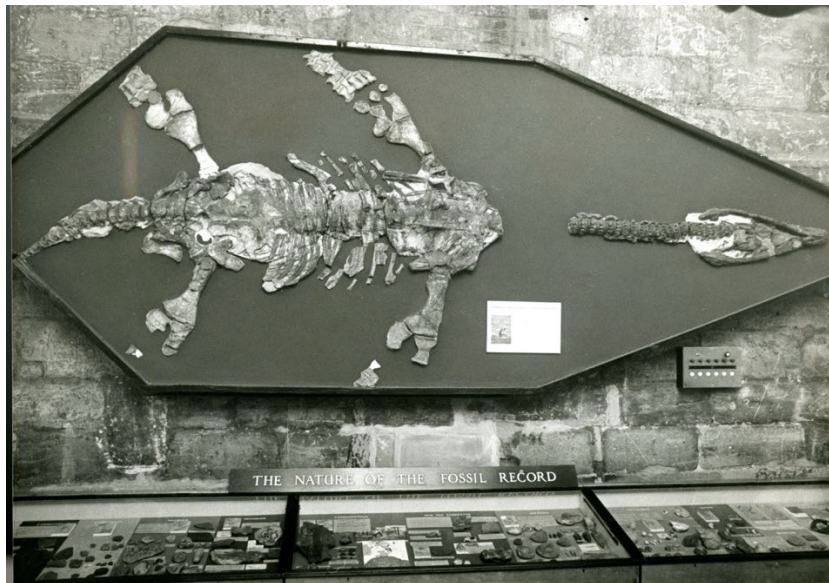
The bat species of brown long-eared has been recorded in the settlement area. In the wider area there are additional records of grass snake, badger, hedgehog, barn owl with additional bat records of common pipistrelle, natterer and an indeterminate bat species plus a butterfly record of grizzled skipper, dingy skipper, pearl-bordered fritillary, white-letter hairstreak and small heath. There are also rare plants including basil thyme, blue pimpernel, lesser centaury, parsley water dropwort, yellow bird's-nest, small scabious, rye brome and field garlic, round-headed leek, greater butterfly orchid and hounds tongue in the wider area.

### Recommendations for Further Survey

- Stratford-upon-Avon Canal
- Fields at Mary Arden's House museum, new potential local wildlife site
- Extension to Hardwick Farm Meadows



**Wilmcote's Plesiosaur found at Wilmcote quarry and acquired by Warwickshire Museum.**



SDC's study makes mention of Wilmcote being a site of geological importance – (Penarth Group) states 'Wilmcote has much potential for its late Triassic – early Jurassic geology and basal Blue Lias Formation including the Wilmcote Limestone). The report states that '...geology would be of potential interest of recording an/or museum collection.' If this proposed development is allowed to proceed, a valuable study area will be lost forever.

RAG ranking should be **AMBER**

## SUMMARY

### A Flawed and unsustainable Proposal

The BW settlement is a short-sighted, financially unviable and environmentally reckless development.

It fails on:

1. Transport Infrastructure: will be financially unviable and cause severe congestion.
2. Flood Risk: climate change and the new settlement will inevitably lead to catastrophic flooding
3. Green Belt land: no 'exceptional circumstances to destroy Green Belt land'.
4. Heritage: erosion of heritage assets is unthinkable for future generations.
5. Habitat and Biodiversity: flora and fauna will be severely compromised.

As well as failing on all of the above we believe that the estimated housing figures are unreliable and question the reasoning behind the need for 6,700 new homes new settlement with associated facilities.

**The Campaign for Rural England are in line with our thinking.**

**The CPRE states:**

Under the SWLP to 2050, there is a clear danger that our areas will be obliged to provide housing and land to meet a statutory Birmingham housing requirement that is three times the City's actual demographic need. So that's potentially homes that Warwickshire doesn't need, to meet a Birmingham shortage that doesn't exist. The final factor leading to unrealistic numbers is the decision to extend the SWLP plan horizon to 2050, not 2040. (15 years is more usual.) Of course, it's important for local authorities to have time to plan infrastructure and utility needs. But can Warwick and Stratford seriously say – hand on heart – that they know housing needs and likely land availability for the next 27 years? Covid destroyed even five-year plans. Extending the South Warwickshire plan to 2050, increases housing numbers and the land grab by 50%. (35,000 homes by 2050, not 23,370 by 2040.)

We believe that these assumptions are seriously flawed. That's why we are respectfully asking those responsible to reconsider the base assumptions underpinning the South Warwickshire Local Plan. They need to take Gerald Kells' forty pages of detailed statistical evidence seriously. Otherwise, more farmland and greenbelt will be destroyed, to meet a non-existent housing shortage.

Judith Cobham-Lowe, Chair, CPRE Warwickshire

*At the time of writing and before printing the joint Local Plan proposal is live. It remains to be seen whether the changes in the political landscape of Warwick and Stratford upon Avon following the recent local elections result in 'more of the same' or something different.*

*It is now fact that under the current government we have 'more of the same' with an increase from 35,000 new homes by 2050 to accommodating up to 54,700 new dwellings by 2050 across Stratford upon Avon and Warwick District Council areas.*

**The Cabinet must reject this ill-conceived plan in favour of a solution that respects both the environment and the community it serves.**

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