

**Warwick District Council**  
**Local Plan Examination**  
**Response to Inspector's Initial Matter**  
**and Issues**

**Green Belt Background Paper**

**August 2016**

## Table of Contents

National context .....	4
Exceptional circumstances - Legal background .....	7
Safeguarded Land.....	10
Other issues .....	11
Sub-regional Context .....	12
Planning policies – Proposed Modifications 2016 .....	16
Site identification and allocation – confirmation of exceptional circumstances .....	18
Sustainability Appraisal Update.....	21
Green belt evidence .....	22
Strategic approach to land release in green belt .....	24
Effects of the proposed allocations on purposes of including land in the green belt .....	26

1. This paper is intended to set out Warwick District Council's (WDC) approach to the identification of sites within the confirmed West Midlands Green Belt. It should be read in conjunction with the Distribution of Development Strategy Paper (HO25PM), Housing Topic Paper and the Development Strategy for the district (DS4).

## National context

2. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework within which decisions should be made. Further guidance is provided by National Planning Practice Guidance (NPPG). In order to be found sound, policies must be positively prepared, justified, effective and consistent with national policy (NPPF, paragraph 182).
3. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green belts are their openness and their permanence.
4. The NPPF (paragraph 80) sets out the five main purposes of the green belt, which are: -
  - to check the unrestricted sprawl of large built-up areas
  - to prevent neighbouring towns merging into one another
  - to assist in safeguarding the countryside from encroachment
  - to preserve the setting and special character of historic towns
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
5. Paragraph 82 states that new green belt should only be established in exceptional circumstances such as when a major urban extensions or a new settlement is being considered.
6. The NPPF allows for the review of green belt boundaries in exceptional circumstances, through the preparation of a local plan (paragraph 83).
7. A case that was heard at the Court of Appeal last year shed some light on the status of paragraph 83. Central Bedfordshire Council (CBC) granted permission for 5,150 dwellings on a 262ha site in the green belt, on the grounds that very special circumstances existed to justify the proposed development. The site had been identified in the emerging plan for development and removal from the green belt. The adjacent council (Luton BC) applied for a judicial review of the decision to grant permission.
8. A decision was published on the 20<sup>th</sup> May 2015 [EWCA Civ 537] that supported the decision and rejected the challenge. Among the issues addressed were the exceptional circumstances advanced by CBC for the development of the site, which included: -
  - a clear need for development in the Green Belt to meet immediate housing and economic needs
  - the policy history (including in the emerging Development Strategy) identifying it as a site suitable for removal from the Green Belt for residential development
  - £45m contribution that the developers would make to the construction of the M1-A5 link road (identified as a key national infrastructure project)
  - the fact that no local plan had been adopted since 2004; should a plan or DPD have been adopted in the interim, the site would already have been removed from the green belt and allocated for development

9. The judgement addressed the weight to be attached to NPPF paragraph 83. While this decision and associated discussion obviously related to the issues around allowing development on green belt sites in very special circumstances, it is included here to demonstrate the fact that the use of green belt for development is not necessarily inappropriate and to help establish the need to be able to justify the removal of land from the green belt in all appropriate circumstances:

54. *The second sentence of para. 83 of the NPPF provides guidance regarding the approach to be adopted if there is a proposal to alter the boundaries of the Green Belt in a local plan: **exceptional circumstances** have to be shown to justify such a course. But paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: "**very special circumstances**" have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan [WDC emphasis].*

...

56. *... Whilst it may be easier to proceed in stages, by changing the local plan to take a site out of the Green Belt (according to the **less demanding "exceptional circumstances" test**) and then granting permission for development without having to satisfy the **more demanding "very special circumstances" test**, there is nothing in para. 83 (read in the context of the entirety of section 9 of the NPPF) to prevent a planning authority from proceeding to consider and grant permission for development on the land in question while it remains within the designated Green Belt, **provided the stringent "very special circumstances" test is satisfied** [WDC emphasis].*

10. Paragraph 84 requires local planning authorities to take into account the need to promote sustainable development patterns when identifying green belt boundaries, and suggests that authorities should consider the sustainability of focussing development adjacent to urban areas inside the green belt boundary, in inset towns or villages or in areas outside the green belt. Land should therefore be fully assessed not just against its suitability for green belt status but also with regard to the sustainability of the development it might accommodate relative to various issues important to the emerging plan or the wider district. WDC ensured that all aspects of potential sites were considered against sustainability criteria and the Sustainability Appraisal undertaken for both the Submission document and the subsequent modifications clearly reflects this approach.

11. Paragraph 85 identifies the various criteria local authorities should take into account when considering the establishment of appropriate boundaries for green belt. They include: -

- ensuring that the defined boundary should reflect requirements for sustainable development set out in the local plan strategy;
- that land shouldn't be included if it isn't necessary for the purposes of openness;
- that "safeguarded land" should be identified between urban areas and the green belt (to meet further long-term needs beyond the plan period);
- making it clear that such safeguarded land isn't available for development in the current plan period and that planning permission should only be granted once a local plan review has confirmed that development is required;

- that the local authority should be satisfied that the boundaries themselves would not need to be amended after the plan period;
  - that boundaries should be identified clearly using physical and permanent features (e.g. roads, rivers, etc.)
12. Paragraph 86 states that if it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the green belt, the village should be included in the green belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the green belt.
13. The NPPF has a general presumption against development in green belts unless very special circumstances are demonstrated. There are, however, some uses that are appropriate in green belt and these are listed in paragraph 89.

## Exceptional circumstances - Legal background

14. As described in NPPF paragraph 83, there is no definition available of what constitutes exceptional or special circumstances as this will vary according to local areas. In the case of WDC, there is a clear and overriding need to provide for a level of new housing over and above that originally identified in the submission version of the new local plan (Housing Requirements Topic Paper - HO29PM).
15. There have been several key legal cases since 2012 that have shed some light on the role of paragraph 83 and the issue of exceptional circumstances.
- A. **Hunston v SSCLG (High Court, August 2013)** – this case was concerned with the correct identification of objectively assessed needs as part of the test of very special circumstances. While this is a stricter test than that for “exceptional circumstances”, it illuminated the weight that could be attached to consideration of the relative importance of housing need.
6. *... a Local Plan could properly fall short of meeting the "full objectively assessed needs" for housing in its area because of the conflict which would otherwise arise with policies on the Green Belt or indeed on other designations hostile to development*
22. *... In essence the submission made by HPL is that on a proper understanding of the NPPF read as a whole, a shortfall between objectively identifiable housing need and the housing that could be provided on identified deliverable housing sites identified by the LPA was capable of being a very special circumstance and that where such a contention was relied on by an applicant or appellant, the LPA and on an appeal the inspector was required to start by identifying the full housing needs of the relevant area on the basis of the best and most up to date evidence available. Once that exercise had been done, it was then for the decision maker to decide what weight should be given to any unmet need that had been identified, the weight to be given to any other circumstances relied on in support of the application and then to decide whether these factors in the aggregate clearly outweighed the harm caused to the Metropolitan Green Belt by reason of inappropriateness and any other harm*
28. *... The crucial question for an inspector in such a case is not: is there a shortfall in housing land supply? It is: have very special circumstances been demonstrated to outweigh the Green Belt objection? ... such circumstances are not automatically demonstrated simply because there is a less than a five year supply of housing land ... one of the considerations to be reflected in the decision on "very special circumstances" is likely to be the scale of the shortfall*
16. However this decision was recovered for determination and subsequently overturned by the Secretary of State, Greg Clarke, on the basis that
- “harm to the green belt has not been clearly outweighed, and very special circumstances do not exist to justify allowing the inappropriate development”.*
- B. **Gallagher Estates v Solihull MBC** – the case revolved around the exclusion of two housing sites previously allocated for development from the new Solihull

Local Plan. It considered the meaning of “exceptional circumstances” and set out a number of accepted principles: -

126:

- i) *Planning guidance is a material consideration for planning, plan-making and decision-taking. However it does not have statutory force ...*
- ii) *The test for redefining a Green Belt boundary has not been changed by the NPPF...*
- iii) *Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt ...*
- iv) *Whilst each case is fact-sensitive and the question of whether exceptional circumstances are exceptional for these purposes requires an exercise of planning judgement, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.*

**C. IM Properties v Lichfield** – the case provides an assessment of the “exceptional circumstances” test.

91. *From that review [Gallagher Homes v Solihull MBC] it can be seen that there is no test that green belt land is to be released as a last resort. It is an exercise of planning judgement as to whether exceptional circumstances necessitating revision have been demonstrated.*
  92. *... the achievement of sustainable development is an ongoing duty upon any body exercising its function under part 2 of the Act. Sustainable development is a concept which is an archetypal example of planning judgement.*
  93. *...inevitably travel patterns are important. Both the SEA and the sustainability appraisal are important components in forming a judgement to be made ...*
  94. *As a result it is submitted that the green belt designation is a servant of sustainable development.*
  - ...
  96. *What is clear from the principles distilled in the case of Gallagher is that for revisions to the green belt to be made exceptional circumstances have to be demonstrated. Whether they have been is a matter of planning judgement in a local plan exercise ultimately for the inspector.*
17. Despite the effective revocation of the Hunston verdict and the associated implications for the relative weight to be given to housing need when considering green belt release, a called-in appeal in Gloucestershire (April 2016) was allowed by the Secretary of State on the basis that:
- ... the main issues revolved around the planning balance of the socio-economic benefits of the scheme versus the harm to the green belt, landscape character and heritage assets. The secretary of state agreed that exceptional circumstances existed for the release of the allocation from the green belt, despite the Written Ministerial Statement of December 2015; it*

*was supported by the local authorities preparing the emerging joint core strategy and was not premature. The proposal would cause harm to the green belt by reason of inappropriateness and loss of openness but the new housing in an area of high and persistent unmet need and the creation of 300 construction jobs and 540 other jobs, £4.6 million in household income, £190,000 in council tax and £1.3 million in New Homes Bonus were material reasons to allow the conflict with the development plan on green belt policy and other grounds.*

DCS Ref: 200-004-875 [Compass link](#)

## Safeguarded Land

18. The NPPF states at paragraph 85 that:

*... when defining boundaries, local planning authorities should: ...*

- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; ...*

19. National policy establishes the need to determine where and whether land should be removed from the green belt and effectively set aside to cover possible longer-term needs. Such land will be protected from development until such time as it has been established through a local plan review or replacement that it is needed to meet identified needs beyond the plan period. Levels of protection offered to such safeguarded land are effectively equivalent to green belt status until a demonstrable need is shown to exist.

20. The identification and allocation of safeguarded land effectively helps to protect green belt boundaries by ensuring that there will be no need to reassess them following the adoption of the plan. Safeguarded land therefore allows for the establishment of permanent green belt boundaries through the emerging local plan that will endure beyond the plan period. As it is often located adjacent to settlements or built-up areas, as in Warwick District, it will also help to promote more sustainable patterns of development.

21. In terms of longer-term planning, safeguarded land also allows for the measured delivery of sites across an area. This ensures that a rolling programme of housing delivery can be more easily maintained and thus will give certainty to the likelihood of meeting ongoing development need. It also allows for the planning and provision of necessary infrastructure across the medium to longer term, rather than as one immediate requirement. It also gives more certainty to local communities and developers on the possibility and potential for certain areas and sites to be developed in the future.

22. The future use or development of safeguarded land will only be considered during a local plan review. The assessment of such land will consider whether an argument for releasing the land (in whole or part) for development can be sustained or whether it should remain safeguarded.

23. WDC has identified the need for two areas of safeguarded land to meet potential future long-term development needs. A policy (DSNEW2) has been incorporated into the proposed modifications, which sets out the parameters for inclusion of safeguarded sites and also explains the rationale behind their selection. The areas identified in the policy will continue to be subject to green belt, countryside and rural policies until such time as a plan review demonstrates that they are required to meet development needs.

## Other issues

### **Small-scale land release for starter homes**

24. In December 2015 the Government consulted on a proposed amendment to national planning policy to allow neighbourhood plans to allocate small-scale sites in the green belt for starter homes. It also proposed to change policy to support the regeneration of previously developed brownfield sites in the green belt by allowing their redevelopment, notwithstanding impacts on the openness of the area, providing this would contribute to the provision of starter homes. This legislation has not yet been formally enacted.

### **Travellers and Travelling Communities**

25. National policy for travellers is contained separately in the document Planning Policy for Traveller Sites. At paragraph 15, it states that if a local planning authority wishes amend the green belt boundary in order to accommodate a traveller site to meet a specific and identified need, it should do so only through the plan-making process and not in response to a planning application. When doing so, the land should be specifically allocated as a traveller site.

## Sub-regional Context

### West Midlands Green Belt (WMGB)

26. The extent of the WMGB was established in 1975 and covers around 1500sq.km around the Black Country, Birmingham, Coventry and Solihull.
27. The presence of the WMGB has effectively prevented the outward spread of the conurbation and has protected and preserved the openness of land on its fringe, prevented coalescence of the various major centres of population and avoided encroachment into open countryside.
28. While the permanence of the WMGB has been established and is a longstanding and well-supported planning tool, there have necessarily been incursions into it from time to time; for example the Dickens Heath development in Solihull was built on an area of interim green belt in the 1990s to meet identified housing need in the borough.
29. More recently Birmingham City Council identified an urban extension on land in the green belt near Sutton Coldfield for around 6,000 dwellings through their local plan process, which was considered sound by the Inspector. This is however subject to consideration by the Secretary of State. In addition, HS2 will bisect the green belt in various places across the region.

### Warwick District Green Belt

30. The green belt in Warwick covers approximately 80% of the district's area (equating to approximately 20,545 hectares). It has been successful in preserving the setting and context of the various historic towns and settlements within the district, as well as helping to manage development in smaller and sensitive rural and semi-rural locations.
31. The broad area covered by the Green Belt in Warwick District did not alter between the publication of previous strategic policies (the Warwickshire Structure Plan Alterations -1989 -2001), against which the adopted Warwick Local Plan was prepared, and the adoption of the last Warwickshire Structure Plan.
32. Generally speaking the Green Belt is located to the north and west of the A46 (excluding the urban centre of Kenilworth) and to the north and east of the urban limit of Warwick and Leamington Spa.

### Planning Policies – Warwick District Local Plan (1996 – 2011)

#### DAP1 – Protecting the Green Belt

33. This policy was not saved when the Local Plan expired, the reason being that it repeated national policy within PPG2: Green Belts. It was effectively struck from the plan in September 2010.
34. The subsequent adoption of the NPPF replaced the extant PPGs and it is that guidance that will now apply (see above).

### Planning policies – Warwick District Local Plan Submission Version (January 2015)

35. The development strategy is set out in **Policy DS4** in the emerging Local Plan. It requires development to be identified and distributed in a way that reflects both national and local policy in a sustainable manner.

36. The approach entails new housing and employment allocations to be located in the following broad hierarchy: -
- Previously developed land, especially sites with regeneration potential
  - Housing - greenfield sites on the edge of urban areas and in sustainable locations with services, facilities, jobs and transport available
  - Employment – greenfield sites should only be allocated in locations suitable for 21<sup>st</sup> century business and accessible by various modes of transport
  - Limiting development that would result in coalescence
  - Avoiding sites that would have a detrimental impact on heritage assets unless public benefits outweigh harm
  - Areas of high landscape value / high environmental value will be avoided
  - Green belt sites will only be allocated where exceptional circumstances apply – taking into account the following: -
    - Availability of non-green belt sites
    - Potential of site to meet specific housing or employment needs that can't be met elsewhere
    - Potential of site to support regeneration in deprived areas
    - Potential of site to support facilities and services in rural areas
37. The Proposed Modifications (February 2016) amend the wording of DS4 slightly to refer to “*built-up*” areas rather than urban areas. The policy in general provides a clear strategic basis for the proposed site allocations and also allows for a degree of flexibility when considering what exceptional circumstances might relate to a particular site.

**“DS19 – Green Belt**

*The extent of the green belt is defined on the Policies Map. The Council will apply green belt policy in accordance with government guidance as set out in the national policy.”*

38. The draft policy identifies a number of locations – mainly individual sites and growth settlements - that will be removed from the green belt upon adoption of the plan, to allow for appropriate development to support those areas to be delivered.

**“MS1 – University of Warwick**

*Development at the University of Warwick will be permitted in line with an approved Masterplan or Development Brief as agreed with the relevant local planning authorities.”*

39. The University of Warwick lies on the boundary of the district with Coventry City and its campus is effectively split between the two local authorities, with the majority of the educational activity occurring in Coventry and ancillary and residential uses lying within Warwick. It is a significant driver of growth and economic activity. A revised masterplan is being drawn up for the university that will see a degree of internal reorganisation. It is proposed to remove elements of the current operation from the green belt, to allow development to take place to achieve this.

**"MS2 – Major sites in the green belt**

*Development at existing developed sites in the Green Belt will be restricted to the limited infilling and redevelopment of previously developed land and will be assessed in accordance with national planning policy.*

*Due to the importance of the Former Honiley Airfield, Stoneleigh Park, and Stoneleigh Deer Park to the economy and the District, there may be very special circumstances to justify further development (within the boundary identified on the Policies Map).*

*Where this can be demonstrated, proposals should be brought forward in line with an approved Masterplan or Development Brief which demonstrates that the openness and the purposes for including the land in the Green Belt is retained, and which complies with other relevant policies in this Plan.*

*In the case of Stoneleigh Park, appropriate amendments as a result of HS2 will be supported without the need to revise the Masterplan."*

40. National policy allows for the limited infilling or redevelopment of previously developed sites within the green belt that would not have any further impact on the openness of the area and the purpose of including land within it.
41. However, this policy identifies certain significant sites with strategic importance to the district that, through the importance of their role or activities, may generate exceptional circumstances that justify additional development within identified boundaries. These sites include the former Honiley Airfield, a strategically important location for automotive research and development that is supported by the LEP, Stoneleigh Park (HQ of the Royal Agricultural Society for England) and Stoneleigh Business Park.

**"H11 Limited Village Infill Housing Development in the Green Belt**

*Limited village infill housing development in the Green Belt will be permitted where the site is located within a Limited Infill Village (as shown on the Policies Map) and the following criteria are satisfied:*

- a) *the development is for no more than 2 dwellings;*
- b) *the development comprises the infilling of a small gap fronting the public highway between an otherwise largely uninterrupted built up frontage, which is visible as part of the street scene; and*
- c) *the site does not form an important part of the integrity of the village, the loss of which would have a harmful impact upon the local character and distinctiveness of the area."*

42. This policy recognises the need for some limited development in smaller settlements washed over by green belt under certain circumstances and clarifies "limited infilling" in a local context.

**"H13 Replacement Dwellings in the Open Countryside**

*Proposals to replace existing dwellings in the open countryside will not be permitted unless the existing dwelling is:*

- a) *structurally unsafe and beyond reasonable repair; or*
- b) *of poor architectural design and does not add to the rural character of the area.*

*Any replacement dwelling must not be materially larger than the existing dwelling and have no greater impact on the character and openness of the rural area. The Council will consider whether it is necessary to remove permitted development rights by condition when determining these applications."*

43. The purpose of this policy is to ensure that replacement dwellings do not have an adverse impact on the surrounding open countryside and are of an appropriate design and scale for their location. The policy applies with equal measure within and outside of land designated as Green Belt.

***"H14 Extensions to Dwellings in the Open Countryside and Limited Infill Villages***

*Extensions to dwellings in the open countryside will be permitted unless they result in disproportionate additions to the original dwelling (excluding any detached buildings) which:-*

- a) do not respect the character of the original dwelling by retaining its visual dominance;*
- b) do not retain the openness of the rural area by significantly extending the visual impression of built development; or*
- c) substantially alter the scale, design and character of the original dwelling."*

44. The purpose of this policy is to ensure that extensions to dwellings do not have an adverse impact on the surrounding open countryside and are of an appropriate design and scale for their location. The policy applies with equal measure within and outside of land designated as Green Belt.

## Planning policies – Proposed Modifications 2016

45. The proposed modifications relate to the concerns expressed by the Local Plan Inspector on the failure to meet sub-regional housing needs and the over-optimistic figure assigned to the windfall allowance.
46. The Updated Assessment of Housing Need: Coventry-Warwickshire HMA (September 2015) sets out the objectively assessed future housing needs of the Housing Market Area and the six local authority areas within it. The report indicates that Warwick District's Objectively Assessed Housing Need is 600 dwellings per annum, which equates to 10,800 dwellings over the plan period.
47. However, in recognition that Coventry City Council is unable to accommodate its housing needs in full within the City boundary, the Local Plan seeks to provide for 332 dwellings per annum (5976 over the plan period) towards Coventry's housing needs. Warwick District therefore aims to meet its housing requirement by providing for a minimum of 16,776 new homes between 2011 and 2029.
48. This has been addressed through the identification of a series of strategic and smaller sites as part of a series of modifications to the submitted plan that have been subject to public consultation.
49. The relevant modifications are summarised below:

### **Mod 9 – paragraph 2.38**

*2.38 In selecting sites on the edge of urban areas, non-Green Belt sites are favoured over Green Belt sites where possible. However, where there are no suitable non- Green Belt alternatives to meet an identified need, sites are removed from the Green Belt to enable development to take place. This applies to land to meet the needs of Coventry, Leamington, Kenilworth, some of the villages and land on the edge of Lillington to assist in the regeneration of the area.*

### **Mod 16 – paragraph 2.81**

The modification identifies additional sites to be removed from the green belt to help meet local housing need, and also identifies areas of safeguarded land suitable for consideration later in the plan period or beyond it to meet identified needs.

### **Mod 20 – Policy DS NEW 1 – Directions for growth south of Coventry**

#### **Mod 21 – Policy DS NEW 1 – Explanatory text**

The purpose of the new policy is to provide a comprehensive approach to the planning of this area of growth, including growth beyond the plan period. Land south of Coventry is currently washed over by green belt; the proposed allocations will clearly have an impact on the immediate location and the relevant area of green belt. However, as discussed later in this paper, the overall purpose and functionality of the wider green belt in this area will remain essentially as valuable and important as it is at present.

### **Mod 22 – Policy DS NEW 2 – Safeguarded Land**

This policy identifies sites for green belt release following a plan review or at the end of the plan period, to allow for potential additional growth should

that prove to be necessary and also to help establish long-term green belt boundaries that should endure beyond the plan period.

## Site identification and allocation – confirmation of exceptional circumstances

50. The extent of the green belt in Warwick district is considerable. This meant that it was appropriate to examine the suitability of sites within green belt areas as well as outside them.
51. The total area of land allocated for housing development in the Submission version of the local plan and the subsequent modifications to it is around 908ha. WDC has an overall area of 28,300ha and the area of land currently designated as green belt is estimated to be around 20,550ha. The total area of land allocated for housing development in the green belt is estimated at 509ha. This represents a loss of approximately 2.5% of the designated green belt in the district. The remainder of the housing need will be provided for on a mix of brownfield and greenfield sites outside the green belt - 33.3ha on brownfield land and 365.37ha on greenfield land.
52. The non-green belt areas to the south of Warwick and Leamington have already accommodated both strategic development sites and more locally focussed ones, to the point where it was considered that further significant development would be unsustainable in terms of its potential impact on the character and infrastructure of the area.
53. In terms of the functional relationship with Coventry, these areas do not enjoy the easy accessibility to the conurbation that areas north of Warwick and Leamington do. Further development in these areas would thus create additional traffic and congestion on an already constrained network. This would not be in line with the identified strategy and the preferred options for growth, which looked at locating new and additional development close to strong transport links (see below, paragraph 54).
54. Although it is important to maximise growth outside the green belt, in reality, due to environmental constraints, site availability, infrastructure capacity and the fact that this area is not best located to meet all the district's growth needs, it can provide for only part of the district's growth. The extent to which this area can accommodate the housing requirement is a matter of judgement. This judgement needs to draw a range of factors as follows:
  - a) The Phase 2 Strategic Transport Assessment (STA09) explored a "Southern Focus option". This tested the impact of accommodating 6250 dwellings in the area outside the green belt. Whilst this showed that, with mitigation, this scale of development could be accommodated, the Local Plan proposals combined with existing completions and permissions exceeds the scale tested in this model.
  - b) The availability of further sites that are consistent with the spatial strategy is limited to areas adjacent to the three non-greenbelt growth villages (Barford, Bishops Tachbrook and Radford Semele). Each of these is already accommodating significant levels of growth and it is suggested that further growth in these locations would result in disproportionate levels of growth for each village (V18PM). Further, the sites being promoted in these locations are in sensitive landscapes or have other constraints that prevent them being suitable and consistent with Policy DS4.
  - c) Appeal decisions in January 2016 for the Asps (application W/14/0300) and Gallows Hill (application W/14/0681) and in 2015 to the east of Bishops Tachbrook (application W/13/1688) recognise the sensitive nature of the

- landscape and the importance of the setting of key heritage assets. The evidence would suggest that further large scale development in this area is not appropriate. This is supported by the landscape assessments (LA08PM, LA09PM, LA03, LA04)
- d) Finally, the market dynamics resulting from concentrating too much development into one part of the district are likely to prevent all the district's housing needs being deliverable within the plan period and would limit the choice of locations for housing across the District.
55. National Planning Policy Guidance (PPG) paragraph 034, reference ID 3-034-20141006, asks the amended question "*In decision taking, can unmet need for housing outweigh Green Belt protection?*" and goes on to state that unmet need is unlikely to outweigh harm to constitute "*very special circumstances*" that would otherwise justify development in the green belt.
56. The Planning Advisory Service (PAS) have commented in their guidance note **Planning on the Doorstep: The Big Issues – Green Belt** (February 2015) that the amended wording in the question itself (addition of the words "*In decision taking*") suggests that it is distinguishing application and decision-taking, in cases where development is not generally permitted, from the process of plan-making, where it is quite clearly the role of the local planning authority to make a decision on whether the green belt boundary needs to be amended to take account of additional development needs. The PAS note states on page 5,
- The PPG has not changed the approach to reviewing and changing Green Belt through the preparation (or revisions) of a local plan where there are 'exceptional circumstances'. It is still not the case that a local planning authority can expect to be able to ignore its housing needs by saying it has Green Belt, and a proper look at how the Green Belt performs against the purposes of including land in the Green Belt is clearly required.*
57. The Council has used a three-stage approach to assessing Exceptional Circumstances for various sites:
- Is there an essential need that has to be met? If yes;
  - Are there any suitable sites outside the green belt that can meet this need? If no;
  - Is this the best site within the Green Belt to meet the need (taking account of the Green Belt study as well as other aspects of the site assessments)? If yes, then there are exceptional circumstances to release a site from the green belt and allocate it in the Local Plan.
58. The **Distribution of Development Strategy Paper** (HO25PM) contains a summary of the considerations undertaken when selecting the various strategic green belt allocations – it is reproduced below at Appendix A for convenience.
59. The Council also undertook a high-level assessment of six spatial options for further development, which were considered prior to identifying and consulting on the modifications. The six options are examined in more detail in the Sustainability Appraisal Addendum (2016) and the Distribution of Development Paper (Appendix 1) but in brief, they were: -
1. Focus development outside the Green Belt
  2. Focus development in and the around the edge of urban areas & sustainable growth villages
  3. Focus development around key transport corridors

4. Dispersal Approach: distribute development across urban areas & urban edge, growth villages and limited infill villages
  5. New Settlement outside the Green Belt
  6. New Settlement in the Green Belt
60. Options 2 and 3 in the above list scored most highly as sustainable broad locations for development and thus have shaped the siting of the additional allocations, including through the consideration of areas within the green belt that are concomitant with those options – in and around the edge of urban areas and sustainable growth villages, and around key transport corridors.
61. As an adjunct to this, the most recent update of the Strategic Housing Market Assessment (Updated Assessment of Housing Needs Coventry – Warwickshire HMA, September 2015) identified the relative affordability of housing in Warwick district as being the second highest in the sub-region, with a lower quartile affordability ratio in 2013 of 7.82 (i.e. lower quartile house prices in the district are 7.82 times higher than lower quartile earnings). The HMA average (broadly equated to the England average) is 6.5.
62. There has been a fall in the ratio and a modest improvement in affordability over more recent times since 2007. As part of an overall picture, therefore, the need to improve affordability in the housing market is also linked to the provision of suitable sustainable housing sites and opportunities, which in the case of the district has required consideration of green belt release.
63. The issue is therefore the relative weight that should be attached to those parcels of green belt being considered for development when compared to other potential sites both within and outside the designated areas. There is a significant need to provide for the continued managed growth of the district, to enable it to provide capacity for economic prosperity while recognising and protecting the most sensitive environmental resources and ensuring that proposed development does not adversely affect certain areas unduly. In particular, population-derived and economic needs generated within the main towns and larger villages in the district necessitates land being allocated to meet local needs, which in line with the identified strategic approach falls within the adopted green belt.
64. The green belt boundaries in the district have been tightly drawn around the main towns and larger settlements, with the effect of limiting outward growth and development. Given both locally generated need for additional housing and the obligation to help meet the demands of the housing market area by absorbing some of Coventry's housing overspill, the local plan process is the most appropriate vehicle for considering whether green belt boundaries need to be redrawn to accommodate land for both current and future objectively assessed needs.

## Sustainability Appraisal Update

65. The Sustainability Appraisal Addendum Report (2016) examined the potential impacts of allocating further land outside the green belt for development. Table 3.4 (p.16) provided an outline of the reasons whereby sites were accepted or rejected, which included looking at the options above.
66. For growth outside the green belt, the reasons for rejecting the option related to the outcome, which would have seen a concentration of development in one area of the district, with no scope for considering the needs of other areas such as Kenilworth, growth villages or land adjacent to Coventry. It was also considered unlikely that there would be sufficient capacity in the area to meet the housing requirement. The SA Addendum also identified the option as restricting accessibility to employment to the north of the district and concomitantly increasing the need to travel for some residents in the north, helping to reduce poverty to the south but not the north, increasing social exclusion and increasing traffic in the south of the district, amongst other issues (SA Addendum, 2016 - SA11PM)
67. Option 2 in the SA was identified as meeting the needs of residents across the district and improving accessibility to employment, services and facilities, including public transport. It was recognised that it would lead to a loss of green belt and open land, with associated long-term effects, although it was acknowledged that at the time there was uncertainty around the potential location for development.

## Green belt evidence

68. The Council has been involved in / commissioned a series of assessments and studies of the green belt within its jurisdiction, with a view to identifying its character and functionality. The various documents clearly share a degree of overlap in their approach and outcomes but have not been predicated on exactly the same basis each time, so will not necessarily demonstrate detailed levels of uniformity. However, jointly they have provided the authority with a clear view on the relative merits of various areas and parcels of land within the adopted green belt, upon which the Council has based its decision-making in part when selecting sites for housing.

### **Joint Green Belt Study, 2009**

69. The Joint Green Belt Study 2009 was a report commissioned by Coventry City Council and the adjoining boroughs of Rugby BC, Nuneaton & Bedworth BC and Warwick DC. It was intended to inform a series of emerging Core Spatial Strategies for the various authorities and accorded with the nationally and regionally extant planning policy guidance available at the time.
70. The report identified a series of land parcels, which were then assessed against the then five purposes of green belt and the outcome of that assessment was recorded. Those parcels that achieved four or five of the purposes determining the inclusion of land within the green belt were considered to contribute the most to the purposes of green belt and were excluded from further consideration. The remaining parcels across the four authorities were subject to a more detailed analysis and measured against certain primary and secondary criteria. The outcome of this process was the identification of a series of land parcels that could be examined in more detail as potential sites for development based on their relative contributions to the purposes of green belt.
71. Of the sites within Warwick district, those assessed as being suitable for further consideration included land to the immediate east of Kenilworth, land north of Leamington / Warwick (Milverton and Blackdown, Old Milverton and Guy's Cliffe), east of Lillington and west of Warwick Racecourse.
72. The document can be viewed on the Local Plan Examination Submission Documents page (report reference [LA05](#); appendices [LA05](#))

### **Village Housing Options and Settlement Boundary Consultation**

#### **Appendix 8 - Green Belt and Green Field Review**

73. Work was also done by the authority to look at the green belt and areas of open land adjacent to a number of settlements within the district in 2013. The Village Housing Options and Settlement Boundary Consultation included at Appendix 8 a Green Belt and Green Field Review (Local Plan Examination Submission Documents reference [V13](#) ). This conducted a partial review of the green belt and green fields adjacent to the district's ten most sustainable growth villages, a limited number of smaller village locations and two edge-of-urban housing options.
74. To ensure impartiality, a "critical friend" in the form of an independent specialist environmental planning adviser was used to examine the report and verify its findings. The Green Belt critical review (Green Belt Review Critical Friend Analysis and Methodology – Local Plan Examination Submission Documents reference [V14](#)) states on page 14;

*Because of the period of time since the Green Belt was designated, combined with the forecast extent of housing and employment needs during and beyond plan periods, there is a significant likelihood that the boundaries will need to be revised. In this context, the NPPF makes it clear that revisions to Green Belts should only take place through the Local Plan process.*

75. Pages 24 to 31 set out a close evaluation of a number of parcels of land in the green belt close to various villages / settlements and assigns both the settlement and the identified parcel an Overall Value Assessment (OVA). Some parcels were recognised as being of medium to high value in the initial sift but a more focussed assessment of “sub-parcels” or individual sites revealed that those sites by themselves did not contribute as significantly to the overall quality of the green belt. Several of these sites have been brought forward as allocations.
76. This document was subsequently updated in April 2015 (Green Belt and Green Field Review – Parcel Update; Local Plan Examination Submission Documents reference [V15](#)).

### **Joint Green Belt Study, summer 2015**

77. A further Joint Green Belt Study (JGBS) was undertaken in summer 2015, for Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council. Of the area surveyed, 43 parcels and two broad areas fall wholly or partially within Warwick. Each of these parcels and areas was assessed and given a score against a series of criteria. This was designed to reflect how well or poorly each location contributed in relative terms to the five main purposes of including land within the green belt.
78. Part of the importance of the joint study is found in it being able to help establish the relative merit of areas, to assist authorities engaged in both strategic and local decision-making. The approach adopted takes a clear and impartial view of parcels of green belt across a number of authorities. It is a tool for allowing authorities to confirm the characteristics of green belt in their area in terms of how it contributes to the purposes of inclusion.
79. Whilst the JGBS determined a mathematical total for each parcel of land it covered, WDC considered it appropriate to take into account the overall contribution the parcel made rather than relying on a simple score. Thus WDC has considered whether and how the parcels have made contributions to green belt and if so, at what level, rather than relying on the overall total. Table 3.2 of the JGBS sets out the relative value of each of the criteria used to assess individual parcels as well as the relative score, and this is what WDC have chosen to focus on. For example, higher value will be attached to a parcel partially or wholly adjacent to a conservation area within an historic town and which has good intervisibility with the town’s historic core. A parcel within or adjacent to a conservation area or which has good intervisibility would be considered to be less valuable, whereas a site that met neither criteria would have no value.
80. Other authorities within the JGBS area may choose to use the document in a slightly different way, but this is how WDC has determined its usefulness in assessing land parcels. It is also important to remember that there are other criteria that have been used to identify sites for potential allocations and that green belt, whilst important and necessary in protecting the openness of land around built-up areas, is only one of the issues to be considered.

## Strategic approach to land release in green belt

81. Green belt land release has been identified as necessary and appropriate in meeting the housing needs of the district and adjacent authorities. The emerging local plan is thus proposing the release of a series of sites within the confirmed green belt and in this context it will be important to consider both the role of the overall strategic approach in justifying those releases and also the function of the “residual” green belt. This is in addition to the consideration of exceptional circumstances and the technical assessment of site characteristics that has also taken place.
82. There is a close functional relationship between Warwick District and the city of Coventry, which provides a significant quantum of employment to Warwick residents. This relationship is reflected in the strategic housing market area covering Coventry and its surrounding districts, who are each taking on a proportion of Coventry’s additional housing requirement. This effectively meant that part of the area of search for sites to accommodate this overspill, in line with the identified strategy and the assessment following the first part of the examination, was focussed on sustainable locations to the south of Coventry. The modifications sought to “plug the gap”, as the Submission local plan had been predicated primarily on the basis of meeting local need and as a result had not looked at land to the immediate south of Coventry.
83. The sites south of Coventry thus represent a sustainable and strategically aligned means of addressing Coventry’s housing need in a manner that reflects the need to make the most of infrastructure links, community provision, employment opportunities and deliverability.
84. The University of Warwick is also a significant presence in the area. It is in the process of producing a revised long-term masterplan for its landholdings in the immediate vicinity, including the proposed alteration of extant green belt boundaries to accommodate the provision of additional student accommodation, and the rationalisation of other activities.
85. There have also been a number of larger-scale allocations made adjacent to Kenilworth, one of the main built-up areas in the district and also lying within the green belt. Kenilworth offers a range of services, facilities and employment opportunities and additional housing sites have been identified to the east of the settlement. Further significant allocations have also been identified to the north and east of Leamington, at Milverton and Cubbington. The proposed line of the HS2 high-speed rail link runs within a relatively short distance of the edge of Coventry and again will be built across the green belt.
86. The 2015 JGBS (LA07PM - Appendix 2) has provided a set of plans illustrating the relative contributions made by each parcel to the overall aims of the green belt across the study area. These graphically demonstrate that for sites south of Coventry and around Kenilworth and elsewhere, the parcels within which they sit make varying contributions to the purposes of green belt. This appendix attempts to illustrate the contribution that certain parcels are making to individual Green Belt purposes; contributions can be lost when scores against all five purposes are aggregated. All parcels score 4 for purpose 5 (aiding regeneration).
87. An example of some of the larger sites that have been considered in the Appendix are reproduced in the table below: -

<b>Purpose of green belt</b>	<b>Parcel reference</b>	<b>Parcel Performance (0 – 4)</b>
Purpose 1 - To check the unrestricted sprawl of large built-up areas	C14 – Kings Hill (H43)	3
	C20 – Westwood Heath (H42)	3
	KE1 – Woodside, Kenilworth	3
	KE2 – East of Leamington Road, Kenilworth	2
	KE3 – south of Kenilworth	2
	KE4 – south of Kenilworth	3
	KE5 – Rouncil Lane, Kenilworth	2
	RL1 – Old Milverton (H44)	2
	CB1 – Cubbington (H25, H26, H50)	3
Purpose 2 - to prevent neighbouring towns merging into one another	C14 – Kings Hill	2
	C20 – Westwood Heath	2
	KE1 to KE5 – east of Kenilworth (H40, H06)	2
	RL1 – Old Milverton	4
	CB1 – Cubbington	2
Purpose 3 - To assist in safeguarding the countryside from encroachment	C14 – Kings Hill	2
	C20 – Westwood Heath	3
	KE1 – KE3	2
	KE4 – KE5	3
	RL1 – Old Milverton	2
Purpose 4 - To preserve the setting and special character of historic towns	CB1 – Cubbington	4
	C14 – Kings Hill	4
	C20 – Westwood Heath	0
	KE1 to KE5	0
	RL1 – Old Milverton	4
	CB1 – Cubbington	0

88. WDC accepts that these developments and proposals will inevitably have an impact on the openness of the green belt and its functionality in those specific locations. As stated above, the developments proposed through the local plan and its modifications will see the potential loss of around 2.5% of the overall total of allocated green belt. WDC has assessed in detail the nature of each site and has weighed in the balance the sustainability of various locations and their relationships to employment and other services and facilities, the results of the JGBS, various landscape assessments and technical evidence on issues such as infrastructure provision and constraints.

## Effects of the proposed allocations on purposes of including land in the green belt

89. While acknowledging that the total amount of green belt will be slightly reduced, given the strength of the new boundaries that have been identified and the robustness of the overall strategy, WDC does not believe that the sites identified for housing would fundamentally compromise the value or functionality of the remaining green belt.
90. The main consideration is whether the residual green belt still performs the five purposes appropriately and whether the proposed changes to the current green belt boundary will mean that the green belt comes under pressure for further development. It is inevitable that those locations considered in the WDC strategy to be most sustainable – close to built-up areas and adjacent to good transport links – are also going to be areas of green belt that are valuable for preserving openness in more developed areas or preventing encroachment of the built environment into open land.
91. The JGBS report identifies the role of the wider green belt (those areas of land not specifically addressed in the review) in the sub-region in section 4 of the main report. These areas are identified in the report as representing the largely open and undeveloped countryside between the larger built-up areas and main rural settlements. These areas were considered to form the main body of the green belt and were determined to make a significant contribution to green belt purposes to varying degrees.
92. Two areas in particular lie within Warwick district:
- Broad Area 3*
- 4.11 Broad area 3 lies between Royal Leamington Spa to the south, Kenilworth to the north west, Coventry to the north and Rugby to the north east. The area contains the Registered Park and Garden at Stoneleigh Abbey, several Scheduled Monuments and Grade I listed buildings and substantial pockets of ancient woodland, including Ryton Wood SSSI.*
- 4.12 The area makes a considerable contribution to all the purposes of Green Belt:*
- *Checking the sprawl of Royal Leamington Spa, Kenilworth and Coventry.*
  - *Preventing the merging of neighbouring towns in the long term, particularly Royal Leamington Spa and Kenilworth and Kenilworth and Coventry.*
  - *Safeguarding the countryside, including a number of large woodlands, such as Ryton Wood.*
  - *Preserving the setting and special character of the historic towns of Royal Leamington Spa, Kenilworth and Coventry. The historic core of Kenilworth is located on the opposite side of the town, meaning that the broad area makes little contribution to the setting and special character of Kenilworth. However, panoramic views in to the historic cores of Royal Leamington Spa and Warwick to the south are common in the southern half of the broad area and there are some distant views of the historic core of Coventry close to the northern edge of the broad area.*
  - *Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.*

### *Broad Area 4*

*4.13 Broad area 4 lies between Solihull to the north west and Kenilworth and Coventry to the north east. The area contains the Registered Park and Gardens at Wroxall Abbey, Baddesley Clinton Hall and Packwood House, several Scheduled Monuments and pockets of ancient woodland.*

*4.14 The area makes a considerable contribution to all the purposes of Green Belt:*

- Checking the sprawl of Warwick to the south east and Kenilworth and Coventry to the north east.*
- Preventing the merging of these neighbouring towns in the long term, particularly Warwick, Kenilworth and Coventry to the east. However, the south western half of the broad area makes a less significant contribution to preventing neighbouring towns merging due to there being no towns immediately to the west and south west.*
- Safeguarding the countryside, including a number of large woodlands, such as Hay Wood.*
- Preserving the setting and special character of the historic towns of Warwick, Kenilworth and Coventry. The broad area has excellent views in to the historic core of Kenilworth, and Warwick; however, there are limited views in to the historic core of Coventry to the north.*
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.*

93. Following the Inspector's request that WDC identify additional sites for housing, further evidence was commissioned on the potential impacts on landscape of the additional sites. While the work undertaken by the consultants did not look at sites beyond the immediate areas of interest for allocations, the report (LA09PM) does consider the broad impacts on the functional green belt of the various allocations.

94. For example, Appendix A of the Assessment considers the Kings Hill allocation in terms of its location and potential impacts on adjacent land uses;

*1.2.6 ... The King's Hill land parcel is relatively large and if released from the Green Belt could provide a significant opportunity for a new residential neighbourhood.*

*...*

- Development here would reduce the area of open countryside between Coventry, Kenilworth and Stoneleigh – but there would still be a definable and relevant gap between these settlements ...*

*p.3, Appendix A, Part 1*

and determined that,

*... The land presently provides for some of the purposes of Green Belt, but allowing development at this parcel would have clear boundaries to prevent future urban sprawl, would not result in settlement coalescence, will 'fit' the wider settlement pattern and will provide a variety of opportunities for positive planning.*

*p.6, Appendix A Part 1*

95. This makes it clear that for the vast majority of the residual green belt within the district, the value and effectiveness of the designation is going to remain as at present, as the development allocations lie within those parcels specifically covered by the individual assessments and not within the broad areas.

## Appendix A

Broad Location	Approximate Number of Additional Dwelling Proposed (Mods 2016)	Total Number of Dwellings Proposed (including Draft Local Plan proposals)	Green Belt - Exceptional circumstances (three-stage approach): a) Is there an essential need that has to be met? b) If yes, are there any suitable sites outside the Green Belt that can meet this need? c) If no, is this the best site within the Green Belt to meet the need?
Urban Brownfield Sites	0	1208	N/A
Edge of Coventry	2225 dwellings (plus capacity for a further 2000 dwellings beyond the Plan Period)	2245	<p>a) HMA's and Coventry's housing need and lack of capacity within Coventry.</p> <p>b) There are no suitable sites outside the Green Belt that can meet this level of need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet the City's housing need.</p> <p>c) This is a sustainable location which allows expansion on the edge of the City's urban area in sustainable locations providing opportunities for infrastructure improvements (see para 23 above). The 2015 Green Belt considers this area: These locations lie within Parcel</p> <ul style="list-style-type: none"> <li>• C14 (scores 15/20),</li> <li>• C16 (scores 15/20),</li> <li>• C19 (scores 8/20) and</li> <li>• C20 (scores 13/20).</li> </ul> <p>To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic towns.</p> <p>The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt.</p>

Broad Location	Approximate Number of Additional Dwelling Proposed (Mods 2016)	Total Number of Dwellings Proposed (including Draft Local Plan proposals)	Green Belt - Exceptional circumstances (three-stage approach): a) Is there an essential need that has to be met? b) If yes, are there any suitable sites outside the Green Belt that can meet this need? c) If no, is this the best site within the Green Belt to meet the need?
			<p>Although a sustainable broad location, capacity in this area is limited by delivery rates, the availability of suitable sites and major infrastructure constraints (particularly highways). In view of ongoing housing needs and capacity constraints in the City, capacity beyond the Plan Period is provided in this location (including safeguarding land for a future Plan review). This will provide opportunities to address medium to long term infrastructure improvements before further development comes forward.</p>
Edge of Kenilworth	740 dwellings	1500	<p>a) HMA's and Coventry's housing need and lack of capacity within Coventry. Supports expansion of Kenilworth which is tightly constrained by Green Belt thereby providing for local housing needs.</p> <p>b) There are no suitable sites outside the Green Belt that can meet this level of need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet the City's housing need.</p> <p>c) Provide sustainable locations with good links to employment and services within the City. Opportunities for infrastructure improvements (see para 24 above). The 2015 Green Belt considers this area: These locations lie within Parcel</p> <ul style="list-style-type: none"> <li>• KE1 (scores 11/20),</li> <li>• KE2 (scores 10/20),</li> <li>• KE4 (scores 13/20) and</li> <li>• KE8 (scores 18/20).</li> </ul> <p>To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging,</p>

Broad Location	Approximate Number of Additional Dwelling Proposed (Mods 2016)	Total Number of Dwellings Proposed (including Draft Local Plan proposals)	Green Belt - Exceptional circumstances (three-stage approach): a) Is there an essential need that has to be met? b) If yes, are there any suitable sites outside the Green Belt that can meet this need? c) If no, is this the best site within the Green Belt to meet the need?
			<p>safeguarding the countryside from encroachment and preserving the setting of historic towns.</p> <p>The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt.</p>
Northern edge of Leamington Spa	250 dwellings	500	<p>a) HMA's and Coventry's housing need and lack of capacity within Coventry.</p> <p>b) There are no suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet this need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet the City's housing need.</p> <p>c) Sites in this area are consistent with the Local Plan strategy and provide sustainable locations with reasonable links to employment and services within the City and Leamington.</p> <p>Whilst this location is not as well located to the City as the edge of Coventry and edge of Kenilworth, there are no further suitable and deliverable sites in these locations that are not being proposed for allocation.</p> <p>In that context, the area to the north of Leamington offers the next most sustainable location, particularly as the area to the north of Milverton has strong defensible boundaries. There are good opportunities for infrastructure improvements to support development (see para 24 above). The 2015 Green Belt considers this area. These locations</p>

Broad Location	Approximate Number of Additional Dwelling Proposed (Mods 2016)	Total Number of Dwellings Proposed (including Draft Local Plan proposals)	Green Belt - Exceptional circumstances (three-stage approach): a) Is there an essential need that has to be met? b) If yes, are there any suitable sites outside the Green Belt that can meet this need? c) If no, is this the best site within the Green Belt to meet the need?
			<p>lie within Parcel</p> <ul style="list-style-type: none"> <li>• RL1 (scores 16/20),</li> <li>• RL2 (scores 15/20), and</li> <li>• RL3 (scores 15/20).</li> </ul> <p>To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic towns.</p> <p>The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt.</p>
South of Warwick, Whitnash and Leamington	1910 dwellings (including the Asps and Gallows Hill)	3720 (in addition to a number of sites included as commitments)	N/A
Growth Villages	700 dwellings	1146 (in addition to a number of sites included as commitments)	<p>Of the 700 dwellings proposed for growth villages in the 2016 Modifications, 535 are within the Green Belt. This reflects that the growth villages outside the Green Belt are less well-placed to meet the needs of Coventry and have already been subject to significant allocations in the submitted Draft Local Plan.</p> <p>Exceptional circumstances for the allocations to Green Belt growth villages are:</p> <p>a) HMA's and Coventry's housing need and lack of capacity within Coventry; important in achieving a 5 year housing land supply on adoption; important in meeting local housing need (constrained by current planning policy)</p>

Broad Location	Approximate Number of Additional Dwelling Proposed (Mods 2016)	Total Number of Dwellings Proposed (including Draft Local Plan proposals)	<b>Green Belt - Exceptional circumstances (three-stage approach):</b> <b>a) Is there an essential need that has to be met?</b> <b>b) If yes, are there any suitable sites outside the Green Belt that can meet this need?</b> <b>c) If no, is this the best site within the Green Belt to meet the need?</b>
			<p>b) There are insufficient suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet both overall and 5 year supply housing need and - see para 25 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy or effective in meeting these needs.</p> <p>c) It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. For this reason additional locations (proposed in 2016) are focused more on those villages which have stronger access to Coventry. The Village Profile and Housing Allocations paper considers the 2015 Green Belt study</p>