



WARWICK DISTRICT LOCAL PLAN EXAMINATION

HEARING STATEMENT ON BEHALF OF

OLD MILVERTON and BLACKDOWN JOINT PARISH COUNCIL

MATTER 4: SPATIAL STRATEGY

1. Introduction

1.1 Old Milverton and Blackdown Joint Parish Council (the Parish Council) has monitored the preparation of the Warwick District Local Plan (WDLP) process since its inception. Following the suspension of the Examination and the subsequent updating of the evidence on housing requirements and the publication of Proposed Modifications, the Parish Council was unable to maintain its broadly supportive stance and raised objections to the allocation of land at Milverton (H44) and safeguarding of land at that location (DS NEW 2), proposed in those modifications.

1.2 This statement sets out the Parish Council's responses to the Inspector's questions, where relevant, in relation to the Spatial Strategy. The comments below in combination with previously submitted representations clearly demonstrate that the District Council's approach to the spatial strategy for meeting the requirement for dwellings for Coventry and Warwick District by allocating land in the Green Belt at Milverton is contrary to national policy and is therefore not sound.

2. Policies DS4, DS10, DS19 and H1 and list of Growth Villages and Limited Infill Villages-Inspector's questions

Q.1) What is the basis for the spatial strategy in terms of the location and broad distribution of development set out in Policies DS4, DS10 and H1 i.e. between different parts of the District, between the urban areas and villages and between brownfield, greenfield and Green Belt sites?

2.1 Whilst this is primarily a question for Warwick District Council, the Parish Council believes that the most sustainable basis for the spatial strategy is to meet needs where they arise. For the Warwick District Local Plan there are two distinct areas of need. The first is the needs of Warwick District and the second is the unmet needs of Coventry City. Given the overall level of the housing requirements the Parish Council accepts there will be a need to identify a range of sites including previously developed, unconstrained Greenfield and, so long as exceptional circumstances are demonstrated, Green Belt sites.¹

2.2 When considering the need to release Green Belt sites consideration must be given to the contribution towards the purposes of Green Belt designation that each area makes with those causing the least harm being allocated first.

2.3 In terms of the quantum of needs arising from the Memorandum of Understanding with other authorities in the Coventry and Warwickshire Housing Market Area, the Parish Council notes that Coventry City Council's unmet needs to be accommodated within Warwick District is in the order of 5,976 dwellings over the period 2011-2029². As there are no sites adjoining Coventry in Warwick District that fall outside the Green Belt the Parish Council

¹ The Framework paragraph 83

² See EXAM 26, Table 1

believes that this demonstrates the exceptional circumstances that are required by the Framework to release sites from the Green Belt in this location i.e. there are no sequentially better locations.

2.4 However, the distribution strategy, as proposed to be modified, only identifies 2,225 units on sites adjoining Coventry (Westwood Heath 425 and Kings Hill 1,800) though the Parish Council notes the additional potential of 2,200 units post 2029 at Kings Hill and that allocation H43 includes all of the land in question. The Parish Council also notes from other representations that the safeguarded land at Westwood Heath has potential for 2,500 dwellings and other sites are proposed.

2.5 Whilst the Parish Council accepts that the suitability of these sites will be subject to the Inspector's assessment, as many suitable sites should be allocated thereby increasing the potential of sites adjoining Coventry to meet the identified need in the plan period as well as in the period beyond the plan.

2.6 This latter point is important as the Framework also requires that amended Green Belt boundaries should be capable of enduring beyond the Plan Period³. Should the Inspector conclude that further capacity will be needed for beyond the plan period, then the Parish Council recommends that the line of HS2 should provide the southern limit to further safeguarded land west of Kenilworth and that Stoneleigh Road provides the equivalent boundary east of Kenilworth.

Q.2) How has this been affected by the Council's suggested modifications?

2.7 As set out above the Parish Council believes that there should be a clear distinction in the strategy which separates the need to meet Coventry's housing requirements from those of Warwick District's needs. The figures are clearly expressed in the Memorandum of Understanding and for the purposes of transparency, not least for any inspector involved in calculating five year housing land supply, the spatial strategy should be clear on which sites are allocated to meet the two authorities needs. Whilst not seeking to direct the Inspector the Parish Council notes that this approach has been adopted by other inspectors dealing with local development documents that address unmet needs from neighbouring authorities⁴.

Q.3) Specifically how would the approach to development on the edge of Coventry affect the spatial strategy?

³ Framework paragraph 83

⁴ South Worcestershire Development Plan; Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.

2.8 As set out above, the Parish Council believes that as drafted the spatial strategy does not provide the necessary level of clarity to inform future planning decisions. Sufficient sites adjoining Coventry should be allocated where they can make a contribution to meeting Coventry's needs during the plan period with other sites safeguarded to meet the merging needs of Coventry beyond the plan period. The strategy should make it clear that the subsequent housing from these sites does not contribute to meeting the needs of Warwick District. Similarly, the strategy also needs to clarify that those sites allocated elsewhere in the Local Plan are identified to meet the dwelling requirements of Warwick District.

Q.4) What alternative options have been considered in terms of the location and broad distribution of development and why were these discounted?

2.9 Whilst this is primarily a question for Warwick District Council, the Parish Council understands that the exercise informing the Memorandum of Understanding was clear that the capacity within Coventry City Council's area would lead to a shortfall of some 17,800 dwellings when compared with the objectively assessed need 42,400 dwellings. Given that Coventry is constrained by Green Belt that lies between its boundaries and those of Kenilworth and Warwick/Leamington the Parish Council believes that releases of land from the Green Belt is inevitable and the most sustainable location for those releases is adjacent to Coventry.

Q.5) How were different areas of Green Belt assessed and how has this informed the strategy?

2.10 Paragraph 84 of the Framework advises how green belt boundaries should be reviewed.

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

2.11 In terms of the strategy advocated by the Parish Council to address the unmet needs of Coventry City, this test is clearly been met. Similarly, other proposed allocations to meet Warwick District's need that fall within the Green Belt such as at Kenilworth which is surrounded by green belt also meet the test. However, the same argument does not apply to the allocation and safeguarding of land at Old Milverton (H44 and S2). Given that this site lies on the edge of Leamington it is clearly not a sustainable option to meet the needs of Coventry. In terms of meeting the needs of Leamington and Warwick there are alternative locations beyond the outer green belt boundary particularly to the south and east of Leamington.

2.12 The Parish Council, has previously made submissions to Warwick District Council in this regard during the consideration of the submission local plan's development strategy. These are set out at **HPP Appendix 1**. In summary, those submissions concluded that there was significant potential to accommodate the needs of Coventry in sustainable locations adjoining Coventry and that there were sufficient sites outside of the green belt and to meet the housing needs of Warwick and Leamington.

Q.6) Is the approach to the location and broad distribution of development appropriate and justified?

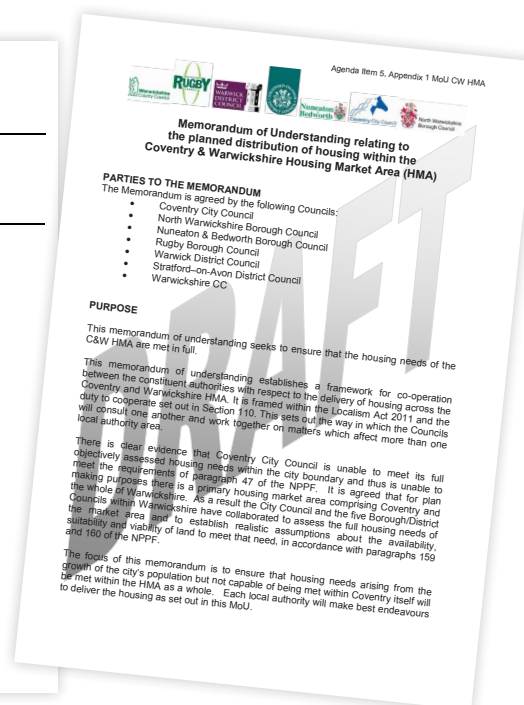
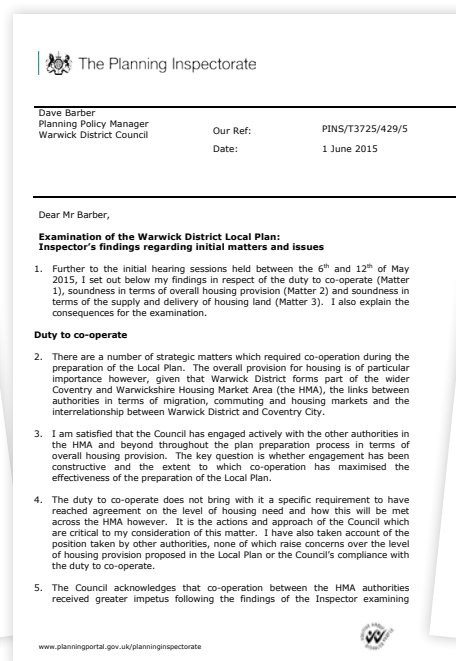
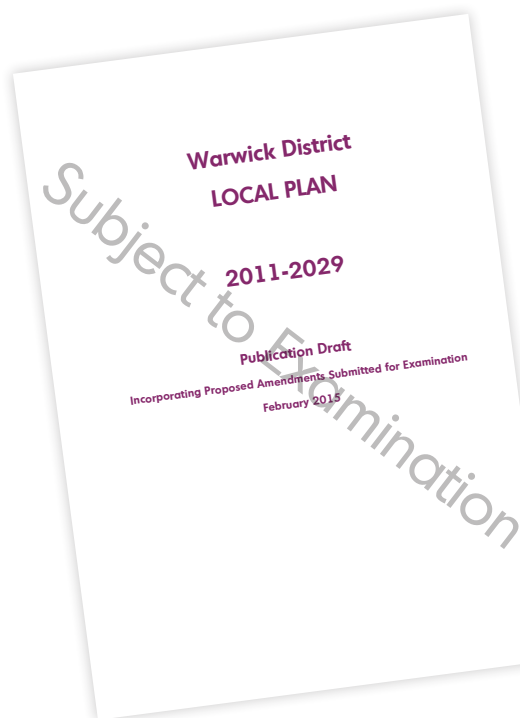
2.13 The Parish Council believes that the Local Plan's approach to the location and broad distribution of development is not appropriate and justified and that the preferred approach identified by the Parish Council addresses those concerns i.e. Explicit needs of Coventry should be met through green belt releases adjoining Coventry and the needs of Warwick and Leamington can be met without the need to release Green Belt land at North Milverton.

Q.7) What is the basis for identifying Growth Villages and Limited Infill Villages? Is the list of villages in each category justified and appropriate?

A. For Warwick District Council to Respond.

Planning Strategy Position Paper on the emerging Warwick Local Plan 2011-2029

prepared by Hunter Page Planning
for Old Milverton and Blackdown Parish Council



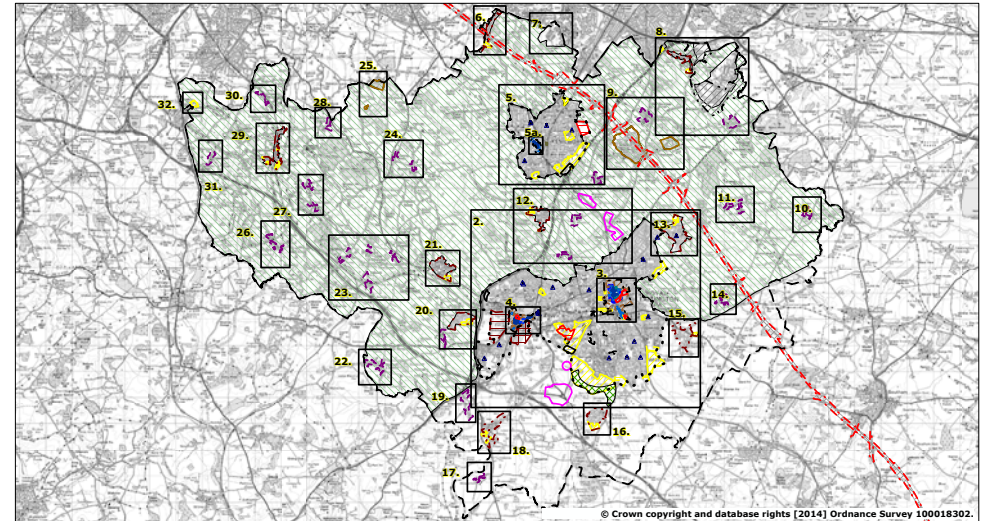
01 INTRODUCTION / EXECUTIVE SUMMARY

1.1 This report has been prepared by Hunter Page Planning (HPP) on behalf of Old Milverton and Blackdown Parish Council in order to assist Warwick District Council's consideration of the implications for the submitted Warwick Local Plan 2011-2029, of the revised housing requirements across the Warwickshire and Coventry housing market area.

Hunter Page has a broad client base including major developers and house builders, national PLC's, Government Bodies and Local Authorities. The company has a breadth of experience in strategic planning and policy formulation and has influenced strategic planning on a number of development plan documents, including the successful promotion of large strategic sites ranging from 800 to 10,000 homes. HPP was involved in the Examination of the RSS for the West Midlands.

1.2 The following sections define the development need; identify the most sustainable strategy; assess the constraints and opportunities; and identify the most appropriate locations to locate identified additional development growth.

1.3 The analysis contained within this report provides a clear direction on the most appropriate areas of search and their capacity to accept additional growth.



1.4 That analysis concludes that **the most suitable sites** within Warwick District, to meet Coventry City's identified housing need, **are specifically located to the south of Coventry** and to meet the additional needs of Warwick District, **to the south of Warwick/Leamington**. It also demonstrates that the potential capacity of these areas exceeds requirements of the local plan to 2029 and to 2031.

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02 DEFINING THE NEEDS

- 2.1 Following The Local Plan Inspector’s letter to the Council in June 2015, where he sought further clarification on the definition of the housing requirement across the Housing Market Area (HMA)¹ and how any shortfall from Coventry City would be met², a considerable amount of work has been undertaken by the local authorities and GL Hearn to provide answers to those questions.
- 2.2 This has resulted in the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity (CWJCEGP) producing a Memorandum of Understanding (MoU) between the six HMA Councils relating to the planned distribution of housing across the HMA and to ensure that this identified need is met in full. At its meeting on 29 September 2015 CWJCEGP members signed the MoU, with the exception of Nuneaton and Bedworth District Council, who indicated that it needs to undertake additional capacity work before agreeing to the MoU. Warwick District Council endorsed this approach at its meeting on 13 October 2015 **and the Inspector has subsequently agreed to suspend the Examination to enable that work to be completed.**
- 2.3 The MoU covers the period between 2011 and 2031 and sets out a need for 88,160 dwellings across the six authority areas. Nearly 50%³ of the dwelling requirement is to meet the needs of Coventry City, however it is understood by all parties that the City Council is unable to meet its housing need in full within the City boundary, as it has capacity for just 24,600 dwellings⁴.
- 2.4 The distribution of the remaining 17,800 dwellings (the unmet need for Coventry) is based upon the functional relationship between each district and Coventry City⁵. This means that just over 37%⁶ of Coventry’s unmet need will need to be accommodated in Warwick District and an annual dwelling requirement of 932 dwellings or 16,776 over the plan period to 2029. **The Coventry proportion is 332 dwellings a year or 5,976 to 2029.**

- 2.5 The submitted Warwick District Council Local Plan makes provision for some 12,860 dwellings which is 3,916 short of the level set out in the MoU.
- 2.6 Furthermore, the Local Plan Examination Inspector also raised concerns in respect of the level of **windfalls** that are expected to come forward during the plan period⁷. Based on his findings this **allowance should be reduced to 100 dwellings per year** from 162.5 over the remaining 14 years of the plan period. This leaves a need to allocate land for 4,792 dwellings plus **an allowance for flexibility** as required by the National Planning Policy Framework⁸ (The Framework). For Warwick District an additional **780 dwellings** is considered appropriate to provide that flexibility⁹ giving an overall figure of 5,580 additional dwellings to be allocated.
- 2.7 The various requirements are summarised below:

Table 1: Housing Requirement over the plan period to 2029

Source of additional Housing requirement	Annual requirement	Requirement over Plan period to 2029
Unmet needs of Coventry	332	5976
Flexibility allowance @5%	39	780
Amended windfall allowance	62.5	875
Less existing commitments and completions as identified within the Local Plan	N/A	-2051
Total		5580

- 2.8 Whilst this figure is slightly higher than that identified in the report to Council on 13th October, it is of the same order.

¹ Warwickshire and Coventry Housing Market Area including Coventry City Council, Warwick District Council, Rugby Borough Council, North Warwickshire Borough Council, Stratford-on-Avon District Council and Nuneaton and Bedworth Borough Council

² Inspector’s findings regarding initial matters and issues; 1st of June, 2015

³ 42,400 dwellings equals 48.1%

⁴ Coventry City Council Strategic Housing Land Availability Assessment summer 2015

⁵ Based on two way commuting flows and migration patterns

⁶ 6,640 dwellings between 2011 and 2031

⁷ Paragraph 32 from Inspector’s letter of 1st June, 2015

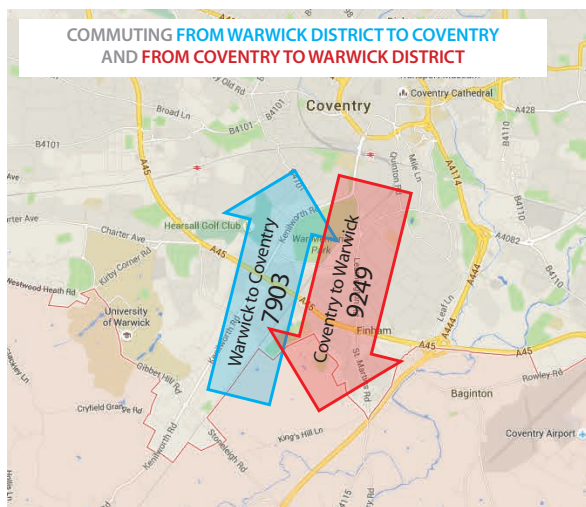
⁸ Paragraph 14 of the NPPF requires plans to meet the full OAN plus an allowance for flexibility.

⁹ 5% of the dwelling requirement still to be built

03 THE MOST SUSTAINABLE STRATEGY

3.1 The core principle for sustainably locating development is that **development should be located where the needs occur**. That principle is also highlighted in the Sustainability Appraisal Report submitted with the Local Plan which identifies meeting the needs of existing communities as a determining factor for the location of growth options to meet the Plans development requirements¹⁰. The relationship between the two council areas (Warwick District and Coventry City) is clearly demonstrated in the plan showing commuter flows established by the 2011 Census as set out at Figure 1 below.

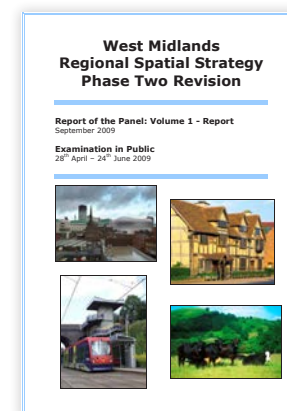
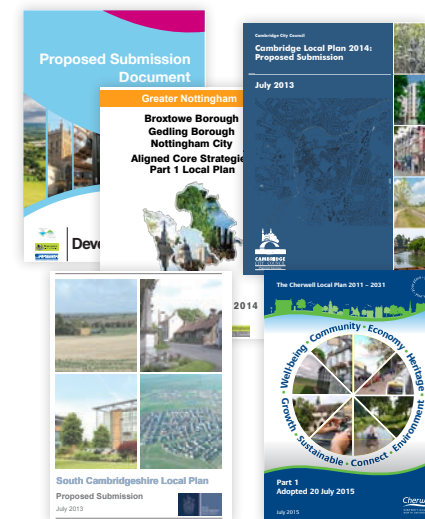
3.2 Given that the majority of the additional requirement is to meet Coventry City's needs, it follows that the most sustainable location to meet those specific needs within Warwick District Council's administrative area is adjacent to Coventry City Council's boundary. This is also the area where larger scale and strategic employment and other infrastructure is found and proposed, such as Coventry Gate Way.



SOURCE: CENSUS 2011

3.3 The approach of placing new development where key employment and other infrastructure is located has been verified by the Planning Inspectorate in dealing with the examination of various local plans¹¹ and is considered to be **consistent with the strategy already set out within the submitted Local Plan (Policy DS4 Spatial Strategy)**.

3.4 Indeed, in the context of Warwick, this is not a new approach and was recommended by the Examining Panel in their report on the West Midlands Regional Spatial Strategy Phase Two Revision¹², which noted the agreement between Coventry City and Warwick District on the location of 3,500 dwellings to serve the needs of Coventry immediately to the south of the city boundary (at that time there was a similar agreement with Nuneaton and Bedworth Borough Council). The Panel was particularly positive in terms of the Gibbet Hill/Finham area.



¹⁰Warwick District Council Publication Draft Local Plan SA Report: Table 4.8: Summary of SA Findings of Options for the Location of Growth (June 2013)

¹¹South Worcestershire Development Plan; Greater Nottingham; Greater Cambridge and Peterborough; Cherwell

¹²Paragraph 8.37

...we can see the strategic value in development in this locality on the north-south axis where it can be served by the upgraded Coventry-Kenilworth-Leamington rail line and would be well placed in relation to the University.¹³

3.5 Such an approach would of course require the rolling back of the Green Belt to the south of Coventry City's boundary. The Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan¹⁴. Paragraph 84 of **the Framework is specific in requiring the need to promote sustainable patterns of development when reviewing Green Belt boundaries**. Accommodating the unmet needs of Coventry City is one such exceptional circumstance and other local plans are having to take such an approach as set out in **Table 2** below.

Local authorities green belt reduction 2014/15 (by %)

Newcastle	-9%
Christchurch	-6%
Rushcliffe	-4%
Gateshead	-2%
Three Rivers	-2%
Bolton	-1%
East Dorset	-1%

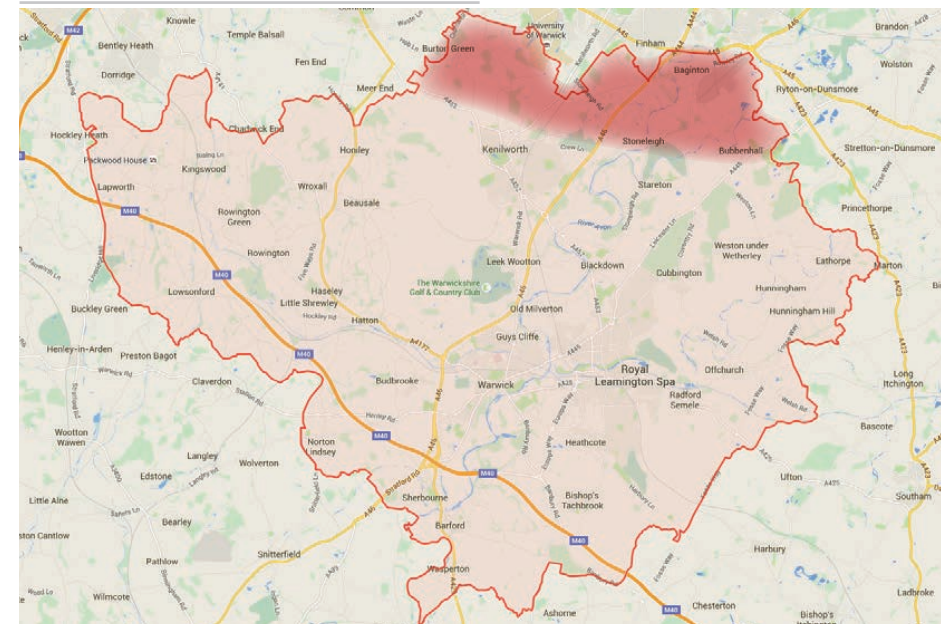
Source: Department for Communities and Local Government

3.6 Following the submission of the RSS, a joint study was commissioned in 2007 to review Green Belt land surrounding the main urban areas of Coventry City, Nuneaton and Bedworth Borough, land adjacent to Coventry within Rugby Borough and Warwick towns of Kenilworth, Warwick and Leamington Spa¹⁵. It assessed different areas based on how they contribute to the purposes and functions of the Green Belt. Whilst the study preceded the Framework, the five purposes for including land within Green Belts, as set out in the 2009 Coventry Joint Greenbelt Study are consistent with those set out in the Framework¹⁶.

3.7 That study identified 73 parcels of Green Belt land, see **Appendix 1**, which adjoined Coventry. Of the 73 parcels, 48 met no more than three of the five purposes for Green Belt designation and were therefore considered to make a **limited contribution to the Green Belt**. Seven of those parcels lie within Warwick District Council area, adjacent to Coventry (see details at **Appendix 2**). This work has been updated in the 2015 Green Belt Study, which is less strategic in nature, but also shows land to the south of Coventry making a limited contribution to the Green Belt. It is clear therefore that **there is significant potential to accommodate Warwick District Council's proportion of Coventry's unmet housing need on these sites, as they are the most sustainable locations for development**.

3.8 **The Planning Advisory Service (PAS)** has prepared **legal guidance** for local authorities considering the release of green belt land for development through their local plan¹⁷. This concludes that the **exceptional circumstances test requires a planning judgement** and direct reference to the test and close regard to the Gallagher Estates v Solihull Ltd observations, will generally **provide a sound, policy-compliant route to Green Belt alterations**.

FIGURE 2 SOUTH COVENTRY AREA OF SEARCH PLAN



¹³West Midlands Regional Spatial Strategy Phase Two Revision Report of the Panel: September 2009; Paragraph 8.40

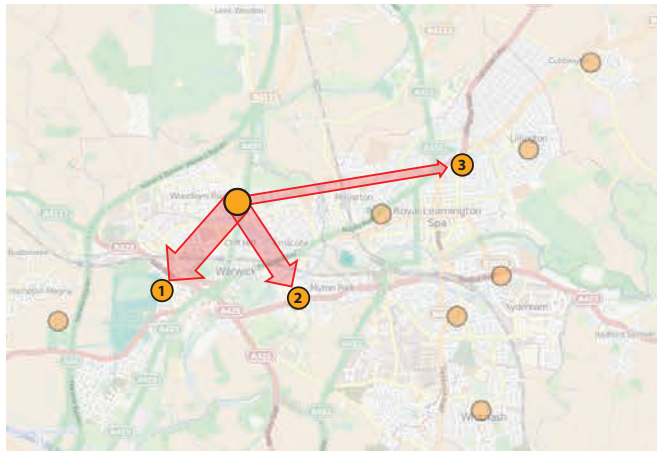
¹⁴NPPF paragraphs 83 to 85

¹⁵Coventry Joint Green Belt Study, SSR Planning 2009

¹⁶Paragraph 80 of the NPPF

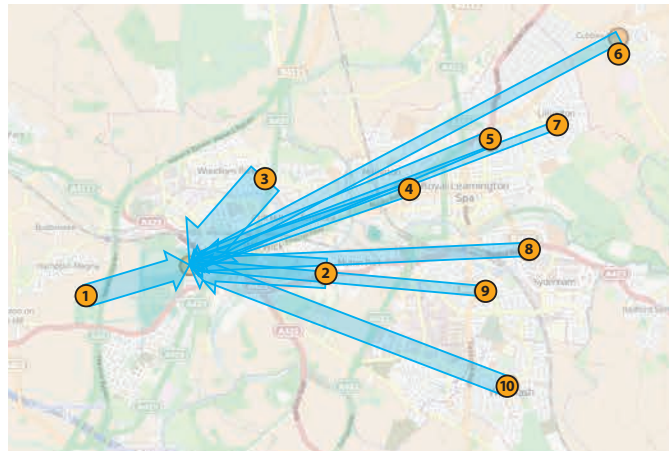
¹⁷PLANNING ADVISORY SERVICE PLAN-MAKING CASE LAW UPDATE MAIN ISSUE 4: GREEN BELT November 2014 (prepared by No5 Chambers)

FIGURE 3 NUMBERS COMMUTING FROM NORTH WARWICK – CENSUS 2011



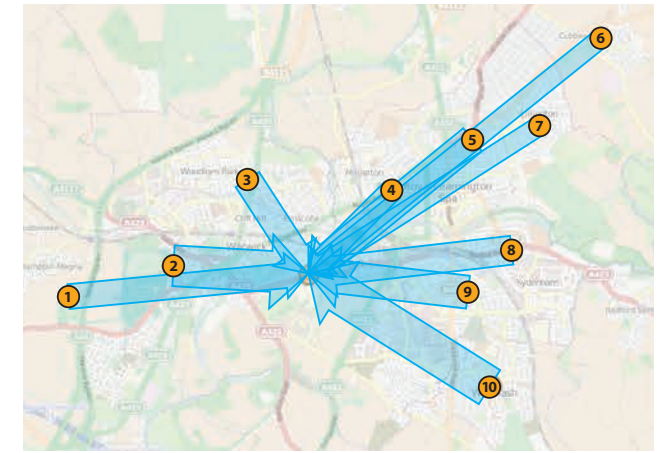
1. South West Warwick	710
2. South Warwick	537
3. Central Leamington	233

FIGURE 4 NUMBERS COMMUTING INTO SOUTH WEST WARWICK – CENSUS 2011



1. Hampton	426	6. Cubbington	235
2. South Warwick	570	7. Lillington	156
3. North Warwick	710	8. Sydenham	260
4. West Leamington	237	9. South Leamington	201
5. Central Leamington	306	10. Whitnash	378

FIGURE 5 NUMBERS COMMUTING INTO SOUTH WARWICK – CENSUS 2011



1. Hampton	478	6. Cubbington	373
2. South West Warwick	787	7. Lillington	293
3. North Warwick	537	8. Sydenham	557
4. West Leamington	426	9. South Leamington	636
5. Central Leamington	572	10. Whitnash	775

3.9 In terms of the most sustainable location to meet the additional housing requirement of Warwick District Council, the existence of infrastructure and employment opportunities is well represented by examining the 2011 Census commuter flows, as set out in Figures 3-5 above. In addition, **these areas to the south of Warwick/Leamington also fall outside the Green Belt and are identifies as potential development locations in the 2015 Green Belt Study**. The following section of this report will examine whether there are other potential constraints.

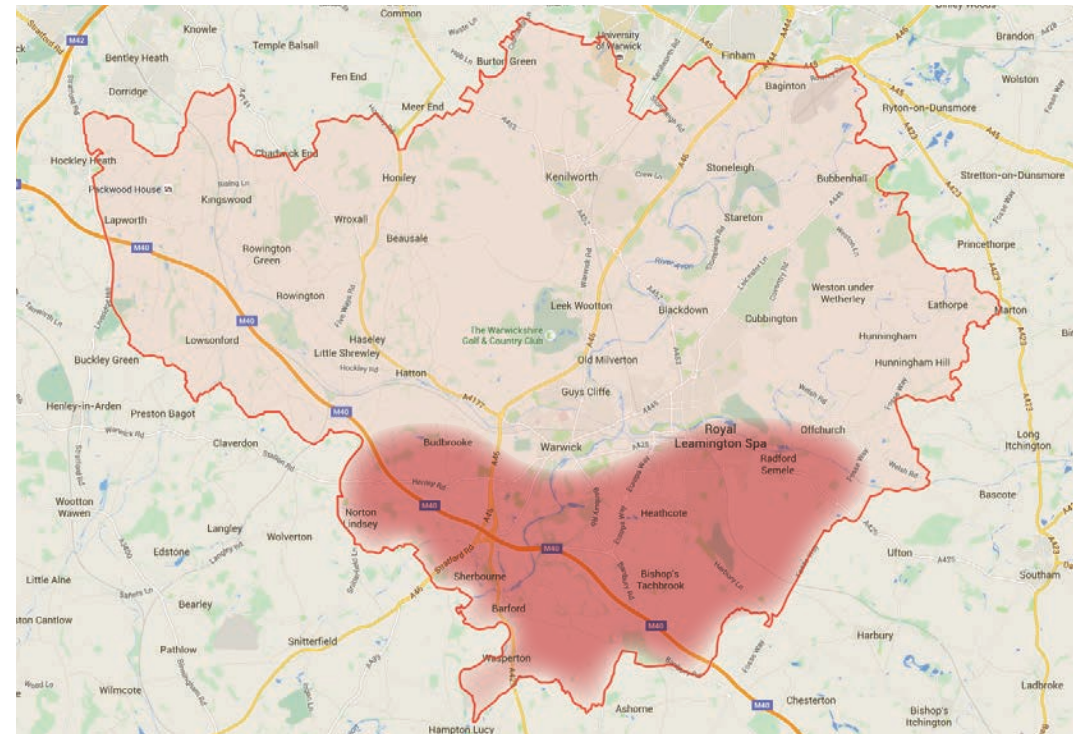


FIGURE 6 SOUTH WARWICK AREA OF SEARCH PLAN

04 ASSESS THE CONSTRAINTS

- 4.1 Having defined the most sustainable areas of search to accommodate the additional housing requirement (Land south of Coventry and Land south of Warwick), it is necessary to assess whether they are constrained from being developed, given the requirements of the National Planning Policy Framework (The Framework).
- 4.2 In particular, **Paragraph 14** sets out that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
 - **specific policies in the Framework indicate development should be restricted.**
- 4.3 Restrictive policies noted within the framework relate to;
- Sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest;
 - Land designated as Green Belt,
 - Local Green Space,
 - an Area of Outstanding Natural Beauty,
 - Heritage Coast or within a National Park (or the Broads Authority);
 - Designated heritage assets; and
 - Locations at risk of flooding or coastal erosion.

- 4.4 In addition to the policies and guidance set out in The Framework, **this document goes a step further** and includes other physical land-based constraints (Pollution, Landfill, Mines, Quarries and other Statutory and Non-statutory designations) as a sensitivity test within the sieving process. The full list of constraints is set out at **Appendix 3**.

WARWICK AREAS OF SEARCH FOR COVENTRY'S SURPLUS HOUSING REQUIREMENT

- 4.5 As set out in the previous section, all of the areas of search to meet Coventry's housing need within Warwick District are in the Green Belt and exceptional circumstances exist. For that reason, the Green Belt is not shown as a constraint. The 2009 Coventry Joint Greenbelt Study provided a detailed appraisal of the 48 sites that met no more than three of the five purposes for Green Belt designation. Of the 48 sites, **20 were identified as being 'least constrained parcels'** and therefore **suitable for development**. **Four** of these 'least constrained parcels' of land **are within the Warwick District** administrative area. It is accepted that this that work needs to be updated and should be subject to sensitivity testing, however the result is set out in **Appendix 4**.
- 4.6 The map below (p9) shows Land south of Coventry and screens out various constraints that would potentially prevent residential development. It highlights the most suitable and sustainable areas that can facilitate Coventry City's unmet housing needs (for details of constraints mapping see **appendix 5**).
- 4.7 The four sites identified, in **Appendix 5, are capable of providing the quantity of housing required**. In fact, taken as a whole, against the Warwick District Council 2014 SHLAA Assessment of Capacity¹⁸, the 518ha therefore provides 259ha for residential use. The SHLAA Assessment of Capacity also outlines that the indicative capacity for sites is 'around 35 dwellings per hectare'. Therefore, the 259ha available for residential development could deliver **a minimum of 9,056 dwellings**.

¹⁸which requires 50% of sites over 10ha to provide supporting uses for infrastructure, employment, open space, allotments, community facilities, landscaping and major roads and 33% for sites under 10ha

4.8 Taken individually the highlighted sites can deliver the following:

Site	Total Size	Available Size	Dwelling Capacity
C12E	185ha	92.5ha	3,238
C14C	106ha	53ha	1,855
C13B	217ha	108.5	3,798
C10A	10ha	6.7ha	235
Total	518ha	260.7ha	9,126

4.9 However, to further add sensitivity testing we recommend that the assessment goes beyond the 2014 SHLAA Assessment of capacity and we suggest that **if 60% of the available 518ha is allocated** for various infrastructure and open space uses, then 40% could be dedicated for residential use. 40% of 518ha amounts to 207.2ha and when taken as a whole, this 207.2ha of land **could deliver a minimum of 7,252 dwellings**.

AREAS OF SEARCH FOR ADDITIONAL WARWICK ALLOCATIONS

4.10 The map shows Land south of Warwick and screens out various constraints that would potentially prevent residential development. It highlights the most suitable and sustainable areas that can facilitate Warwick District's additional housing allocations (for details of constraints mapping see **appendix 6**). **The areas of search to the south of Warwick have sufficient unconstrained land to accommodate both the Local Plan requirement to 2029 and to cover the period to 2031.** Four potential sites have been identified, as seen on the plan below (p10).

4.11 These four parcels have been assessed against the Warwick District Council 2014 SHLAA Assessment of Capacity and are capable of providing the quantity of housing required. As above, the Council requires 50% of sites over 10 hectares (ha) to provide supporting uses for infrastructure, employment, open space, allotments, community facilities, landscaping and major roads and 33% for sites under 10ha. Taken as a whole, Parcels 1-4 amount to approximately 111ha of which 55.5ha (50%) would provide supporting infrastructure. The remaining 55.5ha can therefore provide approximately 1,943 dwellings, in keeping with the Warwick District Council 2014 SHLAA Assessment of Capacity, which outlines that the indicative capacity for sites is 'around 35 dwellings per hectare.'

4.12 Taken individually the highlighted sites can deliver the following:

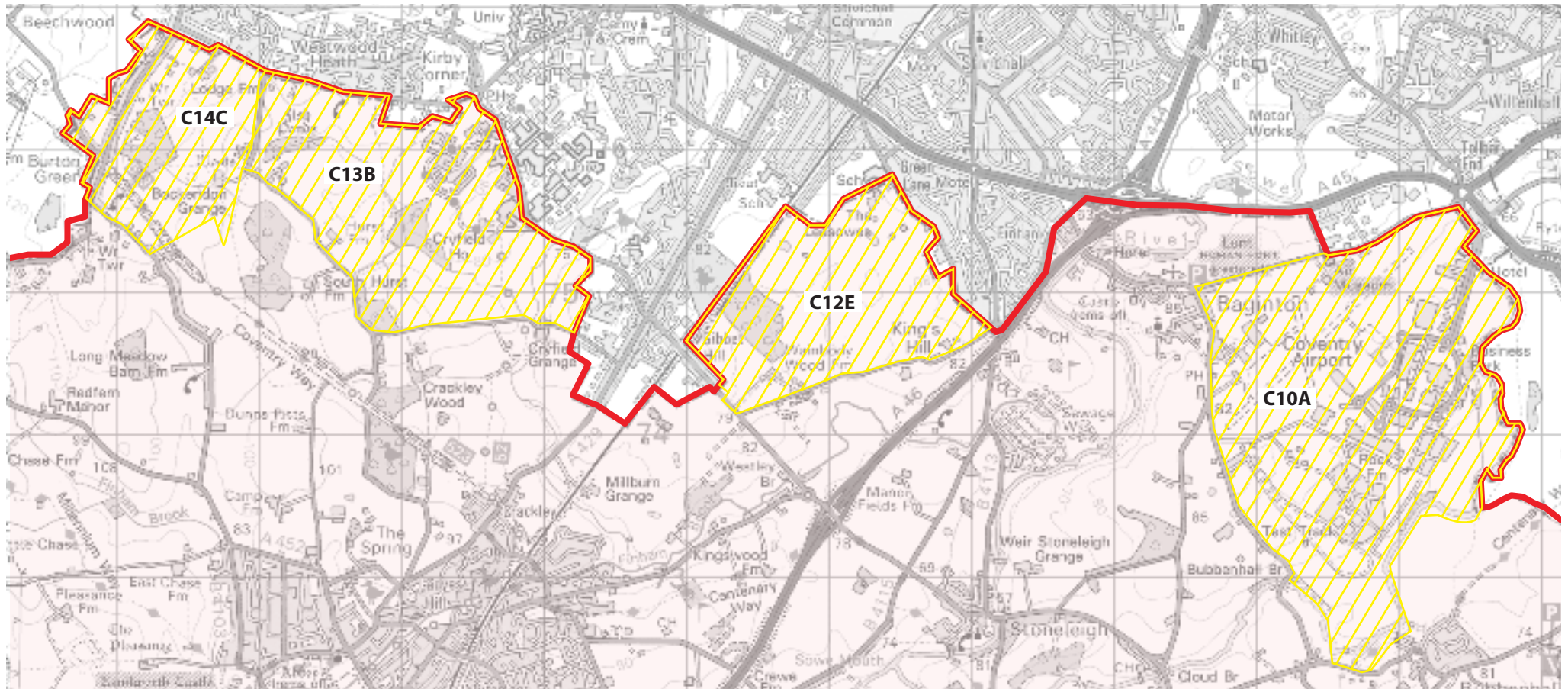
Site	Total Size	Available Size	Dwelling Capacity
Parcel 1	27ha	13.5ha	473
Parcel 2	35ha	17.5ha	613
Parcel 3	15ha	7.5ha	263
Parcel 4	34ha	17ha	595
Total	111ha	55.5ha	1,944

4.13 However, as above, we recommend added sensitivity testing that goes beyond the 2014 SHLAA Assessment of Capacity and considers that **if 60% of the available 111ha is allocated** for various infrastructure and open space uses, then 40% could be dedicated for residential use. 40% of 111ha amounts to approximately 44ha, which when taken as a whole can deliver a minimum of 1,540 dwellings.

4.14 In both cases, land south of Coventry and land south of Warwick can deliver the identified housing requirements and have the potential capacity to deliver in the next plan period. Critically, that approach is entirely consistent with the strategy of the submitted Local Plan which means the emerging plan and its strategy and background work in respect of the Warwick District Council Publication Draft Local Plan Sustainability Appraisal Report can remain intact.

4.15 The results are mapped below, with only those constraints affecting the areas of search being displayed.

Potential Sites South of Coventry




Not to scale. Source: OS Magic Map Crown Copyright and database rights 2015. Ordnance Survey 100022861

Emerging Plan Proposals – Legend


 District Boundary

Additional potential sites for residential development

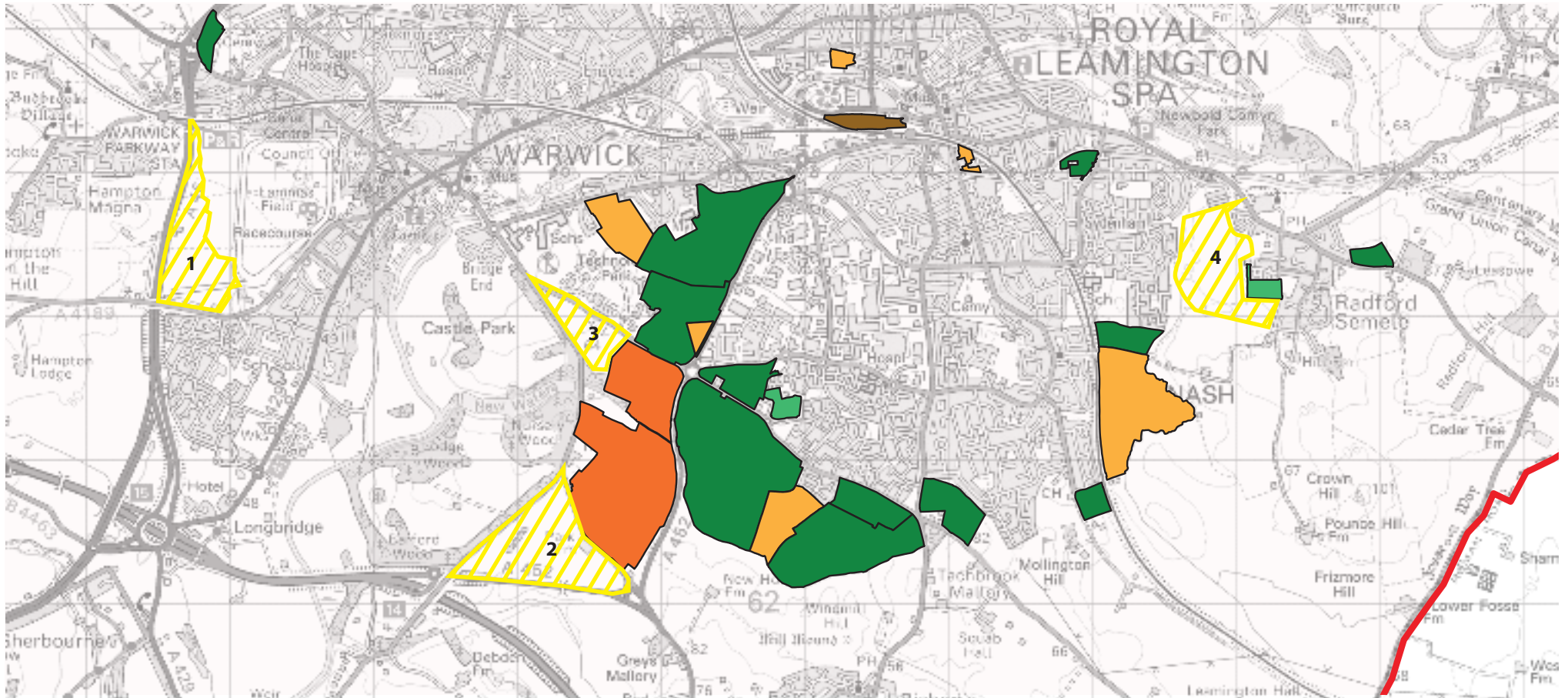
 **C14C** Circa 106ha

 **C13B** Circa 217ha, excluding university campus

 **C12E** Circa 185ha

 **C10A** Circa 10ha, excluding Coventry Airport, Middlemarch business park and sewage treatment works to the south

Potential Sites South of Warwick








Not to scale. Source: OS Magic Map Crown Copyright and database rights 2015. Ordnance Survey 100022861

Emerging Plan Proposals – Legend

 District Boundary

Local Plan – Site Progress

-  Local Plan site – Granted
-  Local Plan site decision pending
-  Non Local Plan site or appeal
-  Local Plan site no appn.
-  Non Local Plan Site – Approved

Additional potential sites for residential development

-  1 27ha
-  2 35ha
-  3 15ha
-  4 34ha

1. Site numbers continued from 2007 Green Belt Study 2. To deliver the required housing only 40% of each site is needed leaving remainder for open space, Green Infrastructure etc

05 CONCLUSION

- 5.1 In order to accommodate the unmet needs of Coventry City, the most sustainable locations would be Land south of Coventry (adjacent to the City Council's boundary in Warwick District). To meet the additional allocations for the remainder of the district, identified by the Inspectors comments, this should be found south of Warwick/Leamington Spa.
- 5.2 This study makes no allowance for the potential of excess capacity in neighbouring districts that may be identified through any future 'duty to cooperate' discussions.

LAND SOUTH OF COVENTRY

- 5.3 Previous studies have already identified parcels of land within the Green Belt which makes a limited contribution to the purposes of green belt designation. Four of those, comprising circa 518 hectares¹⁹, are also considered by the study to be least constrained²⁰. It is clear therefore, that **there is significant potential to accommodate Warwick District Council's proportion of Coventry's unmet housing need** in the most suitable and sustainable locations **adjoining Coventry**.

LAND SOUTH OF WARWICK

- 5.4 Given the availability of employment opportunities and infrastructure capacity, it is considered that the comparatively smaller requirement to meet the needs of Warwick District, as defined by the Inspector's June 2015 Report, can be located to the south of Warwick, without the need for further incursions into the Green Belt. The four identified sites, comprising circa 111 hectares can **adequately meet Warwick's need** in the most suitable and sustainable locations.

SUMMARY

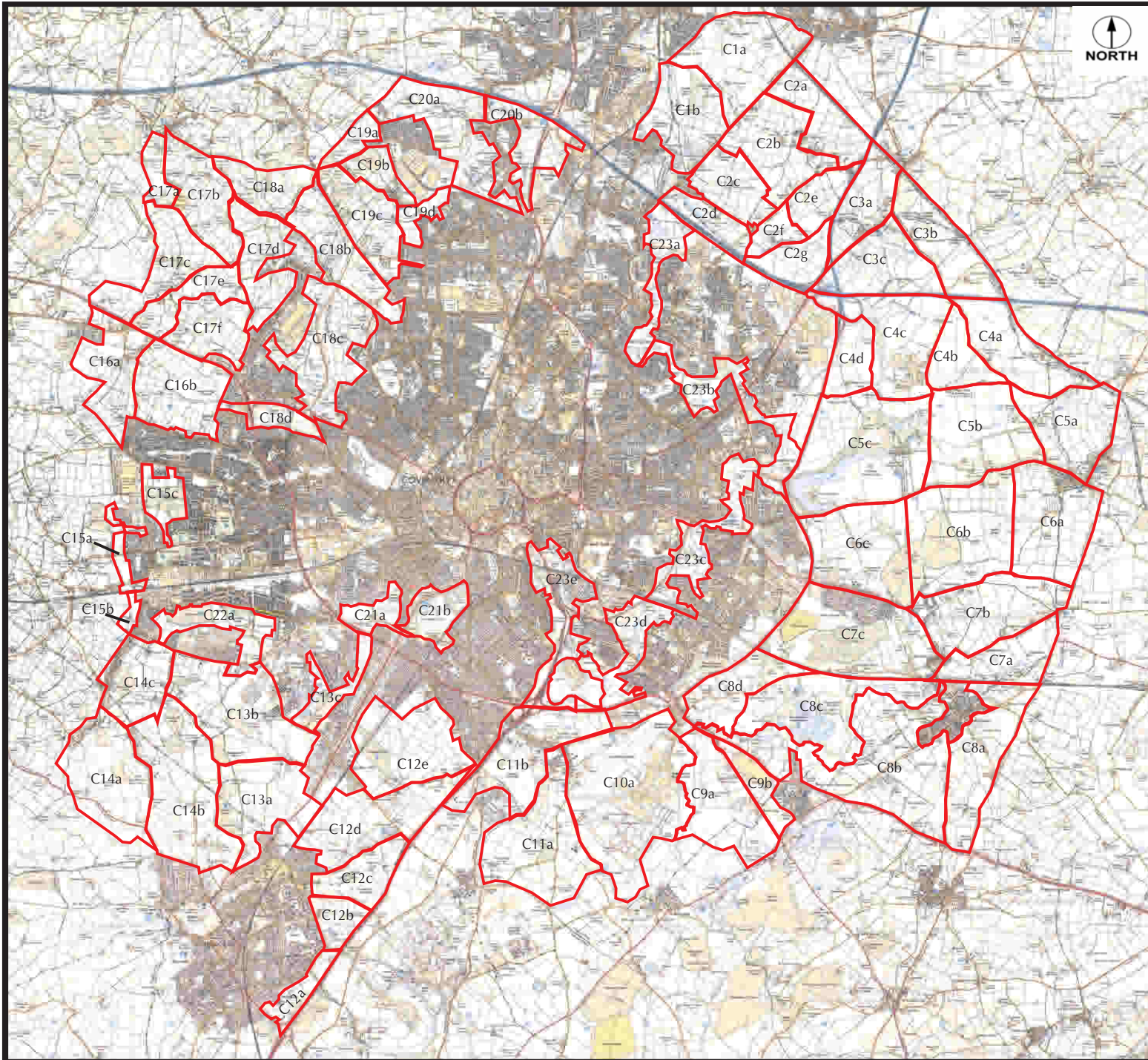
- 5.5 **In all cases, the identified land has excess capacity to meet the housing need up to 2031 therefore providing a level of comfort for further detailed investigation.** The land also provides the appropriate level of infrastructure, educational facilities, transportation, employment, health, open space and recreational facilities required.
- 5.6 The locations identified are also considered to be in accordance with the development strategy of the submitted Local Plan and coincide with such allocations and development proposals.

¹⁹Area excludes the University of Warwick campus, Coventry Airport, Middlemarch Business Park and sewage treatment works to the south.

²⁰Constraints included physical and environmental constraints, links to the urban area development potential and landscape.

APPENDIX 1

73 PARCELS OF LAND ASSESSED IN COVENTRY JOINT GREEN BELT STUDY 2009



COVENTRY

Land Parcels

LEGEND

— Boundary of Parcels

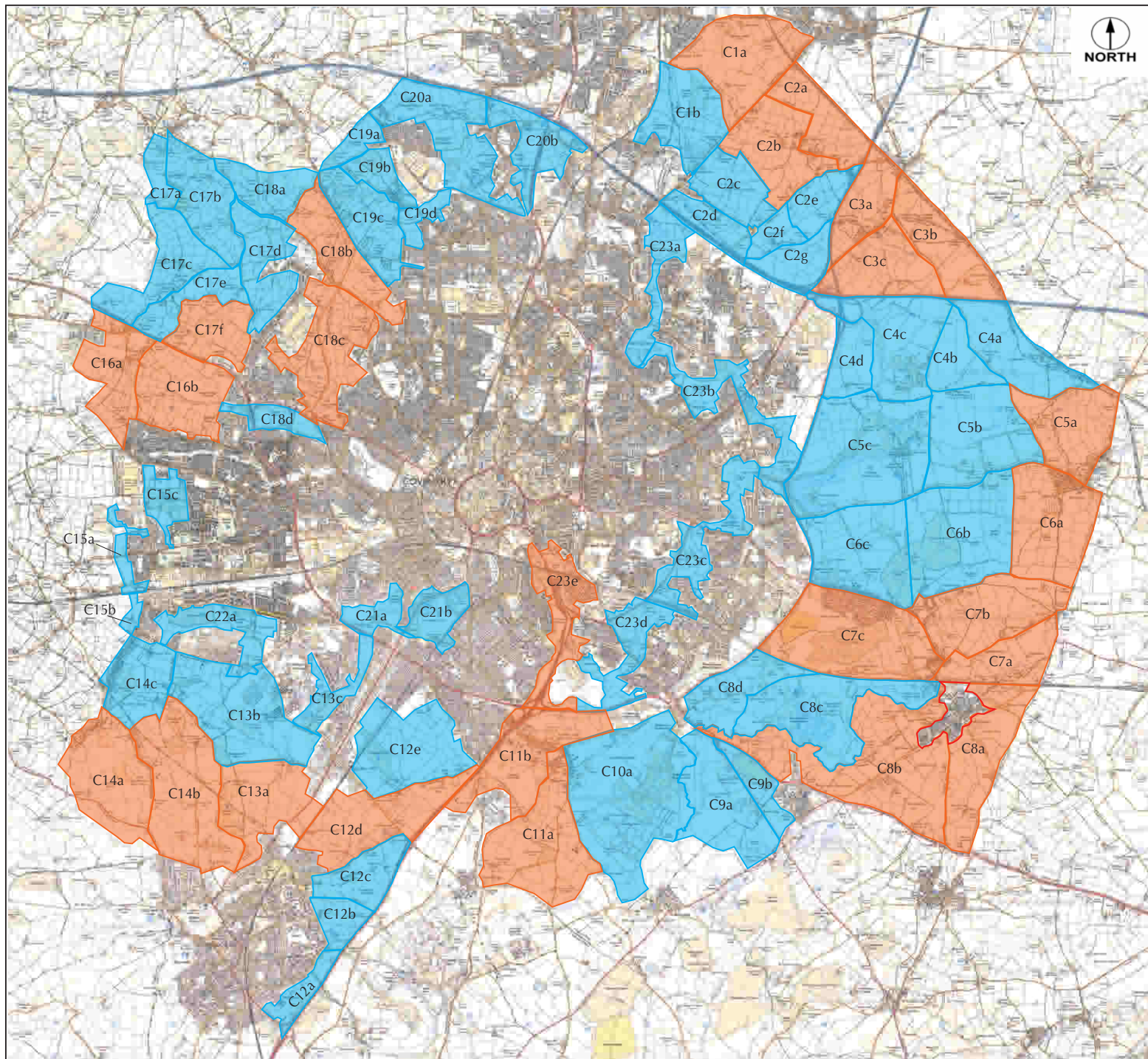
Figure 2.1

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APPENDIX 2

PARCELS TO BE RETAINED IN COVENTRY'S GREENBELT & PARCELS TO BE TAKEN FORWARD FOR DETAILED STUDY

SOURCE: 2009 COVENTRY JOINT GREENBELT REVIEW



COVENTRY

PPG2 Purposes

LEGEND

- Retain in Green Belt
- Consider for Detailed Study

Figure 3.1

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APPENDIX 3

MAPPED CONSTRAINTS

SUMMARY OF MAP CONSTRAINTS

The following highlights, in summary fashion, the constraints applied throughout Warwick District's administrative area. They have been divided into two categories; Statutory and Non-Statutory:

STATUTORY:

LAND BASED DESIGNATIONS

- Areas of Outstanding Natural Beauty (England)
- Natural Nature Reserves (England)
- Local Nature Reserves (England)
- Ramsar Sites (England)
- Sites of Special Scientific Interest (England)
- Special Areas of Conservation (England)
- Special Protected Areas (England)
- Biosphere Reserves (England)
- Disadvantaged Less Favoured Areas (England)
- Severely Disadvantaged Less Favoured Areas (England)

- Sites of Special Scientific Interest Units (Favourable condition, Unfavourable Recovering, Unfavourable No Change, Unfavourable Declining, Part Destroyed, Destroyed and Not Assessed)

HISTORIC FEATURES

- Scheduled Monuments (England)
- World Heritage Site
- World Heritage Sites Buffer Zone (England)
- Listed Buildings (England)

FLOOD RISK

- Flood Zone 1
- Flood Zone 2
- Flood Zone 3
- Main River Line

NON-STATUTORY:

HISTORIC FEATURES

- Ancient Woodlands
- Registered Battlefields
- Registered Parks and Gardens (England)

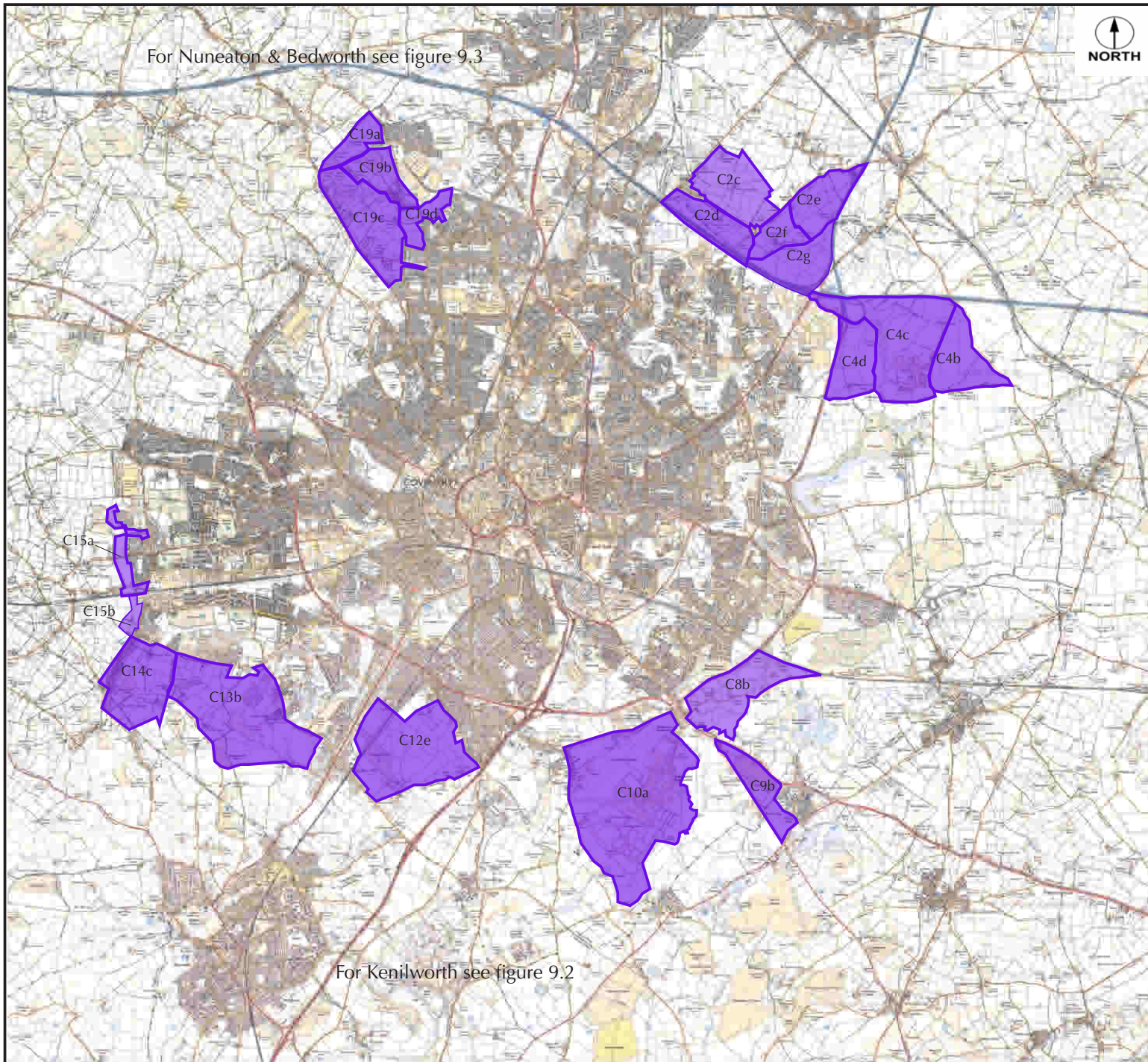
POLLUTION

- Major Pollution Incidents
- Significant Pollution Incidents
- Industrial Operator Scores (OPRA) 2011
 - Band A
 - Band B
 - Band C
 - Band D
 - Band E
 - Band F
- Compliance Rating Scores
 - Very Good
 - Good
 - Moderate
 - Fair
 - Poor
 - Bad

- Industrial Pollution
 - Fuel and Power
 - Metal
 - Mineral
 - Chemical
 - Waste
 - Water
 - Radioactive
 - Associated
 - Other
 - Not Classified

APPENDIX 4

COVENTRY - LEAST CONSTRAINED PARCELS



COVENTRY

Least Constrained Parcels

LEGEND

- Least Constrained Parcels

Figure 9.1

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APPENDIX 5

ASSESSMENT OF FOUR LEAST CONSTRAINED PARCELS IN WARWICK DISTRICT

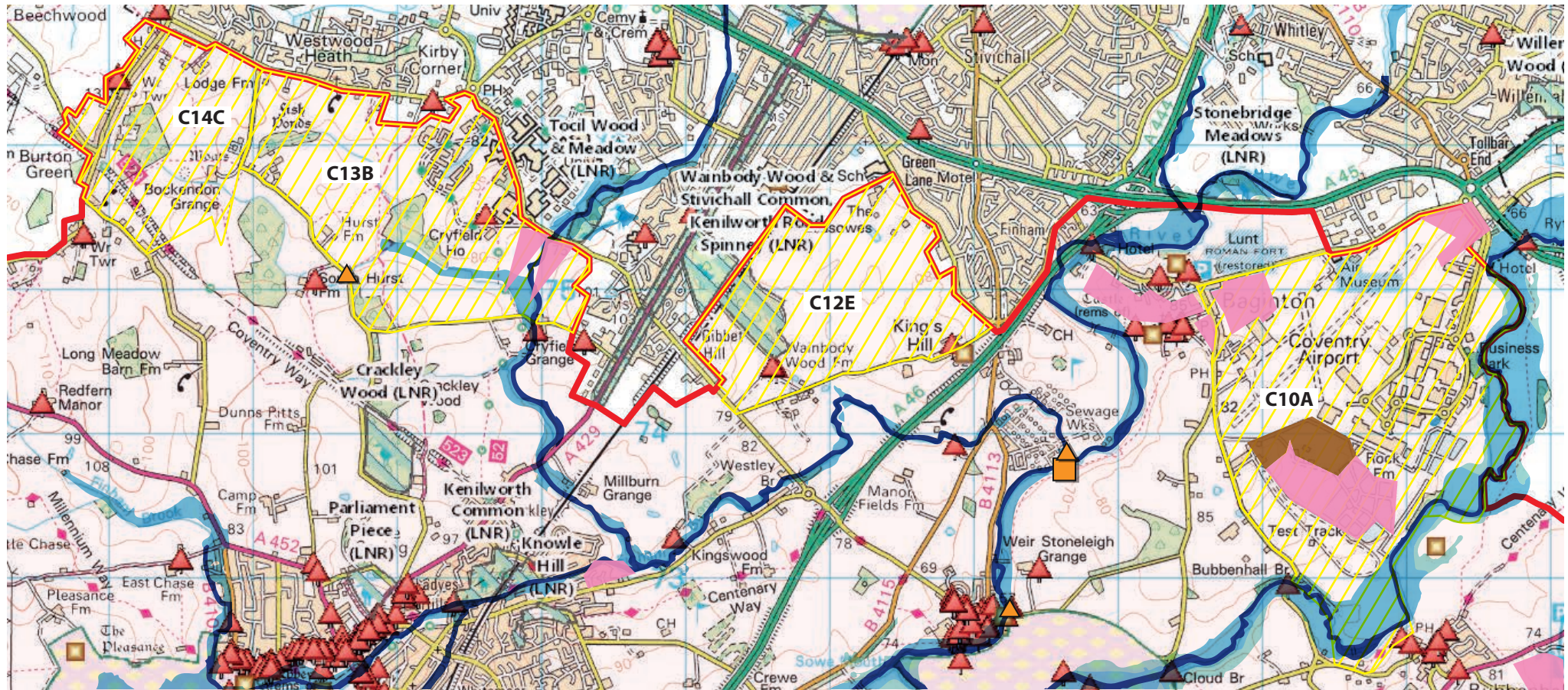
The four least constrained sites which were identified in the 2009 Coventry Joint Greenbelt Review are: C10A, C12E, C13B and C14C. Each of these has been assessed against the five Green Belt Purposes, as is seen below and it is concluded that they don't contribute to purpose of Green Belt.

- **C10A (Circa 10ha, excluding Coventry Airport, Middlemarch business park and sewage treatment works to the south)**
 - It restricts sprawl from airport runways and buildings, sewage works and vehicle test track.
 - Does not prevent neighbouring towns from merging into one another.
 - Does not safeguard the countryside against encroachment.
 - Contributes to preserving the setting of Baginton village.
 - Retention of green belt land will encourage recycling of derelict and other urban land.
- **C12E (Circa 185ha)**
 - Contributes to preventing sprawl from Coventry.
 - Does not prevent neighbouring towns from merging into one another.
 - Safeguards the countryside from encroachment.
 - Does not contribute to setting and character of Coventry.
 - Retention of green belt land will encourage recycling of derelict and other urban land.
- **C13B (Circa 217ha, excluding university campus)**
 - Contributes to preventing sprawl from Coventry.
 - Does not prevent neighbouring towns from merging into one another.
 - Safeguards the countryside from encroachment from Coventry.
 - Does not contribute to setting and character of approach to Coventry, includes University of Warwick Campus.
 - Retention of green belt land will encourage recycling of derelict and other urban land.
- **C14C (Circa 106ha)**
 - Contributes to preventing sprawl from Coventry.
 - Does not prevent neighbouring towns from merging into one another.
 - Safeguards the countryside from encroachment from Coventry.
 - Does not contribute to setting and character of Coventry.
 - Retention of green belt land will encourage recycling of derelict and other urban land²¹

²¹Appendix 3 of the 2009 Coventry Joint Greenbelt Review (Assessment of Parcels against PPG2 Purposes)

Land South of Coventry

Not to scale. Source: OS Magic Map Crown Copyright and database rights 2015. Ordnance Survey 100022861



Legend

District Boundary

Local Nature Reserves (England)

Scheduled Monuments (England)
- points

Listed Buildings (England)

Registered Parks and Gardens (England)

Pollution

Pollution Incidents

Major

Significant

Industrial Pollution

Waste

Water

Radioactive

Flood Zones

Flood Zone 3

Flood Zone 1

Main River Line

Land Fill

Historic Landfill

Authorised Landfill

Additional potential sites for residential development

C14C Circa 106ha

C13B Circa 217ha, excluding university campus

C12E Circa 185ha

C10A Circa 10ha, excluding Coventry Airport, Middlemarch business park and sewage treatment works to the south

APPENDIX 6

ASSESSMENT OF SIX PARCELS IDENTIFIED TO MEET WARWICK DISTRICT'S NEED

- **Parcel 1 (Circa 27ha, excluding flood zone)**

- Has not been allocated in the new Local Plan.
- Located west of the Racecourse/Lammas Field.
- Does not include flood zone to north and east.
- Good connectivity with existing transportation infrastructure.
- Extension to existing settlement.

- **Parcel 2 (Circa 35ha)**

- Has not been allocated in the new Local Plan.
- Site bounded by the A425/A452/Barford Road.
- Good connectivity with existing transportation infrastructure.

- **Parcel 3 (Circa 15ha)**

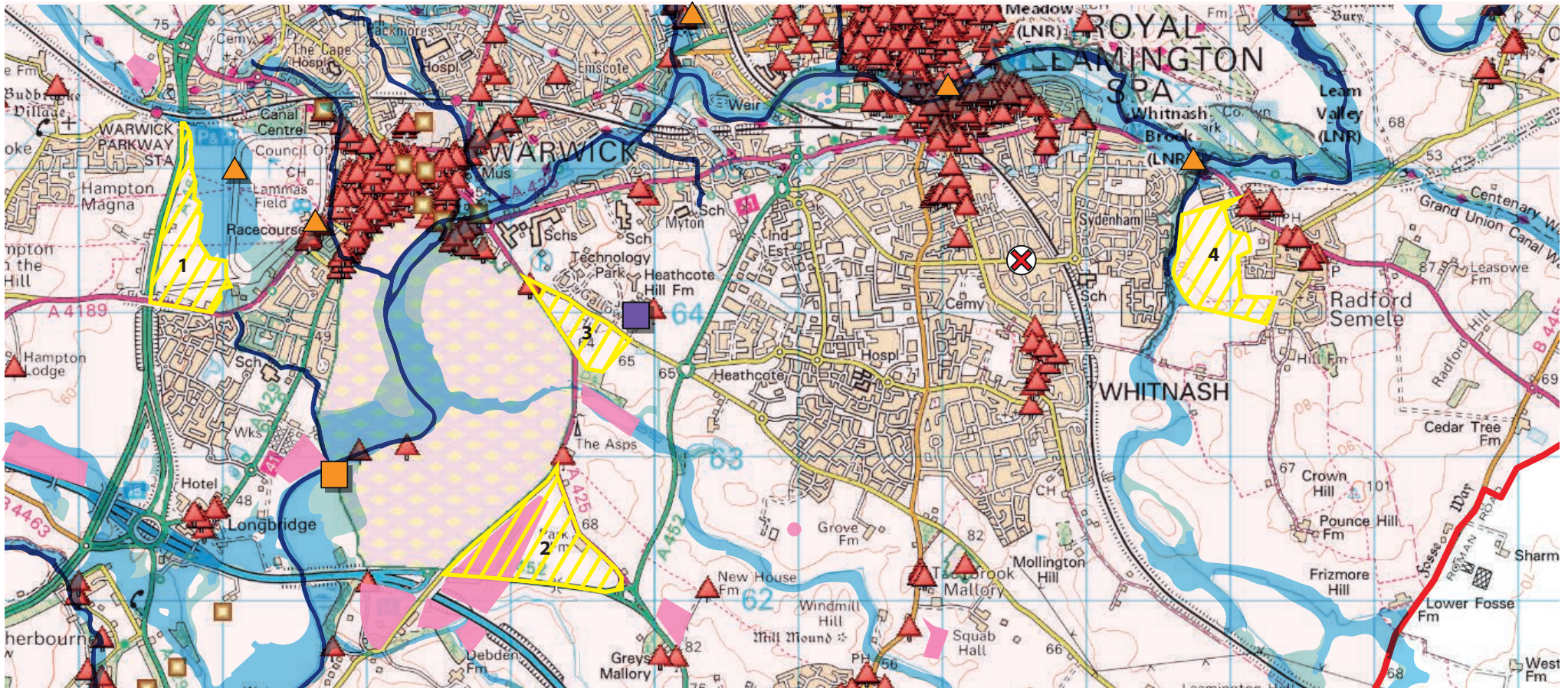
- Has not been allocated in the new Local Plan.
- Located south of Gallows Hill.
- Adjoins Technology Park to south.
- Good connectivity with existing transportation infrastructure.

- **Parcel 4 (Circa 34ha)**




















- Has not been allocated in the new Local Plan.
- Good connectivity with existing transportation infrastructure.
- Extension to existing settlement.
- Does not include flood zone to west.
- Located south of Royal Leamington Spa; between Sydenham and Radford Semele.

Land South of Warwick

Not to scale. Source: OS Magic Map Crown Copyright and database rights 2015. Ordnance Survey 100022861



Legend

- | | | | | |
|--|---|--|---|--|
|  District Boundary | Pollution | Flood Zones | Land Fill | Additional potential sites for residential development |
|  Local Nature Reserves (England) | Pollution Incidents |  Flood Zone 3 |  Historic Landfill |  1 27ha |
|  Scheduled Monuments (England) - points |  Major |  Flood Zone 1 |  Authorised Landfill |  2 35ha |
|  Listed Buildings (England) |  Significant |  Main River Line | |  3 15ha |
|  Registered Parks and Gardens (England) | Industrial Pollution | | |  4 34ha |
| |  Waste | | | |
| |  Water | | | |
| |  Radioactive | | | |

1. Site numbers continued from 2007 Green Belt Study 2. To deliver the required housing only 40% of each site is needed leaving remainder for open space, Green Infrastructure etc