



WARWICK DISTRICT LOCAL PLAN EXAMINATION

HEARING STATEMENT ON BEHALF OF

OLD MILVERTON and BLACKDOWN JOINT PARISH COUNCIL

MATTER 7a: POLICIES DS11, DS15 and DS NEW2
ALLOCATION AND SAFEGUARDED LAND AT OLD MILVERTON (H44 AND S2)

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 The Inspector will note that this issue has raised a significant level of concern in terms of the number of representations to the relevant parts of the proposed modifications (Over 230 for DS15; over 260 for Paragraph 2.81; and over 130 for Policy H44). Whilst the Parish Council accepts that the volume of comments is not the key aspect for the Inspector to consider, the vast majority of the submitted objections are, in the Parish Council's view, well argued in terms of national policy and local constraints.

1.3 This statement sets out the Parish Council's responses to the Inspector's questions, where relevant, in relation to the allocation of site H44 and safeguarded site S2. The comments below in combination with previously submitted representations clearly demonstrate that the District Council's approach to the allocation and safeguarding of land in the Green Belt at Milverton is contrary to national policy and is therefore not sound.

2. Policies DS11, DS15 and DS NEW2

Q.1) What is the current planning status of the site?

A. For Warwick District Council to Respond.

Q.2) How does it fit within the overall spatial strategy?

2.1 As set out in the Parish Council's statement in respect of Matter 4, The Spatial Strategy, the strategy as currently drafted is poorly defined. In addition, the allocation of site H44 at Milverton is not located to meet the needs of Coventry and the emerging Coventry Local Plan which was submitted to the Secretary of State on 1 April 2016 (See **HPP Appendix 1**). Turning to the needs of Leamington, the tests set out in paragraph 84 of the Framework¹ have not been met in that there are suitable alternative sites outside of the Green Belt as set out in the Parish Council's previous submissions (See **HPP Appendix 2**).

¹ *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.*

Q.3) *In addition to housing provision, are there other benefits that the proposed development would bring?*

2.2 The Parish Council notes that the proposed modification to policy DS 11, includes potential for employment land; potential park and ride; primary school; land or contribution for a medical centre; community facilities; and potential for new rail station amongst the infrastructure requirements and other uses for the site. However these would appear to require both the allocation of 250 units and development capacity of up to 1,315 dwellings once the safeguarded land is brought forward beyond the end of the plan period. It is currently unclear therefore, exactly what 'other benefits' arise from the allocation.

2.3 However, taking each in turn the Parish Council raises the following points:

1. It is understood that '**a small amount of employment land**' is to be included as part of the allocation of 250 dwelling units and can therefore only be seen as a potentially 'small' benefit. The Parish Council understands that such land would not be attractive to major employers and that WDC has not undertaken any market analysis to estimate the attractiveness of such land.
2. When considering inappropriate development in the Green Belt the Framework is clear that local transport infrastructure which can demonstrate **a requirement** for a Green Belt Location (our emphasis) is not inappropriate provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt.
3. That requirement has not been demonstrated and therefore the proposal for **Park and Ride** at Milverton is contrary to national policy.
4. In addition, as set out in the following paragraphs the **Park and Ride** proposal seems ill-thought out.
5. Stagecoach emphasise in their submissions what an important bus route the A452 is at present with a variety of buses using the route every few minutes and the X18 is a fast bus that goes straight to Coventry via the A46. Clearly it is not in anyone's interest to encourage car use, but this facility could have the effect of discouraging use of the train (time between Leamington and Coventry stations is only 10 minutes) or indeed using the frequent buses between Coventry and Leamington for the whole journey.
6. Stagecoach in their submissions state, "*The attractiveness of the facility in achieving mode shift into Leamington, and just as important, towards the University of Coventry and potentially Coventry, Whitley, Stoneleigh and Westwood, depends on buses benefiting from comprehensive priority measures both north and south of the facility.*"
7. The County Council cannot produce any evidence that they are intending to provide the required comprehensive priority measures both north and south of the Park and Ride facility which Stagecoach clearly believes is necessary to achieve the modal shift.
8. Most Park and Ride facilities require efforts to cut back on car parking provision in the town centre in order to encourage use of the Park and Ride facilities. The classic example of such a successful approach to Park and Ride is Oxford. Elsewhere, Park and Ride facilities can fail if such parking

restrictions are not implemented such as at Swindon. Leamington Spa already has ample on-street and off-street car parking provision. The County Council are at the moment trying to increase the on-street car provision in the centre of town by removing "No Waiting at any Time" parking and proposing to replace it with "Limited Waiting 2 hours no return 4 hours 8am to 8pm Except Permit holders" for a number of locations. The latest example of this is in Chapel Street just south of the river.

9. The District Council intend to replace the existing Covent Garden Car Park with a new and larger 650 car park. There are no plans to close any of the District Council car parks in Leamington.
10. There is no evidence of any provision to reduce the income from car parking in Leamington by either the County Council or the District Council.
11. The District Council have produced no documents on the likely cost of building the Northern Park and Ride. The District Council has not shown whether either Council will be subsidising this facility or if either Council expects to earn additional income from the facility. It does not appear from Stagecoach's submission that Stagecoach would intend to run the facility.
12. BID Leamington (a Business Improvement District (BID) within Royal Leamington Spa) has for some time been campaigning for more car parking in Leamington Town Centre, it has also had concerns about overly fierce enforcement of on-street car parking in the town centre by the County Council. BID Leamington say they have not been asked for their views on Park and Ride.
13. The provision of a **primary school** will be a normal requirement of development rather than a benefit.
14. Similarly, land or contribution to a **medical centre** and **community facilities** are also normal requirements of development.
15. In common with the suggestion of Park and Ride, the potential for a **new rail station**, has no supporting evidence and is accepted to be 'subject to viability'. A new rail station at this location would need the cooperation of train operator and is likely to lead to a depreciation in service given the time needed to account for stopping at the new station and therefore be resisted by the operator. Network Rail has provided no evidence that there was capacity within existing rail infrastructure to deliver a new station. It is clear therefore that new rail station would not be an 'additional benefit'.

2.4 The Parish Council notes that in their submissions, the site promoters identify economic benefits arising from the development. However, whilst the Parish Council accepts that these are welcome, it considers that they would occur from any development of this quantum.

Q.4) What are the potential adverse impacts of developing the site? How could they be mitigated?

2.5 In addition to the impacts in relation to the loss of green belt, and other constraints which are addressed below, the Parish Council notes that the Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016) highlights the

potential impact of future development on the setting of the Leamington Spa Conservation Area. The Parish Council is aware that the requirements of the Framework² and the Planning (Listed Buildings and Conservation Areas) Act 1990³ place obligations on the WDLP which have not been evidenced and believes that development of the allocation would be contrary to those provisions.

Q.5) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.6 The Parish Council notes that in terms of agricultural land quality the allocation site and the safeguarded area comprise Grade 2 and Grade 3a agricultural land (with the exception of a minor strip of Grade 3B) and is therefore best and most versatile (see **HPP Appendix 3**). The Framework is clear that *'Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'*⁴. The parish council believes that the WDLP has not demonstrated the necessity to develop this land and is therefore contrary to this element of national policy.

2.7 In addition, the rights of way crossing the site are regularly used and provide access to countryside adjoining Leamington.

Q.6) Is the site realistically viable and deliverable?

2.8 This is primarily a question for Warwick District Council and the site promoters. However, the Parish Council notes that the promoters have raised concerns in respect of the infrastructure and other requirements listed in the policy. Such concerns underline that this site is unlikely to be able to provide any local exceptional circumstances.

Q.7) What is the expected timescale for development and is this realistic?

A. For Warwick District Council and the promoter to Respond.

Q.8) What would be the effect of the proposal on the purposes of including land within the Green Belt?

2.9 The West Midlands Green Belt was formally approved by the Secretary of State in 1975. The original purposes of designation were to prevent the unrestricted expansion of the Birmingham conurbation, to prevent the coalescence of towns (such as Kenilworth and

² Paragraph 132 requires the protection and enhancement of the historic environment

³ S72 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

⁴ Paragraph 112

Leamington) and villages around it and to safeguard the countryside from encroachment and to protect historic towns.

2.10 The Parish Council is particularly concerned that this proposal will have significant detrimental and permanent effects on the purposes of including land within the Green Belt. It is noted that the Joint Green Belt Study produced by LUC in June 2015, includes the allocated and safeguarded site within parcel RL1 where it forms the southern two thirds (See **HPP Appendix 4**). That study assesses the parcel against the purposes of designation and the Parish Council highlights relevant extracts as follows:

1. To check the unrestricted sprawl of large built-up areas;
The parcel plays some role in preventing ribbon development along the eastern edge of the parcel which follows Kenilworth Road. All the development within the parcel is concentrated in the northern corner of the parcel. While the remaining areas of the parcel are open and free from development, the openness of the northern corner has been compromised by several large buildings, including Oak Medical Hospital (Warwickshire Nuffield) and Blackdown Clinic.[The Parish Council would draw the Inspector's attention to the fact that the built development is largely developed around original Edwardian houses that would have predated the green belt.]
2. To prevent neighbouring towns merging into one another;
The parcel prevents Leamington Spa adjacent to the southern edge of the parcel from merging with the small village of Old Milverton adjacent to the western edge of the parcel on the other side of the railway line which runs along this edge of the parcel. Although the railway line plays a separating role development along the eastern side of the line up to Sandy Lane would effectively merge these two settlements. The distance between the two settlements is less than 1km along this western edge of the parcel. [Applies to the safeguarded area]
3. To assist in safeguarding the countryside from encroachment;
All the development within the parcel is concentrated in the northern corner of the parcel. While the remaining areas of the parcel retain the character of countryside, are open and free from development, the areas around the Oak Medical Hospital (Warwickshire Nuffield) and Blackdown Clinic are less open and somewhat urbanised by the areas of hardstanding and large buildings associated with these developments. The River Avon meanders to the north of the parcel and protects the countryside on its northern bank from encroachment from Leamington. A railway line borders the western side of the parcel preventing encroachment of the countryside to the west. However, the railway runs perpendicularly to the urban edge of Leamington and does little to prevent encroachment of the countryside within the parcel up to the edge of the River Avon. Furthermore, the River Avon is a significant distance from the urban edge of Leamington meaning that it plays no role in protecting the countryside within the parcel from encroachment. Therefore, both boundaries are considered to be less significant.
4. To preserve the setting and special character of historic towns; and

The parcel borders the Leamington Spa Conservation Area which runs into the core of this historic town. In addition, on the areas of high ground within the parcel, there is good intervisibility with the historic core of the town which lies to the south.

5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites.

2.11 As set out in previous submissions on the WDLP the Joint Green Belt Study scored each parcel in terms of its importance to the Green Belt and parcel RL1 score 16 out of 20 and it therefore makes a significant contribution to the Green Belt. Should the Inspector conclude that exceptional circumstances have been demonstrated to justify the release of Green Belt sites adjoining Leamington Spa then it is clear that the allocated and safeguarded site at Milverton is one of the most sensitive and should therefore not be allocated.

Q.9) What would be the effect on the openness of the Green Belt?

2.12 The Parish Council considers that removing the allocation and safeguarded land from the Green Belt would clearly have a significant and permanent impact on the openness of the Green Belt in this sensitive location, through the introduction of built development. This will be noticed by those who use the public rights of way network, the railway, Old Milverton Lane and Sandy Lane, where unobstructed views of the current built development limits of Leamington can be gained.

Q.10) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?

2.13 For the many reasons set out above the Parish Council believes that exceptional circumstances have not been demonstrated to justify altering the Green Belt in relation to site H44 or the safeguarded land S2.

Q.11) Why was safeguarded land identified, what is it intended to achieve?

Please see responses set out above.

Q.12) How was the safeguarded land identified, what options were considered and why was the land in question selected?

Please see responses set out above.

Q.13) How does it fit within the overall spatial strategy?

Please see responses set out above.

Q.14) What would be the effect of the proposal on the purposes of including land within the Green Belt?

Please see responses set out above.

Q.15) What would be the effect on the openness of the Green Belt?

Please see responses set out above.

Q.16) What are the potential adverse impacts? How could they be mitigated?

Please see responses set out above.

Q.17) Are there infrastructure, physical or other constraints to development? If so, how could these be overcome? Is the land realistically developable?

Please see responses set out above.

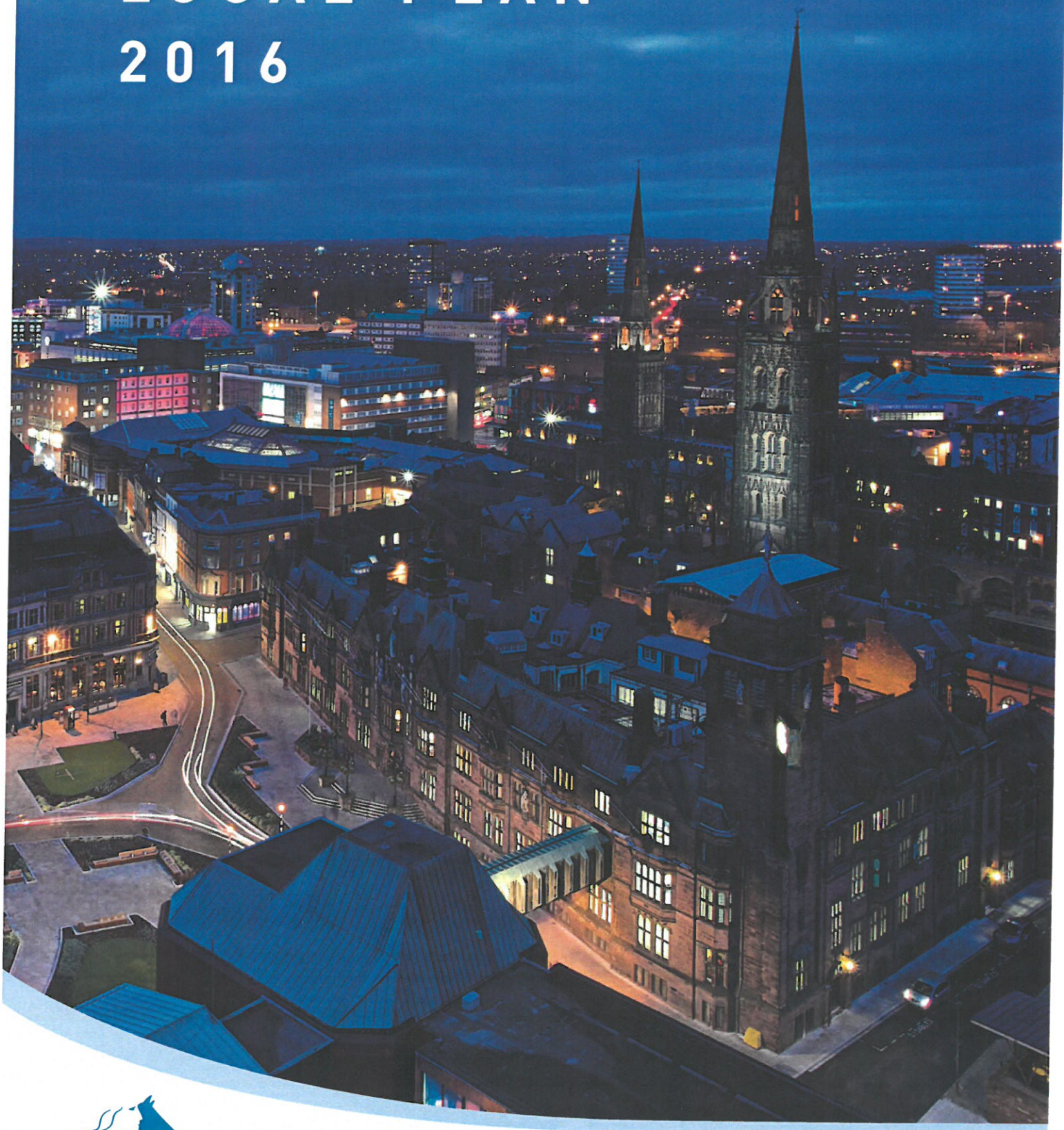
Q.18) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?

Please see responses set out above.

Q.19) Is the overall amount of safeguarded land identified sufficient?

A. For Warwick District Council to Respond.

COVENTRY LOCAL PLAN 2016



Coventry City Council

www.coventry.gov.uk/localplan

recommendations of the Joint SHMA work, the responses to public consultation and findings of the Sustainability Appraisal, the Council consider the city's full OAN for housing to total 42,400 homes (2,120 per annum) between 2011 and 2031, with an OAN for affordable homes of 12,000 (600 per annum), which are to be provided as a proportion of total need and from within the existing housing stock.

Delivering the city's housing need must however be considered within the context of deliverability, sustainable development, justifiable constraints and housing land supply. With this in mind the Council have reviewed and updated its Strategic Housing Land Availability Assessment (SHLAA) to reflect a joint methodology agreed across the HMA. This review has highlighted that the city can accommodate between 24,600 and 25,000 homes. As such, it is not possible to deliver the city's full housing needs within the city boundary and a shortfall of 17,800 homes exists. Even without the significant level of unmet need the annualised rate of growth projected for the city (1,230 per annum on average) continues to represent a step change in regular housing growth within Coventry. It will also represent for the first time in over 50 years that the city has seen significant expansion of its urban area.

As a result, the Council have worked openly and constructively with its neighbouring authorities, particularly over the last 18 months to agree a Joint Memorandum of Understanding (MoU) on housing delivery to support all Local Plans for Coventry and Warwickshire. At the time of writing this MoU has been endorsed by five of six authorities and seeks to demonstrate that the full needs of the HMA will be planned for over the course of the plan period. This approach has been progressed through the Duty to Cooperate (DtC) to help provide as much certainty as possible about how the city's full housing needs will be delivered. The Council recognises however that it can only go so far in this respect as it is inappropriate and beyond the powers of the Council to dictate terms and sites to other local authorities.

Notwithstanding, the Council is committed to continued and constructive engagement, through the DtC, with its Warwickshire neighbours to secure the most appropriate and sustainable locations for housing growth across the HMA. In reflection of the Warwickshire authorities supporting the delivery of the city's wider housing need, where it is shown to be desirable, appropriate, sustainable and deliverable the Council will support its Warwickshire neighbours in bringing forward land for housing and employment that sits adjacent to the city's existing administrative boundaries. This will ensure infrastructure needs are met in full across administrative boundaries (where necessary and as appropriate) and support the continued growth of the city as the central point of the sub-region.

Having regard to this approach, the Housing chapter of this plan identifies the city's current supply pipeline as well as proposed allocations for new homes across the city. This has been set in the context of a need of 42,400 homes, a requirement (informed by capacity) of 24,600 and an identified shortfall of 17,800 homes. This unmet housing need is to be provided within Warwickshire based on an agreed redistribution mechanism.

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Historic England)
- The Homes and Communities Agency (HCA)
- The Local Enterprise Partnership (LEP) and Local Nature Partnership (LNP)
- The Office of Rail Regulation
- The National Health Service Commissioning Board

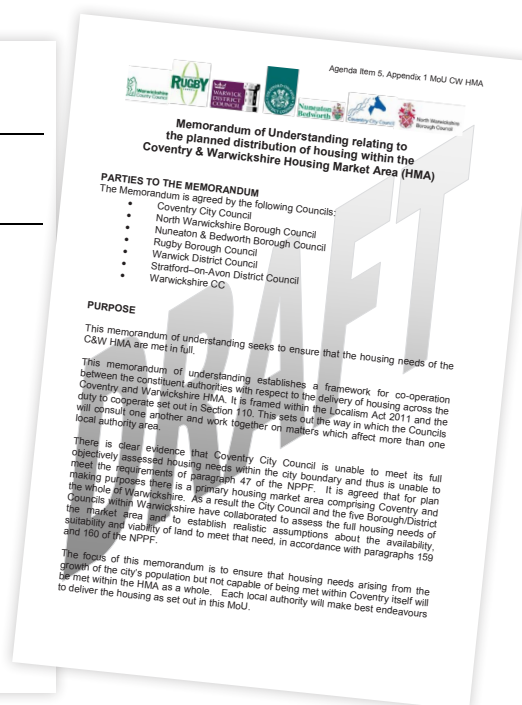
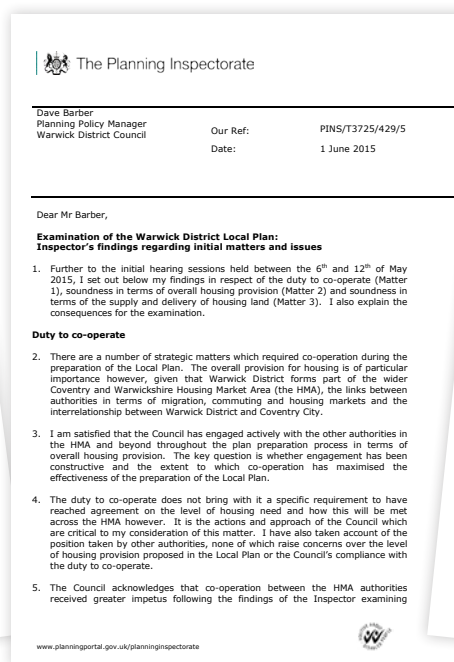
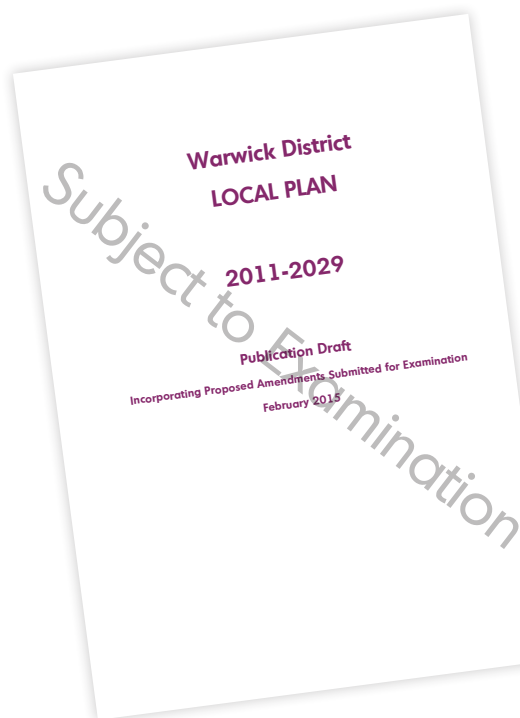
These organisations are required to cooperate with local authorities and the other prescribed bodies. These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.

Policy DS2: The Duty to Cooperate

1. Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.
2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.
3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an on-going basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.
4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.
5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.
6. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership with the CWLEP will continue to work pro-actively will all partners to deliver economic growth and prosperity across Coventry and Warwickshire.

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

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



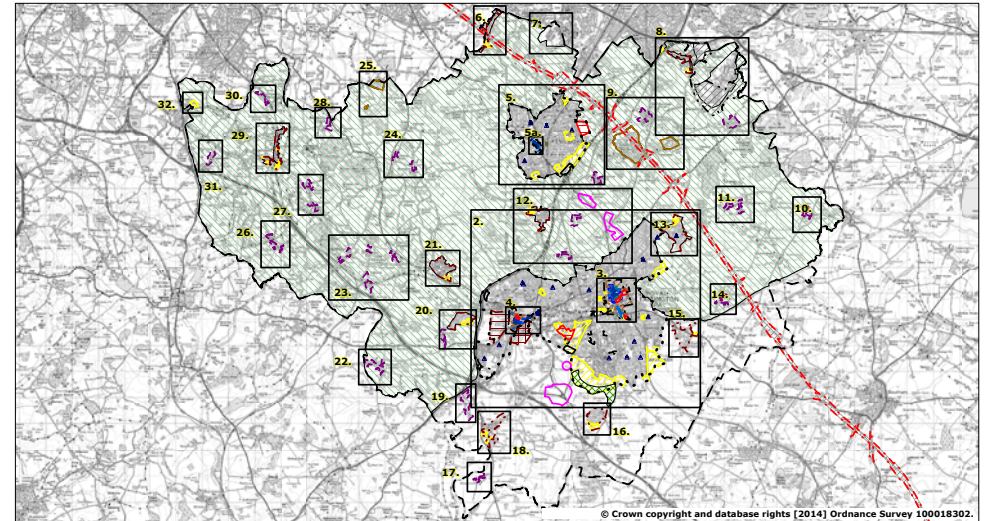
01 INTRODUCTION / EXECUTIVE SUMMARY

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

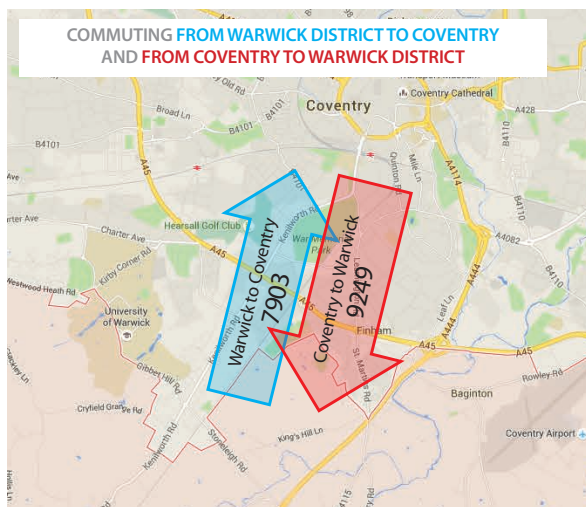
⁸ Paragraph 14 of the NPPF requires plans to meet the full OAN plus an allowance for flexibility.

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.

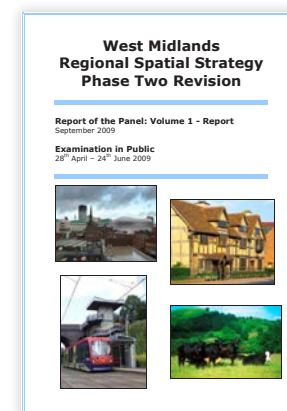
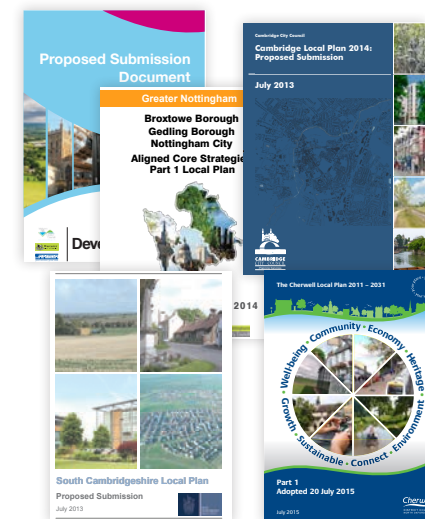
3.2 Given that the majority of the additional requirement is to meet Coventry City's needs, it follows that the most sustainable location to meet those specific needs within Warwick District Council's administrative area is adjacent to Coventry City Council's boundary. This is also the area where larger 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%

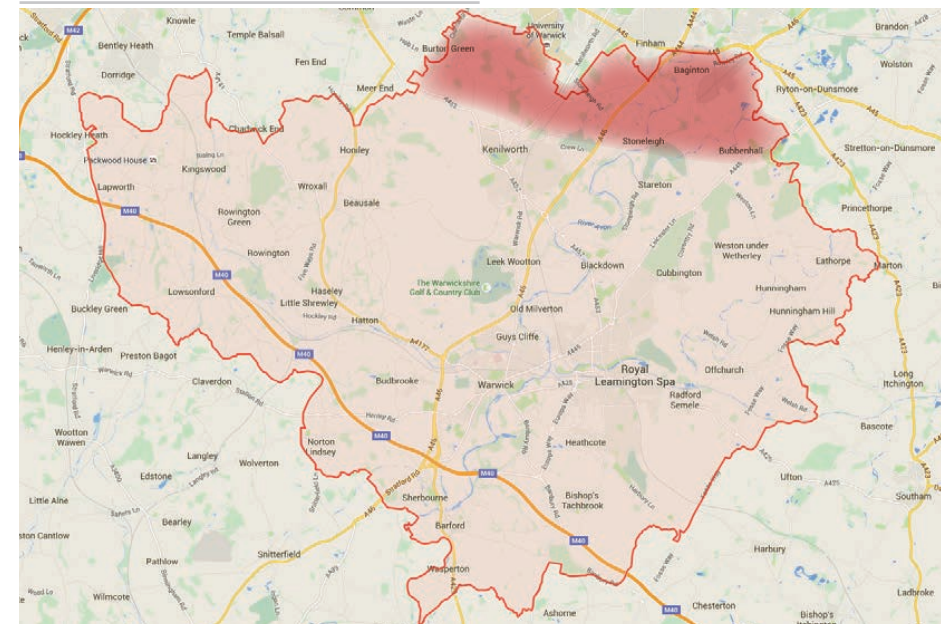
Source: Department for Communities and Local Government

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

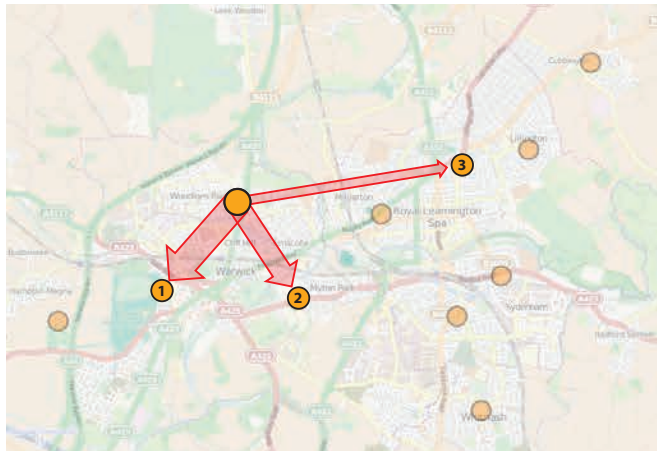
¹⁴NPPF paragraphs 83 to 85

¹⁵Coventry Joint Green Belt Study, SSR Planning 2009

¹⁶Paragraph 80 of the NPPF

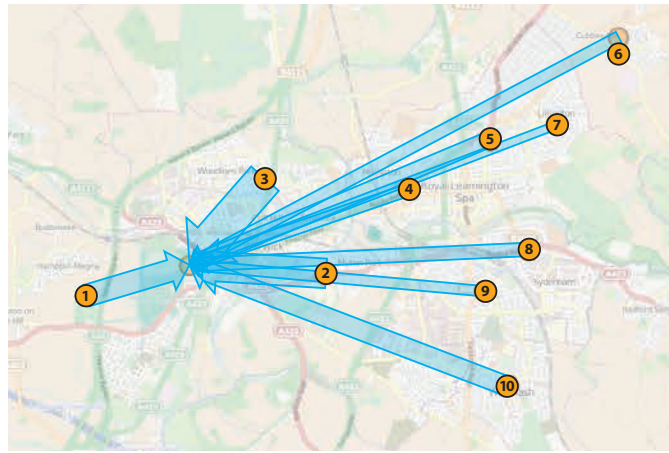
¹⁷PLANNING ADVISORY SERVICE PLAN-MAKING CASE LAW UPDATE MAIN ISSUE 4: GREEN BELT November 2014 (prepared by No5 Chambers)

FIGURE 3 NUMBERS COMMUTING FROM NORTH WARWICK – CENSUS 2011



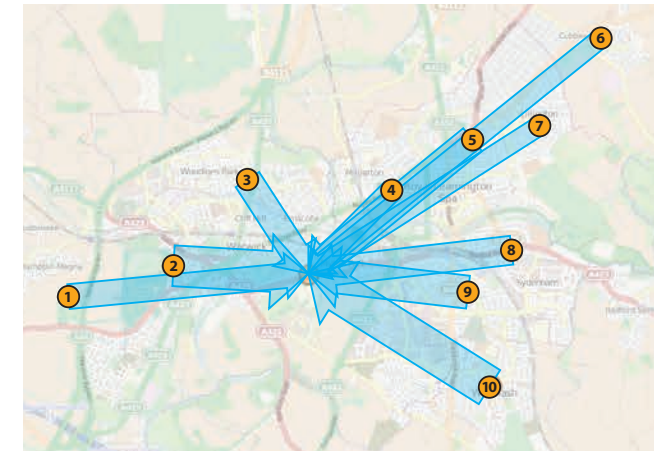
1. South West Warwick	710
2. South Warwick	537
3. Central Leamington	233

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.

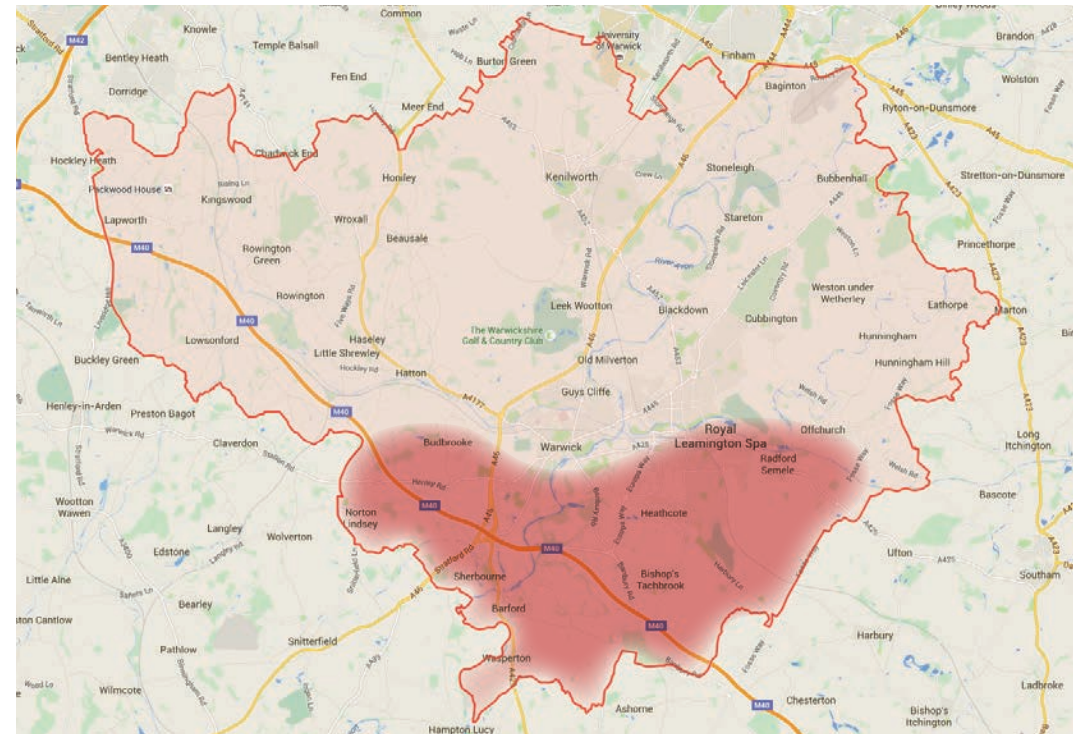


FIGURE 6 SOUTH WARWICK AREA OF SEARCH PLAN

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:

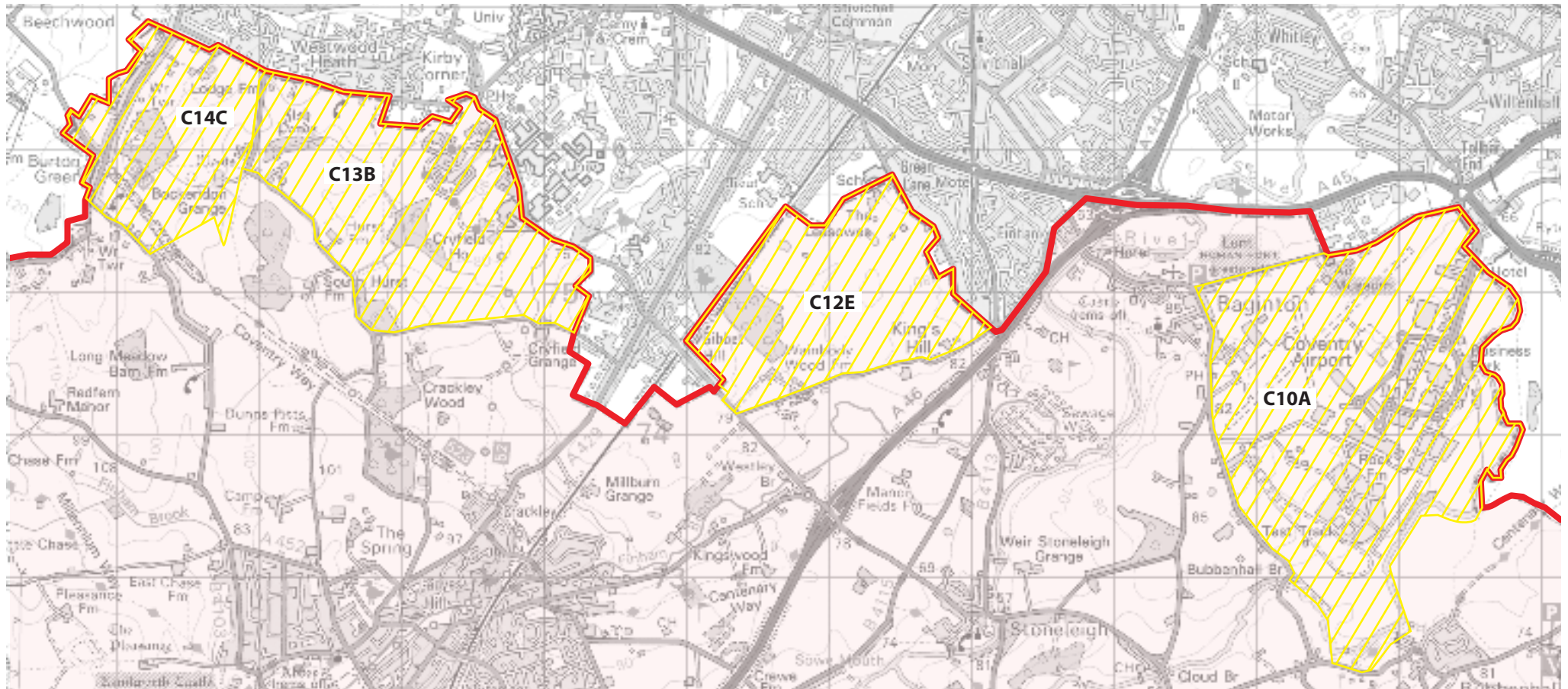
Site	Total Size	Available Size	Dwelling Capacity
Parcel 1	27ha	13.5ha	473
Parcel 2	35ha	17.5ha	613
Parcel 3	15ha	7.5ha	263
Parcel 4	34ha	17ha	595
Total	111ha	55.5ha	1,944

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

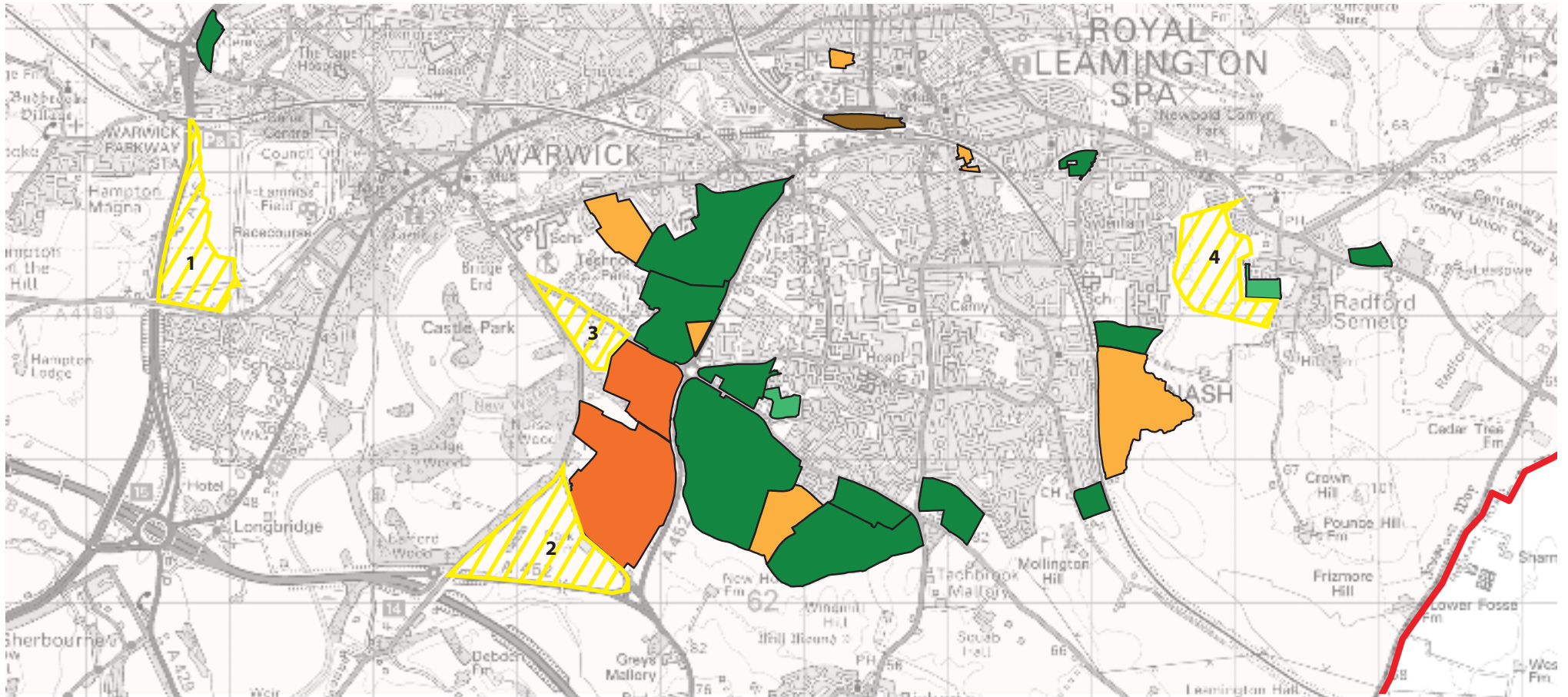
 **C14C** Circa 106ha

 **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

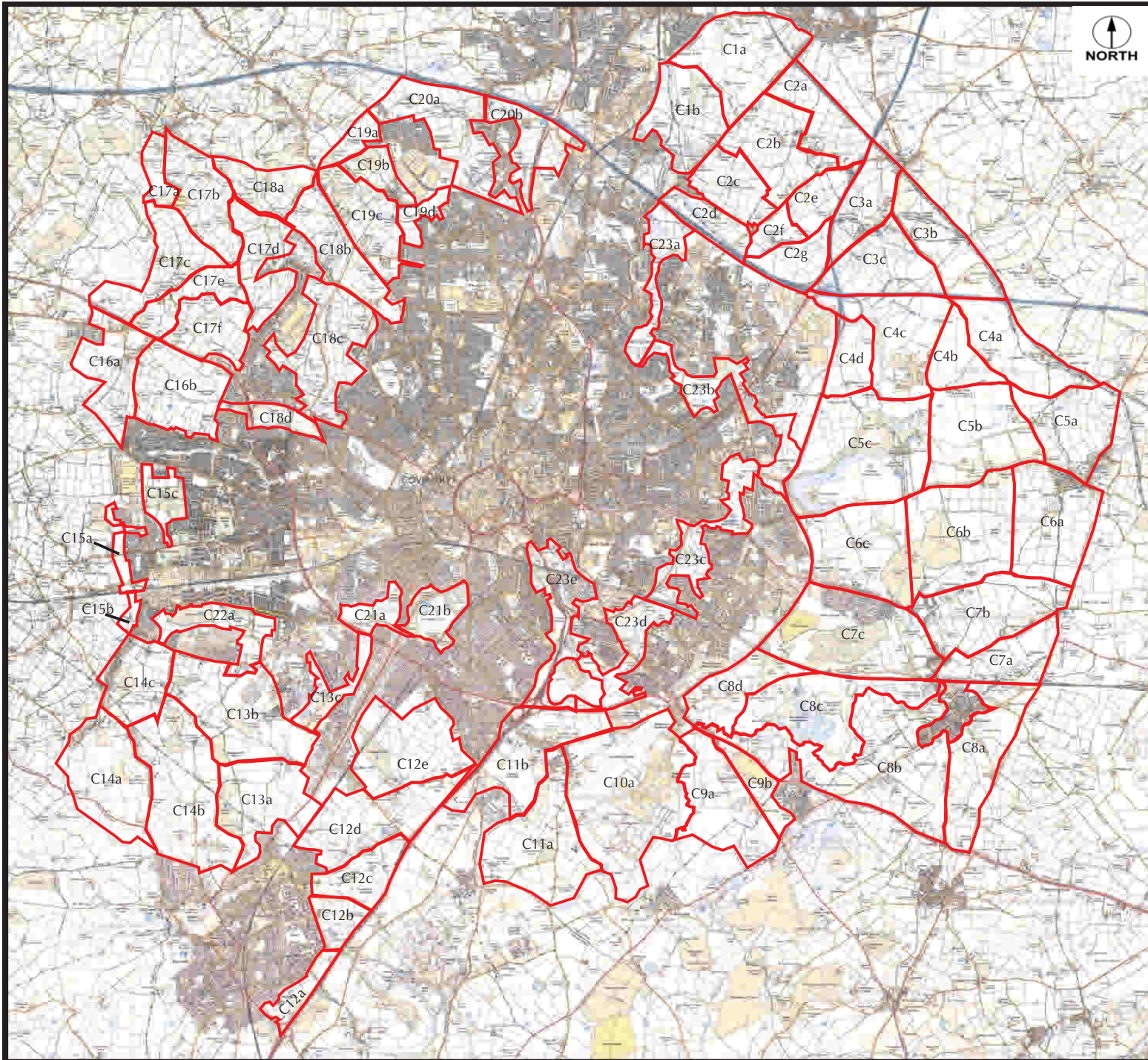
- 5.5 **In all cases, the identified land has excess capacity to meet the housing need up to 2031 therefore providing a level of comfort for further detailed investigation.** The land also provides the appropriate level of infrastructure, educational facilities, transportation, employment, health, open 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

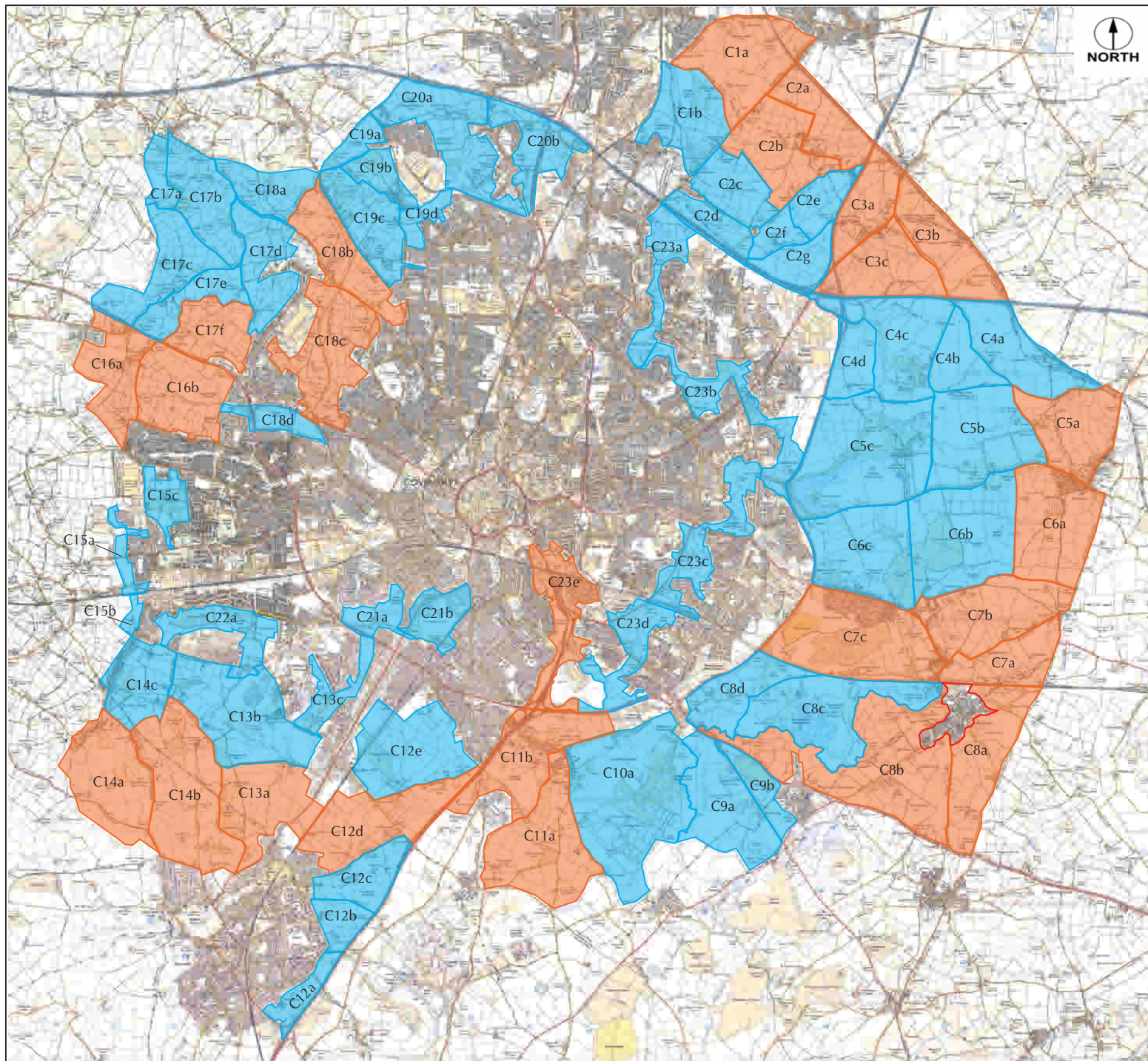
Figure 2.1

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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)

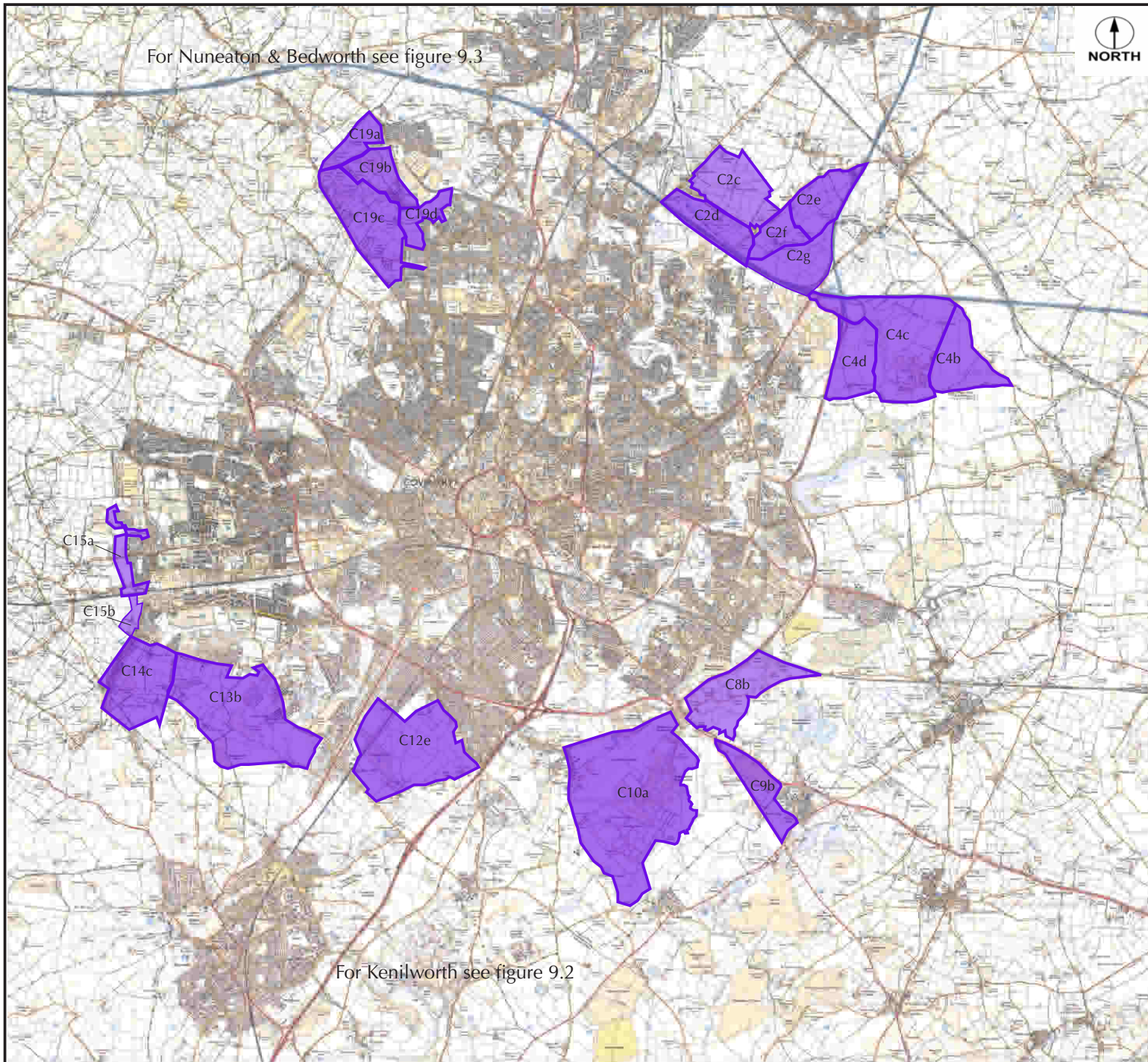
POLLUTION

- 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.

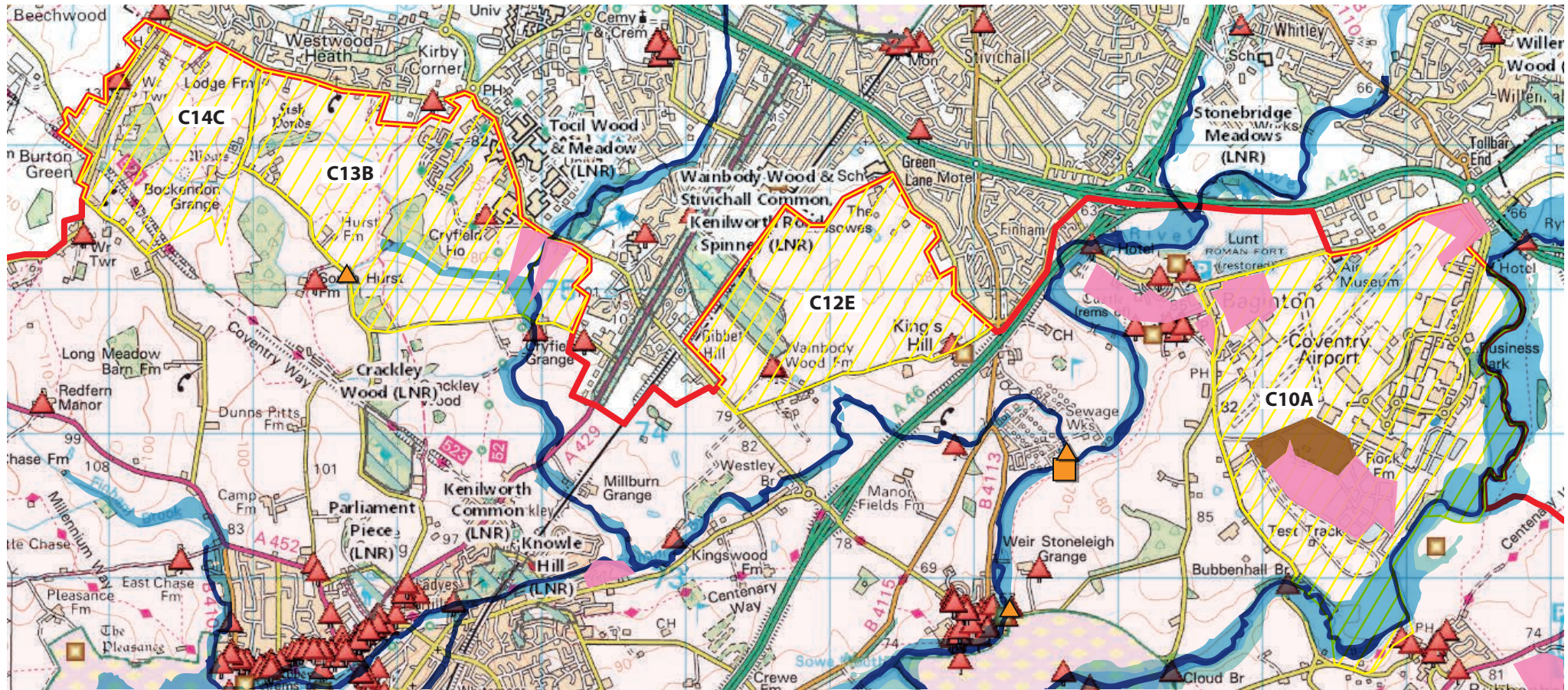
- **C14C (Circa 106ha)**

- 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

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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)**

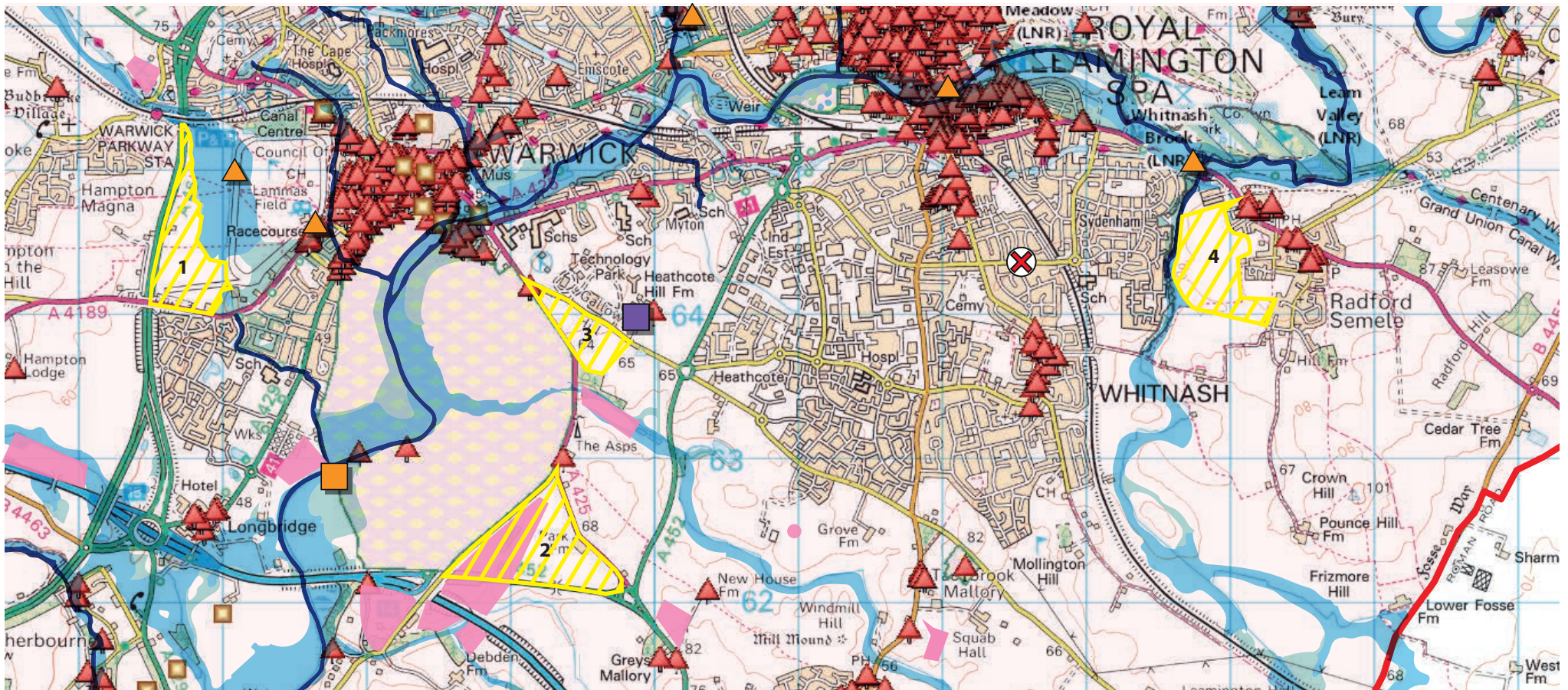
- Has not been allocated in the new Local Plan.
- Located south of Gallows Hill.
- Adjoins Technology Park to south.
- Good connectivity with existing transportation infrastructure.

- **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

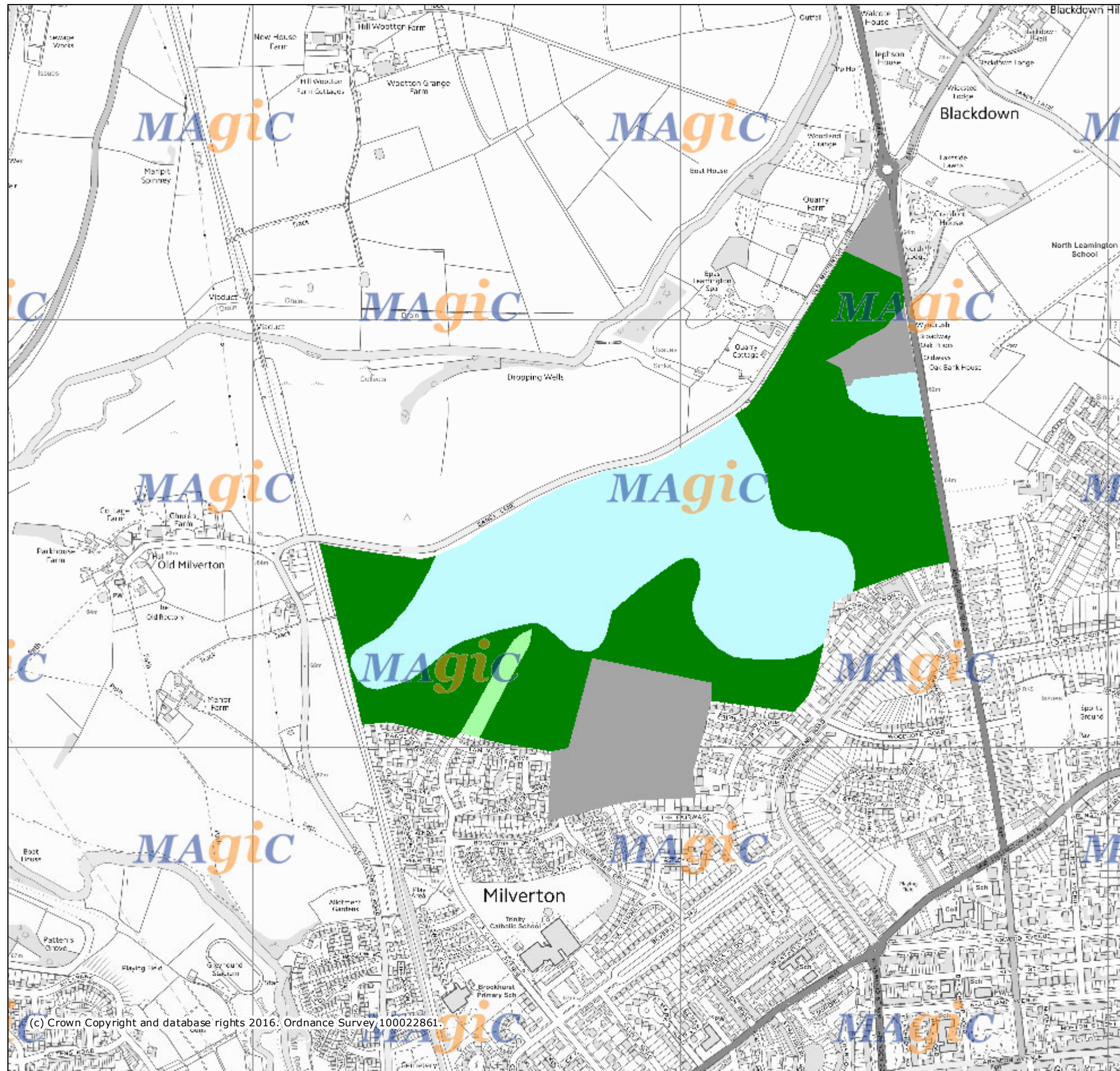
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Legend

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



Legend

Post 1988 Agricultural Land Classification (England)

- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Not Surveyed
- Other

Projection = OSGB36
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 ymax = 268700

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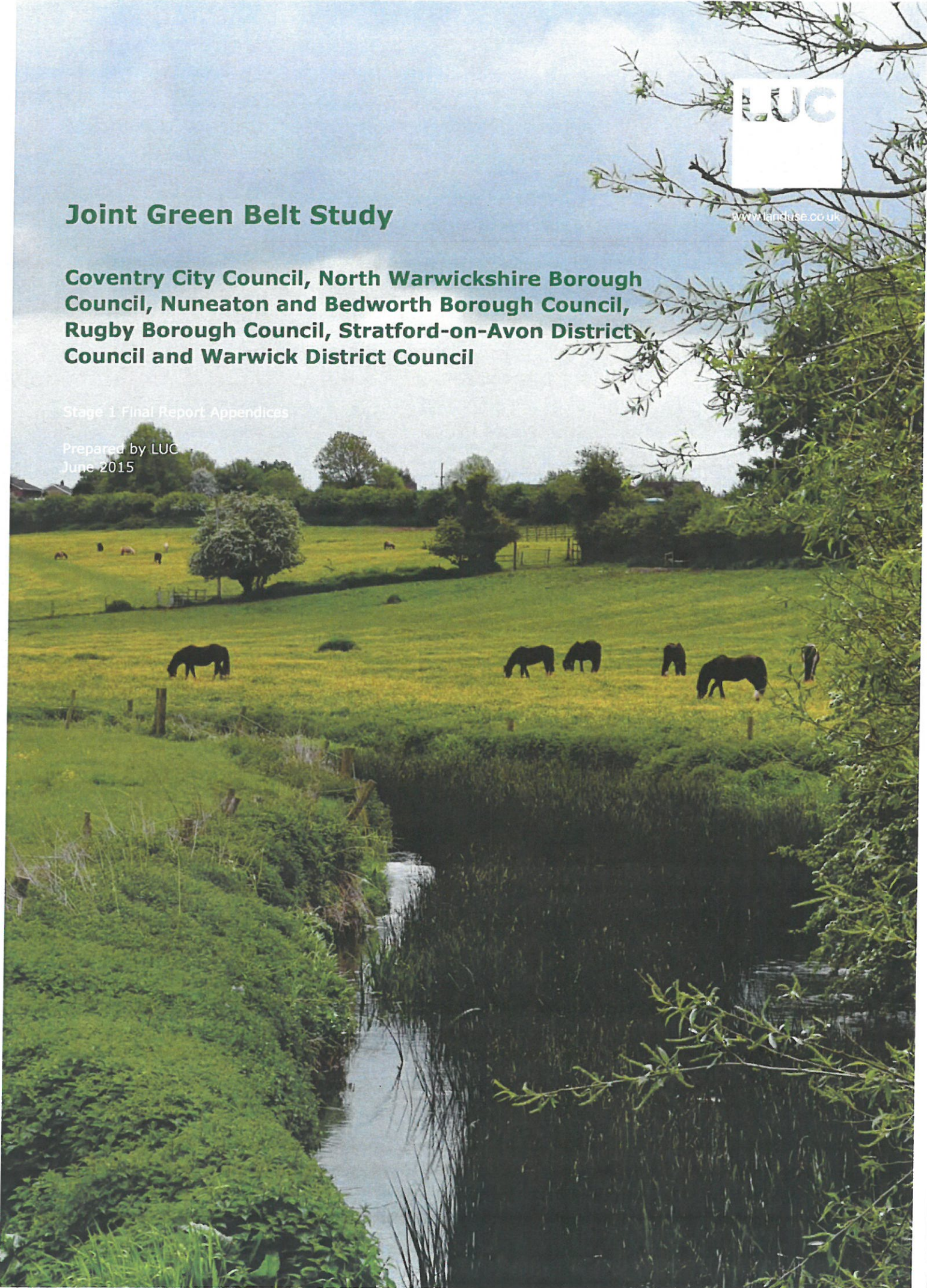
www.landuse.co.uk

Joint Green Belt Study

Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council

Stage 1 Final Report Appendices

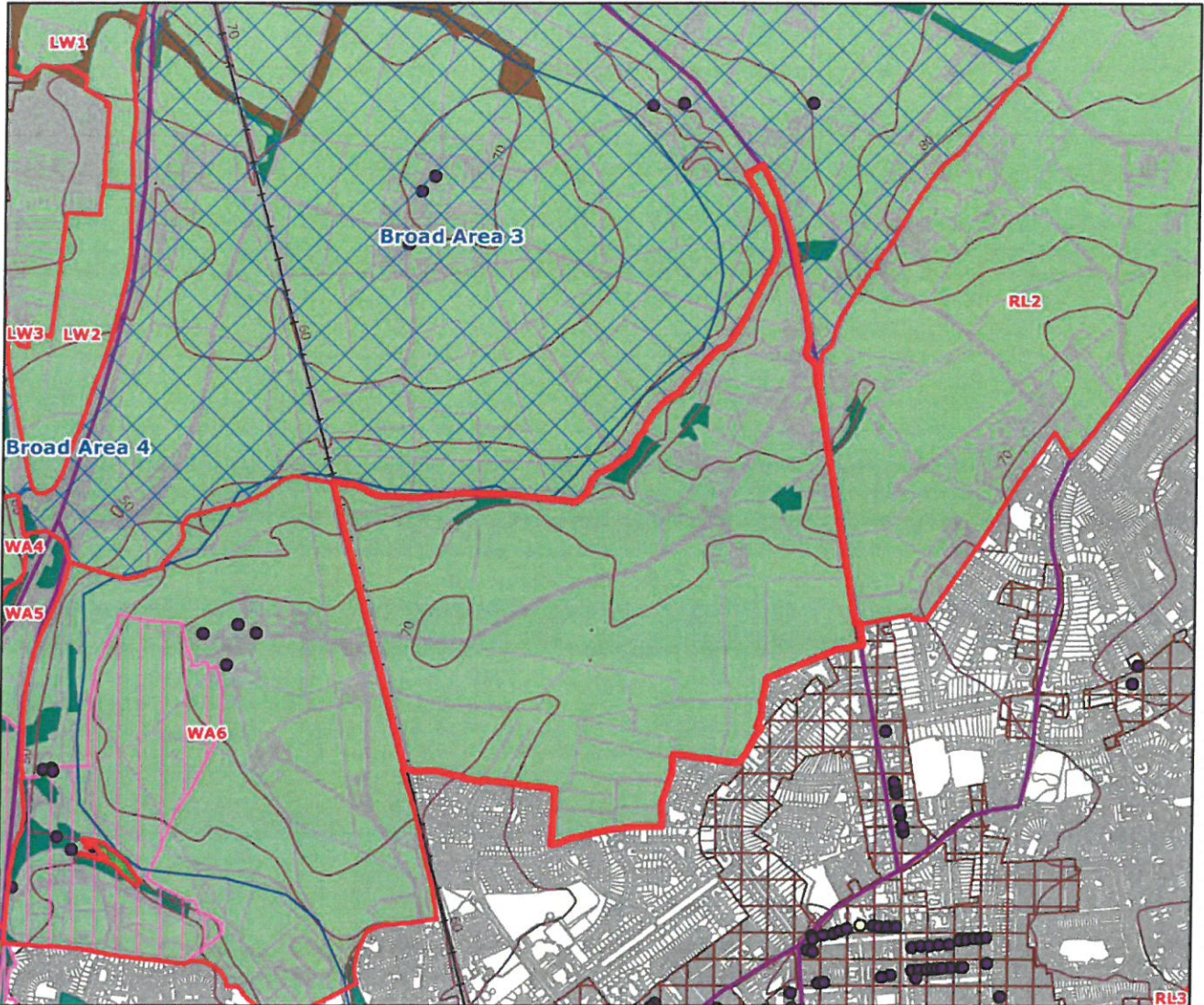
Prepared by LUC
June 2015



Land Parcel Ref: RL1

Main Authority: Warwick District Council

Parcel Type: Land Parcel



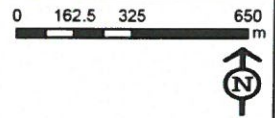
Parcel - RL1

- District Boundary
- Land Parcel
- Broad Area
- Green Belt
- Contours (10m)

- Primary Constraints**
- SSSI
 - Scheduled Monument
 - Flood Zone 3b

- Other Information**
- Grade I Listed Building
 - Grade II Listed Building
 - Grade II* Listed Building
 - Promoted Footpath
 - River/Canal
 - Lake

- Motorway
- A-Road
- Railway Line
- AONB
- Conservation Area
- Registered Park and Garden
- Ancient Woodland Inventory
- National Forest Inventory



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Main Authority: Warwick District Council

Other Authorities: N/A

Land Parcel Ref: RL1

Main Authority: Warwick District Council

Parcel Type: Land Parcel

Purpose 1 - To check the unrestricted sprawl of large built-up areas

Issue 1a - Ribbon development

Does the parcel play a role in preventing ribbon development and/or has the Green Belt within the parcel already been compromised by ribbon development?

Score:

Notes:

The parcel plays some role in preventing ribbon development along the eastern edge of the parcel which follows Kenilworth Road.

Issue 1b - Openness

Is the parcel free from development?
Does the parcel have a sense of openness?

Score:

Notes:

All the development within the parcel is concentrated in the northern corner of the parcel. While the remaining areas of the parcel are open and free from development, the openness of the northern corner has been compromised by several large buildings, including Oak Medical Hospital (Warwickshire Nuffield) and Blackdown Clinic.

Land Parcel Ref: RL1

Main Authority: Warwick District Council

Parcel Type: Land Parcel

Purpose 2 - To prevent neighbouring towns merging into one another

Issue 2a - Location of parcel and distance between neighbouring settlements

Is the parcel located within an existing settlement?

If no, what is the width of the gap between the settlements at the point that the parcel is intersected?

Score:

Notes:

The parcel prevents Leamington Spa adjacent to the southern edge of the parcel from merging with the small village of Old Milverton adjacent to the western edge of the parcel on the other side of the railway line which runs along this edge of the parcel. Although the railway line plays a separating role development along the eastern side of the line up to Sandy Lane would effectively merge these two settlements. The distance between the two settlements is less than 1km along this western edge of the parcel. In totality, the parcel also separates the small village of Hill Wooton roughly 1.7km to the north (measured through the centre of the parcel) on the other side of the River Avon from merging with Leamington.

Land Parcel Ref: RL1

Main Authority: Warwick District Council

Parcel Type: Land Parcel

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Issue 3a - Significance of existing urbanising influences

Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?

Has the parcel already been affected by encroachment of urbanised built development?

Score:

Notes:

All the development within the parcel is concentrated in the northern corner of the parcel. While the remaining areas of the parcel retain the character of countryside, are open and free from development, the areas around the Oak Medical Hospital (Warwickshire Nuffield) and Blackdown Clinic are less open and somewhat urbanised by the areas of hardstanding and large buildings associated with these developments.

Issue 3b - Significance of boundaries / features to contain development and prevent encroachment

Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel)

Score:

Notes:

The River Avon meanders to the north of the parcel and protects the countryside on its northern bank from encroachment from Leamington. A railway line borders the western side of the parcel preventing encroachment of the countryside to the west. However, the railway runs perpendicularly to the urban edge of Leamington and does little to prevent encroachment of the countryside within the parcel up to the edge of the River Avon. Furthermore, the River Avon is a significant distance from the urban edge of Leamington meaning that it plays no role in protecting the countryside within the parcel from encroachment. Therefore, both boundaries are considered to be less significant.

Land Parcel Ref: RL1

Main Authority: Warwick District Council

Parcel Type: Land Parcel

Purpose 4 - To preserve the setting and special character of historic towns

Issue 4a - Parcel forms an historical and/or visual setting to the historic town

Is the parcel partially or wholly within or adjacent to a Conservation Area within an historic town?
Does the parcel have good intervisibility with the historic core of an historic town?

Score: 4

Notes:

The parcel borders the Leamington Spa Conservation Area which runs into the core of this historic town. In addition, on the areas of high ground within the parcel, there is good intervisibility with the historic core of the town which lies to the south.

Land Parcel Ref:

RL1

Main Authority:

Warwick District Council

Parcel Type:

Land Parcel

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Issue 5a - The need to incentivise development on derelict and other urban land within settlements

All parcels make an equally significant contribution (+4) to this purpose.

All Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites.

The Local Authorities involved in this review are covered by the Coventry and Warwickshire Housing Market Area (HMA). Defining the area as an HMA reflects the key functional linkages that operate between where people live and work and the household demand and preferences that define the area. As the whole Housing Market Area functions as one unit, this makes it difficult to accurately assess whether one individual parcel considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. What can be said is that all parcels make an equally significant contribution to this purpose and are each given a score of 4.

Land Parcel Ref: RL1

Main Authority: Warwick District Council

Parcel Type: Land Parcel

Score Summary

Purpose 1 Score: /4

Purpose 2 Score: /4

Purpose 3 Score: /4

Purpose 4 Score: /4

Purpose 5 Score: /4

Total Score: /20