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

**Matter 7d**

**Proposed Housing Site Allocations**  
**Growth Villages and Hockley Heath**

**DS NEW3 – Former Police HQ (incorporating**  
**sites H34, H35 and H36)**

**Issue**

Whether the proposed housing site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

**August 2016**

## Policies DS11 and DS NEW3

### NAME OF SITE: DS NEW3 – Former Police HQ (incorporating sites H34, H35 and H36)

#### 1) What is the current planning status of the site?

- a) The site is currently located in the Green Belt and still (albeit now somewhat scaled down) operational as a site for Warwickshire Police's office use. The site consists of the headquarters building (a Grade 2 Listed Building) and the associated grounds/buildings. Part of the site is also a locally listed Park and Garden.
- b) There is one relevant planning approval for part of the site. Application no. W/11/1166: *"Outline application for the planning permission for the redevelopment of the Warwickshire Police Headquarters site to provide a Continuing Care Retirement Community (Use Class C2)"*. This application concerned only the [arts of the site with buildings on it and excluded the communications buildings. This permission has now expired.
- c) In addition, there have been a number of planning applications associated directly with the Police operations. These are directly relevant to the Local Plan proposals for this site.

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

- a) The site is within the Green Belt on the edge of the village of Leek Wootton. The site has been assessed within the Sustainability Appraisal (Doc's SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows.
  - i) **Criterion a)** N/A
  - ii) **Criterion b)** It is a site consisting of greenfield and previously developed land on the edge of the village settlement of Leek Wootton. It is therefore consistent with criterion b), being located on the edge of built up areas (Leek Wootton).
  - iii) **Criterion c)** N/A
  - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence.
  - v) **Criterion e)** The site has recognised heritage assets (Woodcote House and a locally Registered historic parkland). A Heritage Assets Assessment (Doc HE06) has been undertaken that will inform design and layout considerations, as well as the master planning process to ensure that there are no detrimental impacts on the significance of heritage assets and their setting.
  - vi) **Criterion f)** The Landscape Sensitivity Assessment (V16) has identified this site (LW07) as being of medium to high landscape value, however it is considered that the site suitable for development provided that the strong boundary vegetation and TPO trees are retained / unaffected.
  - vii) **Criterion g)** The site is in the Green Belt; the Council has taken into account the overall spatial strategy and the availability of alternative suitable sites outside the

Green Belt and considers that there are exceptional circumstances for releasing this area of land from the Green Belt (see question 11 below for further detail). The site would help meet housing needs in Leek Wootton and more generally assist in a five year supply through the provision of a range of sites. The site will also help support facilities in the village of Leek Wootton.

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

- a) The sustainability appraisal (SA10 and SA11PM) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this site are:
- i) The site has the ability to support the ongoing viability of services in the village of Leek Wootton.
  - ii) Public access and open space: The site / land currently has no public access, the development of this site will provide opportunities to deliver public open space and enhance / create footpath and networks of public accessibility.
  - iii) Highway/ Transport Improvements: the site may provide a contribution to off- site highway improvements / traffic management proposals in the core of the village (being developed through the neighbourhood plan process in consultation with Warwickshire County Council Highways).
  - iv) The development of this site will be in a well contained locality on the periphery of the village. It is considered a much more acceptable location than alternatives forwarded in consultation responses that are considered more visually intrusive and therefore less acceptable / environmentally sustainable.
  - v) The development of the site (in totality) in a comprehensive manner, will underpin the viability necessary to deliver the conversion of Woodcote House for residential purposes and will improve the setting of the building. Done in a sensitive / appropriate manner, this conversion will ensure the future of this Grade 2 Listed building in order that when its current use/ occupation shortly becomes totally redundant it does not begin to decline into disrepair.

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

- a) **Landscape / Open Space:** Concerns have been raised regarding the impact of the development on the site and the potential loss of the open areas within it. To this end it has been suggested that the heartland of the site should remain in the Green Belt in order that it is afforded protection from development. The Council is continuing to work closely with the promoters of the site to develop a master plan that will reconcile the impacts of development and ensure that the assimilation of the new development parcels and the re-use of the headquarters building do not prejudice the openness and important open / green areas within

the site. Some of these areas will be afforded particular protection in this process as they are integral parts of the locally listed Park and Garden.

- b) **Transport and Traffic:** The Highway Authority supports a housing development here. Concerns have been raised in representations regarding the ability to form safe access to the site and the overall volumes of local traffic that will occur as a consequence of the sites development. The Highways Authority is satisfied that the impact of the development can be successfully absorbed in the locality as it will be no greater than that which occurred when the Headquarters was fully operational. There was also a previous planning approval (now elapsed) ref W/11/1166 for a Continuing Care retirement community that established that safe and appropriate access to the site can be provided.
- c) **Loss of Habitat / features of ecological value:** Representations have raised concerns regarding that the policy framework does not afford sufficient protection to veteran trees and / or areas of valuable woodland that are in close proximity to the site. The policy DS NEW3 (criterion g) ensures that provisions for the future management and maintenance of the balance of the site (those areas not to be utilised for housing development) are made. This includes the areas of woodland at the periphery of the site as identified on the Policy map. Trees of value within the confines of the site will be afforded protection from harm by other policies within the plan and where necessary TPO's may be made to further reinforce this position. If specific reference to trees / woodland management are deemed advantageous the Council would support additional criterion in the policy regarding this matter.
- d) **Loss of amenity land / recreational value:** Concerns have been raised that the loss of this area for development will deprive this locality of the sports uses and areas of recreational value within it. It should be noted that the site currently is not accessible to the wider public and facilities within the site are exclusively for the usage of police employees. The development of the site will enable the creation of links to the existing village and public accessibility to enjoy the setting and green/ open spaces that will prevail following the sites development. The precise details of the distribution and extent of open space will be determined through close consultation with the Parish Council as well as the wider public.
- e) **Heritage:** Representations have been received detailing the need for development to be appropriately reconciled with the heritage assets on site (Woodcote House and the Locally Listed historic park and garden in particular). A Heritage Assets Assessment **Doc HE06** (The Settings of Heritage Assets at Woodcote House) was undertaken to inform consideration of the site for development. This work has been augmented by a master planning process that considers the entirety of the allocation DSNEW3 to ensure that housing development can be successfully assimilated at this location. This will be a fundamental part of the proposals being put forward by the site owners and will continue to be an important consideration shaping the extent and format of the conversion of existing buildings and the form of new-build housing elements. Bringing forward development in a way that considers the whole entity will minimise the detrimental impact on heritage assets.

**5) Is the scale of development proposed compatible with the capacity of the village to accommodate further growth in terms of its character and appearance, the level of services and existing infrastructure?**

- a) The Village Settlement Hierarchy June 2013 (V01 to V03) sets out the Council's approach to the classification of villages and rural settlements. The report explores the size of settlements, availability of services and accessibility of services; facilities and employment from the settlement (see section 4.0). It applies a scoring system to these factors to reach an objective view on the relative capacity of each settlement to accommodate development. Table 4.4 of the report shows the resulting score for each village. (n.b. it should be noted that this score does not take in to account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability).
- i) Using this model, Leek Wootton is identified as the tenth most sustainable village out of 36 that were considered.
- ii) The Village Settlement Hierarchy goes on to classify each settlement. Following the Village Housing Options and Settlement Boundaries Consultation (November 2013), these classifications were simplified in three categories: Growth Villages (of which there are 10); Limited Infill Villages (of which there are 24) and other settlements. The Growth Villages and Limited Infill Villages are set out in paragraph 4.7 of the Submission Draft Local Plan.
- iii) As a result Leek Wootton was identified as a Growth Village with the potential to accommodate some housing growth and land for 21 dwellings was allocated in Leek Wootton on land now subsumed within Policy DS NEW3 (H34, H35, H36), however the allocated sites did not include assumptions on the potential additional provision that might come forward as a consequence of the conversion of the Headquarters Building (Woodcote Hall).
- iv) Since the submission of the Local Plan, the Council has had to identify additional housing land for the modifications submitted in 2016. In preparing the modifications, the Council reviewed the potential of growth villages to accommodate a proportion of the additional requirement. This work is set out in the Village Profile and Housing Allocations Update February 2016 (V18PM).
- v) Village Profile and Housing Allocations Update February 2016 (V18PM) explored an indicative capacity for each of the Growth Villages. For Leek Wootton overall, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 120 dwelling. This indicative capacity was adjusted to take account of policy and environmental constraints such as landscape, Green Belt and flooding. The assumed capacity with regard to DS NEW3 (II5) was also being tested by preliminary work on the master planning approach and appeared to be appropriate in the context of the sites specific needs/ constraints.

vi) Taking all these factors in to account, the Council contends that the proposal to allocate land as defined by DS NEW 3 is sustainable and that the village is of sufficient size and has the range of facilities necessary to support this level of growth without significantly undermining to the character of the village.

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

- a) The 2013 CIL Viability Study (IN06) and its 2015 addendum (EXAM3) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policy requirements, including affordable housing.
- b) The studies tested the ability of a range of housing sites (including a sample of strategic sites) within Warwick District to yield contributions to infrastructure requirements through CIL. Appraisals undertaken also incorporated an allowance of £1,500 per unit to address any residual S278 and Section 106 costs, albeit the actual sums sought will vary according to site specific circumstances. On strategic sites that carry higher costs than other developments, there is a higher allowance of £10,000 per unit for on-site infrastructure (site roads, sewers, utilities, drainage etc.) and community infrastructure (schools, community facilities etc.) plus a further £13,000 per unit to contribute towards on-site community infrastructure through S106. This reflects longer build-out rates of larger sites which require developers to carry costs for much longer times than is the case for smaller schemes.
- c) The ability of residential development to absorb infrastructure requirements through Section 106 / 278 contributions (whilst remaining viable) is also evident by the large number of greenfield strategic sites that currently have planning permission and are presently under construction on sites south of Warwick and Leamington Spa.
- d) Specific infrastructure requirements (physical, social and green) associated with the Plan as a whole are identified and costed in the Infrastructure Delivery Plan (IN07PM). Most components of the IDP do not relate directly to a specific site within the Plan and it is anticipated that infrastructure contributions will be negotiated on a case by case basis in accordance with the CIL Regulations. Full details of infrastructure requirements and costs cannot therefore be set out for each site at this stage.
- e) It should be noted that the IDP is a continuously evolving document and will continue to be refreshed as data on infrastructure requirements are refined or new / changing priorities and needs are identified throughout the plan period. It should also be noted that the Council (in partnership with relevant partners) will continue to explore the availability of other sources of external funding to augment developer contributions.
- f) It is anticipated that housing site DSNEW3 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification
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	<b>required)</b>
Provision of on-site open space and contributions to other open space requirements	✓
Contributions to Health (Hospitals)	✓
Contributions to Health (G.P. services)	✓
Contributions to Highways / Transport	✓
Contributions to Education (Primary)	✓
Contributions to Education (Secondary)	✓
Contributions to other infrastructure requirements in line with the CIL regs	✓

**7) Is the site realistically viable and deliverable?**

- a) The Viability Studies (IN06, EXAM3 and HO24PM) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policies, including affordable housing. The strongest viability is in rural areas and much of Leamington Spa. This site falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. There is a landowner who is willing to sell and who is working with the Council and local groups to prepare a comprehensive master plan for the site prior to marketing the site for sale/ disposal. The existing Police operations will be ending imminently as part of a move to share some functions with West Mercia Police
- c) The agent on behalf of the landowner has prepared a detailed viability study that further reinforces/ supports the positive viability assumptions.
- d) As can be seen from answers to the questions once the master planning is concluded satisfactorily and the Plan adopted there are no major impediments to the site being sold and then developed quickly.

**8) What is the expected timescale for development and is this realistic?**

- a) The Housing trajectory (see appendix 1 of the Housing Supply Topic Paper – HO27PM) indicates the first completions in 2018/19 with a build out rate that indicates completion by 2022//23.



- b) This trajectory is supported by the landowner and is considered realistic given the limited site constraints and the availability of the land

In addition to the above, for all sites apart from those in Barford, Bishops Tachbrook and Radford Semele:

**9) What would be the effect of the proposal on the purposes of including land within the Green Belt?**

- a) The area is within a Green Belt parcel (LW4) and plays some role in preventing ribbon development to the north west of Leek Wootton as well as (like all Green Belt parcels) having a strategic role in assisting regeneration. Representations relating to this site raise concerns about **development being a projection into the open countryside**.
- b) The site forms a reasonably compact area and the impacts of the intended development (with substantive landscaping/ tree lined boundaries boundaries) can be contained and minimise impacts on the residual Green Belt area.
- c) LW4 does not overlap with the nearby Conservation area boundary and there is no intervisibility between the core of Leek Wootton Village and the parcel, therefore it does not serve to preserve the setting of the historic village.
- d) Overall, this parcel plays a less important role in the Green Belt than other parcels surrounding Leek Wootton. The development associated with the Headquarters buildings (in particular the addition of modern buildings for a telecommunications building) have previously compromised the openness of the land within the western half of parcel LW4 and affect the openness of the land within the rest of it. The development of the site and the master planning will identify buildings to be removed and replaced with more appropriate uses less structures which will prove advantageous for the site overall.

**10) What would be the effect on the openness of the Green Belt?**

- a) As set out in 9d above, the role this parcel plays in the openness of the Green Belt is limited. Its removal from the Green Belt would therefore have a limited impact on openness. It is proposed to remove the site from the Green Belt in line with paragraph 85 of the NPPF. This proposal:
- i) ensures consistency with the Local Plan Strategy
  - ii) removes this parcel which is not essential to keep permanently open
  - iii) uses physical features (existing buildings and tree belts/woodlands) to provide a strong Green Belt Boundary.
- b) The residual Green Belt will continue to meet the essential characteristic set out in paragraph

79 of the NPPF. The development of this site will have only a minimal impact on the extent to which neighbouring Green Belt parcels (Broad Area 4, LW1, KE4 and LW3) continue to be consistent with the essential characteristics of Green Belt (NPPF para 79). This is because the site has very limited relationships with the open countryside with open views only to the south west as part of the planned landscape of Woodcote House. Development of the site will not impact on this relationship.

**11) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?**

- a) The process for assessing exceptional has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out this exceptional circumstances that apply to all the village sites within the Green Belt that are identified through the 2016 Modifications.
- b) Specifically, exceptional circumstances for the allocations to Green Belt growth villages are identified as follows:
- i) Is there an essential need that has to be met? Yes, the HMA's and the District's housing need and the lack of capacity within Coventry; important in achieving a 5 year housing land supply on adoption; important in meeting local housing need (constrained by current planning policy).
  - ii) Are there any suitable sites outside the Green Belt that can meet this need? There are insufficient suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet both overall and 5 year supply housing need. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy or effective in meeting these needs.
  - iii) Is this the best site within the Green Belt to meet the need? It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. For this reason additional locations (proposed in 2016) are focused more on those villages which have stronger access to Coventry. In particular there are limited suitable sites in Leek Wootton to meet the village's housing need. This site is supported by the Parish Council as it not only enables improvements to an important heritage asset but also helps provide housing in an otherwise heavily constrained village

N.B. key concerns raised in representations are highlighted **bold**

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

**Matter 7d**

**Proposed Housing Site Allocations**  
**Growth Villages and Hockley Heath**

**H37 – Car park east of The Hayes**

**Issue**

Whether the proposed housing site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

**August 2016**

## Policies DS11 and DS NEW3

### NAME OF SITE: H37 – Car park east of The Hayes

#### 1) What is the current planning status of the site?

- a) The site is used as an informal car park. It is surplus to the requirements of the Warwickshire Golf Club.

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

- a) The site is within the Green Belt on the edge of the village of Leek Wootton. The site has been assessed within the Sustainability Appraisal (SA10) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows.
- i) **Criterion a)** N/A
  - ii) **Criterion b)** It is a site consisting of previously developed land on the edge of the village settlement of Leek Wootton. It is therefore consistent with criterion b), being located on the edge of built up areas (Leek Wootton).
  - iii) **Criterion c)** N/A
  - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence nor would it undermine the separate identity of the settlement.
  - v) **Criterion e)** The site has no recognised Heritage assets.
  - vi) **Criterion f)** The Landscape Sensitivity Assessment has identified this site (Doc LW07) as an area of high / medium landscape value and, albeit it has some development capacity, it must (by good design) be carefully integrated into the landscape.
  - vii) **Criterion g)** The site is in the Green Belt; the Council has taken into account the overall spatial strategy and the availability of alternative suitable sites outside the Green Belt and considers that there are exceptional circumstances for releasing this area of land from the Green Belt (see question 11 below for further detail). The site would help meet housing needs in Leek Wootton and more generally assist in a five year supply through the provision of a range of sites. The site will help support facilities in the village of Leek Wootton.

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

- a) The Sustainability Appraisal (SA10) sets out the sustainability benefits of each of the proposed allocations. This site has the ability to support the ongoing viability of services in the village of Leek Wootton.

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

- a) Potential adverse impacts are limited to the potential negative impact on residences immediately adjacent to the site and could be mitigated by good design / appropriate landscaping as required.

**5) Is the scale of development proposed compatible with the capacity of the village to accommodate further growth in terms of its character and appearance, the level of services and existing infrastructure?**

- a) The Village Settlement Hierarchy June 2013 (V01 to V03) sets out the Council's approach to the classification of villages and rural settlements. The report explores the size of settlements, availability of services and accessibility of services; facilities and employment from the settlement (see section 4.0). It applies a scoring system to these factors to reach an objective view on the relative capacity of each settlement to accommodate development. Table 4.4 of the report shows the resulting score for each village. (NB it should be noted that this score does not take in to account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability).
- b) Using this model, Leek Wootton is identified as the tenth most sustainable village out of 36 that were considered.
- c) The Village Settlement Hierarchy goes on to classify each settlement. Following the Village Housing Options and Settlement Boundaries Consultation (November 2013), these classifications were simplified in three categories: Growth Villages (of which there are 10); Limited Infill Villages (of which there are 24) and other settlements. The Growth Villages and Limited Infill Villages are set out in paragraph 4.7 of the Submission Draft Local Plan.
- d) As a result Leek Wootton was identified as a Growth Village with the potential to accommodate some housing growth. Land for 21 dwellings was allocated in Leek Wootton on land now within Policy DS NEW3 and H37; however these allocated sites did not include assumptions on the potential additional provision that might come forward as a consequence of the conversion of the Police Headquarters Building (Woodcote Hall).
- e) Since the submission of the Local Plan, the Council has had to identify additional housing land for the modifications submitted in 2016. In preparing the modifications, the Council reviewed the potential of growth villages to accommodate a proportion of the additional requirement. This work is set out in the Village Profile and Housing Allocations Update February 2016 (Doc V18PM).
- f) Village Profile and Housing Allocations Update February 2016 (V18PM) explored an indicative capacity for each of the Growth Villages. For Leek Wootton overall, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 120 dwellings of which 26 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of 89 dwellings for the village (see para 11.17). This indicative capacity was adjusted to take account of

policy and environmental constraints such as landscape, Green Belt and flooding. The assumed capacity with regard to DS NEW3 (II5) was also being tested by preliminary work on the master planning approach and appeared to be appropriate in the context of the sites specific needs / constraints.

- g) Taking all these factors into account, the Council contend that the proposal to allocate land as defined by H37 is sustainable and that the village is of sufficient size and has the range of facilities necessary to support this level of growth without significantly undermining to the character of the village.

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

- a) There are no significant constraints.
- b) The site is not of sufficient scale to require infrastructure contributions to be made

**7) Is the site realistically viable and deliverable?**

- a) The Viability Studies (IN06, EXAM3 and HO24PM) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policies, including affordable housing. The strongest viability is in rural areas and much of Leamington Spa. This site falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. The agent on behalf of the Golf Club has stated that an application for the development of this site would be submitted as soon as possible following the Adoption of the Local Plan.

**8) What is the expected timescale for development and is this realistic?**

- a) The housing trajectory (see appendix 1 of the Housing Supply Topic Paper – HO27PM) indicates site completion in 2018/19.
- b) Given the scale of the site and lack of constraints, this is considered to be realistic

In addition to the above, for all sites apart from those in Barford, Bishops Tachbrook and Radford Semele:

**9) What would be the effect of the proposal on the purposes of including land within the Green Belt?**

- a) The area is within a Green Belt parcel (LW3) and plays an important role in safeguarding the countryside from encroachment and some role in preventing ribbon development and town merging, as well as (like all Green Belt parcels) having a strategic role in assisting regeneration.

- b) LW3 overlaps with the Leek Wootton Conservation Area boundary and it therefore it helps to preserve the setting of the historic village.
- c) The site forms a reasonably compact area. Whilst it sits within a parcel that plays an important Green Belt role, the intended development is small and to an extent, is contained by adjacent buildings and landscape features (woodlands). It will therefore have only a minimal impact on the residual Green Belt area.

**10) What would be the effect on the openness of the Green Belt?**

- a) See paragraph 89 to 95 of the Green Belt Background Paper (EXAM 45) for the Council's strategic approach to maintaining the essential characteristics of the Green Belt.
- b) As set out in 9c above, the site is small and is contained by adjacent buildings and woodland. Only to the north does the site have a relationship with an open field. However this area cannot be described as open countryside as the main core of the village and the Conservation Area lies beyond it. The removal of this site from the Green Belt will therefore have only a minimal impact on the openness of the Green Belt. It is therefore proposed to remove the site from the Green Belt in line with paragraph 85 of the NPPF. This:
  - i) Ensures consistency with the Local Plan Strategy;
  - ii) Removes this parcel which is not essential to keep permanently open;
  - iii) Uses physical features (woodland, buildings and road) to provide a strong Green Belt Boundary.
- c) The residual Green Belt will continue to meet the essential characteristics set out in paragraph 79 of the NPPF. The development of this site will have only a minimal impact on the extent to which parcels LW2, LW3 and the adjacent Broad Area 4 are consistent with the essential characteristics of Green Belt (NPPF para 79) as the site is separated from the more open land to east, west and south.

**11) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?**

- a) The processes for assessing exceptional circumstances has been set out in paragraph 14 of the Distribution of Development paper (HO25PM) Table 3, paragraph 28 of this document sets out the exceptional circumstances that apply to all of the village sites within the Green Belt that are identified through the 2016 modifications.
- b) Specifically, exceptional circumstances for the allocations to Green Belt growth villages are identified as follows:
  - i) Is there an essential need that has to be met? Yes, The HMA's and Coventry's housing need and the lack of capacity within Coventry; important in achieving a 5-year housing land supply on adoption; important in meeting local housing need (constrained by

current planning policy)

- ii) Are there any suitable sites outside the Green Belt that can meet this need? It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services.
  
- iii) Is this the best site within the Green Belt to meet the need? It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need.