

5 March 2023

Sent via email - swlp@warwickdc.gov.uk

Dear Sirs

**The South Warwickshire Local Plan (SWLP) Issues and Options consultation  
Land at Red House Farm, Black Lane, Lillington, Leamington Spa, CV32 7UA**

This letter has been prepared on behalf of Wood Abbey in respect of land at Red House Farm (hereafter referred to as the Site), as shown by the red line boundary attached as Appendix 1. The Site extends to 13.4 hectares and can accommodate circa 270 homes.

An amended site boundary is proposed to that which is currently recorded under REFID: 171 in the Call for Sites database. An updated form has been submitted as part of the current Call for Sites consultation. This submission supersedes all previous information submitted on behalf of the landowner.

Wood Abbey is the land promoter for the Site, working on behalf of the landowner. Wood Abbey have appointed a technical team, led by Originate Planning, to prepare representations including technical evidence to promote the Site for residential development through the South Warwickshire Local Plan (hereafter referred to as the Local Plan).

We welcome the publication of the Local Plan and the progress that the Council's are making in addressing the area's sustainable development needs.

This letter, including the listed appendices, forms our submission to the Local Plan Issues and Options consultation document. Responses to specific questions in the Consultation Document are set out in Appendix 2.

The Planning Case for the Site's allocation for residential development is set out in Appendix 3.

This case establishes that the Site is **suitable, available and achievable** and would deliver a sustainable pattern of development. This case includes initial assessments of the suitability of the Site applying the methodology of the Coventry and Warwickshire Sub-Regional Joint Method Statement Housing and Economic Land Availability Assessment - (February 2022) and the South Warwickshire Local Plan Sustainability Appraisal Framework.

An exceptional circumstances case, justifying a review and amendment to the Green Belt boundary and allocation for residential, and a review of the purposes of the Green Belt demonstrating that the Site does not make a strong contribution to the role and function of the Green Belt are also set out in Appendix 3.

A Development Framework has been prepared, attached as Appendix 4, setting out the vision and concept for the Site's development. The vision and concept has been informed by an analysis of the local context including the services, facilities and amenities in the local area and a review of the Site's physical features.

In conclusion we consider that the Site's development for residential use would align with the Vision and Strategic Objectives of the South Warwickshire Local Plan and **deliver social, economic and environmental benefits** including:

- Sustainable place - extending the existing community of Lillington with a new sustainable residential development that has access to all the services and facilities to meet the day to day needs of future residents along with transport options to connect to health, education, jobs and leisure.
- Housing - provide circa 270 homes including affordable housing. The range of homes will increase choice in the local area meeting housing needs including for smaller properties and family housing.
- Improved connections - promote sustainable transport choices where walking, cycling and public transport are all viable options. A new strategic link between Lillington and Newbold Comyn can be established facilitating pedestrian and cycle movement. It would bring the community at Lillington closer to the services and amenities at the Country Park and Royal Leamington Spa Town Centre.
- New access to the country park - bringing health and wellbeing benefits to residents a new access to the Country Park could be established. Current and future residents would have a new direct access to the amenities for sport, recreation and leisure.
- Health and wellbeing - providing a variety of new open spaces for recreational space.
- Improved urban rural transition - preserving and enhancing the important aspects of the existing landscape and providing a softer transition with new landscaping.
- Biodiversity benefits - integrating existing habitats into a comprehensive landscape scheme with added new wildlife habitats and green corridors.
- Relocation of existing equestrian facility - the existing equestrian facility including the livery stables relocated to alternative premises retaining local jobs and facilities.
- Permanent Green Belt boundary - establish a new permanent boundary for the Green Belt utilising mature trees and hedgerows and the conversion of the existing buildings.

Thank you for your consideration of our response to the Issues and Options consultation. We would request that we are kept informed of progress on the South Warwickshire Local Plan and we would welcome the opportunity for continued engagement with the Council's in the production of the Local Plan.

Yours sincerely


Richard Cowell, MRTPI  
Managing Director

### **Attachments**

- Appendix 1 - Red line boundary for land at Red House Farm (the Site)
- Appendix 2 - Response to the Issues and Options Consultation Questions
- Appendix 3 - Planning Case
- Appendix 4 - The Red House Farm Development Framework.

**Appendix 1 - Red line boundary for land at Red House Farm (the Site)**



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## Appendix 2 - response to the Issues and Options Consultation Questions

Responses have been made to the following consultation questions:

- Question V3.1 and V3.2: Strategic Objectives
- Question S4.1 and S4.2: Growth of Existing Settlements
- Question S7.2: Spatial Growth Options
- Question H1-1: Providing the right number of new homes
- Question T1: 20-minute neighbourhoods
- Question B3: Special landscape areas

### Q-V3.1 - Do you agree that the Vision and Strategic Objectives are appropriate?

No

### Q-V3.2 - If no, please indicate why:

We consider that the inclusion of the following wording “avoiding any further damage that might arise from development” in the vision principle ‘A climate resilient and Net Zero Carbon South Warwickshire’ is not appropriate.

The National Planning Policy Framework (‘NPPF’) (July 2021), requires plans to take a proactive approach to mitigating and adapting to climate change. There is no reference to avoiding any further damage.

The wording highlighted would also conflict with the objectives of the Plan to meet the development needs of South Warwickshire. Development may give rise to impacts which may be unavoidable however national policy only requires impacts to be mitigated and adaptation to occur.

If the Plan continues to include this reference “to avoiding” it will be inconsistent with national policy and fail the test of soundness.

We believe that the specific principle should be amended removing the wording, “avoiding any further damage that might arise from development.”

Q-S4.1 - Do you think that growth of some of our existing settlements should be part of the overall strategy?

Yes

Q-S4.2 - Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on.

We consider that growth of some of the existing settlements would be the most sustainable way to deliver the local housing need.

In line with the NPPF (para 11.) all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects.

The Local Plan will provide a spatial development strategy with the aim to provide homes, jobs, green spaces and other infrastructure in the most suitable and sustainable places (page 57).

The 20-minute neighbourhood principle defines those locations that can meet that aim, with the main settlements including Royal Leamington Spa being able to provide the services and facilities for people to meet their regular day to day needs within a reasonable walking distance of their homes as well as the option to be able to travel sustainably by providing a good range of sustainable travel choices.

We consider that the most sustainable pattern of development at the main settlements such as Royal Leamington Spa can be best achieved through an allocation of a mix of sites.

The supply of a variety of land, including small and medium sized sites, for housing will significantly boost the supply of homes as they can be built-out relatively quickly. This supply can make an important contribution to meeting the housing requirement of South Warwickshire.

The land at Red House Farm is a suitable, available and achievable site, as established in Appendix 3, and can make an early and positive contribution of circa 270 homes to the supply of land for housing and to meet local housing needs.

The Settlement Design Analysis and Sustainability Appraisal Framework support this approach to focusing growth at main settlements.

We consider that The Connectivity Analysis has incorrectly assessed Area 7: North Leamington and Cubbington. This Area is currently graded as D, however, this assessment has failed to reflect that any barriers to connectivity can be overcome through the creation of a new access, which is feasible and deliverable. The Site also connects to at least one red

route, which is less than 50 metres from the Site and a brown route being within walking distance. There are also existing and potential active links with the current PRoW available connecting to the wider network. There is also the opportunity to create a new route through the Site and link to the Country Park and wider cycle and pedestrian network. The Site should correctly be assessed as a Grade B for connectivity.

Q-S7.2 - For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:

We consider that Options 1, 2, 3 and 4 represent appropriate growth options as they would support sustainable patterns of development directing development to the main settlements, including Royal Leamington Spa.

We believe that the spatial strategy should prioritise the main settlements in order to deliver the Vision, Strategic Objectives and 20 minute neighbourhood principle.

Q-H1-1: The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trendbased approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?

In line with the NPPF the housing need for South Warwickshire will need to reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

The Council will need to demonstrate that the approach to determining housing needs is consistent with the NPPF.

We consider that even with a lower housing need figure it will be impossible for the Plan to meet housing needs without significant greenfield development.

Q-T1: Please select all options which are appropriate for South Warwickshire

We consider the principle of the 20-minute neighbourhood should be incorporated into the Plan for new development. The policy should ensure that sites and developments are delivered in a sustainable manner.

As such Option T1c is considered appropriate to include as a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.

Q-B3: Please select the option which is most appropriate for South Warwickshire

We consider that Special Landscape Areas should not be introduced to Warwick District. This is consistent with national policy and Natural England's approach.

Option B3c: Discard Special Landscape Areas and bolster general landscape policy is considered the most appropriate. We consider that any landscape policy should be worded to consider the specific character of parcels of land and a blanket approach to areas is avoided whereby certain parcels are afforded greater weight by virtue of a generalised blanket approach instead of a detailed understanding of the specific characteristics and merits of parcels of land.



### Appendix 3 - Planning Case

We consider that the allocation of the Site for a residential development of circa 270 homes would achieve a sustainable pattern of development that can positively contribute to meeting the development needs of South Warwickshire and align growth and infrastructure; improve the environment; and mitigate climate change and adapt to its effects.

The Site would contribute positively to the delivery of the emerging Vision and Strategic Objectives of the South Warwickshire Local Plan, as follows:

- **Meeting South Warwickshire's Sustainable Development Needs** by delivering circa 270 homes that meet local needs including affordable housing and bringing economic benefits to the area including creating construction jobs, generating local spend in the economy and supporting local services.
- **A resilient and Net Zero Carbon South Warwickshire** by contributing towards Net Zero Carbon targets due to its sustainable location with easy access to existing local facilities and services including sustainable transport options with walking, cycling and bus routes all directly accessible from the Site.
- **A well-designed and beautiful South Warwickshire** through the design of buildings, spaces and routes responding to local design codes, where established, and the national objective of achieving well-designed and beautiful places; and protecting and enhancing local heritage and cultural assets by virtue of its location outside of any character areas and distance from protected assets.
- **A healthy, safe and inclusive South Warwickshire** through the design of buildings, spaces and routes and taking the opportunity to establish a new pedestrian and cycle route connecting the existing community at Lillington through the Site and to the Country Park.
- **A well-connected South Warwickshire** by the Site's proximity to a main bus route and existing pedestrian and cycle routes to enable people to access sustainable and active travel options to connect to centres, jobs, education, cultural facilities, green spaces and the countryside.
- **A biodiverse and environmentally resilient South Warwickshire** by taking opportunities to deliver improvements to environmental assets, and creating a better transitional zone at the urban-rural interface.

We consider that the 'Site' is **suitable, available and achievable** meeting the tests in National Planning Policy Framework (NPPF) (July 2021) and also contribute to the five year housing supply as a **deliverable site**.

The Site represents a ***suitable location*** for residential development due to its location and proximity to services and facilities.

The Site would be adjacent to the established residential area of Lillington, which is a suburb of Royal Leamington Spa. The Settlement Design Analysis indicates that the Site is in a location that fully complies with the 20 minute neighbourhood principle.

All the local services and facilities including education, health, convenience retail, open space and places to meet are within walking distance of the Site meeting the day-to-day needs of people. Examples of services include:

- Lillington Nursery and Primary School
- Lillington Children & Family Centre
- Andrew Lee Dental Practice
- Mason Avenue Park
- Crown Way Shops - Convenience Store, Post Office, Pharmacy, Laundrette, and takeaway restaurants
- Lillington Youth Centre

The nearest bus stops are located on Buckley Road, 50 metres from the Site, and provide frequent services operating between Cubbington and Royal Leamington Spa Town Centre.

The Site's location on the edge of Royal Leamington Spa places it within the statutory walking distance for both a Secondary School at North Leamington School – a mixed comprehensive school for students aged 11-18 – under 2 km and Royal Leamington Spa College within 3 km of the Site.

Warwick Hospital, with A&E services, is within 5 km distance of the Site providing accessible emergency health care.

Leisure and recreation facilities can be found at Newbold Comyn where playing pitches, walking and cycling routes are found. The Newbold Comyn Leisure Centre is situated at the entrance to the Country Park. These are within 1 km of the Site.

The Site is 2 km from the Town Centre of Royal Leamington Spa where higher order services are found including comparison retail, cafes and restaurants, art gallery and museum, hotels, theatre, gyms and social clubs, cinema and other facilities.

Leamington Spa Train Station is 2.5 Km from the Site and can be accessed by bus, walking or cycling routes.

The Connectivity Analysis further demonstrates that the Site is accessible. We consider that, based upon a more detailed analysis of the Site's situation, the current analysis has not appropriately assessed the connectivity grade. The Site is within Area 7 Connectivity Grade: North Leamington and Cubbington. This Area is currently graded as D, however, this assessment has failed to reflect that any barriers to connectivity can be overcome through the

creation of a new access, which is feasible and deliverable through working with Warwick District Council. The Site also connects to at least one red route, which is less than 50 metres from the Site and a brown route being within walking distance.

There are also existing and potential active links with the current PRow available connecting to the wider network. There is also the opportunity to create a new route through the Site and link to the Country Park and wider cycle and pedestrian network. The Site should correctly be assessed as a Grade B for connectivity.

The Site is not subject to any designations and is in a location that is considered sustainable against the SA Framework. This assessment is set out in the initial Sustainability Appraisal of the Site, below.

### ***Sustainability Appraisal***

The basis of this assessment is the Broad Location, Royal Leamington Spa East, which provides a starting point for the sustainability performance of the Site due to the Site's location within the Broad Location.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
SA Objective 1 - Climate Change	-	With the opportunity for circa 270 homes the Site would generate less than 1% increase in carbon emissions in the District resulting in a minor negative impact. There is also significant opportunity to mitigate this impact as the Site supports the 20-minute neighbourhoods principle with the development located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions. GHG emissions can be further reduced through the construction and operation of homes. The incorporation of GI into any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.
SA Objective 2 - Flood risk	+	The site is entirely located within Flood Zone 1.

SA Objective 3 - Biodiversity and geodiversity	0	The Site does not coincide with any designations.
SA Objective 4 - Landscape	+	<p>The site is adjacent to the fringe of the urban area of Lillington. The Options for Future Urban Expansion in Warwick District Considerations for Sustainable Landscape Planning (November 2012) Report concluded, for the Red House Farm site, that this generally flat, greenfield site is situated on high ground south of the Lillington residential estate and... In spite of the topography, it is concluded that a sensitively considered development here could avoid being visually prominent and might have potential landscape benefits e.g. opportunities to make good some urban fringe problems and also to create a better transitional zone at the urban-rural interface.</p> <p>We consider that opportunities exist to improve access to the Countryside and deliver an improved transition from urban to rural bringing minor benefits.</p> <p>There are PRow that pass through the Site, however, we consider that there are opportunities to deliver benefits. The current PRow traverses an existing single track used by vehicles with no designated places for passing or pedestrians to use. Through the design of new routes the PRow can be enhanced for users and their experience improved.</p>
SA Objective 5 - Cultural heritage	0	The Site does not coincide with any designations.
SA Objective 6 - Environmental Pollution	0	The Site is not within proximity of any specified receptors.

SA Objective 7 - Natural resources:	-	The Site is classified as Grade 3 – good to moderate quality agricultural land - under the ALC system. The Site is currently less than 20 hectares of arable fields at the eastern end (about half the site area) and three pony grazing paddocks. The Site also includes previously developed land including the barns and stables used for equestrian activity.
SA Objective 8 - Waste	-	The scale of development at circa 270 homes could potentially increase household waste generation by less than 1%. There is the opportunity to also mitigate any impact through provision of appropriate on-site waste and recycling facilities.
SA Objective 9 - Housing	++	The Site has the potential to deliver a significant net gain in housing (of 100 dwellings or more).
SA Objective 10 - Human Health	+	In addition to the access to GP Surgery, access to Leisure Facilities, the Site not being within or in close proximity to an AQMA or Main Road, access to greenspace (which is a major positive effect on health), access to PRoW / Cycle Path, the Site would be within 5 km distance from a NHS Hospital providing an A&E service.

SA Objective 11 - Accessibility	+	<p>The Site is within the target distance of bus stops providing regular services. The Site can also be connected better to the Leamington Spa Train Station through the opportunity for a new route through the Country Park creating potential for shorter walking / cycling distance.</p> <p>We consider that the connectivity analysis has incorrectly assessed the connectivity of the Site, shown by Area 7 Connectivity Grade Analysis: North Leamington and Cubbington. Area 7 is currently graded as D, however, this assessment has failed to reflect that any barriers to connectivity can be overcome through the creation of a new access, the Site connects to at least one red route, which is less than 50 metres from the site and a brown route being within walking distance. There are also existing and potential active links with the current PRow and opportunity to create new routes through the site linking to the Country Park and wider cycle and pedestrian network. The Site should correctly be assessed as a Grade B for connectivity.</p>
SA Objective 12 - Education	+	The Site is within the sustainable target distance of primary, secondary and further education.
SA Objective 13 - Economy	+	The Site comprises undeveloped land with the exception of those used for equestrian facilities. The equestrian facilities will be relocated so that the employment generated will be retained. The Site is located within the target distance to various employment opportunities.

The Site is considered **available** for development demonstrated by this submission and response to the Call for Sites. The Site is in single ownership, and the landowner has expressed intention to sell, with a land promoter appointed demonstrating that it is available for development now.

Residential development on the Site is **achievable** as there are no known impediments to development and no foreseen extraordinary development costs or constraints that would impact on the economic viability of the Site.

Market conditions are considered favourable and the HEDNA identifies that future demand for new homes is driven by population growth and job creation.

The Site is also considered to be **deliverable**, as it is available now, offers a suitable location for development now, and there is a realistic prospect that housing will be delivered on the site within five years. The Site can make a positive contribution to meeting housing needs early in the Plan period with potential to accommodate circa 270 homes.

The Site's suitability, availability and achievability for residential development is further detailed in the following assessment applying the methodology of the Coventry and Warwickshire Sub-Regional Joint Method Statement Housing and Economic Land Availability Assessment - (February 2022).

Criteria	Assessment	Commentary
<b>SUITABILITY</b>		
Site / location attributes		The site is 13.4 ha
Site purpose		The site has been put forward for residential development
Site location		The site is within or immediately adjacent to an existing settlement, that settlement being a main urban area - Royal Leamington Spa.
National Policy Designations - Green Belt		The site is wholly or substantially within the designated green belt. Sites which fully or partially fall within the Green Belt will not be automatically removed from the assessment process and will need to be assessed as part of the overall development strategy of the SWLP. The Site aligns with the emerging vision, objectives and spatial strategy and would constitute a sustainable pattern of development. There are considered to be exceptional circumstances to support Green Belt review and allocation of the Site.
National Policy Designations - AONB		The site is wholly outside of the designated AONB and not adjacent to it.
National Policy Designations - Registered Park and Gardens		The site is not within or adjacent to a registered park or garden.

Ecological designations		The site does not include any land within the following designations European Wildlife site, National Wildlife Site, SSSI, Special Protection Area (SPA), Local Wildlife Site, Potential Wildlife Site, Ancient Woodland.
Land constraints - Flood Risk		The site is wholly outside of flood zones 2 and 3, and where surface water flooding exists mitigation and adaption are available.
Land constraints - Brownfield / Greenfield		The site is substantially comprised of land that has not been previously developed (greenfield) however the equestrian facilities including the house, stables, arena and hardstanding would constitute previously developed land.
Agricultural land quality		The site comprises grade 3 land, further assessment required to determine the sub category.
Land constraints - Minerals and waste		The site is not within a minerals and waste allocation or safeguarded area, as defined on the Warwickshire Published Mineral Resource Map.
Heritage constraints		The site does not include any designated heritage assets, and it is unlikely to directly impact upon the setting of any heritage assets.
AVAILABILITY		
Ownership		Site is in single ownership, and the landowner has expressed intention to sell, and a land promoter appointed.
ACHIEVABILITY		
Viability and deliverability		No foreseen extraordinary development costs or constraints. Market conditions appear favourable.



## **Green Belt and Exceptional Circumstances**

The Site is covered by the West Midlands Green Belt. In line with the NPPF there are considered to be exceptional circumstances that can be fully evidenced and justified for a review of the Green Belt boundary and allocation of the land at Red House Farm for residential development.

The publication of the South Warwickshire Local Plan: Urban Capacity Study (October 2022) and the Local Plan Issues and Options Consultation Document demonstrate that the strategic policy-making authorities have examined fully all other reasonable options for meeting identified needs for development and that releasing land from the Green Belt is justified and would promote sustainable patterns of development.

We consider that there are exceptional circumstances to justify changes to the Green Belt boundaries and release of the Site and its allocation for residential development.

The exceptional circumstances include:

### ***Reason 1 - sustainable patterns of development***

The NPPF establishes that when drawing up or reviewing Green Belt boundaries the need to promote sustainable patterns of development should be taken into account. This is further recognised in the Local Plan and evidenced by the SHEELA, Sustainability Appraisal and Settlement Design Analysis.

The Site forms a natural extension to the main settlement of Royal Leamington Spa being adjacent to the established residential area of Lillington, which is a suburb of the main urban area. The Settlement Design Analysis indicates that the Site is in a location that fully complies with the 20 minute neighbourhood principle.

Residential development at the Site would constitute a sustainable pattern of development in a location that is well connected with good infrastructure and access to facilities and services.

The Site performs positively against the Plan's Sustainability Appraisal Framework and the methodology of the Coventry and Warwickshire Sub-Regional Joint Method Statement Housing and Economic Land Availability Assessment. This is demonstrated earlier in this Appendix.

The available evidence demonstrates that the Site is suitable, available and achievable.

There are no significant constraints to residential development and where they do exist these can be mitigated. The Site's development for residential use aligns with the vision and strategic objectives of the Plan and would promote a sustainable pattern of development.

The Site would also deliver a range of economic, social and environmental benefits contributing to achieving sustainable development. These benefits are set out in Appendix 4 and include:

- A sustainable place - extending the existing community of Lillington with a new sustainable residential development that has access to all the services and facilities to meet the day to day needs of future residents along with transport options to connect to health, education, jobs and leisure.
- Housing - provide circa 270 homes including affordable housing. The range of homes will increase choice in the local area meeting housing needs including for smaller properties and family housing.
- Improved connections - promote sustainable transport choices where walking, cycling and public transport are all viable options. A new strategic link between Lillington and Newbold Comyn can be established facilitating pedestrian and cycle movement. It would bring the community at Lillington closer to the services and amenities at the Country Park and Royal Leamington Spa Town Centre.
- New access to the country park - bringing health and wellbeing benefits to residents a new access to the Country Park could be established. Current and future residents would have a new direct access to the amenities for sport, recreation and leisure.
- Health and wellbeing - providing a variety of new open spaces for recreational space.
- Improved urban rural transition - preserving and enhancing the important aspects of the existing landscape and providing a softer transition with new landscaping.
- Biodiversity benefits - integrating existing habitats into a comprehensive landscape scheme with added new wildlife habitats and green corridors.
- Relocation of existing equestrian facility - the existing equestrian facility including the livery stables relocated to alternative premises retaining local jobs and facilities.
- Permanent Green Belt boundary - establish a new permanent boundary for the Green Belt utilising mature trees and hedgerows and the conversion of the existing buildings.

### ***Reason 2 - housing land capacity to meet housing need***

The Local Plan has demonstrated that all other reasonable options for meeting the development needs have been explored, including the use of brownfield land, optimising density and engaging with neighbouring authorities about accommodating any development needs.

The South Warwickshire Local Plan: Urban Capacity Study (October 2022) evidences this position and demonstrates the significant challenge for the area in meeting local housing needs within existing settlements and on brownfield land.

Factoring all of the sources of potential urban and existing committed housing capacity the study shows a total potential baseline housing supply for the 2025-2050 Plan period of 19,950 dwellings. The study also considers options for higher densities, which would require a higher burden of evidence in order to ultimately demonstrate this is deliverable, and building on car parks which would require significant levels of intervention and management to release.

The available capacity compares to a housing need for South Warwickshire over the new Plan period of 30,750. This housing need is derived from the Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022).

The assessment of housing land supply vs demand uses the new trend-based projections for Warwick and Stratford-on-Avon resulting in a need for 1,239 dwellings annually. If the Standard Method was applied the figure would be 1,679 per annum or 41,975 over the plan period.

The Study concludes that it is impossible to meet development needs without significant greenfield development. This conclusion is based upon the lower housing need figure and excludes meeting a proportion of the unmet need from neighbouring areas, including Greater Birmingham and Coventry.

The Site can make an important contribution to meeting housing need with circa 270 homes. These homes can be delivered early in the Plan period.

### ***Reason 3 - contributing to improving health and wellbeing***

The area of Lillington, is in the top 20 percent of the country's most deprived areas (Lillington East), according to the Index of Multiple Deprivation. The Lillington Regeneration Needs Assessment (2016) has identified a series of health and wellbeing needs of the population of Lillington and recommendations for improvements.

The Site can make a significant contribution to the Strategic Objectives of the Plan; namely to deliver a healthy, safe and inclusive; and a well-connected South Warwickshire by providing new pedestrian and cycle routes that would create a direct connection from Lillington to the Newbold Comyn country park.

A new entrance point to the Country Park would open up access to the leisure and recreation facilities for the wider community leading to improved health and wellbeing opportunities for residents. The Site can also facilitate access to the national cycle network.

In light of the above, it is therefore considered that there are exceptional circumstances which can justify changes to Green Belt boundaries.

The release of the Site from the Green Belt would facilitate sensibly planned growth and direct development away from the most sensitive areas of the Green Belt. This is considered further below.

## Purposes of the Green Belt

The Site is covered by the West Midlands Green Belt. The NPPF 'Protecting Green Belt Land' is clear that where development is unavoidable it should be directed away from the most sensitive areas of Green Belt. Sites which therefore do not make a strong contribution to the role and function of the Green Belt will be considered for potential release in order to facilitate sensibly planned growth.

<b>Purposes of the Green Belt</b>	<b>Commentary</b>
<p>To check the unrestricted sprawl of large built-up areas</p>	<p>The Site is located on the southern edge of Lillington, and is bounded to the west by water treatment works. There are mature trees and hedgerows, with some veteran trees, and existing buildings including a house and equestrian facilities (brownfield land) forming the southern boundary of the Site.</p> <p>Given the assessment in Options for Future Urban Expansion in Warwick District Considerations for Sustainable Landscape Planning (2012) the Site has an urban fringe character.</p> <p>If it were removed from the Green Belt, the Site would therefore form a logical extension to the urban area being bounded by built form to the west and residential to the north. The retention of existing mature trees and hedgerows and provision of a landscape transition would create a contained development and checking any unrestricted sprawl.</p> <p>Development would 'round-off' the existing urban area in this location and provide a softening of the existing transition from urban to rural.</p>

<p>To prevent neighbouring towns merging into one another</p>	<p>The Site is located in an urban fringe location, at the current built up edge of Lillington, a suburb of the main settlement of Royal Leamington Spa.</p> <p>The nearest settlements are Cubbington, Radford Semele, and Offchurch. Cubbington is to the north east and the Site is directed away from the Site's location, there is no role in preventing merging. Both Radford Semele and Offchurch are over 2 km from the Site and are separated by significant change in topography and landscape character. There is no risk of merging.</p> <p>The development of the Site would therefore not worsen the existing position with regard to the 'merging' of neighbouring towns, as, although it would constitute the expansion of development beyond existing boundaries, it would not encroach on neighbouring settlements due to the distances, existing physical features in the landscape and changes in topography.</p>
<p>To assist in safeguarding the countryside from encroachment</p>	<p>Most Green Belt sites will make a contribution to openness, but the Site, as previously explained due to topography and location, means it can make a potential positive contribution to the wider landscape. The Site would be viewed as a natural extension of the existing urban area and be viewed as 'rounding off' the existing settlement.</p> <p>It is proposed to retain key landscape features of the Site including significant internal hedgerows and field trees. The development will also work with the natural topography of the Site. Opportunities also exist to provide mitigation planting and ecological enhancements in line with the Site's landscape character.</p> <p>To the southern boundary of the Site are the existing equestrian facilities with a house, stables, large shed structure and arena / hardstanding constituting previously developed land.</p>

<p>To preserve the setting and special character of historic towns</p>	<p>The Site is on the edge of Lillington, a predominately 1950s suburban area which includes four-storey flats adjacent the Site at Mason Avenue / Burberry Close, and although not immediately adjoining, the much taller Eden Court and Southern Court flats. There are no heritage designations within the Site itself, or in proximity.</p> <p>As such, heritage sensitivities are fairly limited at the Site and development of the Site could not be said to undermine the setting and special character of a historic town.</p>
<p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>The removal of this Site from the Green Belt would not affect urban regeneration through the recycling of derelict and other land. Given the growth needs for the area and the acknowledgement of the unmet need for housing, it is clear that greenfield and Green Belt land must be released to meet housing numbers if sustainable patterns of development are to be achieved.</p>

Overall the amendment to the Green Belt would allow for a sustainable pattern of development to be achieved and would not undermine the purposes of the Green Belt designation across the wider area.

## **Appendix 4 - Red House Farm Development Framework**