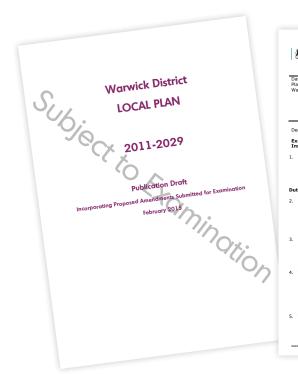
Planning Strategy Position Paper on the emerging Warwick Local Plan 2011-2029

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





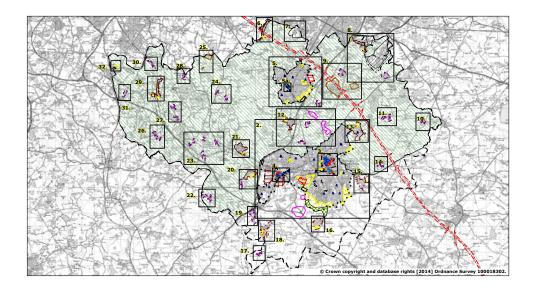


01 INTRODUCTION / EXECUTIVE SUMMARY

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 analyses 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.

Date Issued:	October 2015	Author:	JL/DGW
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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

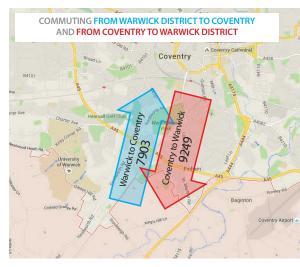
⁷ Paragraph 32 from Inspector's letter of 1st June, 2015

 $^{^{\}rm 8}$ 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

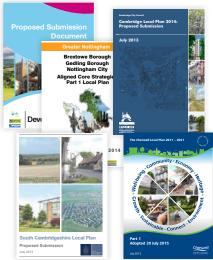
03 THE MOST SUSTAINABLE STRATEGY

- 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)**.
- 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

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

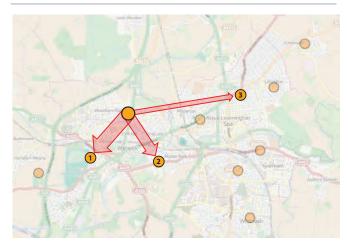


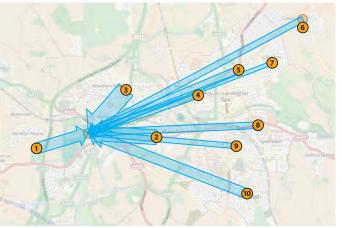
¹³West Midlands Regional Spatial Strategy Phase Two Revision Report of the Panel: September 2009; Paragraph 8.40 ¹⁴NPPF paragraphs 83 to 85

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)





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

1. Hampton	426
2. South Warwick	570
3. North Warwick	710
4. West Leamington	237
5. Central Leamington	306

6. Cubbington	235
7. Lillington	156
8. Sydenham	260
9. South Leamington	201
10. Whitnash	378

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

- 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.

¹⁸ which 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 sensivitity 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

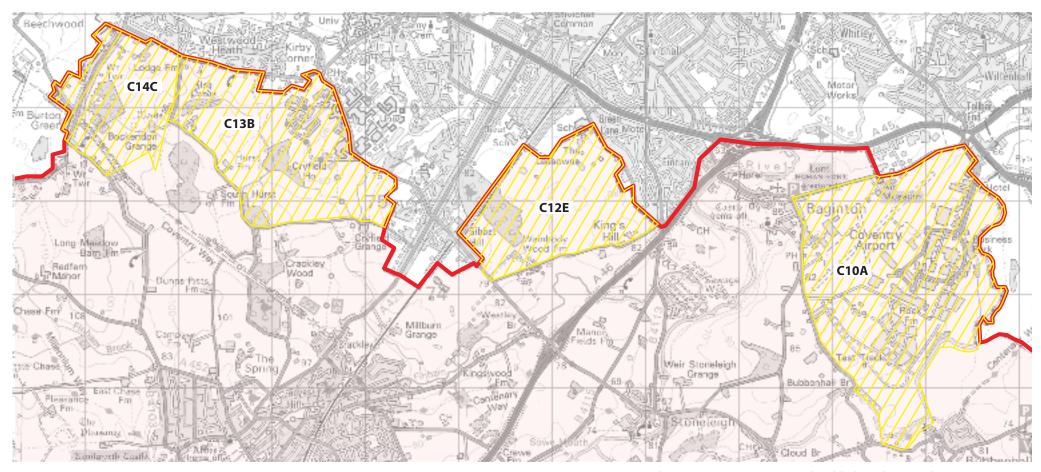
- 4.10 The map shows Land south of Warwick and screens out various constraints that would potentially prevent residential development. It highlights the most suitable and sustainable areas that can facilitate Warwick District's additional housing allocations (for details of constraints mapping see appendix 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



Circa 106ha



Circa 185ha



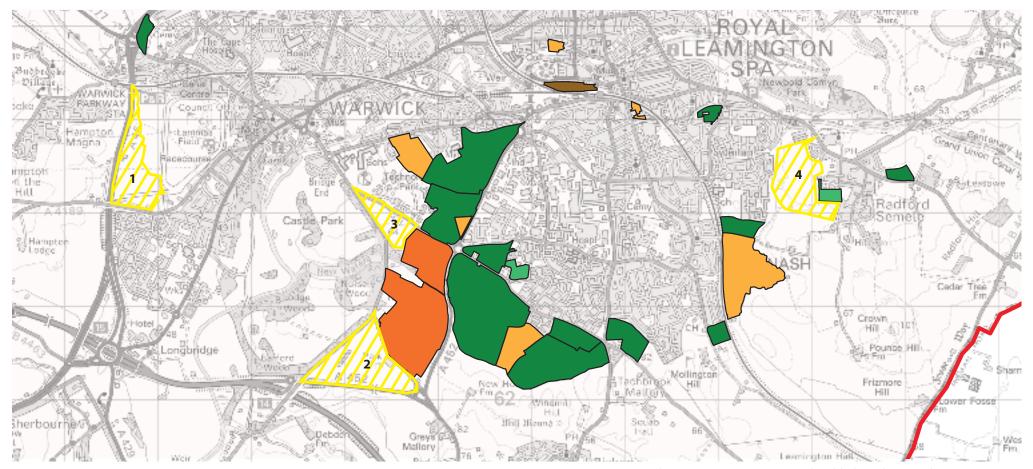
Circa 217ha, excluding university campus



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

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

Potential Sites South of Warwick



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



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

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.

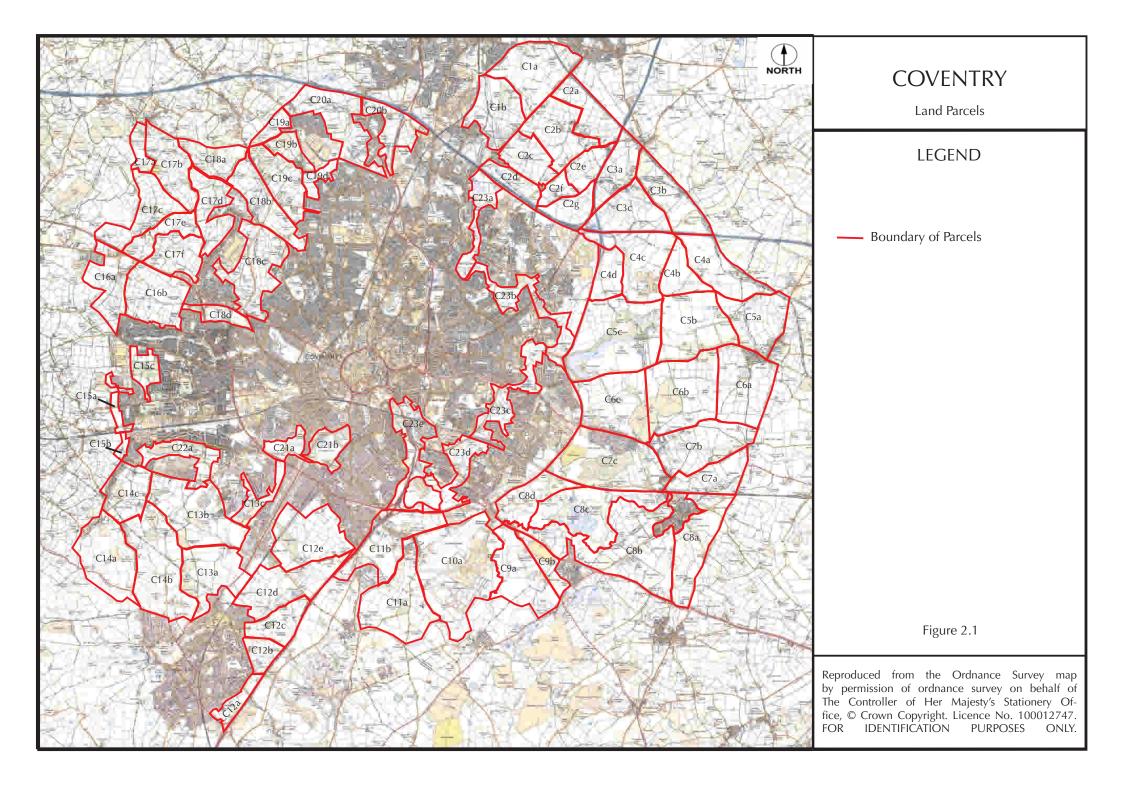
SUMMARY

- 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.

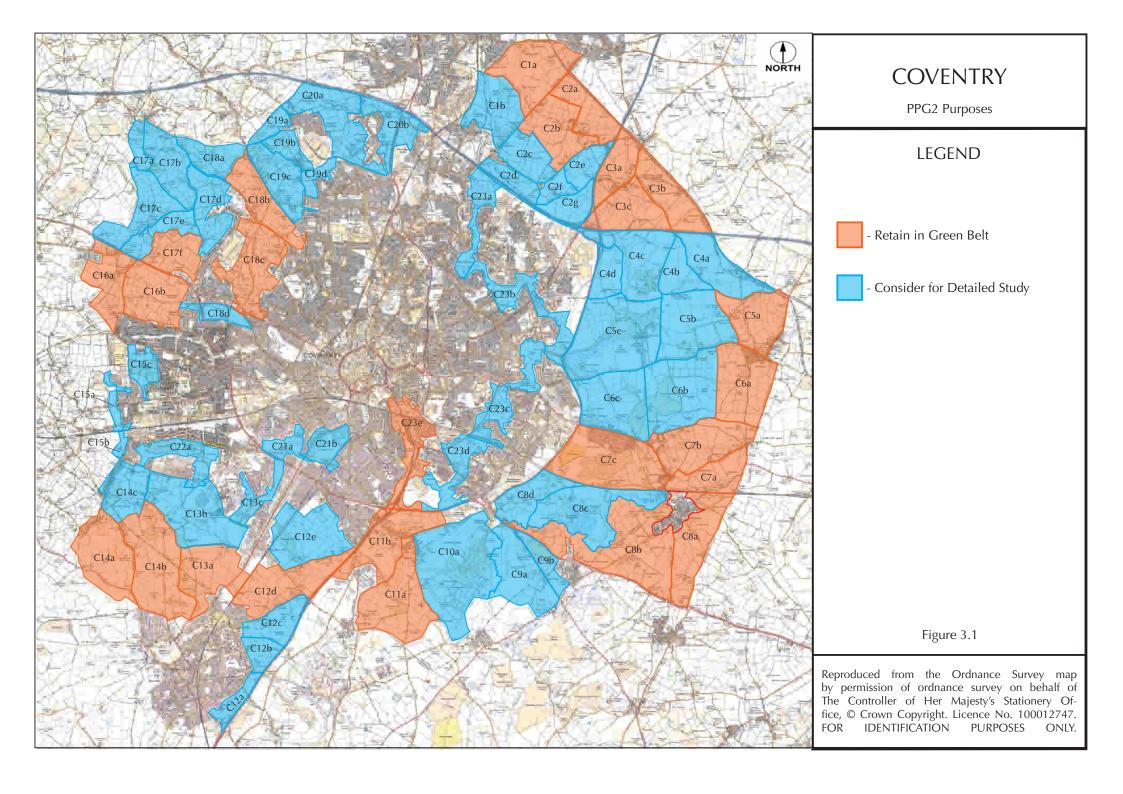
²⁰Constraints included physical and environmental constraints, links to the urban area development potential and landscape.

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



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

SOURCE: 2009 COVENTRY JOINT GREENBELT REVIEW



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 Zone1
- Flood Zone 2
- Flood Zone 3
- Main River Line

NON-STATUTORY:

HISTORIC FEATURES

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

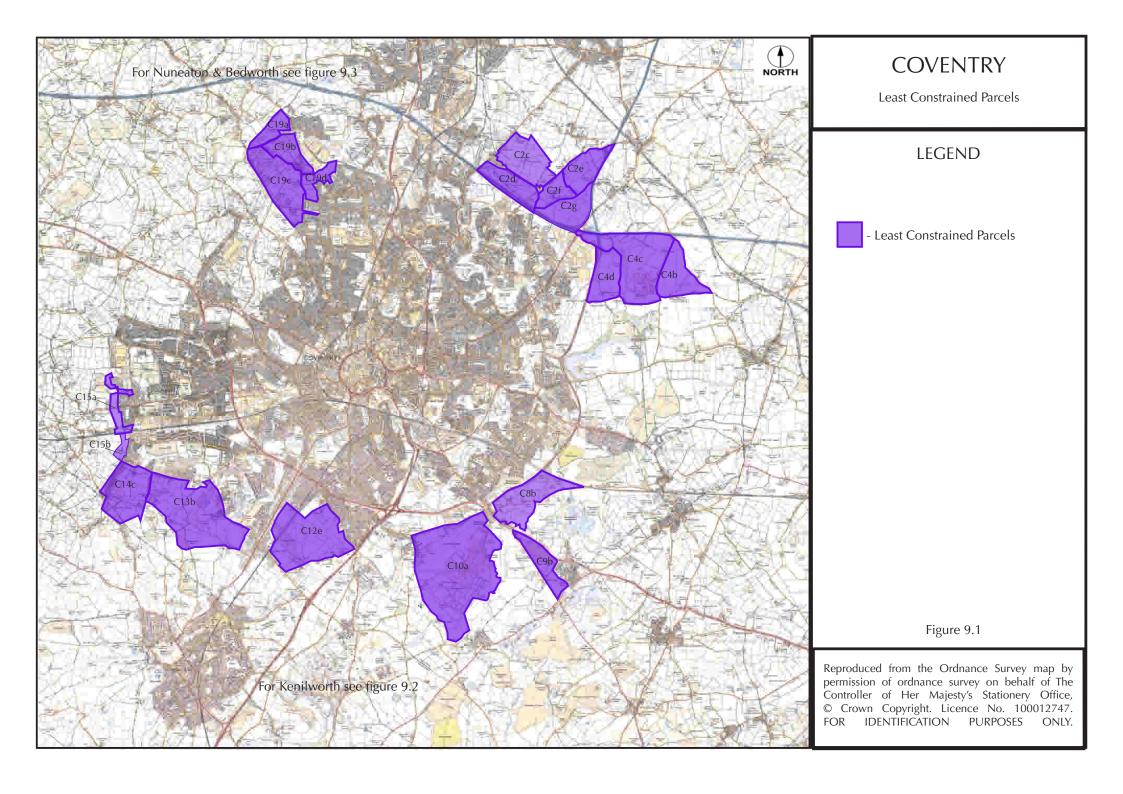
POLLUTION

- 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

COVENTRY - LEAST CONSTRAINED PARCELS



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)

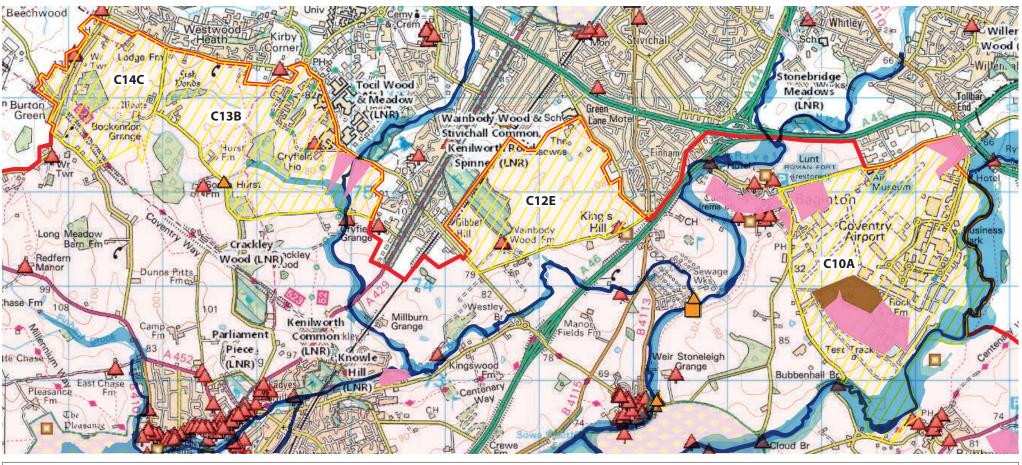
- Contributes to preventing sprawl from Coventry.
- Does not prevent neighbouring towns from merging into one another.
- Safeguards the countryside from encroachment from Coventry.
- Does not contribute to setting and character of approach to Coventry, includes University of Warwick Campus.
- Retention of green belt land will encourage recycling of derelict and other urban land.

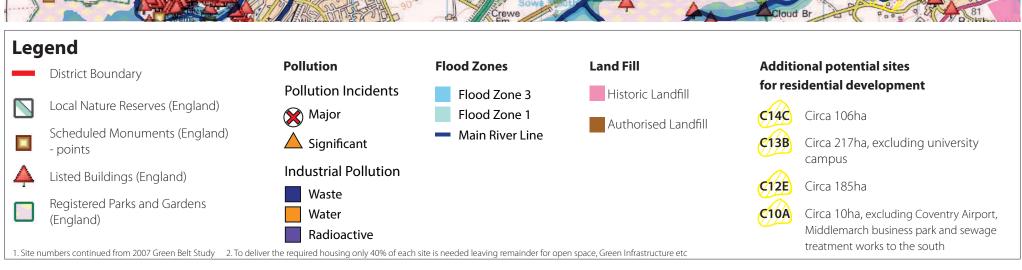
• C14C (Circa 106ha)

- 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





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.

