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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H01 – Land West of Europa Way Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H01 – Land west of Europa Way

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

- a) With the exception of a triangular area towards the south east of the site (approx. 2ha), the whole area has outline planning permission:
 - i) W/14/0967 grants outline permission for the southern part of the site for "Development of up to 425 residential dwellings (Use Class C3), medical centre, community hall, formal and informal green spaces, sports and recreation provision, structural landscaping, new roads, footpaths and cycle ways, site access and ancillary works (outline application including details of access)".
 - ii) W/14/1076 grants planning permission for the northern part of the site for "Construction of up to 735 dwellings; a mixed-use neighbourhood centre to include retail development (Use Classes A1, A2, A3 & A4) and/or community and health uses (Use Class D1); safeguarding of land for education use; provision of formal and informal open spaces including sports and recreation provision, children's and youth play areas and allotments / orchards; strategic landscaping and drainage works including surface water attenuation ponds as part of a sustainable urban drainage system; provision of two vehicular accesses, one off Europa Way and one off Saumur Way; car parking; creation of new footpaths and cycleways and their connection to adjoining networks; ground remodelling; undergrounding of overhead power lines including a new pylon to link to off-site overhead lines; formation of ponds as an ecological mitigation measure to accommodate the translocation of great crested newts."
 - iii) **W/15/0981** grants planning permission for a revised application following planning permission no. W14/1076 to allow for a longer time limit for the commencement of the various phases of development.
- b) In total the site has outline permission for 1160 dwellings with an estimated further capacity of 50 dwellings.
- c) It should be noted that in the Publication Draft Local Plan 2014, this site included proposals for 8ha of employment land at the southern end of the site. Following this, land at Stratford Road was made available for employment and as a result the Council undertook a focused changes consultation which resulted in the submission Draft of the Local Plan allocating the southern part of the site for housing.
- d) The Submission Draft also proposed that land adjacent to Myton Road, currently in the control of Myton School, should be allocated for housing as part of this site. However following the granting of planning permission on appeal for the Asps and the area to the south of Gallows Hill, the strategy for the provision of secondary education in this area was amended and that land is now required to be retained for educational purposes. This is

reflected in the modifications submitted in June 2016.

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

- a) It is consistent with Policy DS4, as follows:
 - i) Criterion a) N/A
 - ii) **Criterion b)** The site is consistent with this criterion. It is a greenfield site on the urban edge of Warwick Specifically it is close to the major employment areas to the south of Warwick and to both Leamington and Warwick Town Centres (which are within 1 to 2 miles). Other facilities such as shops and schools are close by and where additional capacity is required (such as schools and medical facilities) the site has the scope to provide for this on-site.
 - iii) Criterion c) N/A
 - iv) Criterion d) Concerns have been raised in representations that the site leads to the coalescence of Warwick and Leamington. However, the two towns are already substantially and physically linked at Myton Road and Emscote Road to the north of the site. The site is therefore currently a green "wedge" surrounded by development except to the south. It does not therefore lead to coalescence, nor does its development undermine the identity of Warwick as the area to the northwest and east of the site all lie within the Town.
 - v) Criterion e) The site is adjacent to a listed building at Heathcote Hill Farmhouse. However the proposals for the site will take account of the setting of this building. The southern end of the site is visible from the ramparts of Warwick Castle. However, in this view, the site lies behind Warwick Technology Park and in front of the industrial areas at Heathcote and Tachbrook Park. It therefore does not have a significant impact on the Castle. The proposed allocation will not impact on any other heritage assets.
 - vi) **Criterion f)** The site is not high landscape value nor does it contain any other highly sensitive features in the natural environment (LA03 Landscape Character assessment of Land South of Warwick 2009).
 - vii) Criterion g) The site is not in the Green Belt.

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

The site will bring a range of additional benefits as follows:

- a) Public access and open space: The land is currently in agricultural use and there is no public access to it. The proposals for this site therefore bring this area of land in to use for the direct public benefit of the towns including the provision of public open spaces, recreational areas, cycleways and footpaths.
- b) Secondary Education: The site will provide land for a new secondary school in line with Policy DS12, which in conjunction with the expansion of other secondary schools in the area

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will enable secondary school capacity to be expanded to meet the additional pupil numbers generated across a wide range of sites to the south of Warwick and Leamington.

- c) Primary Education: the site will provide for an additional 2 form entry primary school.
- d) Neighbourhood Centre/Community Hub: The site will provide for a new neighbourhood centre including small scale retail in line policies DS14 and DS15, a medical centre and community hall.
- e) Community Stadium and associated uses: In line with Policy DS14, land has been set aside within the approved applications for a new stadium to enable the relocation of Learnington Football Club from its existing site at Harbury Lane. Work is currently being undertaken to prepare a viable scheme to achieve this. In the event that this is not feasible or viable, the area set aside for these uses will be available for further housing.
- f) Highway Improvements: the site will support a range of highway improvements to mitigate the impacts of the proposed development. In particular it will provide land and funding towards the dualling of Europa Way which will have wider benefits for the towns.

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

There are a number of potential adverse impacts many of which have been raised in representations objecting to the allocation of this site (along with the other sites to the south of Warwick and Leamington). The potential impacts can be summarised and mitigated as follows:

- a) **Highways**: Development in this part of the District will inevitably have an impact on the existing highway network. The Infrastructure Delivery Plan includes a range of measures to mitigate these impacts. Measures include: improvements to sustainable transport modes such as cycling, walking and buses; dual carriageway and junction improvements for Europa Way to provide efficient access to the M40; improvements to junctions at Banbury Road; improvement to the traffic system in Warwick Town Centre; improvements to the network in a range of other locations across the towns including Myton Road and Emscote Road. The strategy of focusing a significant number of dwellings in this area enables improvements to the Europa Way corridor, thereby providing an alternative route from the south of the towns to the M40 and A46 without putting further pressure on the town centres. This is a significant concern of residents that has been raised in representations relating to this site, particularly as there is a view that development here will impact on areas that are already congested.
- b) **Heritage:** There are three heritage issues that need to be considered in relation to this site:
 - i. Firstly, the impact on Heathcote Hill Farmhouse. This issue has been considered as part of the approval of application no. W/14/0967. The reserved matters application for this part of the site will need to show in detail how the setting of the listed building will be satisfactorily taken in to account in the development of the site.
 - ii. Secondly, as this site is on higher ground the potential for development here to intrude on views from the Castle and Banbury Road. The site is not easily visible from Banbury

Road and in the context of the planning permission for housing to the south of Gallows Hill is unlikely to be visible at all. In terms of views from the Castle, the site lies behind the already built up area at Warwick Technology Park and in front of the industrial areas at Heathcote and Tachbrook Park. At this distance, the site is not a major feature and its development will therefore not significantly change the nature of the views from the Castle ramparts.

- iii. Thirdly, the impact of the transport mitigation proposals on sensitive heritage assets in and around Warwick Town Centre. This concern has been raised by Historic England (and other representations). However, the District Council has been working closely with Warwickshire County Council to develop mitigation proposals that take account of heritage assets and where possible improve their setting. As a result, Historic England has now indicated that they are satisfied that appropriate mitigation can be achieved.
- c) Landscape: Concerns have been raised about the loss of green fields close to the towns and the loss of the area of restraint as identified in the current Local Plan. The site does have some landscape value and was identified as an area of restraint in the extant Local Plan. However, the area of restraint policy is now out of date and the landscape evidence indicates that the quality of the landscape should not prevent development here. These issues were considered in approving the applications referred to in 1) above.
- d) **Air quality:** The air quality assessments (A01 and A04PM) shows that over the plan period, air quality is expected to improve due to cleaner vehicle technology. Although this is an issue that has been raised in a number of representations, the evidence suggests that the situation will improve.
- e) **Loss of agricultural land**: Representations have raised this as a concern. The site is predominantly classified as Grade 1 and 2. This issue was considered as part of the approval of the planning applications referred to in 1) above.
- f) Ecological impacts / hedgerows / trees: Representations have raised this as a concern.
 This issue was considered as part of the approval of the planning applications referred to in 1) above.
- g) Focus of development in to congested south of District: Representations have raised this as a concern. Whilst there is a significant focus of development to the south of Warwick, the evidence suggests that with mitigation, the infrastructure can accommodate this level of growth (IN07PM, TA5 and TA9).
- h) Car dependency: Representations have suggested that the expansion of the towns to the south of the District will lead to car dependent suburbs. However, this site is only a short distance from two town centres, and has a range of other facilities and services in close proximity including retail, schools, employment. Further, provision of services on site is also proposed. The site will also be accessible by public transport and will be integrated in to the existing cycle and pedestrian networks.

- i) **Employment provision**: Representations have suggested there is little employment provision in the area. However, the evidence suggest otherwise with vibrant employment areas at Warwick Technology Park, Heathcote Industrial Estate, Tachbrook Park and Queensway and well as local employment in the retail and service sectors.
- 5) What are the potential 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) The planning applications associated with this site have already been required, through section 106 agreements to make contributions to infrastructure. The part of the site without planning permission will be expected to make proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
Provision of on-site open space and contributions to other open space requirements	Development to provide allotments, contribution to a Country Park
Contributions to Health (Hospitals)	Financial contribution
Contributions to Health (G.P. services)	Financial contribution
Contributions to Highways / Transport	Strategic Highways contribution including provisions for walking and cycling, contribution to public transport (refer to appendix a of the IDP)
Contributions to Education (Primary)	Financial contribution to primary school provision (also for pre-school, special needs)
Contributions to Education (Secondary)	Land and finance to provide for secondary/ sixth form educational requirements, the land is for the future location of a new secondary school
Contributions to other infrastructure requirements in line with the CIL regs	Indoor sports provision contribution, outdoor sports contribution, provision of play areas (LEAPS / NEAP), contribution towards library services, police service contribution, contribution to rights of way provision, provision of SUDs

g) Infrastructure Capacity and Funding: Representations relating to this site and others in the area to the south of Warwick have focused on infrastructure capacity and the funding gap. As demonstrated by the IDP (IN07PM) the Council has undertaken substantial and detailed work to ensure infrastructure capacity can be expanded to meet the needs of additional housing. With regard to the funding gap, it is correct that at present not all the infrastructure is fully funded. But the IDP demonstrates that significant sums of money have already been identified and that there is a good prospect that funding will be available to support all the essential infrastructure.

6) Is the site realistically viable and deliverable?

- a) The vast majority of the site has planning permission suggesting that it is deliverable.
- b) The 2013 CIL Viability Study (IN06) indicates that strategic sites in this broad area are viable for housing development. This is supported by clear evidence of activity to bring forward the different parts of the site for development, including; submitting planning applications, agreeing infrastructure provision and contributions; undertaking site preparation work such as re-routing existing overhead cables underground.
- c) For other uses, notably the proposed new secondary school and the community stadium there remain some feasibility issues, particularly in relation to how these schemes will be

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financed. However, work is well advanced in both these cases and funding options are being developed. These schemes are being supported by the Council's Projects Team, including the Site Delivery Officer.

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

- a) See the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper June 2016 (HO27PM). This indicates the following timescales:
 - i) Application W/14/0967: First completions 2018/19; thereafter 65 dpa; Site built out by 2024/25
 - ii) Application W/15/0981: First completions 2018/19; thereafter up to 112 dpa; site built out by 2024/25
 - iii) Remaining 50 dwellings: Commence 2020/21; complete 2021/22
- b) These development timescales are considered to be realistic given:
 - i) the progress the site has made through the planning process
 - ii) the ongoing activity by landowners and developers associated with the site to resolve issues as quickly as possible and to bring forward detailed schemes
 - iii) the lack of constraints preventing the early development of the site

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

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Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H02 – Land South of Harbury Lane Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H02 - Land south of Harbury Lane

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

a) With the exception of the former Sewage Treatment Works (STW) and a triangular area of land to the west of the STW the whole area has either full or outline planning permission as follows:

i) Lower Heathcote Farm Area

- a. W/14/0661 Outline permission granted for Residential development up to a maximum of 785 dwellings; Provision of three points of access one from Europa Way and two access points onto Harbury Lane; A mixed use community hub/local centre to include retail development (Class A1 to A5 inclusive) and community buildings (Class D1); Potential provision of a primary school; Comprehensive green infrastructure, continuous open space network and multi-functional open space, including children's play space, potential open space for sport, informal open space and SUDS; Potential provision of allotments; Potential footpaths and cycle ways; Foul and surface water drainage infrastructure, including attenuation ponds; Ancillary infrastructure and ground remodelling. (Outline application including details of access)
- b. **W15/1473** Permission granted for reserved matters for layout, scale and appearance for first phase (435 dwellings).
- c. **W/15/1740** Permission granted for reserved matters for layout, scale and appearance for remainder.

ii) Grove Farm Area

- a. **W/14/0023:** Outline planning permission granted for residential development (approximately 200 dwellings) with new access onto Harbury Lane, land safeguarded for a new primary school, allotments, open space, local shop (A1 use up to 100 sqm gross), car parking and associated infrastructure.
- b. W/14/1865: Reserved matters permission granted for the layout, scale and appearance of 90 dwelling houses comprising one and two storey housing together with associated garages, parking facilities, infrastructure and drainage, forming Phase 1 of the Grove Farm Harbury Lane development granted under outline planning permission W/14/0023.
- c. W/15/0851: Outline planning permission granted for residential development for (approximately) 520 dwellings together with two new accesses onto Harbury Lane, land for Country Park, open space (including areas of formal and informal open space, allotments, structural landscaping and drainage works including surface water attenuation ponds as part of a Sustainable Drainage System),

demolition of existing buildings, car parking and associated infrastructure.

iii) Former Sewage Treatment Works Area

- This area has no relevant recent planning applications and is open land encompassing a number of ponds and structures associated with former sewage works.
- b) The site has a total estimated capacity of 1820 dwellings. Planning permission for 1505 dwellings has been granted and construction has commenced at both Lower Heathcote Farm and Grove Farm. The site has an estimated further capacity of 315 dwellings on areas without planning permission (215 at the former STW and 100 at Lower Heathcote Farm).

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

a) It is consistent with Policy DS4, as follows:

i) Criterion a) N/A

- ii) **Criterion b)** The site is consistent with this criterion. It is predominantly a greenfield site on the urban edge of Warwick Specifically it is close to the major employment areas to the south of Warwick and to both Leamington and Warwick Town Centres (which are within to 2.5 miles). Other facilities such as shops and schools are close by and where additional capacity is required (such as schools and medical facilities) the site, in combination with other sites in the area, has the scope to provide for this.
- iii) Criterion c) N/A
- iv) **Criterion d)** Warwick and Bishops Tachbrook will continue to be separated by at least half a mile of undeveloped land, including a new Country Park along the Tach Brook which seeks to provide a permanent separation between the two settlements.
- v) **Criterion e)** There are no unresolved heritage issues. Heritage issues have been resolved in principle through the consideration of the planning applications.
- vi) **Criterion f)** The site is not classified as high landscape value nor does it contain any other highly sensitive features in the natural environment (see Landscape Character Assessment of Land South of Warwick 2009).
- vii) Criterion g) The site is not in the Green Belt.

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

The site will bring a range of additional benefits as follows:

- a) Public access and open space: Whilst the land is currently in agricultural use, there is no public access to it. The proposals for this site therefore bring this area of land in to use for the direct public benefit of the towns including the provision of public open spaces, recreational areas, cycleways and footpaths.
- b) Country Park: the development of the site will include provision of a new Country Park along the northern side of the Tach Brook. The Country Park will include footpaths and cycleways, ecological areas and recreation areas.

- c) Primary Education: the site will provide for two additional two-form entry primary schools.
- d) Neighbourhood Centre: The site will provide for a new neighbourhood centre including small scale retail in line policies DS14 and DS15, a medical centre and community hall. There have been representations that the development will increase stress on local infrastructure, including emergency services access. This can be mitigated through proper design and layout and through the appropriate use of s106 / CIL funding to alleviate traffic and congestion and allow for local services and facilities to be made accessible.
- e) Highway Improvements: the site will support a range of highway improvements to mitigate the impacts of the proposed development. In particular it will provide land and funding towards the dualling of Europa Way which will have wider benefits for the towns.

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

There are a number of potential adverse impacts many of which have been raised in representations objecting to the allocation of this site (along with the other sites to the south of Warwick and Leamington). The potential impacts can be summarised and mitigated as follows:

- a) Highways: Development in this part of the district will inevitably have an impact on the existing highway network. This is a significant concern of residents that has been raised in representations relating to this site, particularly as there is a view that development here will impact on areas that are already congested. Linked to this, other presentations suggest that the location of the site will lead to car dependent suburbs. The Infrastructure Delivery Plan includes a range of measures to mitigate these impacts. Measures include: improvements to sustainable transport modes such as cycling, walking and buses; dual carriageway and junction improvements for Europa Way to provide efficient access to the M40; improvements to junctions at Banbury Road; improvement to the traffic system in Warwick Town Centre; improvements to the network in a range of other locations across the towns including Myton Road and Emscote Road. The strategy of focusing a significant number of dwellings in this area enables improvements to the Europa Way corridor, thereby providing an alternative route from the south of the towns to the M40 and A46 without putting further pressure on the town centre.
- b) **Heritage:** the representations raise two related heritage issues. First, as this site is on higher ground the potential for development here to intrude on views from the Castle and Banbury Road. See response 2(e) above. The site is not easily visible from Banbury Road and, in the context of the planning permission for housing to the south of Gallows Hill, is unlikely to be visible at all. The second heritage issue raised in representation concerns the impact of the transport mitigation proposals on sensitive heritage assets in and around Warwick Town Centre. This concern has been supported by Historic England. However, the District Council has been working closely with Warwickshire County Council to develop mitigation proposals that take account of heritage assets and where possible improve their setting. As a result, Historic England has indicated that they are satisfied that appropriate mitigation can be achieved.

- c) Landscape: Concerns have been raised about the loss of green fields close to the towns and the loss of the area of restraint as identified in the current Local Plan. The Considerations for Sustainable Landscape Planning Report undertaken in 2012 (LA01) looked at the wider site south of Harbury Lane and concluded that although the quality of the landscape made development challenging, ensuring that high quality design and substantial and attractive landscaping could mitigate adverse impacts (LA01, Appendices paragraph 2.4.1)
- d) Air quality: concerns have been raised through representations that additional traffic generated from proposed development to the south of Warwick will adversely affect AQMAs and other area where are quality is an issue, particularly in Warwick and Leamington Town Centres. However the 2013 Air Quality Report (A01) and its 2016 update (A04PM) demonstrate that air quality is likely to improve over the Plan Period.
- e) **Loss of agricultural land**: the Council acknowledges that there will be a loss of grade 2 and grade 3 agricultural land. This issue was considered as part of the approval of the planning applications referred to in 1) above.
- f) Ecological impacts / hedgerows / trees: Representations have raised this as a concern.
 This issue was considered as part of the approval of the planning applications referred to in 1) above.
- g) Focus of development into congested south of District: Representations have raised this as a concern. Whilst there is a significant focus of development to the south of Warwick, the evidence suggests that with mitigation, the infrastructure can accommodate this level of growth (IN07PM, TA5 and TA9).
- h) Car dependency: Representations have suggested that the expansion of the towns to the south of the District will lead to car dependent suburbs. However, this site is only a short distance from two town centres, and has a range of other facilities and services in close proximity including retail, schools, employment. Further, provision of services on site is also proposed. The site will also be accessible by public transport and will be integrated in to the existing cycle and pedestrian networks.
- i) **Employment provision**: Representations have suggested there is little employment provision in the area. However, the evidence suggest otherwise with vibrant employment areas at Warwick Technology Park, Heathcote Industrial Estate, Tachbrook Park and Queensway and well as local employment in the retail and service sectors.
- 5) What are the potential 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) The planning applications associated with this site have already been required, through section 106 agreements to make contributions to infrastructure. The parts of the site without planning permission will be expected to make proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
Provision of on-site open space and contributions to other open space requirements	Development to provide allotments, contribution to a Country Park
Contributions to Health (Hospitals)	Financial contribution
Contributions to Health (G.P. services)	Financial contribution
Contributions to Highways /	Strategic Highways contribution including provisions

Transport	for walking and cycling, Contribution to Public transport (refer to appendix a of the IDP)
Contributions to Education (Primary)	Financial contribution to primary school provision (also for pre-school, special needs)
Contributions to Education (Secondary)	Land and finance to provide for secondary/ sixth form educational requirements, the land is for the future location of a new secondary school
Contributions to other infrastructure requirements in line with the CIL regs	Indoor sports provision contribution, outdoor sports contribution, provision of play areas (LEAP'S,/ NEAP), contribution towards library services, police service contribution, contribution to rights of way provision, provision of SUD's

g) Infrastructure capacity and funding: concerns have been raised through representations that the development to the south of Warwick will adversely impact on infrastructure (particularly roads, education and health). Linked to this other representations suggest that there is too much development focused in this area. The evidence in the Strategic Transport Assessments and information provided by WCC Education, the CCG and NHS England shows that the quantum of development proposed will result in demands on the existing highways, education and health infrastructure exceeding existing capacity. The IDP (IN07PM) sets out the proposals to mitigate these impacts including significant improvements to the highway network, investment in a range of other transport proposals, new schools and new and improved health facilities.

6) Is the site realistically viable and deliverable?

- a) The vast majority of the site has planning permission and is under construction
- b) The 2013 CIL Viability Study (IN06) indicates that strategic sites in this broad area are viable for housing development. This is supported by clear evidence of activity to bring forward the different parts of the site for development, including; submitting planning applications, agreeing infrastructure provision and contributions. The sites in the immediate area are under construction, which points to their viability and deliverability.
- c) For other uses, notably the proposed new secondary school and the community stadium, there remain some feasibility issues, particularly in relation to how these schemes will be financed. However, work is well advanced in both these cases and funding options are being developed. These schemes are being supported by the Council's Projects Team, including the Site Delivery Officer.

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

- a) See the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper June 2016 (HO27PM). This indicates the following timescales:
 - i) Lower Heathcote Farm: First completions 2016/17; thereafter up to 106 dpa; site built out

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by 2023/24.

- ii) Grove Farm (Harbury Gardens): First completions 2016/17; thereafter between 90 and 130 dpa; site built out by 2023/24.
- iii) Former STW: First completions 2021/22; thereafter up to 50 dpa; site built out by 2025/26.
- b) These development timescales are considered to be realistic given:
 - i) The planning permissions at Lower Heathcote Farm and Grove Farm are under construction.
 - ii) The lack of constraints preventing the delivery of the remainder of the site.

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 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H03 – East of Whitnash/South of Sydenham Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H03 – East of Whitnash/South of Sydenham

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

a) Agricultural land. The site has not been the subject of planning applications for housing.

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

- a) It is consistent with Policy DS4, as follows:
 - i) Criterion a) N/A
 - ii) **Criterion b)** The site is consistent with this criterion. It is a greenfield site on the urban edge of Leamington and Whitnash. Services and facilities such as shops, schools, community centre, bus services and employment are close by.
 - iii) Criterion c) N/A
 - iv) Criterion d) Development of this site would not lead to coalescence.
 - v) **Criterion e)** There are no significant impacts on heritage assets associated with the development of this site.
 - vi) **Criterion f)** The Landscape Assessment 2016 (LA09PM) concludes that this site, including the additional capacity proposed in 2016, is appropriate with suitable mitigation.
 - vii) Criterion g) The site is not in the Green Belt.

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

- a) The sustainability appraisal (SA10) set out the sustainability benefits of each of the proposed allocations. Specifically the development of this site will provide the following benefits:
 - i) Public access, including open space (allotments, playing fields, play facilities etc).
 - ii) Cycleways.
 - iii) Potentially a new primary school (subject to final assessments of capacity of existing primary schools.
 - iv) Access to the site is required through Campion School. The land agreement associated with this provides opportunities for the school to improve its building stock.

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

a) Transport and Access: Access can be achieved through partial redevelopment of Campion School. An agreement is in place between the school and developers to do this. Impact on wider transport network can be managed within current mitigation proposals (TA14PM). The development would also need to demonstrate that provision is made for pedestrians, cyclists and public transport services within the site and connecting with local facilities. Stagecoach has indicated that the nature of the site could make public transport provision difficult. Detailed development proposals will need to address these concerns.

- b) Landscape: The railway line makes a definitive edge to Whitnash and there are constraints for development of this area. However, as it is relatively hidden from the main towns and their approaches, in theory this area could be developed without significant harm to the landscape setting of Warwick or Leamington. Landscape Assessment review January 2016 (LA09PM) suggests that the proposed scheme includes a generous and thoughtful approach to green infrastructure provision and that the two most southern paddocks are left open. It is also suggested that a minimum of 25m set-back from Whitnash Brook is required. Representations have raised concerns about the impact of development on the landscape. However the evidence indicates that landscape impacts can be mitigated. There are concerns about loss of views from Whitnash. However, the landscape evidence suggests that the site can be successfully integrated in the landscape.
- c) Ecology: It is essential that Whitnash Brook Local Nature Reserve is retained and a considerable buffer zone is designated and implemented, with appropriate management of the buffer zone to meet objectives of the reserve. The Linear pLWS / SINC Whitnash Brook should be retained and a buffer zone implemented to prevent direct or indirect impact on the site. The brook is potential water vole habitat and needs to be protected. The size of the buffer zone for this linear habitat therefore depends on the presence or absence of water voles. A management plan for the brook should be written and implemented to ensure future good management and enhancement of the habitat. It is recommended that hedgerows are replaced with new hedgerow habitat through and around any development, comprising suitable native species, as advised by Arden Character area guidelines. The mature trees within the parcel should be retained.
- d) Heritage: (HE04PM) there are no listed buildings on the site and although Whitnash conservation area lies to the west of the railway, there is little or no inter-visibility between the site and the heritage assets within the conservation area. There is potentially some archaeological which will require investigation to establish the extent and significance. However, overall, the heritage impacts associated with this site minor.
- e) **Loss of agricultural land:** The development of housing will result in the loss of some grade 2 agricultural land. However, the Council contend that the public benefits of housing in this location out-weight the loss of agricultural land. Representations have indicated concern about the loss of farmland.
- f) Water, Flooding and Sewerage: Site drainage should consider highways culvert on not to increase surface water or highway flooding on the A425. The site is mainly Flood Zone 1 with eastern boundary in Zone 2 and 3. There is a high potential sewage impact and development is likely to require pumping but is located upstream of a sub-catchment with known sewer flooding problems, which have recently been appraised as part of Severn Trent's sewer flooding investment programme. No specific further action is proposed at this time, but further hydraulic analysis will be required to assess the impact of this development on sewer capacity.

- g) Public right of way: There is a footpath which crosses the site from east to west. This right of way will need to be retained. Representations have indicated concern about its loss. However the detailed proposals for the site will need to show how this is retained and integrated in to the development.
- 5) What are the potential 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 H03 will be required to make a proportionate contribution to the following requirements:-

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

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	Especially Sydenham Drive / Radford Road junction
Contributions to Education (Primary)	Possible requirement for land and finance for the provision of a new primary school (if required)
Contributions to Education (Secondary)	Contribution to increase capacity at Campion school
Contributions to other infrastructure requirements in line with the CIL regs	✓

6) 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. This site falls within an area that was assessed as being viable.
- b) The site is deliverable within the Plan period. The land is controlled by a housebuilder who is actively working to promote the site and bring it forward for development and has indicated an intention to submit a planning application soon after adoption.
- c) As can be seen from answers to the questions there are no major impediments to the site being developed quickly, particularly as access issues have now been resolved.

7) 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 2019/20 with a build out rate of 120 dwellings per annum and completion by 2023/24.
- b) The proposed trajectory is supported by the housebuilders associated with the site. Given the scale of the site it has potential to support two outlets and the fact that there are relatively few constraints on the timing of the development, this is considered to be realistic.

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 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H04 – Red House Farm Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H04 – Red House Farm

Please note the following:-

- 11.5 ha of land at Red House Farm was originally allocated in the Local Plan Preferred Options (May 2012 LP05) for 200 homes. This land is in a single ownership (Mr. H. Johnson of Red House Farm). The allocation was increased in size to include a further 2ha in the Revised Development Strategy (June 2013 LP08) and the capacity of the site overall increased to 250 homes. This additional 2ha (the northern corner of the site) is owned by a charitable trust. This larger allocation (13.5ha) has been carried through into the Submission Local Plan.
- The Council has commissioned feasibility work to understand how the Red House Farm site may
 be developed and how any regeneration benefits may be delivered. A feasibility report was
 published in March 2015 and is included as **Appendix 1** to this Statement.
- Catesby Estates Ltd has submitted representations to the Local Plan on behalf of the landowner (Mr. H. Johnson). In particular a document "Red House Farm Vision Framework" has been submitted (representation 69754 and document 14281-4) and this is referred to in this Statement.
- A map has been included as appendix 2 which shows the location of the Red House Farm allocation in relation to local services and Local Super Output Area & ward boundaries.

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

- a) Agricultural land. The site has not been the subject of planning applications for housing
- b) In the adopted Warwick District Local Plan (O02) the site abuts, but sits outside, the urban area of Leamington and is within the Green Belt.

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

- a) The site is within the Green Belt on the edge of Learnington. 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 set out in Policy DS4 as follows:
 - i) Criterion a) N/A
 - ii) **Criterion b)** The site is consistent with this criterion. It is a greenfield site on the urban edge of Leamington. Specifically it is close to local shops and services on Crown Way lying 0.4 miles (0.7 km) from the shops on Crown Way and 0.33 miles (0.55km) from local services including the library, community centre and youth and children's centres. Leamington town centre is approximately 1.2 miles (2km). Other facilities such as schools and local medical facilities are close by.
 - iii) Criterion c) N/A

- Criterion d) The site is consistent with this criterion as it would not lead to coalescence iv)
- Criterion e) There are no significant heritage impacts associated with the site. V)
- Criterion f) The site is consistent with this criterion. Assessment of this allocation was vi) considered in two stages, initially in November 2012 (LA01) and then, following the decision to increase the size of the site, in March 2014 (LA02).
- vii) Criterion g) The site is within 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 there are exceptional circumstances for releasing this area from the Green Belt. The response to Q7 below gives a commentary on the likely housing trajectory. It shows that whilst the current published trajectory would not see any completions within the next five years, evidence from the site promoter shows that the site could help meet housing needs in the district (and in particular the need to provide a 5 year land supply through a range of sites). Furthermore, there are regeneration benefits that the site will bring to the surrounding immediate area (see question 10 below for further detail).

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.
- b) The specific benefits relating to this site are:-
 - Development will support the regeneration of Lillington and bring an improved quality and choice of housing to the area as well as improved local facilities. This matter is considered further in response to question 10 below.
 - ii) The site will have a significant impact on the Sustainability Appraisal objective of meeting housing need.
 - iii) It will have indirect positive effects on the economy, health and well-being and poverty/ social exclusion through providing good quality housing.
 - iv) The site has good access to public transport leading to Leamington's town centre with a bus route along Mason Avenue within approximately 50m from the site.

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

- a) **Transport and Traffic**: The Highway Authority supports a housing development here. Feasibility work undertaken by the Council (and included as **Appendix 1** to this Statement) shows how an access with two or three access points will assist in distributing traffic. This will also allow much improved public transport permeability through the site as buses that currently use Buckley Road and Mason Avenue (route 67) will be able to also effectively serve the new housing. An access approach which embodies these principles has been included by Catesby Estates Ltd (in the document: "Red House Farm Vision Framework"). Concerns about traffic congestion at peak times can be mitigated by these measures.
- Landscape: The site is on high ground immediately south and east of the highest point of

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

the Lillington residential area. At the present time there is a "hard" urban edge here. The Council's landscape advisor assessed this site (LA01) and stated, however, that:-

"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." (Para. 8.6)

He also recommended that a slope at the south-east corner of the site is not developed.

In respect of the north eastern portion of the site (added to the allocation in the Revised Development Strategy in 2013), the Council's landscape advisor commented that

"the previous JGBS study [Joint Green Belt Study] (2008) concluded that the abrupt transition from the existing tall flats to open countryside at Lillington might be mitigated by well-considered settlement expansion in this locality." He concluded: "There would be potential to integrate all three areas (ie the existing estate and the two extension areas) to maximise development potential whilst also ensuring provision of appropriate and sustainable new 'multi-functional' green space." (LA02 para. 2.2).

He further set out some measures to ensure that this potential was realised.

These principles have been incorporated into the feasibility studies that the Council has subsequently undertaken (see Appendix 1). This has informed an assessment of those areas that can be appropriately developed. The representation by Catesby Estates Ltd also reflects these broad principles.

- c) Loss of agricultural land: The development of housing will result in the loss of grade 3 agricultural land. However, the Council contends that the public benefits of housing in this location outweigh the loss of agricultural land. Representations have indicated concern about the loss of farmland.
- d) **Ecology**: Objectors have raised concerns about the possible loss of wildlife species. The Habitat Biodiversity Audit (B03) identified that this area is dominated by arable and improved grassland which has low ecological value. It recognised that the hedgerows are the most ecologically significant aspect of the ecology of this area due to their number and their value to wildlife. The Council would wish to protect these hedgerows as the site is developed, and the submission from Catesby Estates Ltd shows how this could be achieved.
- e) Pollution: The Sustainability Appraisal (SA10) recognises that air, light and noise pollution are likely to increase (albeit in a minor way) - particularly in the short term during the construction phases. This may affect the residential areas to the west of the site. The SA considers that suitable mitigation can be set out through development management policies in the Local Plan and will also be available at the project level to address negative effects. This matter has been raised by objectors. The Council contends that the public benefits of housing in this location out-weight any air, light and noise pollution that will result.

- f) Overall: The Council recognises that there are potential adverse impacts of developing this site, however contends that in the majority of cases, these can be mitigated. Overall, the Council contends that the public benefits of housing in this location outweigh any adverse impacts.
- 5) What are the potential 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 (IDP) (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 H04 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if
---------------------	-----------------------

	clarification required)
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	✓

6) Is the site realistically viable and deliverable?

- a) The 2013 CIL Viability Study (IN06) indicates 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 viable.
- b) The site is deliverable within the Plan period. There is a landowner who is willing to sell and who is working with a development partner. The development partner (Catesby Estates Ltd) has submitted a "vision framework" document.
- c) As can be seen from answers to the questions there are no major impediments to the site being developed quickly. The site will require the demolition of a limited number of properties along Buckley Road. Although a number of properties along Buckley Road have been sold under "right to buy" legislation, many remain in the control of the District Council.

7) 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 2025/26 with a build-out rate of 75 dwellings per annum and completion of the site by 2028/29.
- b) Given the scale of the site and the fact that there are relatively few constraints on the timing of the development, this is considered to be cautious.
- c) Theoretically, it is possible that the site could come forward significantly more quickly, subject to securing the necessary access arrangements. Discussions with the site promoters have indicated that an outline planning application could be submitted shortly

after the adoption of the Local Plan (mid 2017). Start of development on site could therefore be during 2018, with 30 dwellings completed during that year. Completions would be at 50 pa between 2019/20 – 2022/3. The trajectory would then be:-

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total
30	50	50	50	50	20	250

d) Although this trajectory is possible, the Council has taken a cautious view when estimating housing delivery so as not to be reliant on it in the early years following the adoption of the Local Plan.

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

- a) This site was included within the Submission Local Plan. At that time, evidence on Green Belt matters was provided by the Joint Green Belt Study (LA05). More recently, a new Joint Green Belt Study (LA07PM) has been produced. The evidence provided below is based on the more recent document unless otherwise indicated.
- b) The area is within Green Belt parcel RL3 in the Joint Green Belt Study. As a whole it is recognised that this parcel plays an important role in safeguarding the countryside from encroachment and preserving the setting and special character of a historic town (Leamington), as well playing some role in checking the unrestricted sprawl of built-up areas and preventing neighbouring towns from merging. Like all parcels, it has a strategic role in assisting regeneration.
- c) Whilst these comments are true for the parcel overall, it should be noted that the parcel is a large one, covering the entire eastern edge of Leamington (within the Green Belt) from the river Leam at Newbold Comyn to the south through to the edge of Cubbington to the north. Whilst parts of the parcel offer viewpoints into the historic core of Leamington, thereby contributing to the setting of the historic town, the area proposed for allocation at Red House Farm does not. The development of the Red House Farm site would not therefore have any impact on the Green Belt purpose of preserving the setting and special character of a historic town.
- d) Representations relating to this site raise concerns about the development encroaching onto open countryside. It is recognised that releasing this area from the Green Belt will encroach into open countryside in this location. The landscape considerations that have informed this allocation (LA01 & 02 and response to question 4(b) above) do, however, show how this can be mitigated and offset in three ways. This is by
 - (i) limiting the extent of the developable area within the site,

Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

- (ii) ensuring that sensitive structural woodland planting in key locations is provided, and
- (iii) taking the opportunity created by the development of the site to soften the currently "hard" urban fringe through good urban design.
- e) The release of this site will not impact in any way on the purpose of the Green Belt to prevent neighbouring towns from merging. The nearest settlements to the site are Offchurch and Radford Semele, both of which are over 2km from the site.
- f) It is considered that by applying good design and development principles, a new strong and defensible Green Belt boundary can be provided on the edge of this site and that, moreover, the current hard urban / rural interface can be softened and improved.

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

- a) See paragraphs 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) It is proposed to remove this 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 (a hedge-line / tree belt) to provide a strong Green Belt boundary.
- c) The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. The development of this proposal will have a limited impact on the extent to which parcel RL3 is consistent with the essential characteristics of Green Belt (NPPF para 79) as the land to south and east will remain open in character. Moreover, landscape evidence (LA01) concludes that sensitive development in this location would not be visually prominent and would have landscape benefits. Therefore, the perception of the openness of the wider Green Belt in this area may be enhanced by sensitive development of this proposal.

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

- a) The process for assessing exceptional circumstances has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). However, representations suggest that exceptional circumstances for the release of this site from the Green Belt have not been demonstrated.
- b) There are particular exceptional circumstances relating to this allocation. Specifically, these relate to the issues of deprivation affecting areas of Crown Ward within Lillington. As Local Plan policy DS18 describes, Crown Ward (the ward which abuts the allocation and includes most of it) is the most deprived ward within Warwick District. The Council is publicly committed to working with partners to help communities address deprivation in this ward.

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Significantly, the deprivation is not uniform across the whole ward but focussed within one Local Super Output Area (LSOA), the Lillington East LSOA. See map at Appendix 2 for these boundaries in relation to site H04. Within this LSOA:-

- i. Unemployment is the highest within Warwick District (9.4% at June 13).
- ii. Indicators for education, skills, training show this as the worst ranked in Warwick District for educational attainment, unauthorised school absences, NEETS and those with no qualification.
- iii. Child poverty is highest in Warwick District.
- Health indicators are close to the bottom 20% nationally for risk of premature death and iv. impairment to quality of life through poor health.
- ٧. Are the lowest measures of "wellbeing" across Warwickshire.
- vi. Are the lowest levels of car ownership in Warwick District (54% of households own a car).
- c) Overall, the Index of Multiple Deprivation shows the highest score for the Lillington East LSOA across the whole of Warwick District. It is also ranked as the most socially excluded in the District. The report "Achieving social inclusion across Warwick District" produced by the Warwickshire Observatory in April 2014, concluded:-

"Lillington East in Crown ward is the most socially excluded area on the index.... This area exhibits a wide range of exclusion related issues rather than a handful of problems which exist elsewhere."

(Source for document: https://apps.warwickshire.gov.uk/api/documents/WCCC-1014-41, p6)

- d) Against this background, it should be noted that Crown Ward benefits from a good level of community and social provision. These include a library, Children's and Youth Centres, a dentists and an NHS Clinic. These facilities are, however, somewhat scattered and housed in separate buildings which are not ideally suited to delivering present day services.
- e) The regeneration opportunities that the Council and its partners are currently exploring, and which would be either enabled or assisted by the allocation of site H04 at Red House Farm are as follows:
 - i) New improved GP surgeries.

The nearest GP surgery is on the Cubbington Road (see map at Appendix 2). This Practice has joined with two other practices serving the central and north Leamington area (the Clarendon Lodge and Sherbourne Medical Practices), all of which are currently operating out of unsuitable premises. The surgeries have publicly declared their wish to relocate and co-locate to a new site where they can deliver an improved and wider range of GP services to a base of c 30,000 patients. A site within Crown Ward would be ideally suited to meet their needs and would help address health inequalities in this area. The surgeries are currently preparing business case to the CCG.

ii) Community hub.

Warwickshire County Council is reviewing how it delivers its key services in Lillington (particularly through the library, children's and youth centres). It is considering whether

Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

there is a case for re-providing these facilities, possibly in a new single "hub" building. This may allow greater flexibility in terms of how services are delivered in the future. This could help tackle a number of indicators of deprivation including those relating to child poverty, health and wellbeing.

iii) Widening the mix of housing.

There is a concentration of local authority-owned housing in the Lillington East LSOA. The new housing at Red House Farm will introduce a wider range of housing tenures into this immediate area including private, intermediate (including shared equity) and social rented housing.

iv) Opportunity to re-provide existing council housing.

The current mix of council housing stock in the LSOA includes a large number of flats (including 180 within three tower blocks). The development of the adjacent green field site will allow the opportunity for some of this housing to be demolished and re-provided. As well as improving the environment of the area, this will enable the provision of a better mix of council housing stock which better meets the needs of the community.

v) Environmental improvements.

Reference has already been made earlier in this Statement (see responses to 4(b) and 8(d) & (e)) to the opportunity to improve the urban/rural interface in this area. Moreover, the opportunity exists to improve permeability between the urban area and countryside beyond. Public open space will be provided as part of the new softer urban edge and the transition between urban area and surrounding countryside.

f) In response to these opportunities and challenges, the Council has commissioned feasibility work to understand how the Red House Farm site may be developed, how any redevelopment of council-owned properties within the Lillington East LSOA may be undertaken alongside this and how any wider regeneration benefits may be delivered. A feasibility report was published in March 2015 and is included as appendix 1 to this Statement. This recommended that the Council considers regeneration in two areas: (1) at The Crest (within the Lillington East LSOA and including the three tower blocks) and (2) at Crown Way. In summary, the feasibility report recommends the following:-

At The Crest: Demolition of selected properties and the redevelopment of this area with

new housing.

At Crown Way: Demolition of selected properties and replacement with a community hub,

Primary Care Centre and further new housing.

g) The Council is currently exploring the feasibility of these proposals, including whether the objectives of the regeneration could be achieved with more selective demolitions. It is also working with partners to understand what other interventions could be undertaken to best address deprivation in this area and support local communities.

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

LILLINGTON REGENERATION Master Planning and Feasibility Study for **Warwick District Council**

Architects
Consulting Engineers
Project Managers
Surveyors

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001	05.02.15		AJB	
002	18.02.15		AJB	
003	22.02.15		AJB	
004	25.02.15		AJB	GCR
005	26.02.15		AJB	GCR
006	02.03.15		AJB	GCR

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APPENDIX A

Feasibility Study Area

APPENDIX B

Willmott Dixon Further Feasibility Report See separate document.

1.0 INTRODUCTION

This report has been prepared by Pick Everard. Its purpose is to provide an overview of the Further Feasibility Study, a report prepared by Willmott Dixon to look specifically at regeneration options for Warwick District Council in the Lillington area of the Crown Ward. Willmott Dixon's report is included in Appendix B.

The objectives of the Master Plan and Feasibility Study were to address a number of questions arising from a separate piece of work, entitled Feasibility and Options Appraisal; a joint report by Pick Everard and Willmott Dixon. The objective of the initial report was to look at the principles of developing the Lillington Hub (the shopping zone) and the Crest and to identify and appraise a number of high level options which could then be taken forward in this report. This report sets out those options.

Importantly, the options had to comply with Warwick District Council's regeneration objectives for the Lillington area, they are:

- 1. To safeguard existing jobs and create new employment and training opportunities in Lillington.
- 2. To support, sustain and revitalise local community facilities in Lillington.
- 3. To deliver a net increase to the district's housing supply of at least 250 new homes to meet Local Plan objectives.
- 4. To improve the quality and choice of council housing stock in the local area.
- 5. To increase the choice of housing in the locality by offering a greater range of tenures, including private housing.
- 6. To bring about environmental improvements, both in terms of the urban form in this part of Lillington, and improved linkages made between the urban and rural areas.
- 7. To create a strong, defensible and attractive urban edge where new development abuts the Green Belt.
- 8. To open up adjacent rural areas for recreation and community benefits.

Accordingly, Section 2 provides an Executive summary. Section 3 sets out the background and scope to the study. Section 4 summarises the methodology employed during the study programme. Section 5 describes the key findings and proposals. Section 6 sets out the socio economic benefits. Section 7 provides a brief narrative on Willmott Dixon's costs. Section 8 summaries the Project risks and constraints, Section 9 looks at potential funding options and finally Section 10 sets out the key findings and recommendations.

2.0 EXECUTIVE SUMMARY

- 1. This report demonstrates that it is feasible for Warwick District Council to deliver a scheme that incorporates land on Red House Farm in accordance with the Council's Garden Towns, Villages and Suburbs document and re-provision in such a way that it enables a Community Hub to be built.
- 2. The feasibility proposals could have a wider impact on improving the environmental quality of the area through creating a strong sense of place and identity for the whole community. Moreover, they represent an opportunity to support, sustain and revitalise local facilities.
- 3. The study does demonstrate that the regeneration will bring socio-economic benefits and these are set out in some detail. Through employing contractors committed to local spend, local labour and SMEs, the regeneration of Lillington will provide job opportunities, as well as education and training for the local community over the projected build-life of the project, as well as creating a legacy of jobs over a number of years to come. It is recognised, however, that these regeneration benefits do require further assessment and need to be more fully explored.
- 4. In addition to re-providing Housing Revenue Account properties, an additional 250 homes could be provided of which 40% could be affordable in accordance with planning policy.
- 5. The feasibility options take into consideration the need for a greater range of tenure across the HRA.
- 6. Willmott Dixon has proposed a range of feasibility options for Crown Way and in doing so has widened the initial study area. The review has concluded many of the local facilities are outdated and no longer meet the needs of the community.
- 7. The four options considered for Crown Way all include the demolition of 54 units (being 43 HRA, 10 private and 1 County Council asset) and the re-provision of approximately 105 units, a community hub and parking.
- 8. The proposals considered for Crest include the demolition of the 3 no high-rise tower blocks known as Eden Court, Ashton Court and Southorn Court, as well as a number of local HRA properties. This equates to the demolition of 259 HRA and right-to-buy properties and the re-provision of 159 HRA properties and associated parking.
- 9. The options for Red House Farm include Charity Trust land and show the provision of circa 318 properties and associated parking. It should be noted that this number may well vary if the design was progressed to the nest stage.
- 10. Access to the Red House Farm is fundamental to the success of the feasibility proposals for sites C, D and E and early consideration would need to be given to the need to work with the land owner to deliver the proposals.
- 11. Should Warwick District Council wish to take forward any of the options it would need to acquire private properties and may need to consider whether it wishes to use Compulsory Purchase Order powers (CPO) to deliver the proposals set out. Further work should be undertaken to determine how appropriate and necessary it would be to use CPO powers.

- 12. Careful consideration has been given to landscaping proposals. The proposals seek to create an improved linkage with the recreation ground on Mason Avenue and Public Open Space (POS) on the proposed Red House Farm development area. The proposals also include for a buffer along Green Belt land on Red House Farm following the guidance notes set out in Warwick District Council's Garden, Towns, Villages and Suburbs document dated May 2012.
- 13. The risk of 'doing nothing' needs to be adequately understood; it is recommended a further piece of work is also required in this regard. The proposals offer the Council the opportunity to create a legacy within the Lillington area that will benefit the local community and the wider area for many years to come. The proposals are an opportunity to replace existing, 'tired' housing stock and change the density and mix with the area. That may become more challenging both financially and logistically if the objectives of Warwick District Council and Red House Farm are no longer aligned.
- 14. Warwick District Council should consider entering into a detailed dialogue with Warwickshire County Council and Sport England with a view to ascertaining and determining the extent of land which could be developed off Crown Way. In particular this should focus on whether any development activity can be undertaken upon the existing Lillington Primary School site.
- 15. Warwick District Council should consider setting aside a budget for undertaking detailed site investigation and survey works to enable the cost appraisals to be further refined whilst at the same gathering sufficient information to enable detailed planning applications to be submitted in due course.
- 16. Warwick District Council should give further consideration with regards to the development logistics in order to establish the preferred and optimum sequence of demolition and re-provision, potentially incorporating both existing and new stock as appropriate. This may therefore assist in delivering the overall regeneration scheme on a quicker timeframe.
- 17. Under the proposals in this Study, Warwick District Council cannot deliver the demolition and re-provision of HRA housing at the Crest without utilising some land on Red House Farm.
- 18. Should the Council wish to proceed with developing an improved access to the recreation ground, it should consider entering into discussions with the Roman Catholic Diocese, with regards to the potential acquisition and demolition of the existing buildings at the rear of the Church of Our Lady.

3.0 BACKGROUND AND SCOPE

3.1 **Background**

Warwick District Council has been investigating regeneration opportunities in Lillington focussing on two key areas (see map in Appendix A). The first relates to an allocation of land at Red House Farm for housing in the emerging Local Plan. The second relates to the provision of housing, health and community facilities within Lillington itself, focusing in particular on Crown Way and Mason Avenue.

The area of land on Red House Farm included within the study area comprises 11.75 hectares and lies within the Green Belt. The Local Plan acknowledges that when linked to the Crest this area of land may be able to facilitate a wider regeneration of the area

Crown Way is a hub to many of the current local community facilities. In many cases, these are housed in outdated buildings which make it difficult to provide modern efficient services which respond to customers' needs. The brief was to consider how these existing facilities could be renewed and new services provided to improve services and create a "community hub" within the heart of Lillington.

In June 2013, the Council considered these opportunities and commissioned Pick Everard and Willmott Dixon to undertake a Feasibility & Options Appraisal (FOA), to investigate the options and potential costs of the refurbishment and/or demolition and redevelopment/ re-location/ re-provision of housing stock at Crown Way and "The Crest" and the potential impact of such options on Warwick District Council's (WDC) Housing Revenue Account (HRA). The Feasibility and Options Appraisal (FOA) was delivered to the Council in February 2014, and reported to the Council's Executive on 12th March 2014. The report generated a number of further questions that necessitated further study, these included:

- 1. The need to refine the options generated by the Feasibility and Options Appraisal (FOA).
- 2. A review of the housing density assumptions made in the Feasibility and Options Appraisal (FOA).
- 3. The net and gross number of homes to be provided across the site overall mix of housing to be created/re-provided.
- 4. The nature and role of landscaping and green space within the proposed areas as well as an assessment of the landscape constraints on the site, in particular Red House Farm.
- 5. Issues around the mix of uses and the design of the "community hub."
- 6. A review of the finance options and impact on the HRA Business Plan.
- 7. Possible delivery models for bringing this development forward.

3.2 **Scope**

Warwick District Council's remit to Willmott Dixon was to look at regeneration options within the Crown Way and Crest. It should be noted the extent of the study areas have been determined by Willmott Dixon. The key sites within Lillington that make up the study area are detailed in Table 1 below and are shown in Figure 1. They are as follows:-

Site reference	Description	Area (approximate)	
A1A2 B1 B2	Land either side of Crown Way	2.78 hectares	
В3	Lillington Primary School	3.33 hectares	
С	The Crest	3.10 hectares	
D	Red House Farm	11.75 hectares.	
E	Charity Trust Land	1.90 hectares	
G	Mason Avenue	Position to be determined	
Н	Valley Road Recreation Ground	Position to be determined	
J1	Land Corner of Mason Avenue	Position to be determined	

Table 1
A full plan that shows the areas covered in this study can be found in Appendix A.



Figure 1

3.3 Additional Study Requirements

It was a requirement of the brief that any HRA properties earmarked for demolition would be re-provided within the Lillington study area.

The appropriate density of homes proposed had to take into consideration the Council's "Garden Towns, Villages and Suburbs" document, which was prepared to inform the design and density standards that would be applied to major new green field sites being allocated in the new Local Plan.

There was a willingness to consider changing the overall mix of housing within the study area by the introduction of more saleable (market) housing to create mixed-tenure development. It was acknowledged this may be necessary to support the overall viability of the proposal.

Consideration was to be given to landscape studies undertaken as part of the preparation of the Local Plan which sought to identify the appropriate extent of development.

Consideration was to be given to key access points into, and routes through, the site for vehicles (including public transport), pedestrians and cyclists, including a viable bus route.

Consideration was to be given to massing, scale, height and density of development across the site.

Public Open Space (POS) had to be provided to meet the needs of existing and new residents (in accordance with the principles set out in the Council's Open Space SPD).

Design options were required that both included and excluded the Primary Care Centre. It should be noted that all the feasibility options have been predicated on the need for a Primary Care Facility on Crown Way. Should this not be required this space could be utilised for either commercial or residential purposes.

It was a requirement to consider car parking needs across the study area.

There was a need for a financial appraisal of the development costs, including costs of demolition, likely costs of acquiring non-HRA land and buildings, any relocation costs for residents, and all relevant construction costs.

The proposals needed to set out the likely economic and other benefits to local people. This was to consider, but not be restricted to, the levels of job creation (including apprenticeship opportunities) both in the construction sector and, as far as possible, when any new facilities are operational.

4.0 METHODOLOGY

Pick Everard was appointed to provide project management and governance services, and manage the overall master planning and feasibility study process. Willmott Dixon was appointed to provide expert knowledge of the housing market as well as the likely socio-economic benefits. BM3 was appointed for its master-planning expertise and the production of study drawings, which provided specific conceptual plans for each of the redevelopment study sites, so as to enable high level feasibility appraisals to be prepared by Willmott Dixon. BM3 Architects was appointed as a sub-consultant to Willmott Dixon Housing.

A structured engagement process took place, with a number of different stakeholders and Council departments. Project Board Meetings took place on a monthly basis and Project Team Meetings on a fortnightly basis.

The Project Board consisted of the following:

Name	Role	Company Name
Andrew Jones	Deputy Chief Executive	Warwick District Council
Philip Clarke	Philip Clarke Senior Projects Co-ordinator	
Andrew Thompson	Head of Housing and Property Services	Warwick District Council
Jacky Oughton	Housing and Property Services	Warwick District Council
Abigail Hay	Housing and Property Services	Warwick District Council
Mike Snow	Head of Finance	Warwick District Council
Mark Smith	Finance	Warwick District Council
Julian Humphreys	Property Services	Warwickshire County Council

The Project Team consisted of the following:

Name	Role	Company Name
Philip Clarke	Senior Projects Co-ordinator	Warwick District Council
Jacky Oughton	Sustaining Tenancies Manager	Warwick District Council
Tony Corbett	Development Manager	Willmott Dixon Housing
Sophia Lawrie	Framework Manager	Willmott Dixon Housing
Tony Brady	Principal Project Manager	Pick Everard
George Rankin	Assistant Project Manager	Pick Everard
lan Foden	Director	BM3 Architects

To ensure the overall design options were both deliverable and compliant with current planning policies, and Warwick District Council's predicted future housing requirements, engagement took place with Warwick District Council Housing Revenue Account and Planning department and Warwickshire County Council Estates and Highways Departments on a regular basis. Engagement also took place with Warwick District Council's nominated landscape consultants, Richard Morrish Associates. There were also briefings with elected members. Where appropriate, feedback has been included in the development proposal.

Advice on open market sales values (OMV) was provided by Jones Lang LaSalle, Chartered Surveyors, who provided comprehensive development appraisals on independent market commentary. This included advice on rental values for the commercial, Community Hub and housing values in respect of the properties to be acquired. They also provided likely sales values for open market properties within in the proposed sales area.

Full details of the meetings are listed below:

7 No. meetings with the Project Board, ensuring that the engagement strategy was approved by the Council and the master plan followed the brief set out by the Council.

Fortnightly Project Team meetings were held throughout the 5 month master planning and feasibility study process.

- 2 No. meetings with the Housing Revenue Account to ensure the correct tenure and mix of housing was achieved within the master plan, and to receive guidance on decant and future housing strategy of Warwick District Council.
- 3 No. meetings were held with Warwick District Council Finance department, to understand the reporting criteria and share the constraints of the feasibility study.
- 2 No. meetings with Warwickshire County Council Highways department, to develop a high level compliant highways strategy within the design proposals.
- 1 No. meeting with Gleeson, the company nominated to act on behalf of Red House Farm. The objective of the meeting was to understand any additional constraints to the Further Feasibility Study.
- 2 No. meetings with Warwick District Council Planning department, this was to ensure any designs of the designated areas would be compliant with the Council's planning guidance.

Programme / Timeframe

The development proposals formulated over the five month feasibility period used well established design principles and have been subjected to the scrutiny of Pick Everard and Warwick District Council officers and elected members.

5.0 KEY FINDINGS AND PROPOSALS

5.1 Crown Way and Associated Areas - Potential Development and Design Strategy

The extent of the study area is shown in Figure 2. There are four options for the Crown Way which the Council may wish to consider, options A, B, C and D. Should the Council wish to take forward any of the options then the next stage would be for the Council to develop a detailed brief for the area clarifying what elements are included.

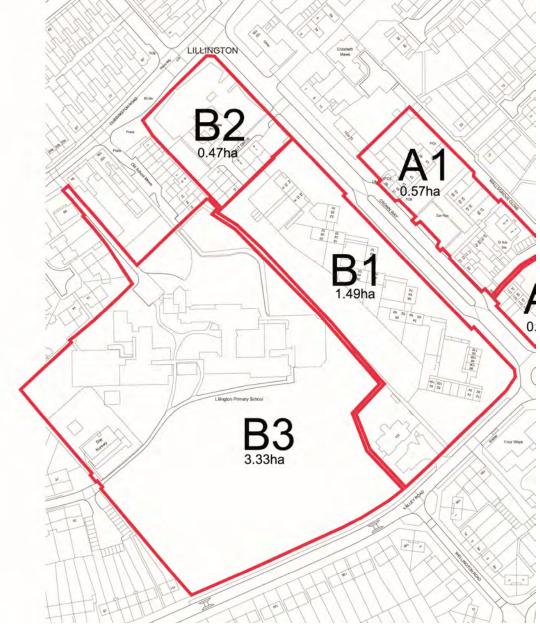


Figure 2

All included the creation of a new community hub incorporating a re-provided library, Youth Centre, Children's & Community Centre together with a new health facility incorporating a doctor's surgery (see Table 2 below).

The Crown Way site plays an important part in the re-provision of existing HRA stock of 1 and 2 bedroom properties, a key objective of Warwick District Council's brief. A proposed housing mix for Crown Way is set out in table 2 below.

Output	Option A	Option B	Option C	Option D
1 bedroom apartments	75	72	70	70
2 bedroom apartments	40	41	35	35
Community Hub	1	1	1	1
Housing for sale	0	0	28	28
Retail space	0	1	1	1
Primary school Re-provision	0	0	1	1
Nursery Re-provision	0	0	1	1
Car parking for apartments	95	91	80	80
Car parking for local communal hub	141	135	142	142

Table 2

The gross floor area of the Community Hub including parking varies depending on the option chosen. The services and approximate GIFA are set out below (see Table 3).

Community Hub	GIFA	
Community hall	300m2	
Library	360m2	
Children's centre	480m2	
Youth services	360m2	
Primary care centre	1,800m2	
Communal space	250m2	
Parking spaces	142	

Table 3

Parking provision, for all four options, per dwelling varies between 0.76 and 0.83 per unit. This does not comply with current parking standards. However, given the proximity of the site to local shops, services and bus routes it is considered that a case can be made to slightly relax the Council's adopted standards. Further engagement with the planning department would be required on this matter. Notwithstanding, there is a potential over provision of car parking spaces to the Community Hub which could be used to address any shortfall.

All proposals show an outdoor play space. It is acknowledged that ultimately any proposals would need to segregate these spaces.

5.2 Crown Way and Associated Areas – Design Options

Option A - Site B1 Crown Way

This option shows land within B1 being redeveloped (see Figure 3). This is land principally within Warwick District Council's ownership but does include 53 flats, 43 of which are within Warwick District Council ownership. This option is considered to be the simplest to deliver as Warwick District Council owns the majority of the land. It should be noted the tenant that occupies the County Council bungalow would need to be re-provided elsewhere. This option should be considered as the base position for the redevelopment of Crown Way.



Figure 3

This option shows a new community hub, broadly in accordance with Table 2, and 115 new self-contained one and two bedroom apartments with 95 dedicated car parking spaces below the amenity deck. It is proposed additional car parking for the community hub is located at the rear of the site in line with planning requirements.

Option B – Sites B1 and B2 Crown Way

This option shows land within areas B1 and B2 being redeveloped (see Figure 4). For this option to be viable a number of pieces of land would need to be acquired. The need to temporarily relocate the existing Tesco store prior to works commencing and then relocate it on completion would arguably make this option relatively expensive and problematic to develop. It was felt appropriate to consider this additional land within the study area as it allowed the potential to create a car parking square opposite the existing shops.



Figure 4

It shows 113 new self-contained one and two bedroom apartments with 91 dedicated parking spaces below the amenity deck. This option shows a reverse orientation to that within Option A. An allowance has been made to provide a new store in order to be able to relocate Tesco and provide dedicated car parking.

Option C – Site B1 and B3 Crown Way

This option shows land within areas B1, B2 and B3 being redeveloped (see Figure 5). This option is arguably controversial, as it shows the possibility of providing a new Lillington Primary School and Nursery to free up land for development.

Currently there is a two form entry primary school and nursery which would need to be replaced. Detailed discussions would be required with Warwickshire County Council, but this option demonstrates the potential benefits of including a new 5 aisle supermarket and an additional 28 saleable properties. The cost of providing a new primary school would need to be met out of the overall development costs. It has been assumed that Warwickshire County Council will not be in a position to fund any element of this cost.

The advantage of this option is that it does provide a more efficient use of land and more options for delivering the community hub, primary care centre and other development along Crown Way. It also delivers a new primary school for the County. The downside of this option is twofold. Firstly, it reduces the size of the school playing field, which may be a source of objection by Sport England. Secondly, it restricts the County's ability to increase the size of the school to a three form entry at some point in future.



Figure 5

It shows 105 new self-contained one and two bedroom apartments with 80 dedicated parking spaces below the amenity deck. By re-providing a brand new 2 form entry Primary School with a nursery and the associated outside play space and pitch, it makes it possible to develop a five aisle supermarket and provide an additional 28 saleable (market) houses for sale.

Option D – Sites B1 and B3 Crown Way

This option again shows land within areas B1, B2 and B3 being redeveloped (see Figure 6). This is a variation on Option C above, whereby the access point to the residential housing on the existing school site has been amended so that it's serviced from Grange Road and not from the proposed new access road.



Figure 6

This option segregates traffic to and from the proposed new housing development from that of the school. The access off Valley Road acts as the service point for both the retail space and the access point for the residential apartment site and potentially the School staff car park. This option, like option C reduces the size of the school playing field and may restrict the County's ability to respond to any future increase in pupil numbers.

5.3 The Crest and Red House Farm - Potential Development and Design Strategy

Figure 7 shows the study area. Area C is land at The Crest, and was identified by this Study as the broad area within which redevelopment of properties could be considered. Area D is Red House Farm and area E is owned by the Sir Thomas White's Charity and the King Henry VIII Endowed Trust. This option shows land within all three areas being developed

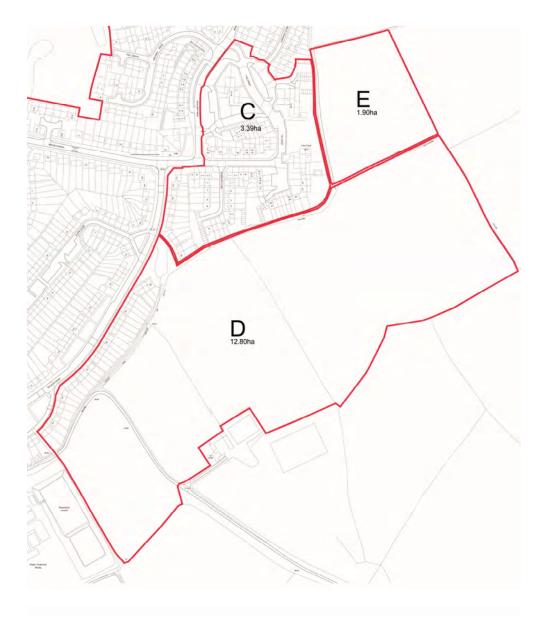


Figure 7

The Crest – Potential Development and Design Strategy

Area C, the Crest, plays an important role in providing a greater range of mix and tenure of properties (see table 4 below). The proposals show how area C could be redeveloped and could assist in delivering the Council's wider regeneration objectives. The options for study area C range from selective to wholesale demolition.

Note; the table below is indicative only. There are a number of ways this area can be delivered.

Output	HRA	Market
1 bedroom apartments	0	0
2 bedroom apartments	65	0
2 bed house	12	20
3 bed house	30	24
4 bed houses	8	0
Retail space	1	0
Total	115	44

Table 4

5.4 The Crest - Design Options

This option shows land within C being redeveloped (see Figure 8). This is land principally within Warwick District Council's ownership but does include 17 no privately owned properties. The proposals would see the creation of a new 'Urban Square' which would be bordered by three small apartment blocks, circa three stories in height and a small commercial / retail unit. The balance of the development proposals for the Crest incorporate predominately two storey traditional housing, the housing located on the Eastern boundary of the site would be more urban in form.

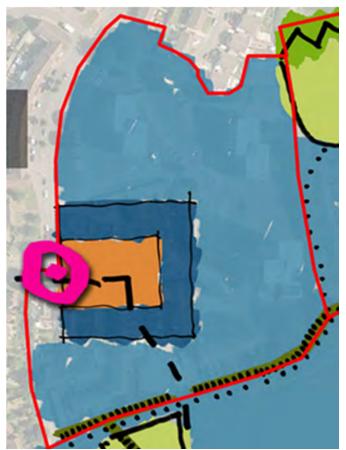


Figure 8

As an urban design solution the areas would benefit from a square, which would provide a sense of arrival and place. This may include a small number of apartment blocks, three and four storey in height as shown on the illustration below (see Figure 9).



Figure 9

The creation of a new 'Urban Square' could also act as a pick up and drop off point for local bus services, which would ultimately end up servicing both the new development on the Crest, Site C and the wider redevelopment on Red House Farm (Site D and E).

5.5 Red House Farm and Charity Trust Land –Design Options

The inclusion of area D within the study area delivers a number of important objectives. It delivers the local plan objective of at least 250 new homes; it allows the demolition of the 3 high rise towers at the Crest and re-provision of improved housing stock to a greater choice and quality, and it increases the choice of housing within the area by offering a greater a greater range of tenure and private housing.

Study area E is included in the Red House Farm proposal but is in separate ownership. It is owned by the Sir Thomas White's Charity and the King Henry VIII Endowed Trust.

The option shows the provision of 318 no properties within areas D and E respectively, (see Figure 10). It should be noted that these numbers would vary if a detailed sales mix were applied. It nevertheless represents a quantum of development, which would seem appropriate for the proposed site. A suggested mix is set out in Table 5.

Output	HRA	Market
2 bedroom houses	58	
3 bedroom houses	74	
4 bedroom houses	6	
2 bedroom bungalow	7	
Saleable (market) properties incl. Charity Trust land		173
Total	145	173

Table 5

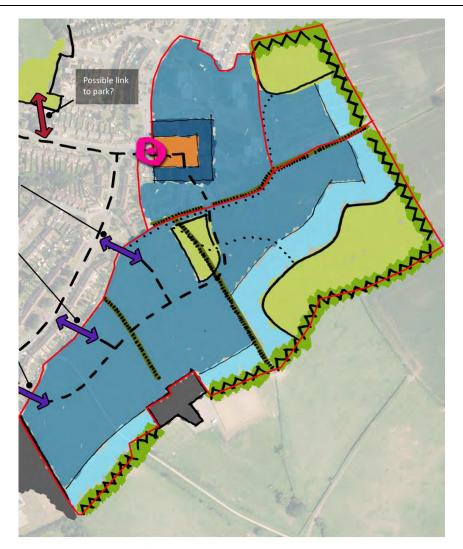


Figure 10

The proposal is formed of two storey housing, with a mix comprising a range of terrace, semi-detached and detached properties. The proposals would be to reduce the overall development density the further properties are developed away from the existing residential boundary (see Figure 10). The proposal fulfils the additional brief requirements for a strong, defensible and attractive urban edge where new development abuts Green Belt and opens up adjacent rural areas for recreation and community benefits.

Access to Red House Farm is fundamental to the delivery to sites C D, and E, early consideration needs to be given to forming the entrances.

Charity Trust Land - Site E

The site itself has a range of levels and drainage issues which would need to be addressed, in conjunction with the overall Red House Farm proposal.

5.6 Recreation Ground – Potential Development and Design Strategy

The Council may wish to consider improving access to the recreation ground on Mason Avenue, the entrance to which is not readily apparent. In effect, the recreation ground turns its back on the properties along Mason Avenue. The proposals would help to create a better, 'formal link' to the recreation ground, making it more accessible and visible from Mason Road / Crown Way.

5.7 Recreation Ground - Design Options

Valley Road - Site J

The study area for Site J is shown in Figure 11. The proposals are ambitious as they consider the possible demolition of the children's centre and community centre as well as the acquisition and demolition of the adjacent church hall and presbytery. These proposals could only be considered after the County Council facilities have been reprovided at the "community hub" along Crown Way.



Figure 11

This proposal would need to be discussed with both Warwickshire County Council and the Catholic Church Diocese in order to determine deliverability. The cost of acquiring any church land or building would need to be incorporated into the financial model (see Figure 12).



Figure 12

The old library building would be retained and may have potential as a replacement hall for the Catholic Church. Furthermore, any proposals must recognise the need to provide a new presbytery on site, or in the immediate vicinity.

Mason Avenue – Possible access to site H

In addition, the Council may wish to consider creating improved access to the recreation ground by removing a small number of properties and forming a new entrance on Mason Avenue (see Figure 13).



Figure 13

6.0 SOCIO ECONOMIC BENEFITS

6.1 **Background**

Deprivation and social exclusion is prevalent within Lillington. Lillington East Local Super Output Area (LSOA) is ranked within the worst 10% nationally for employment and education, skills and training and amongst the worst 20% for overall deprivation and income. This is against a background where two thirds of the LSOA's in north Leamington overall are in the 50% least deprived in the country.

It is clear from the brief, that meeting the socio economic needs of the community is paramount and will be a fundamental element of any regeneration.

The overall regeneration of the Lillington area should not only aim to breathe life into the physical environment, but also aim to significantly improve the overall life chances and wellbeing of local residents within the Lillington area. This should be part of an overarching strategy between Warwick District Council, Warwickshire County Council and their wider stakeholders.

6.2 A commitment to Local Spend, Local Labour and SMEs

Willmott Dixon Housing has extensive experience of undertaking regeneration projects and has brought that knowledge to bear. Using this knowledge, Willmott Dixon has generated a number of Key Performance Indicators (KPIs) that the Council may wish to consider adopting when employing any future contractor, or developer.

A regeneration project of the magnitude proposed for Lillington (circa £70m) should aim to ensure the majority of capital expenditure is within the local area, where it can have a significant economic impact and assist in wider regeneration. Developers should therefore be contractually committed to deliver project specific Key performance Indicators (KPIs) focused on Local Spend, Local Labour and SMEs.

This legacy must be embedded in a procurement process that identifies local economic priorities and needs, and challenges private companies to meet them. A properly executed plan with realistic targets, one that maps a service provider's activities so they are aligned with local strategic needs and growth plans, should lead to tangible improvements.

Table 6, below demonstrates the target outputs that typically should be sought from developers. The outputs are derived from the Scape National Framework which sets of project specific Key Performance Indicators (KPIs) for contractors when undertaking capital projects.

Economic Outputs	Typical Developer Commitment	Outputs
	20% to be within 10 miles of site	£14.0m
Local spend	40% to be within 20 miles of site	£28.0m
	75% to be within 0 – 40 miles of site	£52.2m
SME spend	75% of total construction contract value to be Small and Medium Enterprises (SME)	£52.5m

Table 6

The definition of an SME is less than 20 employees and less or equal to £50m turnover.

Table 7, below demonstrates the target outputs that typically should be sought from developers in terms of local labour. The outputs are derived from the Scape National Framework.

Local Labour	Typical Developer Commitment	Outputs
	20% to be within 10 miles of site	25%
	40% to be within 20 miles of site	50%
	75% to be within 0 to 40 miles of site	90%
	Number of contracts awarded to social enterprises	4
	Number of Lillington residents employed by developers	15%
	Number of Lillington residents employed through supply chain	25% of workforce
	Number of apprentices employed throughout the project	Approximately 60
	Number of apprentices to be recruited from within the Lillington area	30%

Table 7

Table 8, below demonstrates the target outputs that typically should be sought from developers in terms of training. The outputs are derived from the Scape National Framework.

Training	Typical Developer Commitment	Output
	No of school / college / university students visiting site	3150
	No of students attending school / college workshops	2100
	No of work experience 15 – 17 years students	50
	No of work experience 18+ years students	100
	National vocational qualifications	192
	No of people attending short courses	4550
	Construction skills certification scheme	100%
	Number of trade taster sessions offered to residents	50
	Number of Lillington residents taking up training opportunities and qualifications	Approximately 200
	Number of NVQ qualifications achieved	75% achieve NVQ level 3
	Number of training opportunities offered to residents	20 days learning per year
	Number of Lillington residents receiving CSCS training and achieving card	Unlimited driven by demand

Table 8

6.3 A Local Training Academy

As part of any development proposals there should be a commitment to establish a local training academy in order to deliver life-long skills for those people living within the CV32 postcode and the wider community. Similar academies have been developed elsewhere within the region by a number of contractors /developers.

The academies typically offer training programmes ranging from short courses in electrical compliance, renewable technology, to lifetime skills such as NVQs and City & Guilds qualifications and accreditation to the Construction Skills Certification Scheme (CSCS). For example, Willmott Dixon formed the 4Life Academy in Aston Birmingham which delivers life-long skills to employees and the wider community. The academy has the capacity to train 2000, people per year and acts as a centre of excellence.

Subject to funding, the aim should be to create a local training centre that continues to operate and support the local community, with a range of employment and training programmes beyond the regeneration programme, creating a legacy to the local community.

There are a number of sites that could be suitable for a training academy. These include a site at Pound Lane, a former school that has been converted into an Adult Education and Learning Centre. It lies just outside Crown ward, less than half a mile from the Crown Way shops, and would be easily accessible to local people in Crown Ward. An alternative location would be the former library, once the new library facility has been provided

7.0 COMMERCIAL SUMMARY

The commercial review of Willmott Dixon's financial appraisals has focused on the cost/m2 for the various sites and the proposed buildings within those sites. Using benchmark data from previous projects of a similar nature, Pick Everard has been able to comment on whether the costs, included at current prices, are within the ranges we would expect.

With the exception of the Crown Way options A to D, the costs submitted by Willmott Dixon are within the ranges expected at feasibility stage. As and when further design work is undertaken to the various sites and the Client brief is further developed, the costs can be revised and updated to provide more cost certainty.

It is worth noting that at this stage, the costs are at today's values with the following excluded:-

- Inflation:
- Phasing costs relating to the works;
- Asbestos removal;
- Removal of contaminated land;
- Other professional fee costs (Client PM, QS, CDMC etc.);
- Show units or marketing suites;
- Contingency;
- Surveys (Ground Investigation; Ecological; Topographical etc.)

The items above will need to be reviewed and allowed for within the overall project development costs currently excluded by Willmott Dixon.

An abnormal cost is defined as, associated with the site but outside the normal cost plan parameters.

It is recommended more work is undertaken to understand the costs of, and models for, providing the community hub.

8.0 PROJECT RISK /CONSTRAINTS

Clearly there are a number of significant risks to Warwick District Council, that need very carefully consideration should it decide to take forward the proposals set out in Section 5, these include:

Physical

- 1. The acquisition of a number of privately owned property and the time and costs associated with this.
- 2. The need to maintain suitable services and access points to the Crest area whilst the development is taking place.
- 3. Red House Farm would need to be developed in two distinct halves, with the affordable units needing to be delivered within the first stage of the development.
- 4. The cost for acquisition, demolition and landscape will however be an abnormal cost to the overall project.
- 5. Consideration must be given to Compulsory Purchase Order (CPO) powers and their appropriateness and necessity.
- 6. If Options C or D taken forward for Site B, a new primary school will be provided on the existing Lillington Primary School site. The existing school and nursery will need to be maintained whilst the new school and nursery is constructed on the existing playing fields. There will therefore be a need to provide alternative playing field facilities for between 12 and 18 month period and arguably reprovision elsewhere within the local community for the loss of playing fields, which would be subject to the agreement of Sport England.
- 7. The development of Site J which will provide a more formal entrance to the existing Recreation Ground will necessitate the demolition of the existing Presbytery and Hall to the rear of the existing Church of Our Lady. Any cost of acquisition, demolition and landscaping will also be an abnormal cost to the overall project.
- 8. Access to the Red House Farm is fundamental to the success of the feasibility proposals for sites C and D and early consideration would need to be given to the entrance(s).

Financial

- 1. The development proposals will require the demolition of up to 284 existing council properties that are currently contributing to the Housing Revenue Account (HRA).
- 2. Funding would need to be sourced in order to acquire the privately owned properties, many of which have been purchased under the right-to-buy. The precise cost of these can only be determined once detailed negotiations have commenced with all respective owners.
- 3. To ensure the re-provision of Warwick District Council properties at Red House Farm, it will be necessary to agree a suitable collaboration agreement and an appropriate Section 106 Agreement in relation to the delivery of affordable housing units and/or any alternative cash payment. Warwick District Council

- would need to give both early and careful consideration to both these requirements as they are fundamental to the success of the project.
- 4. Careful consideration would need to be given as to the impact on the Housing Revenue Account (HRA) of undertaking such a comprehensive capital project across the Lillington area.
- 5. Warwick District Council would need to set aside both an appropriate compensation, and associated discretionary relocation payment, for each of the tenants who would need to be rehoused as part of the redevelopment process.
- 6. There is potential loss of Council revenue by forming additional entrances to the recreation ground.
- 7. Consideration should be given to the revenue impact of changes to public service hubs.
- 8. Careful consideration needs to be given to the revenue implications for the loss and re-provision of County Council and District Council public facilities.

Logistical

- 1. To ensure a resident is moved once and costs are kept to a minimum, the phasing strategy would need to ensure new replacement homes were readily available for HRA tenants.
- 2. The required replacement mix as indicated by Warwick District Council does not specifically match the mix of properties which are to be demolished. This will therefore need to be fully considered by Housing Management.
- 3. To enable the decanting of the Crest tower blocks, a key requirement of the phasing strategy is to develop Site B, Crown Way, primarily an apartment scheme for general letting purposes.

9.0 FUNDING ROUTES

Consideration has been given to the various delivery models that could be applicable to the overall Lillington redevelopment. Set out below is a brief narrative of some of the options available in respect of the affordable housing provision, the Community Hub, and properties yet to be allocated as either saleable or social housing.

9.1 Affordable Housing

Warwick District Council could choose to fund the replacement, and indeed any new affordable housing through a lease funding model.

Under these arrangements Warwick District Council would not have to fund any of the capital expenditure for either the pre-development costs or the physical construction work relating to any affordable housing.

Warwick District Council would typically use its covenant strength to engage in a longer term lease typically between 40 to 60 years, whereby at the end of this lease period the affordable housing would pass for a nominal value (typically £1) to the Council.

9.2 The Community Hub

In order to fund the Community Hub, both Warwickshire County Council and Warwick District Council could consider the possibility of leasing the required space from a commercial developer.

This would mean that the capital expenditure required to deliver the community hub and/or any retail space would fall outside of both the capital expenditure budgets. This would however then need to be considered in the context of the respective of both District and County Council's long term revenue expenditure budgets.

As part of any such arrangement Warwick District Council would need to consider whether they are prepared to transfer the required landholding for the neighbourhood hub for the nominal value, in exchange for a lower rental payment profile or alternatively whether they would need to receive a capital receipt for this land which would then need to be factored into any commercial developers appraisal.

9.3 Unassigned Properties

As part of the overall regeneration proposal Warwick District Council has the opportunity to either develop 44 shared ownership or sales properties on the Crest. These are in addition to any requirement to replace the existing council stock that would be demolished. If Warwick District Council is to develop either shared ownership or sales properties they will of course have a need to fund the construction of these properties.

Should the Council choose to develop these on either a sale or shared ownership basis they would receive an income from the disposal of these properties which would represent not only a generated land value but also a potential development of profit. These funds could then be recycled into the HRA.

Alternatively, Warwick District Council could procure the necessary planning approvals and then simply dispose of the land and receive a land payment which again could be utilised to cross subsidise any expenditure on the overall scheme.

10.0 RECOMMENDATIONS AND CONCLUSIONS

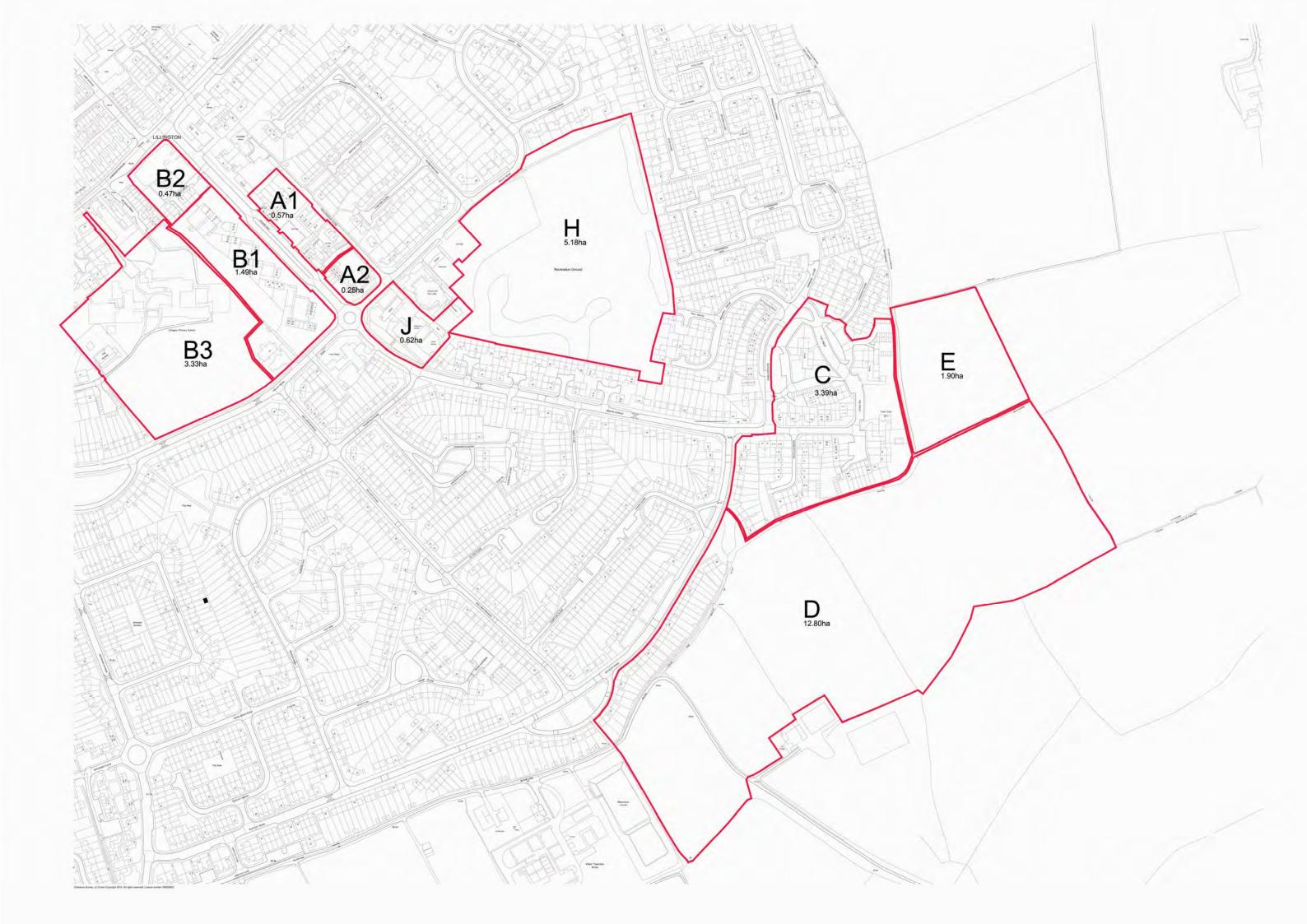
The recommendations and conclusions of the study are set out below:

- 1. When considered against Warwick District Council's Brief, the design proposals for Lillington are considered feasible. The costs are also considered to be within the ranges expected at feasibility stage.
- 2. The study does demonstrate that the regeneration will bring socio-economic benefits. It is recognised, however, that these regeneration benefits do require further assessment and need to be more fully explored. It is recommended further piece of work needs to be undertaken in this regard before a final decision is made.
- 3. The redevelopment proposals would require the release of sites D and E from the existing Green Belt. Delivering the proposals included with the report will require a constructive relationship with Red House Farm.
- 4. Proposals for Red House Farm can help deliver a greater mix within the local area and a better urban edge and softer link with the Green Belt.
- 5. Funding of community facilities will be complicated. Consideration should be given to the revenue impact of any changes to public service set out in options from the Crown Way and the recreation ground.
- 6. Warwick District Council should consider entering into a detailed dialogue with Warwickshire County Council and Sport England with a view to ascertaining and determining the extent of land which could be developed off Crown Way. In particular this should focus on whether any development activity can be undertaken upon the existing Lillington Primary School site.
- 7. Warwick District Council should consider commissioning a further piece of work setting out in outline summary terms why the composite Red House Farm and the Crest area constitute a viable development area and why Red House Farm can help deliver the Regeneration aspirations set out in the study. This would use general development principles to satisfy the Inspector that due consideration has been given to specific site issues and to demonstrate that the site was deliverable. It would therefore support the proposed land release at the forthcoming Local Plan examination.
- 8. Consideration must be given to Compulsory Purchase Order (CPO) powers and their appropriateness and necessity.
- 9. Warwick District Council should consider setting aside a budget for undertaking detailed site investigation and survey works to enable the cost appraisals to be further refined whilst at the same gathering sufficient information to enable detailed planning applications to be submitted in due course.
- 10. Warwick District Council should give further consideration with regards to the development logistics in order to establish the preferred and optimum sequence of demolition and re-provision, potentially incorporating both existing and new stock as appropriate. This may therefore assist in delivering the overall regeneration scheme on a quicker timeframe.
- 11. It should be noted Warwick District council cannot deliver the demolition of the Crest without acquiring some land on Red House Farm. Warwick District Council

- should consider entering into discussions with the Roman Catholic Diocese, with regards to the potential acquisition and demolition of the existing buildings at the rear of the Church of Our Lady.
- 12. It is recommended more work is undertaken to understand the costs of, and models for, providing the community hub.
- 13. The risk of 'doing nothing' need to be adequately understood. The proposals offer the Council the opportunity to create a legacy within the Lillington area that will benefit the local community and the wider area for many years to come. The proposals are an opportunity to replace existing 'tired' stock and change the tenure, density and mix with the area.

APPENDIX A

Feasibility Study Area



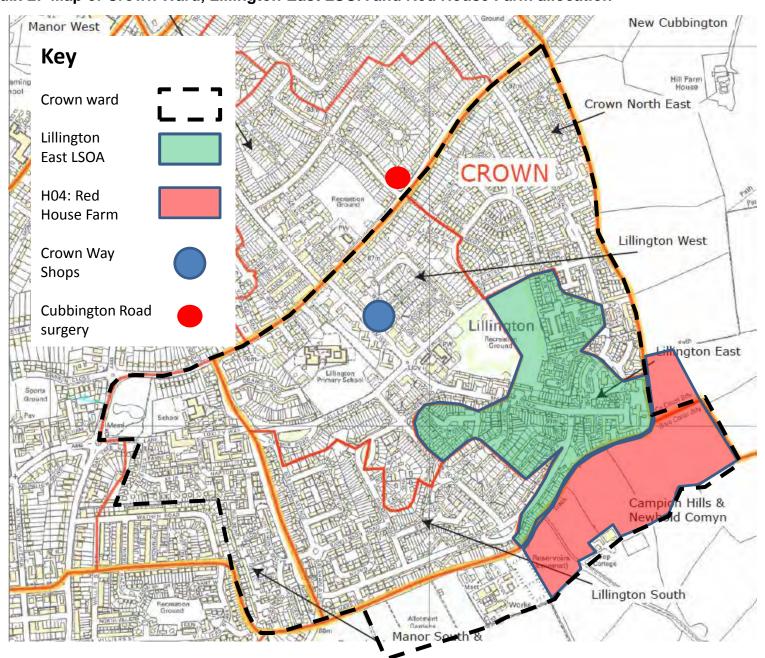
APPENDIX B

Willmott Dixon Further Feasibility Report

See separate document.

Matter Statement 7a: Site H04 (Red House Farm)

Appendix 2: Map of Crown Ward, Lillington East LSOA and Red House Farm allocation



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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H10 – Station Approach, Leamington

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H10 – Station Approach, Learnington

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

- a) The site is all previously-development land. Currently the site is in a range of uses; a bus depot, surface public car park, car dealership and vacant land.
- b) W/15/0905: The site has planning permission for "Demolition of the existing bus depot, car sales lot and disused building between the lower and upper portions of Station Approach and changes to existing Warwick District Council car park reducing spaces from 300 down to 100. Construction of 212 homes consisting of 118 flats and 94 houses with ancillary parking, open space and associated highway alterations to Station Approach" (application ref: W/15/0905). The proposed site plan is attached as **Appendix 1**. The site is being developed by the Council's housing partner Waterloo Housing Association and 75% of the new homes will be affordable.
- c) Development is due to commence before the end of October 2016.

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

- a) The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) Criterion a) This site is previously-development land within the urban area. It has been identified for many years by Warwick District Council as having potential for regeneration and enhancement. It has been identified in both this Local Plan and the current adopted Local Plan (Doc O02) as being suitable for development. The Council has prepared a planning brief for this site in the past.
 - ii) Criterion b) N/A
 - iii) Criterion c) N/A
 - iv) Criterion d) N/A
 - v) **Criterion e)** There are no significant heritage impacts associated with the site. The site is adjacent to the Leamington conservation area and the development of the site has the potential to improve the setting of the conservation area.
 - vi) Criterion f) N/A
 - vii) Criterion g) N/A

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

- a) The sustainability appraisal (SA10) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this site are:
 - i) The site has a positive effect on SA objectives relating to the economy and housing and

- could have an indirect positive effect on health and wellbeing, poverty and social exclusion. In this context, it should be noted that since the sustainability appraisal was completed, it has been confirmed that 75% of the homes on the site will be affordable and therefore the site will have direct positive impact upon poverty and social exclusion.
- ii) As the site is previously-development land, the allocation will have a positive effect relating to the prudent use of land.
- iii) As noted in response to 2 (e) above, the site has the potential to enhance the setting of the conservation area and have a positive impact on heritage.
- iv) As the site is close to Learnington town centre development here will reduce the need to travel. Furthermore, the site is close to a bus routes and the railway station giving good access to other parts of the district and beyond by public transport.

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

- a) Any potential adverse impacts have been addressed through the planning application.
- b) Traffic and transport. The Highway Authority supports a housing development here and did not object to the planning application. It should be borne in mind that the although 212 new homes and 100 space car park are being provided on the site through the regeneration, the existing current uses (bus depot, 350 space car park and car dealership) will cease and therefore the Highways Authority had no objections to the traffic that the development would generate.
- c) Parking for the station. The site lies close to Leamington railway station and the current 350 space car park at Station Approach serves rail customers. Concerns were raised by objectors that there should continue to be adequate provision for car parking when the site is developed. This is being addressed in two ways. Firstly, the Council has worked closely with Network Rail and with Chiltern Railways (the rail franchisee) in formulating these regeneration proposals. Network Rail has secured another site on the Old Warwick Road which lies close to the railway station and Chiltern Railways is currently developing this for a surface car park with a capacity of c350 spaces. This will become the main station car park and is due to open later this year. Secondly, a smaller 100 space car park will be provided at Station Approach. This will be managed by the Council and could provide additional station parking capacity in the future if required.
- d) Air, light and noise pollution. There could be some increase in this, particularly during the construction phase. Also, there will be residents living close to the railway line than presently. This has been addressed through careful design of the scheme to the satisfaction of environmental health officers.

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

a) All infrastructure requirements and costs were considered as part of the planning application to the satisfaction of the local planning authority

6) Is the site realistically viable and deliverable?

- a) The 2013 CIL Viability Study (IN06) demonstrates 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 viability of this scheme recognising that the development of the site carries abnormal site development costs in having to relocate the bus depot was considered by an independent expert as part of the Council's determination of the planning application. This also confirmed that the scheme is viable. The affordable housing element of the scheme is being funded with support from the Homes & Communities Agency (HCA) through its National Affordable Housing Programme.
- c) The site is deliverable within the Plan period. As mentioned earlier, there is an extant planning permission on the site. The site was currently in several land ownerships (Waterloo Housing Association, Network Rail, Stagecoach, the HCA and Warwick District Council) however this land has now all been brought under the control of Waterloo Housing Association. The contractor has been appointed and development is scheduled to start on site before the end of October 2016.

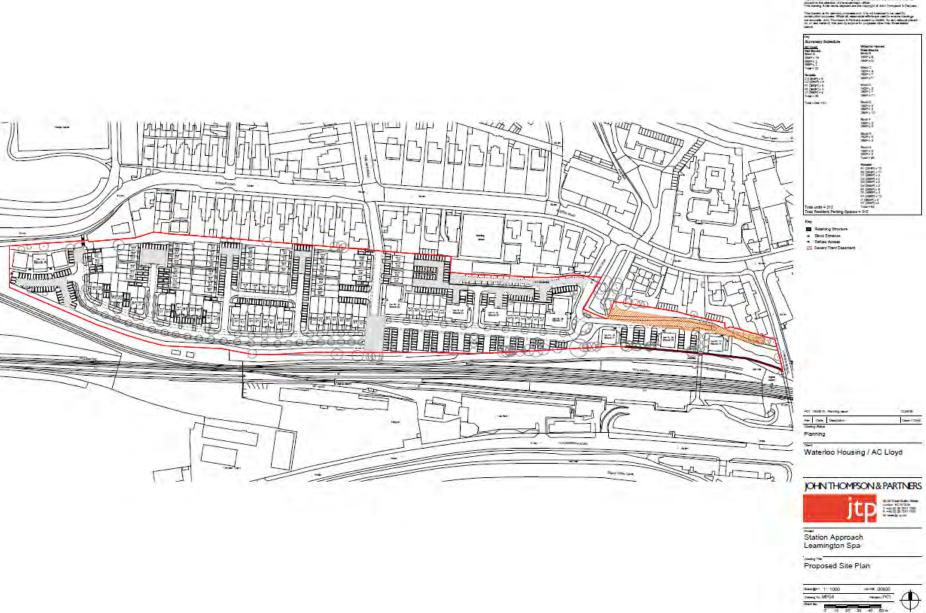
7) What is the expected timescale for development and is this realistic?

a) The housing trajectory (see Appendix 1 of the Housing Supply Topic Paper - HO27PM) indicates the first completions in 2016/17 with 100 in 2017/18 and the remaining 62 in 2018/19. A more recent development programme prepared by the developer has indicated the following based on a start on site which has now been confirmed as October 2016:-

	2017/18	2018/19	2019/20	2020/21	2021/22
Completions	0	68	63	64	17

b) This is deliverable as the scheme has significant grant backing from the Homes & Communities Agency, and the delivery schedule for the affordable housing element (75% of the total housing) is tied to this funding.

Appendix 1: H10 – Station Approach, Leamington Planning application W/15/0905 - Proposed site plan



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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H11 – Land at Montague Road

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H11 – Land at Montague Road

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

- a) This is the site of the former Ridgeway School, fire station and county council depot and lies between Montague Road, Coventry Road and the Grand Union Canal. The site is c3.7ha. It has been identified as having the capacity to provide 140 dwellings.
- b) No significant planning proposals have been recorded against the site since 2010.
- c) In 2005, an application for residential development was received for part of the site (W/05/0181). The proposal was granted for a maximum of 24 dwellings on land identified as the Warwickshire County Council Depot and neighbouring land and involved the demolition of part of the depot building, the relocation of a car park and the erection of housing and the creation of a playing field for the adjoining school.
- d) No representations were received to the allocation of the site during the current local plan process.

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

- a) The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) **Criterion a)** This site is previously-development land within the urban area. It has been identified for many years by Warwick District Council as having potential for regeneration and enhancement. It was identified as "opportunity site C" in policy TCP7 of the current adopted Local Plan (Doc O02) as being suitable for a range of uses including housing.
 - ii) Criterion b) N/A
 - iii) Criterion c) N/A
 - iv) Criterion d) N/A
 - v) **Criterion e)** There are no significant heritage impacts associated with the site. The properties fronting onto Clemens Street lie within the Leamington conservation area and the rest of the site abuts this. Development of the site has the potential to improve the setting of the conservation area.
 - vi) Criterion f) N/A
 - vii) Criterion g) N/A

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

- a) The development of the site would provide opportunities to deliver public open space and associated landscaping opportunities.
- b) The Submission draft Sustainability Appraisal identifies the site as having potential for a long

term major positive effect on housing supply and other positive impacts on economy, health and wellbeing and poverty and social exclusion. It also represents the prudent use of land and the landscape as it relates to the reuse of brownfield land.

c) The SA also identifies the proximity of services and facilities and the fact that the site is not prone to flooding.

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

- a) The site's development could represent a loss of community facilities, including the removal of open space / playing field. However, the Council's Playing Pitch Strategy (I05) indicates that the single pitch at the former school does not meet the strategic priority for retention.
- b) The SA identifies the likelihood of an increase in air, light and noise pollution particularly in the short term during construction. Mitigation will be achieved through the use of appropriate conditions in the planning consent.
- c) The site is not in a conservation area nor does it contain listed buildings, but the SA suggests that given Warwick's historic character, there may be archaeological remains that could be impacted by development. Again, this can be mitigated through the use of appropriate conditions on planning permissions.

5) What are the potential 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

Matter 7a - Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

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 H11 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
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	✓

Is the site realistically viable and deliverable?

- 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. This site falls within an area that was assessed as being clearly viable.
- b) The landowner is willing to bring the site forward for development ad it is currently being actively marketed for residential development.
- Given the relative lack of constraints for the site the site is considered deliverable.

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

- The Local Plan Housing Trajectory June 2016 update (HO27PM) identifies that delivery is scheduled to start in 2017 / 18 with 20 units, followed by 40 units per annum until 2020 / 21.
- Given here is a willing landowners who is currently marketing the site and the relative lack

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

of constrai	nts, this is considered to	be realistic.	

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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H13 – Soan's site, Sydenham Drive Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H13 – Soans site, Sydenham Drive

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

- a) The site has been the subject of a number of planning applications in recent years.
 - i) W/14/1132: outline consent for the erection of 143 dwellings, which was eventually allowed at appeal. This consent was for 88 affordable and 55 low-cost dwellings. This consent is the one being implemented.
 - ii) Further outline consents were granted in 2015 (W/15/0634 for 66 affordable and 36 low-cost dwellings, granted in August 2015 and W/15/1361 for 88 affordable and 55 low-cost dwellings, granted in September 2015.
 - iii) W/16/1118: The most recent application was made in June 2016 for minor alterations to house types and other details, relating to the 2014 appeal consent.
- b) One representation was received on the site during the local plan allocation process, expressing support for its allocation providing it does not have any adverse impact on the waterways and the quality of the water; or discharge which would affect the ecological quality and character of waterways.

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

- a) The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) **Criterion a)** This site is previously development land within the urban area. It has been identified as having potential for regeneration and enhancement.
 - ii) Criterion b) N/A
 - iii) Criterion c) N/A
 - iv) Criterion d) N/A
 - v) **Criterion e)** The site is within 200m of the Leamington Spa Conservation Area, in an area likely to contain archaeological deposits. Mitigation will be in the form of national policy on the protection of such areas and also through appropriate design and layout.
 - vi) Criterion f) N/A
 - vii) Criterion g) N/A

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

- a) The site is able to provide a significant quantum of affordable and low-cost housing in a sustainable location.
- b) The Publication Draft Local Plan Sustainability Appraisal, Appendix V (SA05, p.14 16), considered that development of the site would have several direct and indirect positive

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

impacts, including on the economy, local community services, health and wellbeing and poverty and social exclusion.

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

- a) The site is identified in the SA as a potential source of contaminants, given its previous use for industry. Remediation will be required to secure the safe development of the site. The SA suggested a survey should be carried out to identify possible contaminants and suggest means of mitigation.
- b) The site lies adjacent to a waste treatment facility, which could cause odours, and other industrial activities. These will have been considered / addressed through the planning process.
- c) Air, light and noise pollution are likely to increase, particularly through the construction phase. The SA suggested this could be mitigated by appropriate phasing and the use of monitoring and appropriate conditions.
- 5) What are the potential infrastructure requirements / costs and are there physical or other constraints to development? How would these be addressed?
- a) All infrastructure requirements and costs were considered as part of the planning application to the satisfaction of the local planning authority.
- 6) Is the site realistically viable and deliverable?
- a) The site has been subject to a series of planning consents and physical work has now started on site preparation (Summer 2016).
- 7) What is the expected timescale for development and is this realistic?
- a) Although dwelling construction has not yet started, it is likely that this will commence shortly.
- b) The indicative trajectory identifies 47 low-cost and affordable units to be constructed in 2016 17 and 96 units in 2017 18.

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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H14 – Riverside House

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H14 – Riverside House

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

- a) The site is all previously-developed land. Currently the site is in use as offices for Warwick District Council.
- b) There are no relevant planning permissions relating to this site.

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

- a) The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) Criterion a) This site is previously-developed land within the urban area.
 - ii) Criterion b) N/A
 - iii) Criterion c) N/A
 - iv) Criterion d) N/A
 - v) **Criterion e)** There are no significant heritage impacts associated with the site. The site abuts the Leamington conservation area and the development of the site has the potential to renew and strengthen the character and sense of place of the conservation area.
 - vi) Criterion f) N/A
 - vii) Criterion q) N/A

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

- a) The Sustainability Appraisal (Doc SA10) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this site are:
 - i) The site has a positive effect on SA objectives relating to the economy and housing and could have an indirect positive effect on health and wellbeing, poverty and social exclusion.
 - ii) As the site is previously-development land, the allocation will have a positive effect relating to the prudent use of land.
 - iii) As noted in response to 2(v) above, the site has the potential to enhance the setting of the conservation area and have a positive impact on heritage.
 - iv) As the site is close to Leamington town centre development here will reduce the need to travel. Furthermore, the site is close to a bus routes giving good access to other locations including Warwick town centre.

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

- a) Flooding: Approximately 38% of the site is within flood zones 2, 3a and 3b. Development will be resisted within the areas at greatest risk of flooding. This area is likely to be used, in part, for car parking.
- b) Impact on wildlife: Although there are no notable biodiversity designations that directly affect the site, there is a potential Local Wildlife Site to the south. Any potential adverse impact could be mitigated by the creation of a buffer between any development and the southern edge of the site. As this southern area is within an area at risk of flooding (see above) development would be resisted in this area.
- c) Trees: The site includes a number of mature trees which have been given Tree Preservation Orders. These include Beech, Copper Beech, Wellingtonia, Horse Chestnut, Cedar and Lime. The development will need to retain these trees. A number lie within the area at risk of flooding and therefore would not be close to any built development.
- d) Impact on listed buildings, conservation area and registered park of historic interest: The site is outside, but surrounded on three sides by the Leamington conservation area. The buildings on Portland Place immediately to the east are Grade II listed. To the south, the river Leam marks the northern edge of the Spa Gardens Registered Park & Garden of Historic Interest. Development will need to respect all of these designations. Indeed, as referred to in response to question 2 above, a good quality development has the potential to renew and strengthen the character and sense of place of the conservation area here.

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

- a) There are no particular infrastructure requirements relating to the development of this site. As the site is currently in office use, it is anticipated that when redeveloped traffic movements will be no greater than at present.
- b) The 2013 CIL Viability Study (Doc IN06) and its 2015 addendum (Doc EXAM3) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policy requirements, including affordable housing.
- c) 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.

- d) 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.
- e) Specific infrastructure requirements (physical, social and green) associated with the Plan as a whole are identified and costed in the Infrastructure Delivery Plan (Doc 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.
- f) 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.
- g) It is anticipated that housing site H14 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
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	✓

6) Is the site realistically viable and deliverable?

The Viability Studies (Docs 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 viability and deliverability of the scheme need to be understood together as they are interlinked. The site is both owned and occupied by Warwick District Council and in order to release this site for development, the Council will need to find new offices. It has spent the last four years assessing options for a new headquarters site and in April 2016 committed to undertaking further work to develop firm proposals and seek planning approval for new offices on a site at Covent Garden in Leamington town centre. The sale of the site at Riverside House is essential to help fund the new offices. The timetable for this is set out in answer to question 7 below, however the commitment by the Council to prepare detailed proposals for new offices and to commit funds to the project is clear evidence of its commitment to vacate the Riverside House site and redevelop this for housing.

7) 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 50 dwellings in 2020/21 and the remaining 50 in 2021/22.
- b) The project plan for the headquarters relocation for Warwick District Council (from April 2016) has refined this. In doing so, it is proposing a phased approach to the redevelopment of Riverside House whereby the eastern half of the site (i.e. that part that is not covered by the footprint of the office building) could be developed as phase 1 while the Council was still occupying the building. Phase 2 would follow once the Council had vacated the site and the existing building could be demolished. The revised programme is therefore as follows:-
 - Planning approval for housing at Riverside House will be submitted in December 2016 and granted by March 2017.
 - Development of phase 1 on Riverside House would commence in September 2017.
 - Demolition of the offices could commence in October 2018, thereby enabling phase 2 to commence.

On this basis, the trajectory can be viewed as being cautious and completions are likely to be in advance of those projected.

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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H₁₆ - Court Street

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H16 - Court Street

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

- a) The site is all previously-development land. Currently part of the site is in use as a public car park and much of the remainder is vacant land / buildings. The properties on the south west corner (junction of the canal and Clemens Street) are shops with residential uses above.
- b) The following planning permissions are relevant to this site.
 - i) W/15/1448: The southern part of the site, a former BT depot which abuts the canal, has approval for: "Demolition of existing building and erection of 4 storey building and single storey link, comprising 187 student residential accommodation, communal and management facilities, with associated private amenity space, public realm, landscaping, vehicular access, parking and servicing area, and widening of the canal towpath footway, removal of two sycamore trees and works to one sycamore tree."
 - ii) W/14/1707: The property "Amara" (7 Court Street) has approval to "Demolish nightclub/public house (retaining basement) and erect 3 storey residential building for 5no 1 bed and 4no 2 bed apartments".
 - iii) W/14/1479: The Bridge Dental Practice on Court Street has approval for: "Additional storey extension and internal alterations to provide 3 flats (1 x 1 bed and 2 x 2 bed)."
- c) The following other planning applications are relevant:
 - i) Earlier in 2016 a hybrid planning application was submitted on the northern half of the site, including the WDC car park, vacant tyre depot and vacant public house (fronting onto Clemens Street) for: 1) application for outline planning permission for the erection of up to 40 dwellings with a pocket park and landscaping (matters of appearance and landscaping to be reserved) 2) Full application to part demolish the former Stoneleigh Arms public house and change the use of the Stoneleigh Arms public house to create 2 no dwellings (Use Class C3) (W/16/0511). This application subsequently withdrawn.
 - ii) In 2015, an application was submitted on the Priors Club in Tower Street for "Demolition of existing social club and erection of a four storey building to include 7 HMO cluster flats to create 36 bedrooms" (W/15/1716). This application was refused for reasons of unacceptable harm to the character and appearance of the Conservation Area as well as detriment to highway safety and insufficient parking. The principle of residential development was not a reason for refusal.

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

a) The allocation of this site for housing development is consistent with the spatial strategy as

follows:

- i) Criterion a) This site is previously-development land within the urban area. It has been identified for many years by Warwick District Council as having potential for regeneration and enhancement. It was identified as "opportunity site C" in policy TCP7 of the current adopted Local Plan (Doc O02) as being suitable for a range of uses including housing.
- ii) Criterion b) N/A
- iii) Criterion c) N/A
- iv) Criterion d) N/A
- v) **Criterion e)** There are no significant heritage impacts associated with the site. The properties fronting onto Clemens Street lie within the Leamington conservation area and the rest of the site abuts this. Development of the site has the potential to improve the setting of the conservation area.
- vi) Criterion f) N/A
- vii) Criterion g) N/A

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

- a) The sustainability appraisal (SA10) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this site are:
 - i) The site has a positive effect on SA objective of meeting the district's housing need.
 - ii) It will have an indirect positive effect on the economy (by increasing the supply of labour and consumer spend in local businesses), local community services (by increasing use of these), health and wellbeing and poverty and social exclusion.
 - iii) As the site is previously-development land, the allocation will have a positive effect relating to the prudent use of land.
 - iv) As noted in response to 2(v) above, the site has the potential to enhance the setting of the conservation area and have a positive impact on heritage.
 - v) As the site within and adjacent to Leamington town centre development here will reduce the need to travel. Furthermore, the site is close to a bus routes giving good access to other locations.
- b) The site will bring about major improvements to the appearance and character of this area, and in particular the canal corridor.

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

a) **Air, light and noise pollution**. These are likely to increase, particularly during the construction phase. In particular, the site is adjacent to the Royal Leamington Spa Air

Quality Management Area, however over the plan period concentrations of pollutants are expected to be lower than 2011 levels with the introduction of more stringent controls on vehicle emissions.

b) Wildlife. The Grand Union Canal to the south is a potential Wildlife Site. Careful development of this area will protect any wildlife. There is already full public access along the canal towpath in this area. The Canal and River Trust has expressed support for the allocation provided it does not have any adverse impact no the waterways and quality of the water, or create discharges which would affect the ecological quality and character of the waterways.

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

- 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.
- 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.
- 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 H16 will be required to make a proportionate contribution to the following requirements (even though it is expected to come forward through multiple planning applications):-

Infrastructure type	Comments (but only if clarification required)
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	✓

g) The site will come forward in parcels and each will address local infrastructure needs. In the case of the Court Street car park site (the subject of the withdrawn application W/16/0511) this relates to the need to balance the car parking needs of existing residents and businesses in the Court Street with those of the new residents.

6) 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 Learnington Spa. This site falls within an area that was assessed as being clearly viable.
- b) The development of student housing on the BT Depot site (W/15/1448) is currently under construction.
- c) As regards the proposal for the vacant public housing and Court Street car park (W/16/0511), there are no indications from the work undertaken on the previous planning application that the scheme is not viable or deliverable. There are no fundamental constraints to developing the site.

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

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

- a) The housing trajectory for the BT Depot site (see appendix 1 of the Housing Supply Topic Paper – HO27PM) indicates that all these will be completed by 2018/19. This is realistic as the developer is now on site.
- b) The housing trajectory for the remainder of the site indicates 25 completions in 2017/18 with 25 in 2018/19 and the remaining 25 in 2022/23. This trajectory is considered reasonable. The scheme on the Court Street car park (W/16/0511 40 units) could be completed in 2018/19, subject to the approval of a revised planning application. Some of the smaller schemes could come forward sooner than this.

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 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H17 – Garage site, Theatre Street Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H17 – Garage site, Theatre Street

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

- a) The site is classed as previously developed land in the built-up environment of Warwick.
- b) W/16/0496: Planning permission was granted on the 25th May 2016 for the erection of 39 apartments with associated parking and open space. This was a slight revision to a previous consent (W/14/0746) for 37 units.
- c) No representations were received to the allocation of the site in the local plan.

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

- a) The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) **Criterion a)** This site is previously-development land within the urban area. It has been identified for many years by Warwick District Council as having potential for regeneration and enhancement.
 - ii) Criterion b) N/A
 - iii) Criterion c) N/A
 - iv) Criterion d) N/A
 - v) **Criterion e)** The site lies within the Warwick Conservation Area and the potential impact of development on the historic environment was considered as part of the planning application to the satisfaction of the local planning authority.
 - vi) Criterion f) N/A
 - vii) Criterion g) N/A

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

- a) The nature of the housing (affordable and low-cost) would provide a benefit to people otherwise unable to afford to live in an attractive and sustainable location.
- b) The report on the planning application identified the development as providing significant enhancement to the conservation area; the extant building is run down and does not make a positive contribution to the appearance of the area. It adds little to the amenity of the conservation area and the new building will make a more positive contribution.

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

- a) Archaeology: The site is in an area considered to have potential for as yet undiscovered historic remains. With regard to this, a further pre-commencement condition was imposed on the 2016 approval requiring a programme of archaeological works to record any remains on site.
- b) Loss of Employment: The former use of the site was as an employment-generating activity.

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

However, it had been vacant for around 15 years prior to the application in 2014.

- c) Air Quality: Theatre Street is in an Air Quality Management Area. Evidence considered during the planning application process suggested that the proposed development was expected to comply with relevant local and national policies with respect to air quality.
- d) The Council also commissioned an update to its own evidence base relating to air quality (Air Quality Assessment Update 2016), which found (paragraph 5.1) that,

For all pollutants, there are much lower concentrations in 2028 than in 2015.

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

- a) Infrastructure requirements have been resolved through the planning application process and are the subject of a section 106 agreement.
- b) The site was formerly in use as a garage and thus subject to contamination. The planning application in 2016 required as a pre-condition a scheme of site investigation of the nature and extent of contamination and a remediation process to be agreed.

6) Is the site realistically viable and deliverable?

 a) An independent assessment of the scheme during the planning application process identified that the scheme could not provide for the levels of contribution requested. However, given the amount of affordable housing being provided, this was felt to be reasonable and contributions to infrastructure were therefore reduced to ensure scheme viability

7) 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 39 dwellings in 2017/18.
- b) Given that the site has full planning permission, this is considered to be realistic.

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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H39 – Opus 40, Birmingham Road, Warwick Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H39 – Opus 40, Birmingham Road, Warwick

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

- a) The site has planning permission for 85 dwellings and is currently under construction. See application number W/15/0646.
- b) Previously, this former car park had planning permission for B1 (a/b) uses granted in 2011 (see application no. W/10/0073).

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

- a) The allocation of this site for housing development is consistent with the spatial strategy as follows:
- i. **Criterion a)** This site is previously-development land within the urban area.
- ii. Criterion b) N/A
- iii. Criterion c) N/A
- iv. Criterion d) N/A
- v. Criterion e) There are no significant heritage impacts associated with the site.
- vi. Criterion f) N/A
- vii. Criterion g) N/A

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

 The sustainability appraisal (SA10) set out the sustainability benefits of each of the proposed allocations. Here are no others specific benefits relating to this site.

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

- a) Transport and access: Access issues using the existing in to the adjacent office area have been adequately addressed through the planning application process. Contributions to the strategic transport network, including junction improvements on the Birmingham Road were included within a Section 106 agreement.
- b) Noise and air pollution: the site is close to the A46 and has the potential to experience resulting pollution. An adequate landscape and noise attenuation area to mitigate the issue was agreed and is being implemented. An air quality assessment formed part of the planning application process.
- c) Biodiversity: biodiversity impacts have been mitigated through an agreed biodiversity offset.

Warwick District Council Examination In Public Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

- d) Loss of employment land: the land had previously been part of the District's employment land supply. However, the loss of employment land here was compensated by the proposed allocation of land at Stratford Road, Warwick.
- 5) What are the potential infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
 - a) All infrastructure requirements were addressed through a section 106 agreement as part of the planning approval.
- 6) Is the site realistically viable and deliverable?
 - a) Yes, the site is under construction.
- 7) 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 29 dwellings in 2017/18, 29 in 2018/19 and the remainder in 2019/20.
 - b) Given the advanced stage of site construction, this is now considered to be cautious and it is likely the site will complete in 2017/18.

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

Matter 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H44 – North of Milverton Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H44 – North of Milverton

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

- a) The site is currently agricultural land. It forms part of the designated Green Belt.
- b) There is no relevant planning history

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

- a) The site is within the Green Belt on the edge of Learnington Spa. The site has been assessed within the Sustainability Appraisal (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 greenfield site on the urban edge of Learnington Spa. The site is in a sustainable location and is close to the major employment areas to the south of Warwick and also to Learnington Town Centre with its many shops and services/cultural facilities. The site is also in close proximity to local shopping centres to be found at Lillington and at Rugby Road, Learnington Spa. Other facilities such as schools and medical facilities are located nearby. The site is adjacent to the main Kenilworth Road which is well served by current bus provision/ services.
 - iii) **Criterion c)** The site is consistent with this criterion and may have the potential to provide an area of employment development. This may ultimately provide sustainable job opportunities for residents of the intended housing development and create employment opportunities to the north of Leamington.
 - iv) **Criterion d)** Concerns have been raised in representations that the site may lead to the coalescence of Leamington with Hill Wootton, Warwick and Kenilworth. The Council contends that with appropriate mitigation and good design of development this will not be the case and that appropriate separation will be maintained.
 - v) **Criterion e)** There are no significant heritage impacts associated with this site, however its proximity to the Leamington Conservation area boundary is noted.
 - vi) **Criterion f)** The site is not high landscape value nor does it contain any other highly sensitive features in the natural environment (see Landscape Character assessment of Land North of Leamington 2009). The allocation is therefore consistent with this criterion.
 - 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 given the need for housing there are exceptional circumstances for releasing this area of land from the Green Belt (see question 10 below for further detail) (and in particular the need to provide a 5-year land supply through a range of sites). This site would help meet the District's overall housing requirement and more generally assist in a 5-year supply through the provision of a range of sites. The site would also deliver important infrastructure north of Leamington Spa. Exceptional Circumstance

that justify the Council's intention to remove this land from the Green Belt and to allocate it for housing and employment development are set out in the Councils Distribution of Development Paper (HO25PM) paragraph 28 (table 3).

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 north Leamington locality.
 - ii) Public access and open space: The land is currently used for agricultural purposes and whilst there is currently limited 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 will support a range of highway improvements to mitigate the impacts of the proposed development. In particular it will provide funding towards the dualling of the Kenilworth Road which will have wider benefits for the town/area. The site may also prove to be the location for a virtual park and ride facility that will deliver wider benefits for the area by assisting in the reduction of traffic volumes, congestion and air pollution in Leamington town centre and also reduce vehicular movements across the town to areas south of Leamington and Warwick.
 - iv) The development may also deliver an area for employment uses that will provide employment opportunities in north Leamington. This matter is being given consideration by the developer as they continue to progress there work on the potential layout and disposition of uses that the site will be deliver.

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

- a) Landscape: Concerns have been raised about the loss of green fields and the impact on the landscape close to the town at the land north of Milverton. The site does have some landscape value and was identified as an area of medium / high landscape value. The 2016 Landscape Update (LA09PM) has stipulated that development of this site could be made acceptable with appropriate attention to detail in the design process (good design / use of landscaping) to mitigate the impacts of built form at this location.
- b) **Transport and Traffic:** The Highway Authority supports a housing development here. The Highway Authority have identified improvements to the main Kenilworth Road and also require enhancements to the provision of footways and cycleways that connect the existing infrastructure provision thus enabling travel choices by all modes of transport. It is possible that this allocation may ultimately be the site for a north Leamington virtual park and ride

facility that will assist traffic management and congestion issues in the area / Leamington Town Centre. Representations have raised concerns regarding additional traffic volumes and the impact on air pollution / congestion. The success / functional benefits of a park and ride at this location are also contested. However the proposals to be put forward by the developer in close consultation with Highway Authority will address these issues.

- c) Flooding: Concerns have been raised regarding the development of this site and that the land is subject to surface water flooding and that the development of the allocation may cause flooding problems (from increased surface water run-off) to existing residences in north Leamington). The Council is confident that with appropriate drainage infrastructure/ surface water attenuation (SUD's etc.) that this allocation is achievable and there should be no risk of associated flooding impacting on existing north Leamington properties.
- d) Loss of Green Belt / Coalescence: concerns have been raised in representations regarding the impact of the development on the Green Belt and that it will lead to coalescence with other settlements. In particular coalescence with Warwick, Kenilworth, Hill Wootton and Old Milverton. Representations also contend that the Exceptional Circumstances required for the removal of this land from the Green Belt are not made / demonstrated.
- e) The Council has made the decision for the removal of this land from the Green Belt with correct reference to the NPPF and believes that the overriding pressures to provide sustainable housing sites and a lack of suitable non-green belt alternatives to meet supply requirements is the compelling factor for this decision. The basis for this decision is set out in detail in the Distribution of Development Paper (Doc HO28PM) paragraph 28 (table 3).
- f) Regarding the question of coalescence in particular, the Council refers to the landscape study (LA09PM) and that the northern extent of the intended allocation will be contained and can be reinforced by sensitive landscaping to Sandy Lane / Old Milverton Lane to form an appropriate, new and permanent defensible boundary to form the outer limit to the Green Belt Boundary.
- g) Loss of agricultural land: Representations have indicated concern about the loss of farmland. The development of housing will result in the loss of grade 2 agricultural land. However, the Council contend that the public benefits of housing in this location out-weight the loss of agricultural land.
- h) Loss of amenity land / recreational value: Concerns have been raised that the loss of this area for development will deprive the existing residents of this locality of north Leamington the ability to enjoy access to the wider countryside and the enjoyment of it as a resource for walking, leisure and recreation. The development of the site will undoubtedly change the outlook of this area, however good design and layout should deliver new areas of fully accessible public open space and permeable footpaths and linkages/ access to the area will be provided for the use of both existing and future inhabitants of this locality.
- Loss of habitat/ ecological assets: Concerns have been raised regarding the loss of habitat and the impact of development on wildlife. The Additional Sites Ecological Report

(B07PM)) outlines that with good layout and design and the appropriate location of open space and networks of green areas will enable the maintenance of wildlife habitat and species connectivity across the site. The identification and preservation of veteran trees and species rich hedgerows will also assist in providing habitat / ecological benefits.

- j) Pollution: The Sustainability Appraisal (SA10) recognises that air, light and noise pollution will are likely to increase (albeit in a minor way) particularly in the short term during the construction process. This may have a short term impact on the existing residential area north of Leamington. Suitable mitigation can be set out through development management policies in the Local Plan and will also be available at the project level to address negative effects. This matter has been raised in objections. The Council contends that the public benefits of housing at this location outweigh the minor negative effects identified.
- k) The agent (on behalf of the owner) has submitted an objection to this site (H44) on the basis that the full area north of Milverton should be allocated and developed (including the safeguarded area). The Council is not in agreement with this approach and considers that it has allocated adequate sites to meet its housing requirement for the plan period. The position / rationale for the removal of the safeguarded area from the Green Belt is set out in the later sections of this paper.

5) What are the potential 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 are 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 H44 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
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	Note Possible provision / location for a park and ride facility (in the context of H44)
Contributions to Education (Primary)	✓
Contributions to Education (Secondary)	North Leamington School improvements as necessary
Contributions to other infrastructure requirements in line with the CIL regs	** Note in the context of the wider area (the safeguarded area). The development of this land would (if needed) ultimately require additional infrastructure including all of the above, plus land/site for a primary school. Potential for a new rail station. Local centre, community facilities.

6) 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 area falls in an area that was assessed as being clearly viable.
- b) The 2013 CIL Viability Study undertook a detailed assessment of land at land at Blackdown,

also on the edge of Leamington Spa in the Green Belt (with similar characteristics to the land North of Milverton) and concluded that this area would be viable.

- c) The site is deliverable within the Plan period. There is a landowner who is willing to sell and has a development partner (Taylor Wimpey) who is actively developing a master plan/ delivery framework for the site.
- d) The developer has proposed a Statement of Common Ground with the Council. It is hoped to provide this by mid-September
- e) As can be seen from the answers there are no major impediments to the delivery of the site within the Plan period.

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

- a) The housing trajectory (see appendix 1 of the Housing Supply Topic Paper HO727PM) indicates the first completions in 2019/20 with a build rate of 50 dwelling per annum and completion by 2023/24.
- b) Given the scale of the site and that there are relatively few constraints on the timing of the development this is considered to be realistic.

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

- a) The site is within Green Belt parcel (RL1) that plays a role in safeguarding the countryside from encroachment of development (specifically from some ribbon development along the eastern edge of the parcel which is adjacent to the Kenilworth Road). This matter has been raised in representations. It must be noted that to a certain degree existing development to the north eastern area of the parcel including the Nuffield private hospital and other large buildings has partially compromised the openness of the Green Belt.
- b) Parcel RL1 prevents merging with Old Milverton and Hill Wootton (this matter has been raised in representations). It is the Council's opinion that with sensitive and well-considered development design that a meaningful degree of separation can be maintained and that the development will not compromise the setting and identity of the two aforementioned settlements. The site has well defined defensible Green Belt boundaries which provide assurance that further encroachment can be avoided.
- c) The site (and current Green Belt parcel) is adjacent to the Conservation Area of Leamington Spa, with good intervisibility from some of the higher areas of the site. The Council contends that with good design the development of this site should not compromise the visual setting of the historic town.

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

- a) WDC accepts that the development of H44 and when / if necessary the safeguarded area will inevitably have an impact on the openness of the green belt and its functionality in these specific locations. WDC has assessed in detail the nature of each site and has weighed in the balance the sustainability of this and various alternative locations and their relationships to employment and other services and facilities as well as the outputs from of the JGBS (LA07PM), landscape assessments (LA09PM) and technical evidence on issues such as infrastructure provision and constraints.
- b) H44 in combination with the safeguarded land, will ultimately form a parcel of land that will reaffirm / re-define the residual Green Belt by the creation of strong defensible boundaries and appropriate landscaping to the north (Old Milverton Lane Lane,) west (to the railway line / Old Milverton Road) and to the east (the Kenilworth Road).
- c) In this context the remaining Green Belt will continue to be open in nature and will therefore continue to meet the fundamental aims of green belt

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

- a) The process for assessing exceptional circumstances has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out the exceptional circumstances applicable to this site in the Green Belt at the 'Northern edge of Leamington Spa'. However, representations have been made that suggest the circumstances for the release of the site from the Green Belt have not been demonstrated.
- b) Specifically, exceptional circumstances for the allocation of this area and its removal from the Green Belt are identified as follows:
 - i) <u>Is there an essential need that has to be met?</u> Yes, the HMA's and Coventry's housing need and lack of capacity within Coventry.
 - ii) Are there any suitable sites outside the Green Belt that can meet this need? There are no suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet this need (see para 26 of the Distribution of Development document HO25PM). Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet housing need.
 - iii) Is this the best site in the Green Belt to meet this need? Sites have been considered and allocated that relate to the green belt south of Coventry and Kenilworth, they are consistent with the Local Plan strategy and provide sustainable locations with reasonable links to employment and services. In that context, the area to the north of Leamington offers the next most sustainable location, in terms of connectivity with the City and proximity to the services in Leamington.

For the proposed safeguarded land North of Milverton:

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

- a) Given the need to ensure a rolling supply of available and deliverable land is maintained and also given the need to maintain the permanence of green belt boundaries beyond the plan period, it was felt appropriate to consider whether further land should be removed from the green belt through the local plan review process.
- b) Paragraph 85 of the NPPF identifies various criteria that should be taken into account when considering green belt boundaries. The criteria include ensuring that safeguarded land should be identified between urban areas and the green belt to meet further long-term needs beyond the plan period and then making clear that safeguarded land isn't available for development during the current plan period and planning permission for development will only be granted following a local plan review that confirms the development is required.
- c) The Green Belt Background Paper (EXAM 45 in general, and paragraphs 18 23 regarding safeguarding) sets out the reasoning behind the use of green belt for both current allocations and safeguarded land post-plan period. Identifying safeguarded land will help to preserve residual green belt boundaries over a longer time period as there should be no further need to reassess green belt boundaries post-2029.
- d) The intention is to ensure that a sufficient supply of development land is available to meet ongoing needs. In the case of Warwick, this has been identified as coming in part from the extant green belt. The Local Plan is the correct vehicle to review the current Green Belt boundaries.
- e) Given the extent of the green belt in the District and ongoing pressures for development across the area, safeguarded land is considered to be necessary to maintain the permanence of green belt boundaries beyond the plan period at the same time as ensuring the Council is better able to respond to changing circumstance sand development pressures. Specifically, the provision of safeguarded land will enable the Council to bring forward a Plan review in a more agile way should housing requirements change or in the event that monitoring shows that existing allocations are failing to deliver a sufficient housing supply. In this context Safeguarded Area S2 (North of Milverton) could be brought forward quickly as part of the site in the same ownership is already proposed for allocation and there are no significant constraints that would prevent development here if required.

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

- a) The SHLAA update was used to identify and select appropriate sites for further consideration as housing allocations following the Inspector's interim conclusions on the levels of housing being proposed. This enabled the Council to consider various options for meeting the increased housing requirement, including whether and where land could be identified to meet potential longer-term development need.
- b) With regard to site S2, it lies adjacent to housing allocation H44 north of Leamington Spa. S2 is greenfield / agricultural land. It should be noted that this land was considered for development purposes in an earlier part of the Local Plan process and then discounted because at that point in time the required housing numbers could be derived from non-green belt alternatives and so exceptional circumstances did not exist. The compelling need for additional sites as a consequence of the uplift in the housing numbers required for the Local Plan as (to address the requirements of the wider HMA) has led to the allocation of H44. In the context of this allocation and need to maintain enduring defensible boundaries it was considered that s2 formed a natural area for safeguarding that had clear long term development potential should a future need arise.
- c) The Council's own informal appraisal suggests that S1 at Milverton could deliver in the order of around 1000 dwellings (in total).
- d) The proposed allocation site H44 and safeguarded site S2 (collectively) is bounded to the south by the existing urban area and to the north by Old Milverton Lane. The east of the site would adjoin allocation H44 and the western boundary would be formed by the railway line between it and Old Milverton. It thus enjoys firm boundaries that can be expected to endure through and beyond the period of safeguarding and subsequent development if required.
- e) The land lies close to Leamington Spa and as such would benefit from a good relationship to its services, facilities and opportunities if developed.
- f) Alternative options were considered in the vicinity (such a Land at Blackdown L43) but were discounted as they did not have the such a good relationship to the existing built form of Leamington Spa, or did not have such clearly defined boundaries and were both visually and environmentally more fragile in terms of their acceptability for development.

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

- a) The basis for the spatial strategy is set out in the Distribution of Development Paper (HO25PM). Paragraphs 8 to 15 of this document set out the approach taken to establishing a Spatial Strategy for the Submission Draft Local Plan (January 2015). It explains that the approach is supported by the Sustainability Appraisal (SA10). The Sustainability Appraisal also examined the impacts of five options for the location of growth.
- Policy DS4 sets out the spatial strategy for the district. It identifies a clear hierarchy of preferred development locations, and includes the use of greenfield land on the edge of

Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

urban and built-up areas. In addition, it identifies and addresses the use of green belt locations where exceptional circumstances can be demonstrated through the local plan process. This means that the identification and use of green belt land for housing would not be inappropriate under certain specific circumstances.

- c) While the spatial strategy does not discuss safeguarded land per se, it is possible to consider the site in the context of the identified criteria. The allocation of this site for housing development is consistent with the criteria of the spatial strategy as follows:
 - Criterion (a): The Council has already assessed and allocated a number of brownfield sites as well as sites outside the green belt. Given the requirement to meet a portion of Coventry's needs, it is clear that in order to achieve sustainable development, green belt and green field land will also be required. This is in line with the strategic policy approach adopted in the local plan.
 - ii) Criterion (b): The site is consistent with the criterion as it lies to the north of Leamington Spa and will benefit from and support existing services, facilities and employment opportunities.
 - iii) Criterion (c): not applicable.
 - iv) Criterion (d): Development of the site will not lead to coalescence according to the Green Belt Review.
 - v) Criterion (e): The site is consistent with the criterion. According to the recent Heritage Assets Review of Local Plan Site Allocations (2016) there are no listed buildings, scheduled monuments, registered parks or battlefields within the proposed allocation site, nor within the immediate vicinity. However the site is adjacent to the Leamington Spa Conservation area, the setting of which would be affected by development.
 - vi) Criterion (f): The site is consistent with the criterion. Although it will extend development into an area identified as being of landscape value, the recent Landscape Review (LA09PM) identified opportunities for development in this area that would not have substantial adverse impacts on the wider landscape setting.
 - vii) Criterion (g): The Council has taken into account the overall spatial strategy and the availability of alternative suitable sites outside the Green Belt and considers there are exceptional circumstances for releasing this area from the Green Belt. The development of the site would have an impact on the character and function of the green belt but WDC believes this is outweighed by the need to identify sustainable future housing provision.
- d) The site was looked at in part in the updated SA Addendum Report 2016 (SA11PM). The Policy Screening section of Appendix II reported for DSNEW2 that,
 - ... Although the sites are not allocated for development at the present time, the sites are safeguarded with a view to future development, and by including the site within the plan, it does set a precedent for future development in the District. Thus it is deemed important to SA safeguarded sites to identify the potential effects development could have and the type of mitigation that will be necessary to accommodate development at these sites in the future. The sites were subject to the screening process and the findings are presented in the table below ...
- e) The 2015 SA (SA10) did not flag up any significant issues with the larger site in question,

apart from the loss of green belt and agricultural land and the impact on the quality of the landscape.

f) The Green Belt Background Paper (EXAM 45) identifies the exceptional circumstances that exist in the district to justify the use of green belt for additional housing provision.

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

a) Please see paragraphs 89-95 of the Green Belt Background Paper (EXAM 45) and refer to question 8 (above)

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

- a) Please refer to answer 9 (above)
- b) 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 moderate impact on the extent to which parcel the adjacent areas of Green Belt continue to be consistent with the essential characteristics of Green Belt (NPPF para 79), particularly as the area of land proposed to be removed from the Green Belt is so closely related to the existing built-up area of north Leamington Spa
- c) Identification of the land as safeguarded will ensure the character of the green belt is retained until such time as it becomes necessary to consider whether the safeguarded site is required for development. This will only take place once a local plan review is triggered and where monitoring and other evidence demonstrates there is an identifiable need and justification for further development.
- d) Further mitigation could be achieved through ensuring that the design and layout for subsequent applications are treated sensitively and reflect the emerging aims and objectives for the wider area.

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

a) Potential adverse impacts and mitigation are the same as those outlined are itemised in question 4 (above)

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

a) Please refer to question 5 (above). It should be noted that as the site has not been allocated for development, there are no specific infrastructure requirements associated with the safeguarded land. However, the Strategic Transport Assessment (TA14PM) did consider the transport implications of development here and suggested appropriate mitigation could be achieved. Discussions have also taken place with regard to education provision. The development of this area is likely to require a primary school to be provided on site. Secondary education provision is possible through the expansion of North Leamington

School.

b) S2 has a relationship with the railway line on its western boundary. However careful design should provide sufficient separation in order that there are no noise related impediments to residential amenity in the event the site is developed in the future.

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

- a) The process for assessing exceptional circumstances has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out the exceptional circumstances applicable to this. However, the justification for safeguarded land is different to the allocation of land for housing in that the safeguarded land does not respond to an identified need supported by the current evidence base, but rather to a future need that is likely to arise.
- b) In the case of Safeguarded Area S2 the exceptional circumstances for the allocation of this area and its removal from the Green Belt are identified as follows:
 - i) <u>Is there an essential need that has to be met?</u> Whilst the need has not been identified through the current evidence, paragraph 85 of the NPPF says that Local Plans should "where necessary identify safeguarded land...in order to meet longer-term development needs stretching well beyond the plan period. Further housing need beyond 2029 is inevitable and this needs, supported by paragraph 85, provides the starting point for the exceptional circumstances
 - ii) Are there any suitable sites outside the Green Belt that can meet this need? The supply of suitable and available sites in the District lying outside the Green Belt is very constrained and it is unlikely that without future Green Belt releases, future housing supply would be sufficient.
 - iii) Is this the best site in the Green Belt to meet this need? This area is consistent with the Local Plan strategy and provides a sustainable location with reasonable links to employment and services. It has good connectivity with the City and proximity to the services in Leamington. Given the allocation of site H44, it offers an appropriate area to safeguard for future development. In particular the lack of constraints and the willingness of the landowner to make the land available make the site suitable for responding to changing circumstances quickly in the context of an early plan review.

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

- a) The Safeguarded Area S2 ensures permanent green belt boundaries can be maintained at the same time as enabling a more responsive approach to potential changes set out in 11e above.
- b) In the event the Council required the safeguarded land (S2) for development in the future, it is estimated that it could deliver a possible 1000 dwellings (based on 50% of the site being available for development and an indicative density of 35dph). Potential allocation figures are also indicative at this stage.

- c) Whilst it is very difficult to predict future requirements and market conditions / demand beyond 2029, the Council considers that in conjunction with S1 at Westwood Heath, the safeguarded areas could deliver approximately 1800 dwellings which would represent over ten percent of the current Local Plan's housing requirement. In conjunction with the level of flexibility already built in the Plan's housing supply, this is considered to be sufficient to enable the Local Plan to respond to all but the most significant changes without the need for a full Plan review.
- d) The need for additional land for housing will be considered on an ongoing basis through monitoring processes. If required an early partial review in line with Policy DS20 will be instigated. At that time, it will be appropriate to look at whether the allocation of further land for housing is required, and whether Safeguarded Area S2 would be an appropriate location for additional housing.
- e) Representations were received during the consultation process that suggested the area could be allocated now as part of an enlarged H44 site. The Council's view is that given the extant allocations and the associated provision of a degree of flexibility that the current configuration of sites allows for, there is no justification at present to allocate the area for housing at present.

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 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H45 – Hazelmere and Little Acre (Golf Lane), Whitnash

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H45 - Hazelmere and Little Acre (Golf Lane), Whitnash

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

- a) The site includes a residential property and associated gardens, plus paddocks. There are no relevant planning permissions pertaining to the site.
- b) Adjacent site with planning permission for 111 dwellings (land south of Fieldgate Lane W/13/0858, W/14/0775) currently under construction.

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

- a) Criterion a) N/A
- b) **Criterion b)** The site is consistent with this criterion. It is a greenfield site on the urban edge of Whitnash. Services and facilities such as shops, schools, community centre, bus services and employment are close by.
- c) Criterion c) N/A
- d) Criterion d) Development of this site would not lead to coalescence.
- e) **Criterion e)** There are no heritage assets that would be impacted through the development of this site.
- f) **Criterion f)** The Landscape Assessment 2016 (LA09PM) concludes that with a generous approach to landscape, the site could comply with this criterion.
- g) **Criterion g)** The site is not in the Green Belt.

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

a) The Sustainability Appraisal (Doc SA10) set out the sustainability benefits of each of the proposed allocations. Here are no others specific benefits relating to this site.

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

a) Access and Transport: Access is proposed through the site that is currently under construction to the south. This would provide a safe access in to the site. It is noted that this part of Golf Lane could only serve the site if the lane could be widened and constructed to meet adoptable standards (which may require land under other ownerships). The site would result in further pressure on the junction of Whitnash Road and Golf Lane. However the strategic highways assessment (TA14PM) indicates that this is within acceptable limits and does not prevent the development of the site. Whilst the development would be relatively distant from existing bus services (approx. 0.6 miles to Whitnash Road), there may be opportunities to access an improved bus service for the Whitnash East site which is accessible to pedestrians through an underpass below the railway. A number of concerns have been raised in representations regarding access to public transport, road safety and traffic congestion. The evidence suggests that all these concerns can be suitably mitigated.

- b) Flooding and drainage: EA records of areas susceptible to surface water flooding at east corner of site adjacent to railway. The site is in Flood Zone 1. Some flood mitigation will be required for water attenuation; however this is not expected to be a significant constraint on the development of the site.
- c) Landscape: the 2016 Landscape Assessment (LA09PM) notes that the existing buildings on and adjacent to the site, combined with its enclosure by relatively tall hedges and trees defines the landscape of the site. However, it is a transition site lying between the urban area and the countryside and development could be prominent as it is on higher ground. However, the report concludes that development here could take place if existing boundary vegetation was retained and enhanced and if the number of visual receptors to the south and east were limited. Representations raise concerns regarding the adverse impact development would have on landscape and visual amenity of open land. The evidence suggests that with appropriate treatment, these impacts can be mitigated.
- d) Habitats: The Habitats Assessment (B07PM) identifies a number of ecological issues associated with the site and concludes that the site is suitable subject to appropriate regard in the development / layout process necessary to accommodate / mitigate the habitat / biodiversity issue such as retaining and enhancing the hedgerow along Golf Lane and reinstating the hedgerow on either side of the trackway between Little Acre and Hazelemere to enhance connectivity from Mollington Hill south to the Railway Line. Representations have raised concerns regarding the impact on wildlife and the natural environment. However the evidence, summarised above, suggests that these impacts can be mitigated.
- e) Environmental Health: The railway line runs along the eastern boundary of the site so there is the potential for negative effects on health as a result of noise pollution and vibrations; however, it is considered that there is suitable mitigation available to ensure that there will not be any significant negative effects, for instance this could include the provision of a buffer zone between the railway line and development.
- f) Impact on golf club: there is a golf club adjacent to the site to the west. Concerns have been raised that the development of the site would require some land take from the golf club. However, this would only be the case if access was required from Golf Lane. This is not the suggested approach to accessing the site. It is not considered that other impacts will be significant particularly as development of the site will be required to retain the substantial tree/hedgerow along Golf Lane to support landscape and habitat mitigation.
- 5) What are the potential 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 (Doc 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 H45 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
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	✓

6) 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. This site falls within an area that was assessed as being viable.
- b) The Council has been in contact with the site owners who have indicated that they are actively pursuing the development of the site and intend to bring it forward for development at the earliest opportunity following the adoption of the Plan. They are currently considering options regarding development partners to assist them with this process.
- c) Access is a potential issue that still needs to be resolved in terms of delivery. There is a feasible access through the site to the south and it is reasonable to assume that this can be resolved.

7) 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 35 dwellings in 2018/19 and the remaining 2019/20. Given that the adjacent site that is currently under construction is expected to be built out by 2017/18, this is considered to be realistic.

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 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H46a – Gallows Hill Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H46A - Gallows Hill

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

- a) The site is currently in agricultural use.
- b) **W/14/0681**: The eastern part of the site (21.66 hectares) has outline planning permission for "Residential development up to a maximum of 450 dwellings:

Provision of two points of access (on from Europa Way and one from Gallows Hill); Comprehensive green infrastructure and open spaces including potential children's play space;

Potential footpaths and cycleways;

Foul and surface water drainage infrastructure, including attenuation pond;

Ancillary infrastructure and ground modelling.

(Outline application including details of access)".

This was allowed on appeal in 2016 – Appeal Ref. No: APP/T3725/A/14/2229398.

c) The western part of the site (13.84 hectares) does not have any planning permissions although it was the subject of an outline planning application (W/13/1434) in 2013 for up to 250 dwellings. This application was withdrawn.

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

- a) Criterion a) N/A
- b) **Criterion b)** The site is consistent with this criterion. It is a greenfield site on the urban edge of Warwick. Specifically it is close to the major employment areas to the south of Warwick and Warwick Town Centres (which is approximately one mile away). Other facilities such as shops and schools are close by; and additional capacity is planned on sites that are in close proximity.
- c) Criterion c) N/A
- d) **Criterion d)** The site does not lead to coalescence of settlements.
- e) **Criterion e)** The site is in a highly sensitive location close to a number of significant heritage assets, including Warwick Castle Park, Warwick Castle and Warwick Conservation Area. With careful layout and design built around a landscape-led approach, these impacts can be minimised to the extent that the public benefits of additional housing outweigh the heritage impacts.
- f) Criterion f) The evidence shows (LA01 and LA02) that landscape impacts can be mitigated.
- g) **Criterion g)** The site is not in the Green Belt.

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

a) Open space, play areas and allotments: Whilst the land is currently in agricultural use,

Matter 7a – Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

there is no public access to it. The proposals for this site therefore bring this land into use for the direct public benefit of the wider area, including through the provision of public open spaces, recreational areas, allotments and play areas. In particular there is an opportunity to open up high quality and unique views of Warwick Castle from the site.

- b) Cycleways and footpaths: the site has the potential to support a strategic pedestrian and cycle link between the new Country Park and Castle Park / Warwick Town Centre.
- c) Bus services: In conjunction with neighbouring development sites, the site has the potential to contribute to a new bus service, including services linked to the proposed park and ride site.
- d) Highways improvements: the site will contribute to a range of highways improvements / mitigation measures, including the Europa Way corridor.
- e) Ecological links: the site has the potential to provide an ecological link between the new Tach Brook Country Park and the Castle Park.
- f) Education: The site will make contributions to new education provision to the south of Warwick.

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

- a) Transport: The highway network around this site is busy and at times suffers from congestion. Transport is therefore a major constraint. The Strategic Transport Assessments (TA2, TA7 and TA14PM) show that without mitigation, development here (especially when associated with the development of other sites in close proximity) will lead to an unacceptable level of additional road traffic. However, the evidence also shows that with mitigation the road network has the capacity to support development here, even taking account of the cumulative impacts of other sites in the area. In particular, mitigation must involve improvements to the Europa Way Corridor, Banbury Road, Warwick Town Centre and Myton Road. The highways improvements will need to be supported by measures including improvements to sustainable transport modes including walking, cycling and public transport (potentially including the park and ride).
- b) Concerns about traffic have been prominent in representations about all the sites to the south of Warwick. This is an issue that Council has explored carefully in conjunction with Warwickshire County Council. As a result a set of detailed and costed mitigation measures have been prepared and are included within the IDP (IN07PM) – this includes significant investment in the Europa Way corridor, which seeks to provide effective access to the motorway and thereby reduce pressure on Warwick Town Centre.
- c) **Heritage** (direct plus transport impact):
 - i) The impact on Castle Park and the setting of the Castle is of paramount importance. The open countryside views on this side of Warwick are unparalleled elsewhere on the approach to the town. There is a fast transition from countryside to town across

Castle Bridge and the visual impact of the fortification is vital to the appreciation of the historic environment and understanding of the importance of the Castle and its location.

ii) Following consultation with Historic England, the Council is proposing that this site should be allocated subject to sensitive design, landscaping and other mitigation measures. In particular, the development of the site should be landscape-led, to maximise the benefits of views to and from the Castle, St Mary's Church and Banbury Road. Historic England wrote to the Council on 26th July 2016.

In this letter they refer to the Asps (APP/T3725/A/14/2221613) and Gallows Hill Public Inquiries (APP/T3725/A/14/2229398), and write:

As the important heritage matters addressed at those Inquiries are germane to the Strawberry Field site and in view of the judgements made, Historic England does not intend to make further representation on the principle of its development.

They go on to ask that:

... the layout, open space and strategic landscaping shall be informed by an understanding of the significance of the affected heritage assets, their setting and the historic landscape, including taking account of historic designed views, to minimise harm to their significance and support a successful integration of development in the landscape (NPPF paragraph 61).

- iii) Clearly the importance of a heritage and landscape-lead approach has to be the focus for the development of the western part of the site. Subject to a high quality layout and design, the site has capacity for development. The mitigation will however restrict the capacity of the site as key sight lines will need to be protected and the character of the site from key viewpoints will need to be maintained.
- iv) Detailed discussions have been taking place with the site promoters to reach an agreed position on the required mitigation measures. These discussions are ongoing and it is hoped to be able to provide a statement of common ground on these matters by mid-September. In this context, the Council is of the view that the site has further capacity for around 180 dwellings. However, this figure should be viewed as an estimate as the first priority should be to secure effective mitigation for the heritage and landscape impacts.
- v) In addition to the site's direct impacts on heritage assets, the transport mitigation associated with development in this area has been raised as a significant concern by Historic England. There is the potential for proposed junction improvements along Banbury Road and in Warwick Town Centre to impact negatively on the setting of heritage assets. As a result the Council is working closely with Warwickshire County Council on the nature and design of highway mitigation measures and is seeking to use this as an opportunity to enhance some aspects of street design. As a result both Councils are committed to addressing Historic England's concerns as detailed scheme design is developed.
- vi) In addressing the heritage impacts the Council and Historic England have taken note of the representations objecting to the allocation of this site, in particular concerns

about:

- Adverse impacts on historic environment and setting of Warwick Castle, the Castle Park and its environs
- Inter-visibility with the Castle and from the adjacent park
- the important contribution the site makes in maintaining the remaining rural approach to Warwick and context of castle and its surroundings

The Council agrees that these issues are important and has sought to address them in identifying the appropriate mitigation.

- d) Landscape: The site currently provides an attractive rural setting for the south side of Warwick and should be considered an important part of the setting for Castle Park. However given the existing planning permission to the south (the Asps) and on the eastern part of the site, it is suggested that with appropriate landscape mitigation as set out in b) above (taking account of Castle Park, the Tach Brook and wider visual impact) the whole of the site could be developed. The 2016 Landscape Assessment (LA09PM) therefore concluded that with high quality green infrastructure the landscape impact could be mitigated.
- e) **Ecology**: Tach Brook is a potential water vole habitat and needs to be protected by a suitable buffer zone. The size of the buffer zone for this linear habitat will depend on the presence or absence of water voles. A management plan for the brook should be implemented to ensure future good management and enhancement of the habitat. The woodlands and mature trees are of biodiversity value and should be protected from development. Any development within this parcel of land should focus on protecting the section of most ecological significance within the adjacent pLWS / SINC and surrounding grasslands and ponds. Tach Brook is an important linkage with the surrounding landscape and should therefore be retained with suitable buffer zones to minimise disturbance.
- f) Air quality: The Council has carried out an assessment of the cumulative impacts of development on air quality, particularly in locations that are currently Air Quality Management Areas. This study (A04PM) shows that due to cleaner vehicle technology, air quality is forecast to improve during the Plan period. This has been a concern raised in representations.
- g) **Flooding**: The Strategic Flood Risk Assessment (FW02) indicates the site is mainly in zone 1 with the southern boundary in zones 2 and 3. Risk of flooding from land is low to medium, and risk of flooding from artificial sources and groundwater is low. Although this has been raised as a concern in representations, the evidence suggests flood risk is low and that with suitable mitigation through SUDs surface water flooding risk can be suitably mitigated.
- 5) What are the potential 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) The planning application associated with this site (eastern area subject to planning approval W14/0681) has already been required, through section 106 agreements to make contributions to infrastructure. The part of the site without planning permission will be expected to make proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
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	Strategic highways improvements will focus on the Banbury Road and Europa Way corridor – see appendix 1 of the IDP

Contributions to Education (Primary)	✓
Contributions to Education (Secondary)	✓
Contributions to other infrastructure requirements in line with the CIL regs	✓

g) Aside from infrastructure, the other main development constraints concern potential heritage impacts as set out above. These issues have been resolved in principle and subject to suitable mitigation will not be a constraint on delivering around 180 dwellings.

6) Is the site realistically viable and deliverable?

- a) Part of the site has planning permission suggesting that it is deliverable.
- b) The 2013 CIL Viability Study (IN06) indicates that strategic sites in this broad area are viable for housing development. This is supported by clear evidence of activity to bring forward the different parts of the site for development, including; submitting planning applications, agreeing infrastructure provision and contributions; undertaking site preparation work such as re-routing existing overhead cables underground.
- c) The site is deliverable within the Plan period. There is a housebuilder who is actively working to bring the site forward, is in the process of drawing up plans for the site and who has indicated an intention to submit a planning application.
- d) As can be seen from answers to the questions, heritage impacts are a potential constraint on the delivery of the site. However the Council and the developers are working actively together, with advice from Historic England, to resolve this issue. Once this has been achieved there are no other major impediments to the site being developed quickly.

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

- a) See the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper June 2016 (HO27PM). This indicates the following timescales:
 - i) Eastern Area (W/14/0681): First completions in 2018/19. Thereafter up to 95 dwellings per annum with completion on site by 2022/23. This is considered to be realistic given the advanced stage of the site in the planning process whereby the developers are currently working to sign off conditions. The developers have indicated two outlets are likely and that 95 dwellings per annum is therefore realistic.
 - ii) Western Area: First completions in 2019/20. Thereafter up to 50 dwellings per annum with completion on site by 2022/23. This is considered to be realistic given the progress being made towards submitting a planning application for the site. The developers have indicated this timescales is realistic and have suggested that they

are working to a timetable that would see a an outline planning application submitted in 2016 with the first completions a year earlier than assumed by the Council.

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 7a

Proposed housing site allocations and safeguarded land - Warwick, Whitnash and Leamington

H46B – The Asps

Issue

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15 and DS NEW2

NAME OF SITE: H46B – The Asps

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

- a) The site is currently in agricultural use.
- b) It has planning permission for residential development as follows:
 - i) W/14/033: up to 900 dwellings, a primary school (Use Class D1), a local centre (Use Class A1 to A5 and D1) and a Park and Ride facility for up to 500 spaces (Sui Generis) together with associated infrastructure, landscaping and open space (all matters reserved except access).
 - ii) This application was refused planning permission by the Local Planning Authority, and following an appeal, the Inspector upheld the decision of the Local Planning Authority. However, the Secretary of State overturned the Inspectors decision and granted planning permission (APP/T3725/A/14/2221613).

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

- a) Criteria a) N/A
- b) Criteria b) Whilst this site is not immediately adjacent to the built up area of Warwick, it has a close relationship, further reinforced by the allocation of Gallows Hill, immediately adjacent, which is also an allocated site. The site is close to major employment areas to the south of Warwick and to both Warwick and Leamington Town Centres, which are in easy reach of the site.
- c) Criteria c) N/A
- d) Criteria d) The development does not lead to the coalescence of settlements.
- e) **Criteria e)** Whilst the development of the site will have an effect on heritage assets, this was weighed against the public benefits of providing much needed housing development, and other benefits such as the park and ride facilities. The design and layout of the development will also need to be done sensitively to mitigate the harm, together with appropriate landscaping, in particular along Banbury Road.
- f) **Criteria f)** Whilst the development will have an impact on the landscape, again, this was balanced against the much needed housing development.
- g) Criteria g) The site is not in the Green Belt.

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

- a) Park and Ride facility: this has the potential to reduce vehicular traffic, not only in the town centre but also on the surrounding highway network, and would also help alleviate town centre parking congestion. In considering the appeal, the Inspector and Secretary of State gave significant weight to the benefits of the Park and Ride facility.
- b) Air quality: limited weight can be given to the potential improvements in air quality over what would be the case without the development in place.
- c) Job creation: Development of the site would bring economic benefits in terms of job creation by attracting additional workers to the area, the construction industry jobs for the build phase, the jobs to be created from development of the associated retail and service provision at the proposed local centre, and further jobs created by the additional household spend in the area. The Inspector and Secretary of State gave these economic benefits significant weight when considering the appeal.
- d) Bio-diversity: There would be the overall benefit to biodiversity which was given moderate weight in the appeal decision.

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

- a) There are two significant potential adverse impacts which are:
 - i) Impact of Heritage assets and their settings there are a number of important heritage assets in close proximity of the site which include a Grade 1 Registered Park and Garden, a Grade 1 Listed Building, Grade II* Listed Buildings, Grade II Listed buildings and the Warwick Conservation Area. This large area of open agricultural land is part of the setting for Warwick Castle Park and the Conservation Area and provides significance for these assets. Whilst the Local Planning Authority has the view that the proposed development would cause significant harm to a number of designated heritage assets, this has been clearly balanced by the Secretary of State when considering the appeal that when balanced against the housing need, this over-rides the impact on these assets. There is mitigation proposed by a belt of trees and landscaping along the Banbury Road and the detailed layout will ensure that the design and layout of the development is carried out in a sensitive way.
 - ii) Landscape impact the Local Planning Authority submitted evidence to the appeal inquiry stating that the introduction of a large, relatively dense, residential neighbourhood with a school, local centre and transport interchange in the form of a park and ride can only result in a high magnitude of landscape change. However, it is accepted that the impact of the allocation of the land south of Gallows Hill does greatly alter the setting and approach to Warwick. The defined existing edge of the settlement (Warwick school and the Technology Park) creates an acceptable urban/rural interface and that development to the south would create a less harmonious transition. With the allocation of Gallows Hill and planning permission being granted, the effect of developing the Asps starts to

weaken.

- b) The Secretary of State was also of the view that the development would cause very substantial harm, including cumulative effects to the established character and appearance of the area, which is a valued though undesignated landscape. However, again the housing need was balanced against this and the appeal was allowed.
- 5) What are the potential 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) As part of the appeal documents, a unilateral undertaking was submitted which identified all the infrastructure requirements and contributions that will be delivered as benefits to the occupiers of the site, but also provides improved infrastructure for the wider community.

These are as follows:

- i) Education contribution provision of pre-school, primary, secondary and special education school places in the vicinity of the development.
- ii) GP surgery contribution financial contribution to the development of a GP practice to serve the development.
- iii) Healthcare contribution towards the provision of acute and community health care facilities serving Warwick.
- iv) Police financial contribution towards the funding of recruitment and equipping of officers and staff, police vehicles, automatic number plate recognition cameras and premises to serve the development.
- v) Public rights of way contribution to improvements to public rights of way within 1.5 mile radius of the development.
- vi) Welcome packs packs that provide advice to every new occupier of the development on sustainable transport options.
- g) Furthermore, there is a condition requiring a package of highway works that is required to meet the needs of the development, but will also provide wider benefits in the area. This is as follows:
 - i) Europa Way Access Interim Signal
 - ii) Banbury Road Access Indicative Design
 - iii) Gallows Hill Roundabout Potential Mitigation Scheme
 - iv) Banbury Road / Myton Road Potential Mitigation Scheme
 - v) Greys Mallory Roundabout Potential Mitigation Scheme
 - vi) Banbury Road / Gallows Hill Potential Mitigation Scheme
 - vii) Europa Way Corridor Potential Mitigation Scheme.

6) Is the site realistically viable and deliverable?

- a) The site has planning permission suggesting that it is deliverable.
- b) The 2013 CIL Viability Study (IN06) indicates that strategic sites in this broad area are viable for housing development. This is supported by clear evidence of activity to bring forward the different parts of the site for development, including; progress to discharge conditions and a stated intention to submit a reserved matters application as soon as possible.

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

- a) See the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper June 2016 (HO27PM). This indicates first completions 2019/20; thereafter 100 dpa; the site should be built out by 2027/28.
- b) These development timescales are considered to be realistic given:
 - i) the progress the site has made through the planning process

- ii) the ongoing activity by developers to resolve issues as quickly as possible and to bring forward detailed schemes
- iii) the lack of constraints preventing the early development of the site

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