

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

Matter 7c

**Proposed housing site allocations,
safeguarded land and direction for growth -
Edge of Coventry**

Issue

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

August 2016

Contents

Matter 7c – Housing Site Allocations Edge of Coventry

	Page
7c – DSNEW1 Direction for Growth	1
7c – DSNEW2 (S1) Safeguarded Land at Westwood Heath	11
7c – H08 Oaklea Farm, Finham	20
7c – H42 Westwood Heath	26
7c – H43 Kings Hill Lane	37

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

Matter 7c – Policy DSNEW1
Issue – Direction for Growth

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

August 2016

Policy DSNEW1 – Direction for Growth

1. Why is a Direction for Growth necessary? What is it intended to achieve?

- a) This policy relates to a large and strategically significant tranche of land to the immediate south of the boundary between the district and the city of Coventry. The quantum of development proposed here (on H42 – Westwood Heath, S1 – safeguarded land for potential development and H43 – Kings Hill in the main) is very significant. The area also includes part of the campus of the University of Warwick and the identified route of HS2, which gives it both a national and international dimension.
- b) Drafting a specific policy to cover proposed development in the area provides a sufficiently certain yet flexible approach to delivering housing in this sensitive location. It offers the opportunity to create sustainable new communities adjacent to the built-up edge of Coventry, which will support the delivery of jobs, public transport and facilities and services, in a comprehensive manner and also in a way that recognises that delivery in the area will of necessity extend beyond the current plan period. Having a site of the extent of Kings Hill and the potential for the expansion of development at Westwood Heath means that strategic housing delivery is going to run into the following plan period. Identifying a specific and strategic policy that can form the basis for proposals and masterplans running into the next plan provides a continuity of approach and certainty for stakeholders (including residents) and investors. With the opportunity for an early partial review offered by DS20 should it become necessary, this approach will allow for co-ordinated longer-term delivery.
- c) As a result, the Council felt it was appropriate to identify a policy that would reflect both the complexity of bringing forward development in this sensitive area and also highlight the importance the Council attaches to its successful delivery. It will also provide the basis for further strategic development such as roads, schools and other infrastructure and will provide suitable “hooks” for further discussions / development briefs if they become necessary.
- d) The Direction for Growth policy allows the Council to set the agenda in the local plan for the co-ordination of certain essential strategic elements of development and design across a wide area while at the same time allowing developers and promoters and other interested stakeholders flexibility in delivering their schemes.
- e) The approach is intended to enable developers and landowners to position themselves sufficiently robustly to understand the Council’s aims and intentions for the area at an early stage. This in turn should assist in a more focussed and certain delivery path for subsequent planning applications. It would also allow for a degree of flexibility, enabling the production of masterplans and other delivery vehicles from different developers with individual timescales that nonetheless shared certain common goals.
- f) It has been suggested by respondents that an Area Action Plan might be appropriate in this area. The Council is of the view that while this may be appropriate as a vehicle for development where further detailed input is required, the identified sites in the area

covered by this policy benefits from strong and coherent promotion by landowners / developers. Clear lines of communication have been established between relevant parties and work is underway to agree Statements of Common Ground between the Council and key landowners / developers, including in relation to the allocated sites at Westwood Heath (H42), Kings Hill (H43) and the University of Warwick. It is anticipated that these will be available at the latest by the middle of September. These testify to the ongoing levels of discussion and agreement that have already been reached. A further layer of detailed policy represented by an AAP (which would also need to go through public consultation / examination) would seem to be an unnecessary burden, given that delivery of the sites is already subject to joint working. This alternative approach could have impacts on delivery timetables and the housing trajectory. The intention is that by frontloading the policy approach this should provide clear direction to interested parties and allow site delivery to commence as soon as possible, it also allows for separate proposals and sites to be brought forward under a common set of strategic aims and objectives, as identified in the statements of common ground.

- g) Having a strategic overarching policy allocated in the plan gives the necessary recognition and guidance to interested parties.

2. Does Policy DS NEW1 provide sufficient clarity and guidance as to the scale, type and location of future development in the area and the factors to be taken into account?

- a) The scale of development is identified in the policy relative to the amount of land being provided for development, and in other Plan policies such as those dealing with the proposed level of housing across the district and during the plan period.
- b) The location of development is broadly identified but the Council recognises that it would be difficult and somewhat inappropriate to provide a red line boundary to such an area. Although the main foci of growth are recognised, there may be other drivers that appear subsequent to the initial development activity that will also fall within the scope of the policy that have an impact on the location of subsequent development. To enable the policy to capture currently unknown activities, it is important that the broad area remains relatively elastic in nature.
- c) The type of development has been identified as residentially led, as a consequence of the need to meet extant housing needs emanating from Coventry and within Warwick District itself. This is not exclusive; there are opportunities to deliver employment sites, education facilities, local centres and community hubs which will be vital to the development of sustainable communities within the area. Again, the policy recognises and reflects the need for mixed development but is not prescriptive in terms of where and how those elements are delivered.
- d) It was felt appropriate to establish a complementary set of aims and objectives within a broad strategic framework that would provide clear guidance on what the authority and its partners expect in the area. The various elements of interest in this part of the district include infrastructure, cross-boundary relationships, the use of green belt (also with cross-

border implications) and the significant quantum of housing being proposed.

- e) Paragraph New 1.9 of the explanatory text for the policy provides more detail about what is required and how issues should be addressed during development. The proposed Statements of Common Ground (SoCG) also reflect some of the wider issues within the area that masterplans and detailed planning applications will need to address.

3. How will it be implemented in practice?

- a) The policy provides a framework for the area to the south of the boundary with Coventry City, which will form the basis of more detailed masterplanning. The Council has also been in discussion with other strategic stakeholders with a view to establishing a common approach to this level of development and delivery and Statements of Common Ground on these strategic issues are being agreed (to be submitted as soon as possible).
- b) It will be implemented by:
 - i) Close joint working between all stakeholders, including the Councils, landowners, developers and other infrastructure providers. This work will build on the framework provided by the Policy to ensure that requirements (such as infrastructure) are clearly co-ordinated and understood across the area. To this end the Councils are working together to establish clear governance structures to deliver this work. These structures will include ongoing input from landowners and developers.
 - ii) On the 6th April 2016, Warwick District Council's Executive agreed a set of aims and objectives that sought to build on Policy DSNEW1. This report provides further detail on how the Council intends to implement Policy DSNEW1. The agreed aims and objectives are appended to this statement (**Appendix 1**)
 - iii) Following the adoption of the Local Plan, planning applications for the development of sites within the area will be expected to comply with the framework provided by the Policy and the Councils will seek to ensure that statement accompanying the applications take full account of the Policy and that resulting Section 106 agreements enable co-ordinated work between the three Councils to deliver the infrastructure needed to support the developments.

4. In overall terms is the policy justified, effective and consistent with national policy?

- a) Paragraph 52 of the NPPF is particularly relevant to sustainable urban extensions (SUEs), stating *"the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities"*.
- b) The NPPF and national planning guidance stress the need for development to be sustainable. There are three aspects to sustainability – economic, social and environmental. The economic and social aspects will be addressed in part by the direction of high levels of growth to sustainable locations, such as in the case of the land south of Coventry.
- c) With the extent of the proposed development in the area, the Council felt it was justified in recognising this through an overarching policy that would encourage the consideration of comprehensive and longer-term planning within and beyond the plan period. Given this

strategic direction, the onus is on the developers and promoters of various sites to provide a coherent approach in their individual masterplans to the delivery of necessary infrastructure, the provision of services and facilities such as schools and healthcare, the development of housing and employment and the ongoing protection of the local environment.

- d) Development will be close to established areas of employment, infrastructure networks and social and community facilities and services.

Appendix 1

Mission Statement

The intention is to create a new 21st Century living, learning and working quarter serving both Warwick District and Coventry City, which will be a place-shaping exemplar and a major boost to the regional and sub-regional economy, offering an unparalleled educational, residential and community environment.

Vision for land south of Coventry

This area will be a thriving, available and sustainable driver for economic growth, based around its excellent links to the strategic highways network, represented by both a link road between A and B and a bustling rail halt serving the University of Warwick and significant opportunities for cycling and walking through and between the new areas of growth. Transit along both local and strategic networks will be simple, safe and reliable, with minimal delay and congestion.

The area will be a driver for long-term and stable economic growth through the provision of opportunities for employment provision, spin-out activity from the University housed in modern and attractive landscapes and the provision and improvement of strategic highway links to Coventry, the conurbation of Birmingham and beyond.

The presence of the high speed rail link between London and the Midlands, passing immediately to the south of this area, will itself stimulate and secure additional economic opportunities and will open the doors to wider markets both here and to the south.

The University itself will have cemented its reputation as a centre of excellence for higher learning and will have grown in innovative and environmentally sustainable ways to meet demand, resulting in a world-class campus, with buildings and layouts of unparalleled design quality and accessibility.

New housing developments will have created flourishing communities with their own individual characters, catering to residents throughout their lives and providing a range of attractive and well-designed properties.

Residential development improves the quality of life of its inhabitants. It offers healthy and high quality living environments and provides a balanced mix of housing, community facilities, services and employment opportunities that have created a viable and sustainable community. Public perceptions of well-being and security are high, with residential areas designed to promote the safety of pedestrians, cyclists and residents of all ages and physical abilities.

Layouts have been designed to be easily accessible to emergency services and incorporate high degrees of natural surveillance.

Development respects and reflects a high quality natural environment. The landscape and biodiversity value of the area has been enhanced and protected, with precious woodland forming the heart of a system of conjoined and interlocking wildlife and habitat links bringing the countryside into the urban fringe. New habitats have been created and where existing resources were impacted by development, they have been replaced locally.

Access to the natural environment is easily and safely available, with the provision of parks, informal open space, play areas, leisure and sporting facilities an integral aspect of all forms of development.

The following outcomes are what the successful development of land south of Coventry will achieve: -

Infrastructure

Traffic and roads - a strengthened and improved network of strategic transport links serving the area and providing sufficient capacity to allow traffic to flow freely to and from the conurbation, Kenilworth, Warwick and Leamington. This will include: -

- Improvements to existing junctions, carriageways and points of access to the strategic network to mitigate the impacts of additional traffic and, where possible, alleviate current levels of congestion
- The provision of new road infrastructure where required, such as a link road between A and B
- Provision of park and ride opportunities to serve commuters travelling into Coventry and the Warwick / Leamington / Kenilworth areas
- The design of layouts for new housing and amenity areas that allows for the use of modes of transport other than the private car
- Strategic road infrastructure will be phased throughout the life of the developments, with a framework in place to share costs equitably amongst developers in the wider area.

Public and Personal Transport – the extension of existing services to meet demands from new development fully and frequently. This will be particularly important when considering the needs of the resident and incoming student population.

Measures to mitigate and improve services will include: -

- A new rail halt / station servicing the University and Kings Hill
- Improved bus provision, including the extension of extant services and provision of additional routes where necessary
- The creation and enhancement of a network of cycle routes and paths, including safe and accessible links into the conurbation, University and to and from the rail halt.
- The creation and enhancement of safe and accessible pedestrian routes into the conurbation, University and adjacent development, linking wherever possible to existing public footpaths and longer distance routes.

Services and strategic provision –

- Development will be provided with sufficient levels of water, sewage and power infrastructure, to ensure that impacts on adjacent facilities is mitigated.
- Improvements to the capacity of Finham Works will be required as appropriate
- Developers will liaise with service providers to ensure the most appropriate and futureproofed delivery of capacity is achieved, e.g. through shared ducting
- High-speed broadband (fibre optic cabling, wireless etc.) will be provided as standard, as will next-generation mobile technology

Education – the provision of capacity meet demands arising from the new development: -

- New primary school(s) at Kings Hill to meet demand generated by the new community Either a new secondary school or provision of additional capacity at adjacent schools within Warwick District or Coventry depending on demand
- The ongoing development and expansion of the University of Warwick, with best use made of the existing landholding and the extension of the University's built environment in accordance with an agreed masterplan that reflects the high quality of design and sustainability being sought for the area.

Community Facilities – the provision of suitably located and accessible facilities and services to enable the new developments at Westwood Heath and Kings Hill to function as successful and sustainable communities in their own right: -

- Westwood Heath will provide a new health centre, appropriate levels of retail facilities (a convenience store of no more than 500sq.m. gross),
- Kings Hill will provide a new local centre, health centre and employment opportunities
- Both developments will incorporate appropriate levels of emergency services infrastructure, in agreement with the respective services
- Both developments will also include as appropriate community meeting spaces / multifunction buildings that can serve as community hubs.

Green infrastructure – the nature of the landscape and environment in this area will dictate that a significant amount of open space will be required as part of the wider strategic infrastructure requirements. This will be in the form of a mixture of both formal and informal provision: -

- There are existing sports facilities at Kings Hill (Alvis) that will either be retained or relocated within the area, to provide at the least a commensurate level of sports and leisure activity.
- Additional sporting and leisure provision will be required as part of the development areas, to allow people to engage in pursuits conducive to a healthy and active lifestyle
- The development sites themselves (together with areas safeguarded for potential future development) will be removed from the Green Belt.
- The status of the Green Belt in the rest of the area will be maintained and land will be protected from inappropriate development in accordance with the requirements of the NPPG
- Landscape enhancement will be required, to mitigate the impacts of development on the landscape in general and to reinforce Green Belt and other boundaries to prevent encroachment.
- The opportunity to strengthen and reinstate traditional landscape forms will be encouraged.
- Informal public open space will be required on all development sites, especially in locations where meaningful links can be made to the wider countryside. This will allow for wildlife corridors to be maintained and for local communities to be able to enjoy the benefits of a wider range of leisure and recreational opportunities.

- Biodiversity on development sites will be maintained through the provision of habitat creation opportunities or, where habitats are unavoidably impacted on or removed, appropriate levels of offsetting provided elsewhere on the site or as close to it as possible.
- Sensitive habitats, such as Wainbody Wood and the woodlands on Westwood Heath, must be retained and protected and development will maintain these as integral and valued aspects of the final layouts.

Housing – these developments offer an opportunity for the delivery of exciting and innovative housing layouts, house types and a mix of tenures and sizes, that reflect best environmental and sustainable practice: -

- Housing schemes will be of high quality and reflect high standards in construction and residential amenity
- Development will promote higher standards of environmental performance and durability
- Residential development will be expected to make best use of available land, services and infrastructure
- Residential provision will be easily managed and maintained at all stages in the lives of the residents
- Affordable housing will be required to help meet identified need in Warwick District and Coventry, to be apportioned between the two authorities accordingly.
- The level of provision of affordable housing will accord with the requirements set out in the relevant local plan policies for the district.

Employment and economic growth – opportunities for economic growth, both within and adjacent the sites, will help cement the stability and sustainable growth of the sub-region: -

- Employment-generating uses will be housed in modern, attractive and environmentally sustainable buildings that promote energy efficiency and carbon neutrality
- Spin-out activity from the University will be supported and delivered in close proximity, in line with a masterplan
- Infrastructure to support economic growth, such as transport and highways improvements, will be supported through the implementation of the IDP and the provision of funding through legal agreements and CIL requirements.
- A range of new employment opportunities will be explored and where appropriate identified as part of the various masterplans for the sites being promoted.
- The presence of HS2 and the new rail halt will themselves be drivers for economic growth and it will be important to ensure that opportunities for linkages to existing infrastructure and accessibility are maximised.

Health and wellbeing – National planning guidance identifies the following at paragraph 5 of its Health and Wellbeing section:

A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the

physical and mental health of the community. It should ... encourage active healthy lifestyles ... the creation of healthy living environments.

The Vision and Objectives above identify a number of aspects of healthy development, but in addition the following issues should be addressed: -

- Housing will be of sufficient size to prevent overcrowding, will provide for a light, airy living environment and will protect inhabitants from the effects of noise, pollution and extremes of temperature
- Design and layout will promote community interaction through appropriate design and layout, ensuring that residents do not suffer from feelings of isolation
- The layout of schemes will promote physical activity through providing opportunities for walking, cycling and active recreation and will reduce the incidence of traffic accidents
- The provision of substantial areas of open space, landscaping and green corridors will help protect residents from the effects of airborne pollution, as will the design of local streets
- The mental health requirements of residents will be addressed in part through easy and safe access to green open space and the natural environment
- Communities and the residential environment will be enhanced by good access to healthcare, education, social infrastructure and local employment opportunities
- Layouts will reflect best practice in designing out crime

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

Matter 7c – Policy DSNEW2 (S1)
Safeguarded Land at Westwood Heath

Issue

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

August 2016

Policy DSNEW2 – Site S1 - South of Coventry

1. 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. 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 for delivery over a longer period. Identifying safeguarded land through the local plan process will help to preserve green belt boundaries over a longer time period; assuming the sites are confirmed at this stage, 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.
- 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 circumstances and 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.
- f) S1 also has the potential to enable an agile response to other development pressures specific to the area south of Coventry, such as potential expansion at the University of Warwick and emerging plans for transport linkages to UK Central and the HS2 station, even though the details of these proposals are not yet known.

2. How was the safeguarded land 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 S1, this lies adjacent to the current Westwood Heath allocation (H42) and is a greenfield site of around 44ha. It was identified as part of a larger site suggested through the 2015 SHLAA update process (C31 – Hurst Farm; 110ha). Previously, the site had been identified as C03 and C18 (part) in the SHLAA. The larger site was ruled out by a landscape assessment (LA09PM).
- c) The promoters of the site have identified that S1 could deliver around 900 dwellings, although the Council's own SHLAA appraisal suggests a figure of around 770.
- d) The proposed allocation site is bounded to the south by a brook, to the north by Westwood Heath Road, to the west by the proposed allocation at Westwood Heath and Brockendon Road and to the east by the University of Warwick Campus. 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 2016 Landscape Assessment Addendum (LA09PM) confirmed the strength of the brook as a boundary in paragraph 2.2.6;
The brook forms a significant boundary in the local landscape due both to the mature vegetation and blocks of woodland along it (which define local views) and its important local drainage function.
- f) The land lies close to the boundary with Coventry and as such would enjoy a similar relationship to its services, facilities and opportunities as H42 (see separate statement). Development at this location would support a minimisation in the distance commuters may have to travel to access major employment, education and other facilities. Given the open nature of the land, this would also provide an opportunity to create an attractive and environmentally significant development.

3. 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.

- b) Policy DS4 sets out the spatial strategy for the district. It identifies a clear hierarchy of preferred development locations, which includes greenfield land on the edge of 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.
- 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:
- i) **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 south of the edge of the conurbation and will benefit from and support extant services, facilities and employment opportunities.
 - iii) **Criterion c)** N/A
 - 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, conservation areas, registered parks or battlefields within the proposed allocation site, nor within the immediate vicinity, whose setting 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 (paragraph 2.4.1). In addition, part of the site (western section) was considered in the WDC Additional Sites Ecological Report 2016 (BO7PM); there is some evidence of protected species on site and a Local Wildlife Site (Pools Wood) lies along the southern boundary.
 - 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 the Council believes this is outweighed by the need to identify

sustainable future housing provision post-adoption.

- 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. ...

Appendix IV of the Addendum identified (p.9) that the whole of Westwood Heath had been assessed previously and noted that the site referred to as S1 had been identified for removal from the green belt and safeguarding:

*Component parts C05 and C13 allocated for development of 425 dwellings. Site allocation H42. **Part of the site has been removed from the Green Belt and safeguarded for future development** beyond the life of the plan. In identifying this the Council took account of Coventry's housing need, the lack of suitable sites outside the green belt to meet these needs and the good access this area has to the City providing a sustainable location with access to employment, and services. The Council also took account of the need to establish permanence to Green Belt boundaries and the need to plan to consider longer term needs beyond the plan period. [WDC emphasis]*

As the whole of the site had been assessed previously, the Addendum also stated, *Decreased capacity, screened in Appendix II. Reduced capacity is unlikely to lead to any significant effects. No further SA work required.*

- e) The 2015 SA (SA10) flagged up in particular the loss of green belt and agricultural land and the impact on the quality of the landscape of the larger site.
- 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.

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

- a) Please see paragraphs 88 – 94 of the Green Belt Background Paper (EXAM 45).
- b) The site lies within Parcel C20 of the Joint Green Belt Study (JGBS) update (LA07PM). The JGBS identifies the site as having some importance in preventing loss of openness and a significant role in preventing encroachment. However the area was not considered essential to prevent settlement merger or to contribute to the historic character and setting of Coventry.

5. What would be the effect on the openness of the Green Belt?

- a) See paragraph 89 to 95 of the Green Belt Background Paper (EXAM 45) for the Council's strategic approach to maintaining the essential characteristics of Green Belt.
- b) The JGBS (LA07PM) identifies that the open nature of the green belt has already been somewhat compromised in the relevant land parcel (C20) by the presence of scattered farmhouses and dwellings, which have an effect on openness in their immediate vicinity. It also recognises that in the wider area, ribbon development has already occurred along Cromwell Lane in Burton Green and along Kenilworth Road, which has also somewhat compromised the character of the parcel in general.
- c) S1 also lies in the vicinity of HS2, which will run to the south of the site in a cutting. While the use of a cutting is designed to minimise the effect of the line within the landscape, there will inevitably be some impact in relation to the wider countryside, associated paraphernalia and the re-engineering of the landscape.
- d) 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) Uses physical features such as roads (Bockendon Road / Westwood Heath Road), brooks and extant development to provide a strong Green Belt boundary.
- e) The remaining 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 C20 and 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 closely related to the existing built-up area of Coventry and the University of Warwick.
- f) 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 additional land 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.
- g) 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.

6. What are the potential adverse impacts? How could they be mitigated?

- a) **Transport and Traffic:** As discussed elsewhere in this statement, and also in relation to other sites at Kings Hill and Westwood Heath, there is a limited capacity on the current road system to accommodate further traffic related to the large quantum of development in the area to the south of Coventry.
- b) The significant constraints to development relate to the highways infrastructure improvements that would be required to allow additional development to be brought forward. Modelling undertaken by Warwickshire County Highways officers has demonstrated that until such time as significant additional capacity is created on the local highway network, the maximum amount of additional housing development that could be accommodated in the Westwood Heath area without creating unsustainable levels of traffic and congestion is 425 dwellings.
- c) The decision to cap development at 425 dwellings therefore represents the most appropriate strategy for the area at present, although given other wider improvements to highways infrastructure being proposed in the area south of Coventry (e.g. at the A46 / Stoneleigh Road junction), it is likely that there will be some easing of traffic issues generally for certain movements within the network. Development will also bring the opportunity to contribute funding towards other related highway improvements.
- d) Work is being undertaken by the County Council on the consideration of further strategic transport infrastructure within the area that will both provide for additional capacity on the network and also allow for the growth of links between the southern part of the conurbation, the University of Warwick, the various housing allocations and the potential additional housing represented by S1.
- e) Development would result in the loss of some Grade 2 and 3 agricultural land and would impact on an area of medium landscape value. The recent landscape assessment (LA09PM) identified the impact of development at Hurst Farm (C18):

In landscape terms, it would appear likely that there would be significant adverse impacts from the allocation of this land parcel as a whole and it cannot be recommended. However, as identified previously, it could be argued that the watercourse that runs through the most northerly section of this land has the potential to be a strong and natural southern boundary for development adjacent Westwood Heath Road – especially if it was incorporated into a more generous green infrastructure corridor.
- f) Other potential impacts of development generally are addressed in the Matter 7c statement for site H42 at Westwood Heath. The safeguarded site has not been allocated for development at this point so no detailed assessment has been carried out, but the area has been looked at with regard to highways constraints, landscaping, impact on

green belt, ecology and in part in the revised SA.

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

- a) There is a pipeline that crosses the western part of the site, the impact of which would need to be mitigated through appropriate layout and design during the planning process.
- b) The site lies in the vicinity of ancient woodland and a local wildlife site (The Pools). It also covers an area identified as playing fields and allotments. Significant buffering would be required to protect existing ecology and to accommodate infrastructure requirements and easements.

8. 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) and has also been addressed in the Green Belt Background Paper. Table 3, at paragraph 28 of HO25PM sets out the exceptional circumstances applicable to this site. 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 S1 the exceptional circumstances for the allocation of this area and its removal from the Green Belt are identified as follows:
 - i) Is there an essential need that has to be met? Whilst current levels of housing need have been met for the plan period to 2029, 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 the recognition of this need, supported by paragraph 85, provides the starting point for establishing the exceptional circumstances required to support the allocation of safeguarded sites.
 - 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 its services.

Given the allocation of site H42, 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.

9. Is the overall amount of safeguarded land identified sufficient?

- a) S1 ensures permanent green belt boundaries can be maintained at the same time as enabling a more responsive approach to potential changes, as set out in 1e above.
- b) In the event the Council required the safeguarded land (S1) for development in the future, it is estimated that it could deliver a possible 770 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 S2 at Milverton (adjacent H44) 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 into 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 the monitoring process. 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 S1 would be an appropriate location for additional housing.
- e) Representations were received during the consultation process that suggested the site could be allocated now as part of an enlarged H42 site, with a cap of 425 dwellings retained on the total amount of development to be delivered. The promoters felt that the site could accommodate 900 dwellings, with further capacity available on land to the south. 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, particularly in the context of the development cap resulting from local highway capacity constraints.

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

Matter 7c

**Proposed housing site allocations,
safeguarded land and direction for growth -
Edge of Coventry**

H08 – Oaklea Farm, Finham

Issue

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15, DS NEW1 and DS NEW2

NAME OF SITE: H08 – Oaklea Farm, Finham

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

- a) The site lies within the green belt immediately adjacent to the boundary with Coventry City. It was formerly in agricultural use.
- b) There are no records of planning applications being made on the site since 2000.

2) 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.
- b) 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 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) The site in question is small and given its location effectively forms part of the built-up area at present, rather than reading as part of a wider green belt / open landscape.

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

- a) The allocation of the site would offer a rounding-off of the development boundary in this immediate area, while retaining very strong green belt boundaries (A46) to prevent encroachment into other parts of the area.
- b) The biodiversity of the area could be enhanced through the retention and management of the existing tree cover as part of a landscaping scheme associated with a planning application. Landscaping could also help buffer the site from road noise and would offer screening to the wider area.

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

- a) Noise: The site lies very close to the A46 and a significant buffer would be required to allow residential development on site to occur. Noise and air pollution from the road would also require mitigation. The site capacity of 20 units will allow for appropriate mitigation to take

place to enable residential amenity to be created and maintained.

- b) Access: The Village Sites Appraisal Matrix 2016 (V19PM) states that for proposed development to be safely accessible from the highway, the speed limit on Howes Lane would have to be reduced from 40mph to 30mph. an access point into the site would need to be as far south of the site as possible, towards Leigh Avenue. These issues can be addressed and mitigated through appropriate site design and conditions / agreements when an application is considered.
- c) Trees: The site contains a number of significant trees that would need to be retained and protected.
- d) Flooding: The eastern section of the site is within Flood Zone 2. However, this would appear to be that part of the site that contains a large number of trees, so is unlikely to be identified as a developable area.

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 H08 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 owner has expressed an interest in releasing the site for development. Development is achievable subject to designing a suitable scheme to overcome the configuration of the site and appropriate tree and vegetation cover / buffering.

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

- a) See also the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper June 2016 (HO27PM). Delivery is identified as 20 units in 2018 / 19.
- b) Given the scales and availability of the site and relative lack of constraints, 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 Joint Green Belt Study identifies the site as falling within Parcel C13, which also contains Finham Sewage Treatment Works and Coventry Golf Club clubhouse, both of which elements have significant impacts on the overall importance of the parcel in green belt terms.
- b) The parcel
- i) does not have any significant value in preventing ribbon development

- ii) has relatively little importance in maintaining openness
 - iii) no role in preventing coalescence
 - iv) little significant value in safeguarding the countryside from encroachment
 - v) some value for its intervisibility with the historic core of Coventry
- c) Development of the small section of the wider parcel represented by H08 would therefore have little to no impact on the overall purposes of green belt, given the wider area's limited importance.
- d) The Village Sites Appraisal Matrix 2016 (V19PM) describes the sites as:
Small triangular parcel which plays a minor Green Belt role and has a stronger function as part of the surrounding built-up landscape
- e) The Green Belt and Green Field Review (V13) also identified that the site had a low value for green belt purposes

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

- a) The site is identified as green belt but in reality would appear to serve very few of the purposes of green belt, including maintaining openness. The site is bounded by Howes Lane to the west and north, the A46 to the south and existing residential development to the east; the A46 in particular would make a logical and strong green belt boundary.
- b) The residual green belt in the area itself has a somewhat limited role in supporting the purposes of green belt, and the development of this small section of it will not have any significant impact on the character of the rest of the area.

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

- a) Paragraph 13 of the Distribution of Development Paper (HO25PM) makes clear that the Council has never excluded green belt from consideration where exceptional circumstances apply when considering locations for new allocations. Given the quantum of housing required to meet the identified overspill, it was felt that this site would represent a logical and sustainable solution. Paragraph 14 of the Distribution of Development Strategy Paper also refers.
- b) The Green Belt Background Paper (EXAM 45) sets out in more detail the legal and legislative issues around exceptional circumstances. In addition to this, the Council undertook a high-level assessment of six spatial options for further development that were considered following the first part of the examination in public. The six options are examined in more detail in the Distribution of Development Paper (Appendix 1) but in brief, they looked at the following: -
 - i) Focus development outside the Green Belt
 - ii) Focus development in and the around the edge of urban areas & sustainable growth villages
 - iii) Focus development around key transport corridors
 - iv) Dispersal Approach: distribute development across urban areas & urban edge, growth

- villages and limited infill villages
- v) New Settlement outside the Green Belt
 - vi) New Settlement in the Green Belt
- c) Options ii and iii scored most highly as sustainable locations for development and thus have shaped the location of the additional allocations, including consideration of areas within the green belt that are concomitant with the preferred options – in and around the edge of urban areas and sustainable growth villages and around key transport corridors.
- d) Specifically, exceptional circumstances for the allocations in the Green Belt and discussed in strategic terms in the Green Belt Background Paper and are identified as follows in the Distribution of Development Paper:
- i) Is there an essential need that has to be met?
Yes, the HMA's and Coventry's housing need and the lack of capacity within Coventry; important in achieving a five-year housing land supply on adoption; important in meeting local housing need (constrained by current planning policy).
 - ii) Are there any suitable sites outside the Green Belt that can meet this need?
There are insufficient suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet both overall and five-year supply housing need. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy or effective in meeting these needs.
 - iii) Is this the best site within the Green Belt to meet the need?
It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. The allocations identified through the modifications (including in the Green Belt) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potential improvement) of local services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. For this reason additional allocations (proposed in 2016) are focused more on those sites which have stronger access to Coventry.
- e) This small site lies immediately adjacent to residential development within Coventry and as described above would enjoy extremely strong boundaries if taken out of the green belt and developed. At the same time it serves no significant green belt purpose and its removal from the green belt would have no appreciable impact on the wider character and amenity of the area.
- f) The Distribution of Development Paper specifically comments on the site's exceptional circumstances,
- This site contributes towards the District's housing needs and given its size can contribute to 5 year supply on adoption of the Plan. It is a suitable site on the edge of Coventry which is bounded by clear defensible boundaries.*

N.B There have been no objections to the allocation of this site

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

Matter 7c

**Proposed housing site allocations,
safeguarded land and direction for growth -
Edge of Coventry**

DSNEW1

H42 – Westwood Heath

Issue

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15, DS NEW1 and DS NEW2

NAME OF SITE: H42 – Westwood Heath

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

- a) The land is currently agricultural in nature.
- b) There is no current or recent planning history relating to the site.

2) 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.
- b) 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 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) The allocation of this site for housing development is consistent with the criteria of the spatial strategy as follows:
 - i) **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 immediate south of the edge of the conurbation and will benefit from and support extant 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. In addition, the site allocation boundary ensures that a gap exists between the proposed allocation and Burton Green, to help maintain the settlement's character and amenity.
 - v) **Criterion e)** The site is consistent with the criterion. According to the recent Heritage Assets Review of Local Plan Site Allocations (HE04PM) there are no listed buildings, scheduled monuments, conservation areas, registered parks or battlefields within the proposed allocation site, nor within the immediate vicinity, whose setting 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 high 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. This site would help meet housing needs and assist in the delivery of a five-year land supply through the provision of a range of sites. 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 an additional housing site at a scale that provides for the ability to create a truly sustainable community.

- d) The site was looked at in the updated SA Addendum Report 2016 (SA11PM). The Sites Screening section of Appendix II (p.9) reported that,

... Component parts of a single site appraisal undertaken in 2015 for SHLAA sites C02, C03, C05, and C13 ... Given the reduced area of the site for development purposes it is considered that the changes do not significantly affect the findings of the 2015 appraisal. The allocation in part can however contribute to minimising the identified effects on traffic, loss of Greenfield land, loss of Green Belt land, and local biodiversity.

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.

- e) 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 and the Distribution of Development paper (HO25PM) also identifies the exceptional circumstances extant across the district for various areas.

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

a) Infrastructure –

- i) A strategic transport modelling exercise has been carried out for newly allocated sites including this one (TA14PM). It demonstrates that the local road network could accommodate the proposed level of additional growth at Westwood Heath. The development of the site will provide opportunities to enhance existing sustainable transport connections, including those to Tile Hill railway station, and pedestrian / cycleway provision. It is possible that additional housing in the area could support the delivery of a stronger public transport network e.g. through increased bus frequency.

b) Employment –

- i) The proximity of the site to the University of Warwick and Coventry means that there is the opportunity for the new residents to access a wide range of employment opportunities that would be easily accessible by foot, public transport or cycling as well as by car.

c) Landscape and open space –

- i) Additional opportunities for informal and formal leisure and recreation will be created as part of the development of the site. This will include the provision of open space for walking, cycling and other forms of both passive and active recreational activity.

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

a) **Highways –**

- i) There have been concerns expressed over the capacity of the local road network to accommodate additional traffic in the Westwood Heath / Kings Hill area and as a result the Council commissioned an update of the Strategic Transport Assessment (TA14PM) to model the potential outcome of additional traffic / vehicle movements given the potential uplift in the residential population. Modelling suggested that there would be a significant increase in traffic across the Westwood Heath area, even at relatively low levels of additional dwellings. It was identified in the STA that during the morning period, the most congested links adjacent to Westwood Heath Road would be at Crackley Lane or Gibbet Hill Road (reflective of the small rural road character of Crackley Lane) and even at relatively low numbers both roads were reaching capacity. This demonstrated that given current highway capacity, the delivery of 425 dwellings at Westwood Heath would be the maximum development threshold.
- ii) The decision to cap development at 425 therefore represents the most appropriate strategy for the site at present, although given other wider improvements to highways infrastructure being proposed in the area south of Coventry e.g. at the A46 / Stoneleigh Road junction, it is likely that there will be some easing of traffic issues generally. Development on site will also bring the opportunity to contribute funding towards other related highway improvements.
- iii) The site has also been assessed by Warwickshire County Council's Highways Section (as SHLAA sites C03 and C13 – HO22PM). A number of access options have been identified, which will help to ensure safe access to the highways network. Options could include the creation of a roundabout junction with Westwood Heath Road / Ten Shilling Drive and the improvement of Bockendon Road, and it may be possible to close the Bockendon Road / Westwood Heath Road junction. The Westwood Heath site frontage is within the signed 30mph limit but close to a 40mph limit to the east – the assessment recommends speed data be used to inform a visibility splay and forward stopping sight distance criteria. For full development of this site, a minimum of two vehicular accesses would be required.
- iv) The proposed line of HS2 will run close to the site and concern has been expressed about the possible conflict of infrastructure development in proximity to the housing site. Advice has been received to the effect that although the delivery of HS2 spans several years, peak construction will only take place during a proportion of this. In addition, the A46 / Stoneleigh Road junction upgrade is planned to be in place before the peak of HS2 construction traffic in this area is reached in 2019 / 20, resulting in additional local and strategic network capacity to accommodate these movements.
- v) Respondents have cited various issues around transport and access, including inadequate infrastructure, the need for a link road before development starts, poor accessibility, congestion and the need for road improvements to cope with additional

traffic.

b) Heritage –

- i) The Heritage Assets Review of Local Plan Site Allocations (HE04PM) there are no listed buildings, scheduled monuments, conservation areas, registered parks or battlefields within the proposed allocation site.
- ii) Some respondents have suggested that there will be an adverse impact on historic remains and that a programme of intervention and mitigation relating to the historic environment will be needed. In terms of the site, this can be addressed when conditions are being considered as part of a planning application process, with the ability to require a watching brief and appropriate level of intervention should it become apparent that there is archaeological interest on site.

c) Education –

- i) The allocated site, at 425 dwellings, would be too small to support a primary school by itself. The adjacent area of safeguarded land will be considered during an early partial review of the plan (as set out in Policy DS20 as revised and Policy DSNEW1) when further development may come forward on site S1. Until such time as further development of this part of the area is agreed, school place provision will be dealt with through other local means.
- ii) The site promoters have been in discussion with officers at the County Council and the following potential solutions have been identified: -
 - Provision at a new school on the site currently identified as S1 if and when that is brought forward
 - Provision at a school in Kenilworth (to be determined)
 - Shared provision / additional capacity at the new school at Kings Hill
 - Exploration of capacity at schools in Coventry
- iii) It is possible that there will be a need for a short-term solution, such as the provision of a bulge class at an existing school, pending determination of a permanent solution.

d) Ecology –

- i) The WDC Additional Sites Ecological Report 2016 (BO7PM) identifies key features of the site as being ancient and semi-natural woodlands, intact hedgerows, ponds and associated wetlands and semi-improved grasslands. It states that there are no designated sites within the area; there are two local wildlife sites that form part of the southern boundary of the site (Black Waste Wood and The Pools Wood). There are also recorded details of bats and great crested newts on the site or close to it.
- ii) Mitigation is suggested in the form of maintaining and incorporating additional tree cover and well-established hedgerows, to conserve the important semi-natural woodlands and facilitate improved connectivity between them.
- iii) The report also suggests the pond complex and associated wetland habitat should be incorporated into a local wildlife site and then surveyed, and given the presence of HS2, the focus should be on local wildlife site woodlands between the route and the allocated site. It should also be noted that the boundary of the allocated site does not lie adjacent to Black Waste Wood.

iv) Respondents have commented on the adverse impact on wildlife and habitats including protected species.

e) **Landscape –**

- i) Development will have an adverse impact on the visual amenity and openness of the wider area. The site lies within an area of acknowledged landscape value.
- ii) In 2008, the landscape review suggested that this area should be mainly safeguarded from development.
- iii) A subsequent landscape reassessment was undertaken in February 2016 (LA09PM), at which time the conclusion was that there were opportunities for development within the area under consideration (a larger area than the site now allocated) without substantial adverse impacts to the wider landscape setting or Green Belt function.
- iv) In particular, the site identified as C13 (Lodge Farm) in the SHLAA that forms the majority of the current allocation was identified in the assessment as a site that
... could be suitable for development allocation pending evaluation of access infrastructure and other service needs ...
- v) Respondents have cited the loss of agricultural land and the loss of open space as well as the adverse impact of development on the local area. These issues are addressed above.

f) **Flooding –**

- i) While the site lies within Flood Zone 1 and thus does not have a recorded issue with flooding, there is evidence of some surface water flooding to the south-western part of the site.
- ii) A flood risk assessment will be needed for the site, when planning applications are being submitted, to incorporate both surface water and foul water flooding mechanisms and to examine any effects on existing water bodies and sewers.
- iii) Representations have referred to the increased risk of flooding.

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 and its 2015 addendum (IN06, EXAM3, HO24PM) 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 H42 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	The allocation site includes an area of open space that has been identified in the promoter's information as allotments, attenuation ponds, nature park and sporting facilities.
Contributions to Health (Hospitals)	✓
Contributions to Health (G.P. services)	✓
Contributions to Highways / Transport	✓
Contributions to Education (Primary)	The number of houses being provided in this case would be too small to require independent educational provision but discussions are taking place to ascertain where and how capacity might be made available.
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. The strongest viability is in rural areas and much of Leamington Spa. This site thus falls within an area that was assessed as being viable.
- b) The 2015 Viability addendum looks at seven additional sites, including Westwood Heath, and concludes that,
All seven sites generate residual land values which are, in our judgement, sufficient to incentivise the release of the sites for development. Our assessment takes account of the Council's requirement for 40% affordable housing, which we have modelled adopting a tenure split of 80% rented and 20% intermediate
- c) The site is deliverable within the Plan period. There is a developer attached to the site who will be carrying forward its subsequent delivery. They are actively drawing up plans for the site and have indicated an intention to submit a planning application soon after adoption of the local plan.
- d) Discussions with the site's promoters have been taking place over a number of months and this has progressed to the production of a Statement of Common Ground (SoCG). This is in preparation and will be shared as soon as it is ready.

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

- a) See also the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper, June 2016 (HO27PM). The site has the capacity for around 425 new dwellings, with associated infrastructure, services, facilities and open space. The delivery of 425 houses during the plan period has been agreed with the promoters as a realistic delivery target.
- b) The current trajectory assumes that 25 units will be built in 2018-19 and the remainder will be built out at a rate of 100 units per annum between 2019-20 and 2022-23
- c) The Council believes this to be a reasonable and deliverable approach.

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

- a) The site lies within Parcel C20 of the Joint Green Belt Study (JGBS) update (LA07PM). The JGBS identifies the site as having some importance in preventing loss of openness and a significant role in preventing encroachment.
- b) However the area was not considered essential to prevent settlement merger or to be contributing to the historic character and setting of Coventry.

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

- a) See paragraph 89 to 95 of the Green Belt Background Paper (EXAM 45) for the Council's

strategic approach to maintaining the essential characteristics of the Green Belt.

- b) The JGBS (LA07PM) identifies that the openness of the Green Belt has already been somewhat compromised in the relevant land parcel (C20) by the presence of scattered farmhouses and dwellings, which have an effect on openness in their immediate vicinity. It also recognises that in the wider area, ribbon development has already occurred along Cromwell Lane in Burton Green and along Kenilworth Road, which also has somewhat compromised the character of the parcel in general.
- c) Westwood Heath also lies in the vicinity of HS2, which will run to the south of the site in a cutting. While the use of a cutting is designed to minimise the effect of the line within the landscape, there will inevitably be some impact in relation to the wider landscape, associated paraphernalia and the re-engineering of the landscape.
- d) 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) Uses physical features such as roads (Bockendon Road) and mature hedgerows together with additional planting to provide a strong Green Belt boundary.
- e) The remaining 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 C20 and 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 Coventry and the University of Warwick.
- f) Retention of open land to the west (between the site and Burton Green) and the extent of the proposed safeguarded land to the east 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 (please see the Council's statement on site S1 for further details).
- g) As a result of the impact of development upon openness, it is proposed to remove the site from the green belt upon adoption. This will ensure that the remaining green belt retains its overall sense of openness and that a precedent for housing development is not set in green belt areas. Given that green belt boundaries can only be reconsidered during a local plan review, this will help secure the longer-term protection of the area.

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

- a) Paragraph 13 of the Distribution of Development Paper (HO25PM) makes clear that the Council has never excluded Green Belt from consideration where exceptional circumstances apply when considering locations for new allocations. Given the quantum of housing required to meet the identified overspill, it was felt that this site would represent a logical and sustainable solution. Paragraph 14 of the Paper also refers.
- b) The Green Belt Background Paper (EXAM 45) sets out in more detail the legal and legislative

issues around exceptional circumstances. In addition to this, the Council undertook a high-level assessment of six spatial options for further development that were considered following the first part of the examination in public. The six options are examined in more detail in the Distribution of Development Paper (Appendix 1) (HO25PM) but in brief, they looked at the following: -

- i) Focus development outside the Green Belt
 - ii) Focus development in and the around the edge of urban areas & sustainable growth villages
 - iii) Focus development around key transport corridors
 - iv) Dispersal Approach: distribute development across urban areas & urban edge, growth villages and limited infill villages
 - v) New Settlement outside the Green Belt
 - vi) New Settlement in the Green Belt
- c) Options ii and iii scored most highly as sustainable locations for development and thus have shaped the location of the additional allocations, including consideration of areas within the green belt that are concomitant with the preferred options – in and around the edge of urban areas and sustainable growth villages and around key transport corridors.
- d) Specifically, exceptional circumstances for the allocations in the Green Belt and discussed in strategic terms in the Green Belt Background Paper (EXAM 45) and are identified as follows in the Distribution of Development Paper (HO25PM):
- i) *Is there an essential need that has to be met?*
Yes –
 - the HMA's and Coventry's housing need and the lack of capacity within Coventry;
 - important in achieving a five-year housing land supply on adoption;
 - important in meeting local housing need (constrained by current planning policy)
 - ii) *Are there any suitable sites outside the Green Belt that can meet this need?*
There are insufficient suitable sites outside the Green Belt (or any more sustainable locations within the Green Belt) that can meet both overall and five-year supply housing needs. Alternative sites outside the Green Belt are neither consistent with the Local Plan's Strategy nor effective in meeting these needs.
 - iii) *Is this the best site within the Green Belt to meet the need?*
To support the housing market through boosting significantly the housing supply, it is important to provide a variety of sites in various locations. The allocations identified through the modifications (including those located in the Green Belt) offer sustainable and unique locations to help achieve this. These locations also provide directly for local housing needs and support the retention (and potential improvement) of local services. Finally, these locations also support both the Housing Market Area's (including the City's) and the District's housing need. For this reason additional allocations (proposed in 2016) are focused more on those sites that have stronger access to Coventry.

- | | |
|----|--|
| e) | Respondents have suggested that use of the Green Belt is wrong and that development contradicts the safeguarding of the Green Belt. They have also suggested that there is no justification for the allocation, that the site is not suitable for further development and no evaluation of the effects of building houses here has been undertaken. |
|----|--|

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 7c

**Proposed housing site allocations,
safeguarded land and direction for growth
- Edge of Coventry**

H43 – Kings Hill Lane

Issue

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

August 2016

Policies DS11, DS15, DS NEW1 and DS NEW2

NAME OF SITE: H43 - Kings Hill

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

- a) There is no current or recent planning history relating to the site. The site is agricultural in nature, with a scattering of residential and other buildings.

2) 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). Paragraph 8 to 15 of this document set out the approach taken to establishing a Spatial Strategy for the Submission Draft Local (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.
- b) 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 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) The allocation of this site for housing development is consistent with the criteria of the spatial strategy as follows:
 - i. **Criterion a)** Paragraph 13 of the Distribution of Development Paper makes clear that the Council has never excluded green belt from consideration where exceptional circumstances apply when considering locations for new allocations. Given the required quantum of housing to meet the identified overspill, it was felt that this site would represent a logical and sustainable solution.
 - ii. **Criterion b)** The site is consistent with criterion b) as it lies to the immediate south of the edge of the conurbation and will benefit from and support extant services, facilities and employment opportunities.
 - iii. **Criterion c)** The site could provide an element of employment growth and will be close to both the new housing and the southern edge of Coventry.
 - iv. **Criterion d)** The site will not of itself lead to coalescence and although it will narrow the gap between the edge of Coventry and Kenilworth, its strong Green Belt boundaries ensure that the remaining gap is protected.
 - v. **Criterion e)** There are areas within the wider site that are of heritage interest (listed buildings and scheduled monuments) and other heritage assets lie within the wider area adjacent to the site. The on-site assets have been considered in the Heritage Assets Review, January 2016 (HE04PM) and the report considered that development would have the potential to result in a major adverse impact. However, mitigation would be possible, and the report suggested that close consultation with Historic England on the scheduled

monument to establish site constraints would be appropriate, as would a buffer around the monument. The area could be incorporated into green infrastructure as open space. Impact on the listed buildings could be mitigated by sympathetic design, layout and screening. Further mitigation could be included as the site work progresses.

This is also reflected in the SA Addendum (SA11PM), which recognises the potential for adverse impacts on the historic record and assets but which states,

It is considered that the sensitive design and layout of development along with other mitigation measures such as screening will help to reduce the significance of negative effects.

- vi. **Criterion f)** The site has been assessed for its landscape value (LA09PM). While the site is partially visible from certain aspects and contains a number of constraints and some challenging topography, the assessment identifies a series of potential mitigations and considerations and concluded that development would be relatively well contained within the wider landscape. It states,

Appropriate development is unlikely to have a significant adverse impact on the character of the historic centres of Coventry, Kenilworth or Stoneleigh or approaches to those settlements. The land presently provides for some of the purposes of Green Belt, but allowing development at this parcel would have clear boundaries to prevent future urban sprawl, would not result in settlement coalescence, will 'fit' the wider settlement pattern and will provide a variety of opportunities for positive planning.

- 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. This site would help meet housing needs and assist in a five-year land supply through the provision of a range of sites. 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 an additional housing site at a scale that provides for the ability to create a truly sustainable community. 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. The Distribution of Development paper (HO25PM) also identifies the exceptional circumstances extant across the district for various areas; for Kings Hill it identifies the need for additional housing to meet wider needs.

- d) The site was assessed in the SA Addendum Report 2016 (SA11PM), Appendix III. The main adverse impact identified in the Addendum was the potential for a permanent major negative impact against SA Objective 5, the prudent use of land and natural resources, relating to the use of green belt and greenfield land. However, the assessment also identifies the major positive benefit through meeting housing needs, reducing the need to travel and the provision of local services and community facilities. In general it is considered to be demonstrably a sustainable site on the edge of the built-up area, in line with the emerging strategy.

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

The development is of a size that it will generate the need for improvements to road infrastructure, additional provision for education, a new local centre and employment opportunities.

- a) Infrastructure (transport and roads) – the capacity of the local road network means that additional improvements will be needed to ensure that the proposed development will not

exacerbate existing issues. The introduction of required mitigation is anticipated to potentially alleviate issues elsewhere on the network by providing higher capacity alternative routes and improvements to junctions.

- b) The site lies close to the Leamington to Coventry rail line and given the proximity to the University of Warwick, there may be opportunities to consider related improvements / upgrades to passenger services and provision.
- c) Infrastructure (social) – the development will include both its own community hub and local centre retail provision, but is also expected to provide healthcare facilities and emergency services cover as appropriate. This will help prevent additional vehicle movements into and out of adjacent settlements that currently provide similar services and facilities, such as Kenilworth. Appropriately scaled retail provision will also be sought, which again should alleviate additional traffic.
- d) Location / employment – while a specific quantum of land has not been identified to provide for employment use, it is likely that employment opportunities will be provided, indicated in the promoter's representations as potentially being located alongside the A46. The proximity of the site to the University of Warwick and Coventry means that there is the opportunity for new residents to access a wide range of employment opportunities that would be easily accessible by public transport or cycling as well as by car.
- e) Environment - It will offer the opportunity to protect, enhance and extend links between the urban area and the wider countryside, through the provision of green wedges throughout the development, areas of open space and the management of sensitive environmental resources such as Wainbody Wood.
- f) Leisure and recreation – additional opportunities for informal and formal leisure and recreation will be required as part of the development of the site. This will include the provision of open space for walking, cycling and other forms of recreational activity.

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

a) Highways and Transport –

- i) There will be increased pressures on the road network in particular from the addition of 4,000 new houses. This has been modelled by the County Council's Highways Department, who have undertaken a specific analysis of the potential impact on the Kings Hill area with the WDC Local Plan Strategic Transport Assessment (STA). The STA considers the combined impact of Kings Hill and the cumulative impact of WDC local plan development sites (TA14PM). Their findings were that sufficient mitigation could be provided over time that would not only absorb the proposed levels of growth but also make improvements to local conditions as a by-product. The IDP identifies the proposed highways infrastructure requirements as:
 - New access junction to the proposed Kings Hill site via Stoneleigh Road and Green Lane.
 - Implementation of Phase 1 of the A46 Link Road, which will see a major upgrade to the A46 / Stoneleigh Road junction. A second bridge over the A46 to the north of the

existing junction will be provided which will allow the construction of a full roundabout, along with minor associated amendments to Stoneleigh Road and its junction with Dalehouse Lane.

- ii) There are various other forms of improvement measures that are being identified at present that will allow the predicted highways impacts to be adequately mitigated. In addition, locating this housing close to Coventry means that commuting times will be reduced and residents can choose to take advantage of other forms of transport such as bus and rail given the proximity to Coventry.
- iii) The exact form and detail of the mitigation will be determined through the planning application process where more refined, site specific analysis of mitigation requirements will be identified through modelling assessments and engagement with County Highway officers.
- iv) The accessibility of the site has also been assessed by County Highways officers. They have confirmed that the site can be accessed safely at various points, taking into account the need to avoid / accommodate frontage mature trees and ensure that suitable public transport and pedestrian / cycle facilities can be provided to support the proposed development.
- v) Objectors have cited the need for further investment in the highways network, an unsustainable increase in local traffic and poor accessibility as issues.

b) Environment –

- i) The loss of currently open agricultural and green field / green belt land will have an impact on the character and visual amenity of the area. The site has been assessed for its landscape value (LA09PM). While the site is partially visible from certain aspects and contains a number of constraints and some challenging topography, the assessment identifies a series of potential mitigations and considerations and concluded that development would be relatively well contained within the wider landscape. It states,

“Appropriate development is unlikely to have a significant adverse impact on the character of the historic centres of Coventry, Kenilworth or Stoneleigh or approaches to those settlements. The land presently provides for some of the purposes of Green Belt, but allowing development at this parcel would have clear boundaries to prevent future urban sprawl, would not result in settlement coalescence, will ‘fit’ the wider settlement pattern and will provide a variety of opportunities for positive planning.”

- ii) The site also contains some sensitive habitats including Wainbody Wood, an ancient woodland. The WDC Additional Sites Ecological Report 2016 (B07PM) assessed the site. Features identified as having the most significant nature conservation value were the broad-leaved semi-natural woodland of Wainbody Wood, the network of 21 ponds, the watercourse of the Finham Brook, species-rich hedgerows, veteran trees and species-rich grassland. There are a number of protected species present on site. The Assessment makes a number of recommendations about management and mitigation, including:
 - the protection of Wainbody Wood and its enhancement,
 - the retention of trees and hedgerows throughout the site,
 - the implementation of buffer zones and fencing to protect the wood and flora from encroachment,
 - the survey of species-rich hedgerows,

- long-term management of species-rich grasslands.
- iii) As part of Policy DSNEW1, there is a commitment to protect Wainbody Wood and protect and enhance habitats on site. Where necessary WDC will require habitat retention / replacement on site and where this is not possible, provision for habitat creation as close to the site as possible will be required.
- iv) Responses to the allocation have highlighted concerns about the potential impact on habitats and wildlife / ecology as well as about the loss of agricultural land and the impact on the rural character of the area.
- c) **Historic environment –**
 - i) A number of listed buildings and scheduled monuments lies within or adjacent to the site. The on-site assets have been considered in the Heritage Assets Review, January 2016 (HE04PM) and the report considered that development would have the potential to result in a major adverse impact. However, mitigation would be possible, and the report suggested that close consultation with Historic England on the scheduled monument to establish site constraints would be appropriate, as would a buffer around the monument. The area could be incorporated into green infrastructure as open space. Impact on the listed buildings could be mitigated by sympathetic design, layout and screening. Further mitigation could be included as the site work progresses.
- d) **Local infrastructure –**
 - i) The addition of up to 4,000 new houses will have an impact on the capacity of local schools and their ability to provide for both extant and incoming cohorts. The IDP has identified that there will be a need for a new two-form entry primary school located on site (based on 2000 dwellings). It identifies that as the site proceeds to deliver its 4000 dwelling capacity (beyond the current plan period) land should be reserved to cover the possibility of a new 'all-through' primary / secondary school and Special Educational needs facilities.
 - ii) Discussions are ongoing between Warwickshire County Council, Coventry City Council and the promoters of the scheme on the form of educational provision and the most appropriate format / location for it (see Question 5 below). The Council will update the Examination on the outcome of these discussions.
- e) **Noise**
 - i) The site lies adjacent to the A46 and a railway line to the west. These activities generate high levels of noise and fumes and it would be inappropriate to locate residential uses adjacent to such sources.
 - ii) Mitigation will be achieved through careful masterplanning of compatible uses to ensure that residential properties are further away and less sensitive forms of development / use instead are used as a buffer between them.
- f) **Sports and leisure**
 - i. The presence of the existing Alvis Sports Ground at the periphery of the site and a perceived threat to its retention through the proposed development has been identified as an issue by a number of respondents. The intention is to see the sports club facility

retained (albeit that it is a private club and thus not a public resource in the way a park would be), and to encourage the provision of additional recreational opportunities wherever possible. This is in line with the aim of promoting healthy and active lifestyles.

g) **Drainage / sewage –**

- i) The site lies close to the Finham Water Treatment Works to the north east and as a consequence there may be issues around odour and pollution. This could be mitigated by the sensitive design and layout of the site, avoiding residential development adjacent to the cordon sanitaire and instead locating less sensitive uses or open space in the vicinity.
- ii) Finham Brook is located in the south east corner of the site.
- iii) Kings Hill contains land served by aquifers, water wells and boreholes. WDC would anticipate that those resources would be precisely surveyed and the water supply they represent protected from contamination during and after development.
- iv) The most recent Strategic Flood Risk Assessment (2013) indicated that most of the site is within Flood Zone 1, with some areas of Flood Zones 2 and 3 between the A46 and Kings Hill Lane associated with Finham Brook. There are low to medium risks associated with surface water flooding from adjacent land and a low risk of flooding from groundwater and artificial sources. Again, issues around flooding in those areas more susceptible to it due to their proximity to Finham Brook will be mitigated by the design and layout of the wider site.
- v) Responses have identified concerns about flooding and ground water and the potential impact on boreholes.

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 and its 2015 addendum (IN06, 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 H43 will be required to make a proportionate contribution to the following requirements (also identified in modified policy DS15):-

Infrastructure type	Comments (but only if clarification required)
Provision of on-site open space and contributions to other open space requirements	On-site open space will be provided in various forms, including the retention and protection of Wainbody Wood, the provision of landscaped buffering to it, the provision of other open space and recreational opportunities and the retention of extant sports and recreational facilities.
Contributions to Health (Hospitals)	✓
Contributions to Health (G.P. services)	Health centre as part of community provision, location to be confirmed
Contributions to Highways / Transport	Contributions towards strategic infrastructure requirements are anticipated in relation to the planned improvements to the A46 / Stoneleigh junction.
Contributions to Education (Primary)	The IDP has identified that there will be a need for a new two-form entry primary school located on site (based on 2000 dwellings). In addition, it identifies that as the site proceeds to deliver its 4000 dwelling capacity (beyond the current plan period) land should be reserved to cover the possibility of a new 'all-through' primary / secondary school and Special Educational needs facilities. On-site educational provision for all age groups has been discussed and agreed in principle, and discussions are ongoing around the form that provision will take.
Contributions to Education (Secondary)	
Contributions to other infrastructure requirements in line with the CIL regs	Local centre and community facilities; emergency services provision

6) Is the site realistically viable and deliverable?

- a) The 2013 CIL Viability Study and its 2015 addendum (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 2015 Viability addendum looks at seven additional sites, including Kings Hill, and concludes that,

All seven sites generate residual land values which are, in our judgement, sufficient to incentivise the release of the sites for development. Our assessment takes account of the Council's requirement for 40% affordable housing, which we have modelled adopting a tenure split of 80% rented and 20% intermediate.
- c) The site is partially deliverable within the Plan period, based on an understanding of the market capacity (1,800 dwellings out of a total of 4,000). Discussions with the site's promoters, representing a consortium of landowners with interests in the site, have been taking place for a number of months and this has progressed to the production of a Statement of Common Ground (SoCG).
- d) The SoCG will be provided to the examination as soon as it has been completed and signed.

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

- a) See also the Housing Trajectory set out in Appendix 1 of the Housing Supply Topic Paper June 2016 (HO27PM).
- b) The site has the capacity for around 4,000 new dwellings, with associated infrastructure, services, facilities and open space. The delivery of 1800 houses during the plan period has been agreed with the promoters as a realistic delivery target, given the need post-plan adoption to obtain planning permission, adopt legal agreements and discharge conditions. The delivery of the balance of up to 4,000 houses will of necessity take place during the next plan period and the Council are happy that this is both realistic and achievable.
- c) Between 2020/ 21 - 2028/ 29, the assumed build-out rate is c200 units a year, based on the assumption of multiple outlets once planning permission has been achieved.

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

- a) See paragraph 89 to 95 of the Green Belt Background Paper (EXAM 45) for the Council's strategic approach to maintaining the essential characteristics of the Green Belt.
- b) The site lies wholly within parcel C14 of the Joint Green Belt Study (JGBS) update

(LA07PM). The update identifies the site as having some significance for preventing sprawl; it prevents ribbon development along adjacent roads and the majority of the land is open in nature albeit it currently contains some agricultural and other buildings, playing fields and residential properties that have an impact on its sense of openness.

- c) The JGBS identifies the site as having a more significant role to play in preserving the setting and special character of historic towns, inasmuch as it forms part of the setting of historic Coventry and there is intervisibility with the historic core of the city.
- d) The impact of development on the purposes of allocating land as green belt would undoubtedly be significant, but further mitigation could be achieved through ensuring that designs and layouts for subsequent applications are treated sensitively and reflect the emerging aims and objectives for the wider area.

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

- a) See paragraph 89 to 95 of the Green Belt Background Paper (EXAM 45) for the Council's strategic approach to maintaining the essential characteristics of the Green Belt.
- b) 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) Uses physical features such as roads (A46 to the south east, Stoneleigh Road to the south west), watercourses (Finham Brook to the south), residential development to the north east and north west and mature hedgerows together with additional planting to provide a strong Green Belt boundary.
- c) The JGBS identifies that the openness of the green belt has already been somewhat compromised in the relevant land parcel (C14) by the presence of agricultural farms / nurseries, some playing fields along the edge of Coventry and a couple of clusters of isolated residential properties which compromise the openness of the green belt within their immediate vicinity. However, the majority of the parcel is open in nature, so the proposed development is very likely to have an impact on the character of the green belt at this point.
- d) As a result of this impact, it is proposed to remove the site from the green belt upon adoption. This will ensure that the remaining green belt retains its overall sense of openness and that a precedent for housing development is not set in green belt areas. Given that green belt boundaries can only be reconsidered during a local plan review, this will help secure the longer-term protection of the area.
- e) Kings Hill lies in the vicinity of HS2, which runs to the south of the site in a cutting. While the use of a cutting will minimise to a degree the impact on the line, there will be some change to the openness of the green belt in the vicinity of the railway. This in turn will impact on the general sense of the area as open countryside.
- f) The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. The development of this site will have only a minimal impact on the extent to

which the land adjacent to parcel C14 is consistent with the essential characteristics of Green Belt (NPPF para 79).

- g) With regard to green belt being used for housing elsewhere, Coventry has already allocated c.6,600 new houses on around 600ha within its green belt. Not all of this development will be deliverable within their current plan period. When considered as a net amount, this would represent the de-allocation of around 10% of Coventry's confirmed green belt. There are also significant constraints on the remaining areas, relating to heritage and landscape.
- h) Respondents have referred to the negative impact on the green belt, and to the opportunity to develop land within Coventry's own green belt with less impact.

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

- a) Paragraph 14 of the Distribution of Development Strategy Paper (HO25PM) also refers.
- b) The Green Belt Background Paper (EXAM 45) sets out in more detail the legal and legislative issues around exceptional circumstances. In addition to this, the Council undertook a high-level assessment of six spatial options for further development that were considered following the first part of the examination in public. The six options are examined in more detail in the Appendix 1 of the Distribution of Development Paper (HO25PM) but in brief, they looked at the following: -
 - i) Focus development outside the Green Belt
 - ii) Focus development in and the around the edge of urban areas & sustainable growth villages
 - iii) Focus development around key transport corridors
 - iv) Dispersal Approach: distribute development across urban areas & urban edge, growth villages and limited infill villages
 - v) New Settlement outside the Green Belt
 - vi) New Settlement in the Green Belt
- c) Options ii and iii scored most highly as sustainable locations for development and thus have shaped the location of the additional allocations, including consideration of areas within the green belt that are concomitant with the preferred options – in and around the edge of urban areas and sustainable growth villages and around key transport corridors.
- d) Specifically, exceptional circumstances for the allocations in the Green Belt are identified as follows in the Distribution of Development Paper:
 - i) *Is there an essential need that has to be met?*
Yes, the HMA's and Coventry's housing need and the lack of capacity within Coventry; important in achieving a five-year housing land supply on adoption; important in meeting local housing need (constrained by current planning policy).
 - ii) *Are there any suitable sites outside the Green Belt that can meet this need?*
There are insufficient suitable sites outside the Green Belt or more sustainable

locations within the Green Belt that can meet both overall and five-year supply housing need. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy or effective in meeting these needs.

iii) *Is this the best site within the Green Belt to meet the need?*

It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. The allocations identified through the modifications (including in the Green Belt) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potential improvement) of local services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. For this reason additional allocations (proposed in 2016) are focused more on those sites which have stronger access to Coventry.

- e) In terms of Kings Hill, the allocation of the site meets an identifiable need for additional housing, given the undersupply of sites within Coventry and the agreement between authorities in the Housing Market Area to collectively meet the shortfall.
- f) Looking at the ability of sites outside the green belt to absorb further residential development (EXAM 45, paragraphs 52 - 54) it is clear that there are no suitable sites of sufficient capacity to meet the level of need identified in a sustainable fashion. Given the capacity of the site, its proximity to employment opportunities in Coventry and within Warwick, and the presence of community services, facilities and networks, it was felt this represented a strong opportunity to create a sustainable and robust community.
- g) Kings Hill also meets the requirements of the preferred options for development, being close to the edge of a built-up area and adjacent to transport corridors.

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