

Warwick Local Plan Examination

Matter 7c: Housing Site Allocations
(Edge of Coventry)

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Introduction

1. Lenco Investments (Lenco) has a number of soundness concerns with the approach outlined by the Council, principally surrounding the sites that have been proposed for development.

H42 – Westwood Heath

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

2. The Council is proposing that this site is capable of delivering around 450 dwellings, a figure which is capped due to infrastructure constraints. The site has been considered as part of the 2014 SHLAA, identified as site C13. The site is determined to be only suitable in part (around 61%), based on a capacity exercise undertaken by the Council to limit the impact of the site and the potential adverse impacts on the character of the area and special biodiversity interests to the south of the site. The site has been reduced from the boundary proposed in the SHLAA, though it is observed that 83% of the site has been included, contrary to the recommendations of the Council's own evidence.
3. One of the key criticisms of the site as part of the SHLAA is that development involves:

“Extending development beyond a definable boundary into an area of high landscape value with no strong recognisable boundary to the south”
4. It does not appear from the Proposed Modifications that regard has been given to this consideration, which by the Council's own admission could be damaging to the local area.
5. Due to safeguarded land to the east of the site, development at this location would be at odds with the character of the settlement. On these grounds alone, the Council should have considered whether alternative sites would have given rise to more or less significant impacts, which may have been less sensitive for development.
6. Another factor for consideration here is the availability of land required to support the University of Warwick. Within the Proposed Modifications (Para 1.5 of MOD21), the Council indicates that the University will be preparing a revised masterplan for growth, which the Council notes should be accounted for when considering site layouts elsewhere in the vicinity.
7. The University of Warwick is separated from the proposed allocation by an area of newly proposed safeguarded land (DS NEW2 - Land South of Westwood Heath Road). This area of land is proposed to meet arising development needs beyond the current plan

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period and, due to the Green Belt status, could only be removed as part of a Local Plan review.

8. The concern here is that little consideration appears to have been given to the growth aspirations of the University, who may need additional land as part of the plan period to expand operations. Should the Council wish to safeguard Land South of Westwood Heath Road and develop Westwood Heath for residential purposes, there would be little room for expansion of the University, other than directions to the south.

The Council has not appraised Westwood Heath in terms of suitability for a potential expansion site for the University. Given the limited options for growth of the University adjacent to the existing facilities, this is something which needs to be given further investigation by the Council.

H43 – Kings Hill Lane

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

9. The site is currently unallocated in the Green Belt. It does not appear that a planning application has yet been submitted on the site and it is understood that the land is under the control of a consortium who intend to bring the site forward for development. The site therefore has no formal planning status.
10. It should be noted that issues surrounding land ownership can often frustrate delivery, particularly where there are multiple land owners all with expectations about what the site can deliver. As indicated above, there are a number of land uses within the proposed allocation that may conflict with the overall objective for growth at this location.

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

11. The Council has submitted this site for allocation for 1,800 dwellings (overall capacity 4,000 dwellings) including only a supporting Sustainability Appraisal (SA) to justify the inclusion of the site. As part of the Proposed Modifications it is unclear what, if any, alternative sites have been tested by the Council, however the Council has pushed forward and included Land at Kings Hill to meet a significant component of need arising from Coventry. Lenco Investments considers that the inclusion of this site is premature, as the feasibility and deliverability of the draft allocation remains vague and unsupported by evidence.

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

12. The delivery of strategic sites to the south of Coventry would assist in bringing forward significant levels of growth around the edge of the City. With this growth there is the

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potential for social and economic benefits, along with the direct benefits derived from meeting household need.

13. It is considered that the benefits derived from this proposal could also be met on other strategic sites around the south of Coventry, a comparative assessment of which has yet to take place.

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

14. The Council's broad allocation of land at Kings Hill is supported by very little in the way of justification explaining how the site will be served and what improvements need to be made to ensure that the development operates within acceptable tolerances.
15. MOD20 of the Proposed Modifications [**LP25PM**] indicates that a new link road is potentially required, connecting the A46 with Kirkby Corner and subsequently to the A452 or A45. No indication is given where the access from the site will be taken and the Proposed Modifications give no certainty that this proposal can be made acceptable in highways terms. Should it transpire that a link road is not just optional but required in order to facilitate the development, there will be significant implications for the delivery of the site, both fiscally and in terms of the timescales for delivery. It is considered that this issue has not been subject to sufficient levels of scrutiny, which casts serious doubts over the achievability of the proposed allocation.

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

16. The only recorded evidence available at the time of consultation is the SHLAA, which has seen a number of updates over the years. This total area of this site is included as part of the 2014 SHLAA for the South of Coventry (reference C06 [**HO12**]), where a number of constraints to delivery have been noted. As part of the overall summary of suitability, the SHLAA notes that the site may potentially be suitable, however only in part due to a number of physical and environmental constraints.
17. The Council revised its view on the SHLAA as part of the 2016 update [**HO22PM**]. This update removed an area of land surrounding Kings Hill nursery. Despite this change, the highlighted areas of constraint still remain. All of the physical and environmental issues identified by the Council are still recorded in the SHLAA, which casts doubt over the legitimacy of the Council's assessment.
18. A number of principal areas of concern are highlighted for the benefit of the Council which warrant further investigation:

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Deliverable Land

19. The Council expects that this site can deliver 4,000 dwellings, 1,800 of which will come forward as part of the plan period.

20. The site allocation covers a broad area encompassing Kings Hill, butting against Stoneleigh Road and the A46 as the maximum extents of development. From this plan, it does not appear that any consideration has been given to land availability, or features within the site that may constraint housing delivery:
 - Impact of Finham Brook - Finham Brook is identified as a potential Local Wildlife Site which passes through the southern area of the site, south of Kings Hill Lane. Environment Agency records indicate that in addition to presenting an area of Flood Zone 2 and 3, the extents of the brook passes through a significant area of the site, enveloping a significant area of the site as a medium to high surface water flood risk.
 - Existing uses to the north – this includes Leasowes farm/nursery and an existing cricket ground. No information has been submitted to suggest how these uses will be incorporated or replaced.
 - Existing uses to the south – Kings Hill nurseries currently operate on the site, occupying a significant amount of land along Kings Hill Lane.
 - Hill Farm – Hill farm occupies a significant area, to the north east of the site. This farm is a Scheduled Ancient Monument (SAM), which is a site of national significance. Not only will this feature need to be protected, but the setting of the asset will also need to be reflected as part of any development proposal. In addition to this, the SHLAA also notes that part of the site is a Regionally Important Geological site which will need to be excluded from the developable boundary. What the SHLAA did not pick up upon was the three Grade II listed properties within the site. Ensuring that the setting of these historic assets will be an important consideration that any development at this location will need to factor in.
 - Wainbody Wood: This area of woodland is not only of local significance, it is recognised as an Ancient Woodland which will have to be retained as part of any future development proposals. The SA of the site indicates that a buffer zone will be required between the woodland and development to avoid potential impacts.
 - Agricultural land – The supporting SA indicates (p25) that the current extents of the Grade 3 land is unknown. What is known is that there is an area of Grade 2 land along the south western boundary. The SA score is predicated on the fact that it is assumed development will be avoided on this land. If this is the case, this is an additional area of land excluded from development.

21. It is clear from the above that there are a number of features within this site that are likely to constraint not only the ability of the site to achieve the desired number of dwellings, but also affect how the layout of the scheme might be achieved. This list of considerations does not include infrastructure necessary to the deliverability of this site. It is likely that transport improvements and sustainable drainage will place further requirement for land on the site, all of which contribute to difficult conditions for delivery.

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Flooding

22. As indicated above, large swathes of the site are indicated within Environment Agency data as land recorded as either Flood Zone 2/3 or at risk of surface water flooding. One of the main sources of flooding on the site is Finham Brook which passes through the site. Whilst this will not prevent development on the site per se, it will affect the amount of developable land within the draft allocation.
23. The emerging allocation needs to be more realistic about how the impact and flooding and/or surface water will affect the capacity of the site and the ability to deliver a cohesive development with sufficient land for surface water attenuation.

6) Is the site realistically viable and deliverable?

24. As part of the Proposed Modifications process, the Council has submitted evidence relating to the viability of the additional site options [**H024PM**]. This assessment has only considered the Council's preferred options for growth,
25. The latest SHLAA [**H022PM**] indicates that the site is under the control of a consortium that is willing to bring the site forward for development. The red line boundary plan included within the SHLAA does not, however cover the full extents of the site, which excludes land around Kings Hill nurseries. The full extent of land ownership is therefore unknown.
26. The SHLAA is clearly a useful document in setting out the Council's thoughts on land that may be deliverable, however it is not undertaken at the required level of detail needed to support a strategic allocation, particularly one that is being put forward for up to 4,000 dwellings. It is considered that insufficient evidence has been presented in the SHLAA, or the Proposed Modifications document in demonstrating that the site is available for development as part of the emerging plan period.

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

27. Appendix 1(i) of the Council's Housing Supply Topic Paper [**H027PM**] suggests that of the allocation for 4,000 dwellings, 1,800 dwellings can be expected from Kings Hill within the plan period. This assumes delivery rates of 200 dwellings per annum from 2021 onwards. Given that that no housebuilders have been identified against the scheme and no planning application is before the Council, 2021 is the earliest that this site could be considered and Lenco consider even this date to be ambitious.
28. The other point for consideration is rates of development. The Council expect that this site can deliver 200 dwellings per annum. Delivery at this rate would require at least 3 active housebuilders on site to achieve this. At present no housebuilders have associated with this proposed allocation.

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29. Additionally, it should be noted that such an allocation will require significant infrastructure provision from the outset, in order that it can come forward in a planned and sustainable way. There will be a period of time where the development will build up to a maximum build rate and it would be expected that initial years of delivery would be lower than the maximum build rate.

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

30. This is illustrated quite clearly as part of the Green Belt Review [LA07PM], which indicates an overall score of 15/20 for the site (page 22 refers). The Green Belt Review has indicated a number of areas which present challenges for the release of Kings Hill from the Green Belt and it is considered that little consideration has been given to whether other sites of similar or lesser sensitivity would provide a more appropriate solution to meeting housing need on the south of Coventry.