

WARWICK LOCAL PLAN EXAMINATION

MATTER 7c – PROPOSED HOUSING SITE ALLOCATIONS, SAFEGUARDED LAND AND DIRECTION FOR GROWTH – EDGE OF COVENTRY

REPRESENTATIONS BY SAVILLS ON BEHALF OF LIONCOURT STRATEGIC LAND – AUGUST 2016

RESPONDENT REFERENCE NUMBER - 11870

Introduction

1. This statement should be read in conjunction with the representations dated 22 April 2016 submitted by Savills on behalf of Lioncourt Strategic Land (referred to hereafter as 'LSL') to the Warwick District Local Plan proposed modifications consultation.
2. Responses are made to the Inspector's questions, as issued by the Programme Officer on 15 July 2016. Responses are provided only to those questions relevant to LSL's representations. Responses are set out in the order questions are raised.

Q1 – What is the current planning status of the site?

3. The quantum of housing proposed in the Kings Hill allocation will make an important contribution to the delivery of new housing in Warwick and assist in meeting Coventry's housing requirements. The allocation of this site will provide the certainty that a significant amount of housing can be delivered within the early stages of the plan period.
4. To this end, LSL has recently commenced pre-application discussions with Warwick District Council (WDC) on the form and quantum of development and have begun preparing an evidence base to inform a masterplan for comprehensive development relating to all of the joint land interests which make up the Kings Hill allocation to show how the site can be developed.
5. LSL is committed to working positively with WDC and key stakeholders to bring forward the mixed use allocation in the Local Plan and have been supportive of the approach and direction taken by the Council in promoting the Local Plan, which is essential in order to provide the homes and infrastructure required to meet the needs of future generations.

Q2 – How does it fit within the overall spatial strategy?

6. It is clear from the evidence base, including the updated assessment of housing need in Coventry and Warwickshire HMA published in September 2015 (HO20PM), that there is significant requirement for new housing land in Warwick. The NPPF¹ is clear that the a new Local Plan should provide in full for the objectively assessed housing need of the authority and through the duty co-operate for any unmet housing need arising from outside of the authority. In this context, there is a need for a major allocation to come forward at the beginning of the plan period and consistently throughout in order to meet these needs.
7. The residential-led mixed use development of site H43 is intended to help meet sub-regional housing need as well as contributing to meeting local needs within the WDC area.

Q3 – In addition to housing provision, are there other benefits that the proposed development would bring?

8. The Kings Hill allocation is located within a highly sustainable location with good connections to existing services, facilities and infrastructure.
9. Meetings have also been held with both Local Education Authorities and several local schools. Strategic enhancements to primary and secondary school provision are being prepared that will deliver additional capacity to cater for the needs of this draft allocation identified in the emerging Local Plan. At present the proposal is for all school place requirements to be met on site.
10. The key benefits of the development of this site are as follows:
 - 4,000 homes to meet housing needs in Warwick and Coventry;
 - Affordable homes for local people;
 - Sustainably located development close to schools, recreation facilities, public transport and jobs
 - Investment in major infrastructure, including roads, public transport, schools, community and recreation facilities;
 - Protection and enhancement of biodiversity;

¹ Paragraph 14 - NPPF

- A commitment to collaborative working with the local community, key interest groups, the District Council and County Council;
- Investment in, and support of the local economy

Q4 – What are the potential adverse impacts of developing the site? How could they be mitigated?

11. A number of technical and environmental studies have been commissioned by LSL, which examine the potential impacts of the development of the Kings Hill allocation. In addition, an Environment Impact Assessment Scoping Report has been submitted to Warwick District and Coventry City Councils. This has assessed potential highway, ecology, landscape, heritage, flood and socio-economic impacts and the measures envisaged to mitigate against these.
12. Potential impacts on landscape features, nature conservation and cultural heritage assets are not considered to be significant and do not represent a barrier to development on the Site subject to the implementation of appropriate mitigation measures. It is hoped that the Council's Scoping Opinion may be available at the time of the Local Plan Examination Hearings.

Q5 – What are the infrastructure requirements / costs and are there physical or other constraints to development? How would these be addressed?

13. There are some physical limitations to the development of the site but these are not constraints which cannot be overcome subject to appropriate, layout, design and mitigation. These relate to existing infrastructure and the need to protect existing waterbodies and protected trees/woodland in the interest of heritage, nature and landscape conservation.
14. LSL acknowledges that the allocation would need to accommodate primary and secondary infrastructure and healthcare infrastructure, negating the need to rely upon existing medical and educational facilities, as identified within the Draft Infrastructure Delivery Plan (June 2016) (IN07PM). The format and pupil number requirements are yet to be determined however the indicative masterplan for the site currently proposes an all through primary and secondary school which will address all school place requirements arising from the development of the Kings Hill site.

15. There will also be a need for the provision of or contributions to highway improvements associated with the development of the Kings Hill allocation. This includes facilitating access to the site via Green Lane, St Martins Road and Stoneleigh Road and the provision of a north south link to provide a connection through the proposed development site and other local network improvements where these are required.
16. These infrastructure requirements can be considered in more detail as part of the outline planning application and delivered through appropriate mechanisms.

Q6 – Is the site realistically viable and deliverable?

17. The majority of the land within the Kings Hill allocation is within the control of the consortium led by LSL and is available for residential led development. LSL has also entered into discussions with other landowners outside of the consortium. Substantial and comprehensive evidence base work to inform a masterplan has already been undertaken by LSL in partnership with the landowners to determine what can be delivered. LSL is well placed, with the necessary experience and resources to facilitate delivery of housing at the earliest opportunity.
18. A number of technical studies have been commissioned by LSL to support the proposed planning application and issues being looked at include the following.
 - Highways and transport
 - Landscape and visual assessment
 - Flood risk assessment and surface water drainage
 - Ecology
 - Arboriculture
 - Archaeology and heritage
 - Noise and vibration
 - Air quality
 - Sustainability
 - Agricultural land quality
 - Education provision and other socio-economic issues

19. Much of this baseline work has included engagement with statutory consultees. Once completed it is intended this information will be shared with both the Finham Residents Association and Finham Parish Council.
20. In late 2016 or early 2017, a programme of public consultation will also commence and a series of public exhibitions will be held to consult with local residents on the proposals. The consultation exercise will also be used to inform the masterplanning process.
21. Accordingly, LSL can confirm that the site is fully “deliverable”. The site is available, and is actively being promoted for development. It represents a suitable location for development as a proposed allocation in the Local Plan and is achievable, with the potential to accommodate at least 4,000 dwellings with a minimum of 1,800 homes delivered within the plan period.

Q7 – What are the expected timescales for development and is this realistic?

22. As noted above, LSL have commenced pre-application consultation with WDC on the project and intend to work closely with officers in order to bring the allocation forward as soon as possible. Subject to programme, a planning application is targeted for submission in the first half of 2017 around the point the Local Plan is adopted. Subject to a decision being made in 2017 a start on site could be made in 2019 to ensure units are released to the market in 2020.

Q8 – What would be the effect of the proposal on the purposes of including land within the Green Belt?

23. The requirement for Green Belt release is the result of the identification of the revised housing requirements for Coventry and Warwickshire and the absence of being able to deliver this level of need within the urban area. This approach underlines the need for significant but well planned (in terms of achieving sustainable development) extensions at the urban fringe of settlements. There are strong economic arguments for focusing housing at the edge of Coventry in terms of maintaining and attracting employment growth as well as attracting private sector investment. Releasing Green Belt land in more rural locations would contradict the purposes of the Green Belt as it would not assist in urban regeneration.

24. The NPPF² provides that Green Belt boundaries should be altered through the Local Plan process, having regard to their intended permanence in the long-term. Moreover, Local Authorities should take account of the need to promote sustainable patterns of development. The Kings Hill site adjoins the urban edge of Coventry, and is within close proximity to existing and proposed transport links and infrastructure.
25. The attached plan³ depicts the land at King's Hill in the context of its immediate surroundings. It can be seen that the site has a defensible boundary of major road routes (A46 and Stoneleigh Road) and the Coventry to Leamington railway line. These key features mean that the five purposes of Green Belt are not met, establishing a poor quality Green Belt. The HS2 route is planned to run to the south of the site which will also dramatically change the Green Belt and landscape character. Development will not naturally be able to expand beyond this defensible boundary and therefore would not encroach upon neighbouring settlements.
26. WDC has undertaken a number of Green Belt Reviews to inform each stage of the Local Plan. The Joint Green Belt Study (JGBS) (LA07PM) prepared for the Coventry and Warwickshire Authorities in June 2015 confirms that, where necessitated by development requirements, Local Plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes.
27. The Kings Hill site is well connected to the existing urban area which already extends beyond the boundary of the Green Belt with existing development to the north, east and west. The development of this parcel of land would result in a natural rounding off of Finham and therefore constitute infilling within the settlement boundary for Coventry.
28. WDC published a Green Belt Background Paper (EXAM 45) in August 2016. This confirms that whilst the Kings Hill land parcel provides for some of the purposes of Green Belt, its development 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'.

² Paragraph 83 - NPPF

³ See Appendix 1

Q9 – What would be the effect on the openness of the Green Belt?

29. The NPPF states that the essential characteristics of Green Belts are their openness and their permanence (paragraph 79). Whilst 'openness' is not explicitly defined within the guidance it can be understood to mean an absence of development. The JGBS (LA07PM) identifies the Kings Hill site (Parcel C14) to contain several 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.
30. The August 2016 Green Belt Background Paper (EXAM 45) states that whilst the release of the Kings Hill parcel from the Green Belt would reduce the area of open countryside between Coventry, Kenilworth and Stoneleigh there would still be a definable and relevant gap between these settlements.
31. The site's openness will be further compromised by the construction of a new link road between the A46 junction and Westwood Heath Road and the HS2 route which are both proposed to run to the south of the site. These both represent significant permanent defensible boundaries which will inhibit the encroachment of the countryside from Coventry.
32. Given its sustainability and locational credentials and its role in meeting a significant proportion of Coventry's overspill it can be deemed that the release of the Kings Hill site is appropriate. Furthermore, the development of the site will facilitate access to and through the countryside which does not exist at present. This provides an opportunity to enhance biodiversity as well as improve access to opportunities for outdoor sport and recreation thereby maintaining a degree of openness.

Q10 – Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?

33. Paragraph 84 of the NPPF indicates that 'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development'. This should also include demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere.
34. LSL consider that exceptional circumstances exist which support the release of land at Kings Hill from the Green Belt. These include:

- There is insufficient land within Coventry to meet the objectively assessed need that has been identified. Kings Hill is one of the locations that should be prioritised for development and additional housing due to its sustainability credentials.
- There is a need to increase the supply of larger market and affordable housing to support the continued economic growth in Coventry.
- The Kings Hill site can accommodate 4,000 dwellings, with a minimum of 1,800 during the plan period, and 2,200 proposed for longer term needs. This is important as it recognises the need for additional housing beyond the plan period.
- There are no reasonable alternatives to the release of Green Belt. Without such allocations an inappropriate distribution of housing would result which fails to meet the needs of Coventry.

35. The Joint Green Belt Study (June 2015) prepared for the Coventry and Warwickshire authorities responds to the NPPF paragraph 83 requirement for LPAs to review Green Belt boundaries “*having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*”. At paragraph 4.20 of the Green Belt Assessment, it is stated that parcels bordering the southern and western edges of Coventry contribute significantly to the purposes of the Green Belt. When considered in isolation the Kings Hill site (Parcel C14), scores highly in terms of accordance with the Green Belt tests for ‘sprawl’ and ‘setting’ and in overall terms against all of the assessment criteria (15/20). In terms of its historic and visual setting the site is assessed to have good inter-visibility with the historic core of Coventry. This is disputed. The site slopes away to the south and offers limited views towards Coventry in the most part. Furthermore, the proposed development of the allocation would necessarily include the enhancement and protection of features including the Kenilworth Road Conservation Area and Wainbody Wood. The heritage considerations within the Joint Green Belt study result in a disproportionately high score for the Kings Hill site.

36. There are no significant heritage constraints which would preclude the delivery of development at Kings Hill. The site is considerable in size and includes within it areas of land which would rightly remain undeveloped and protected for their historic and environmental value. However, it is entirely feasible to integrate these areas within development proposals for the site in such a way that they are retained and

enhanced through the development. Similarly, there is sufficient land within the ownership and control of LSL to protect, and where appropriate, mitigate any potential impacts.

37. The Kings Hill allocation is well related to the existing urban area of Coventry and has good connections to existing transport links and infrastructure. It is intended to address a major strategic housing issue in the sub-region and will support the future growth of Coventry. Green Belt release in this area best represents a logical expansion of the urban area, in accordance with the need to promote sustainable patterns of development set out at paragraph 84 of the NPPF.
38. Although Green Belt designation should be afforded considerable weight, it is a policy designation and not a physical impediment to development. Provided the development of land does not undermine the purposes of Green Belt, as set out in National Policy, it could be released for development. It is considered that the Kings Hill site should be released from the Green Belt and allocated for residential development to meet the unquestionable housing need in Coventry.

Q20 – Why is a Direction for Growth necessary? What is it intended to achieve?

39. Proper planning for growth requires, in accordance with the NPPF⁴, an objective assessment of housing need and the subsequent derivation of a spatial strategy and distribution for growth which will deliver the housing requirement in the most appropriate and sustainable manner.
40. The evidence base for the Local Plan also demonstrates that there is a strong functional relationship between Warwick District and Coventry City which currently results in substantial migration and commuting flows between the two authorities.
41. The land on the edge of Coventry at Kings Hill is capable of making a substantial contribution to the delivery of housing and employment in a highly sustainable location over the remainder of the plan period and beyond. The sustainability credentials of the site are undeniable and should be afforded considerable weight in defining the spatial strategy and distribution of development. Housing growth in this location would provide a significant increase to the housing stock in a location extremely well placed to support the economic growth needs of Coventry.

⁴ Paragraph 159 - NPPF

42. Given the constraints on housing delivery within Coventry and the significant requirements, as demonstrated by the Household Projections, the delivery of housing on the edge of Finham, in Warwick District would help support a significant boost to housing delivery within Coventry.

Q21 – 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?

43. LSL support the new policy wording in general however seek greater clarification from WDC in respect of paragraph 1.09 third bullet part a which states that Wainbody Wood is to be 'excluded from the development area'.

44. In respect of this criterion we propose the following amendment:

Biodiversity should be maintained and enhanced on all development site wherever possible; where otherwise acceptable development would result in the loss of biodiversity interest and value, mitigation must be offered that offsets loss or damage onsite. If this is not possible, appropriate off-site mitigation and habitat replacement should be provided as close to the affected amenity as feasible;

a. Kings Hill - Wainbody Wood is ancient woodland of around 15.5ha in area, which should be ~~excluded from the development area~~, protected from associated adverse impacts and maintained as a habitat and biodiversity resource for use in conjunction with the wider residential led allocation.

45. The wording of the policy is unnecessarily prescriptive as presently drafted and should be amended as above. This would represent a more 'effective' policy by securing the enhancement and continued maintenance of Wainbody Wood in association with the development of the Kings Hill allocation. LSL are seeking the inclusion of Wainbody Wood within the boundary of the proposed allocation so that managed access to this can be facilitated for mitigation purposes. It would not be the subject of development.

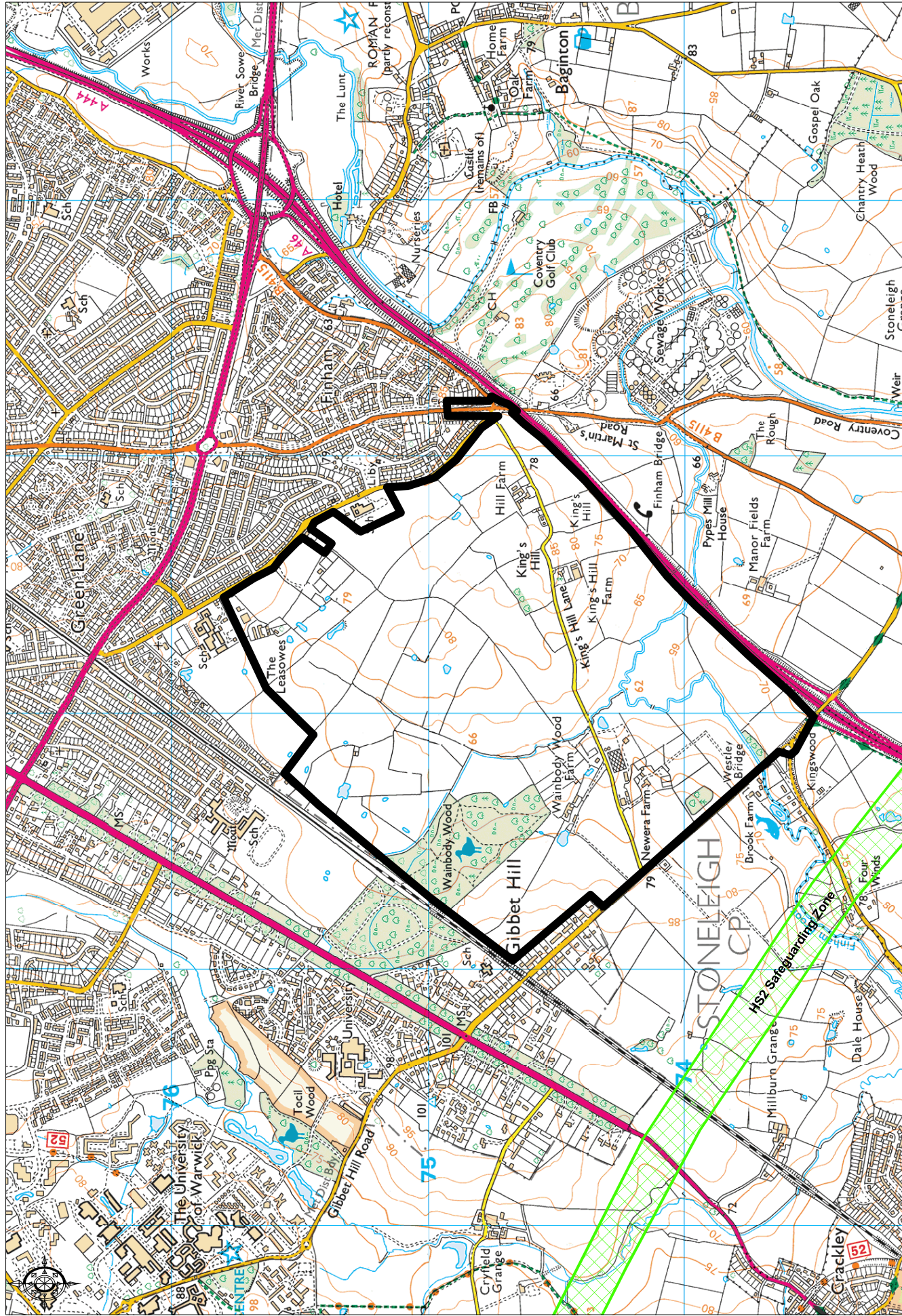
Q23 – In overall terms is the policy justified, effective and consistent with national policy?

46. The policy is not justified and effective as currently drafted but would be with the proposed amendments.



APPENDIX 1 – Kings Hill Allocation Context Plan

Appendix 1 - Kings Hill Allocation Context Plan



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