

Contents

Matter 7d – Housing Site Allocations - Cubbington

	Page
7d – H25 Allotments land, Rugby Road	1
7d – H26 Opposite Willow Sheet Meadow	9
7d – H50 Land east of Cubbington	17

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

Matter 7d

Proposed Housing Site Allocations
Growth Villages and Hockley Heath

H25 – Allotment Land, Rugby Road
Issue

Whether the proposed housing site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

August 2016

Policies DS11 and DS NEW3

NAME OF SITE: H25 – Allotment Land, Rugby Road

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

- a) Currently agricultural land. The majority of the site has not been the subject of planning applications.
- b) A triangular area to the south west of the site has planning permission for 7 affordable houses: W/13/1550 “Erection of 7 affordable homes and associated landscaping and parking”.

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

- a) The site is within the Green Belt on the edge of Cubbington. Cubbington has been identified as a growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) **Criterion a)** N/A
 - ii) **Criterion b)** The site is consistent with Criterion b), being located on the edge of a built up area (Cubbington).
 - iii) **Criterion c)** N/A
 - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence
 - v) **Criterion e)** There are no significant heritage impacts associated with the site.
 - vi) **Criterion f)** The site falls within a wider parcel that has been assessed as High / Medium landscape value. The allocation of the site is therefore consistent with this criterion.
 - vii) **Criterion g)** The site is within the Green Belt. The Council has taken into account the overall spatial strategy; and the availability of alternative suitable sites outside the Green Belt and considers there are exceptional circumstances for releasing this area from the Green Belt (see question 11 below). This site would help meet housing needs in Cubbington and more generally and assist in a 5 year land supply through the provision of a range of sites. The site will help support services and facilities in the village of Cubbington.

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

- a) The sustainability appraisal (SA10 and SA11PM) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this are:
 - i) This site has the potential to support the ongoing viability of services in Cubbington

including the village shop, schools and public houses.

- ii) The site will be required to provide open space.
- iii) Land adjacent to this site and in the same ownership as both this site and H25 will be made available for replacement and expanded allotments – increasing the size of the allotments from 2.23ha to 3.06 hectares. The landowners have been in discussion with the Allotment Association regarding this proposal. The Allotment Association have not objected to the proposal

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

- a) Transport and Traffic: The Highway Authority concluded that access into the site can be achieved from Rugby Road and could also provide access into adjacent site.
- b) Allotments: The development of the site will result in the loss of existing allotments. However, the landowners have agreed to make alternative land available for a larger allotment site (see rep no. 65322).
- c) Flooding: Cubbington has a history of surface water flooding. Any scheme will have to manage flooding impact and avoid adding to local problems. Surface water management is important. Severn Trent Water have not indicated any issues regarding the development of this site.
- d) Landscape: The 2013 Landscape assessment (V16) assessed a wider parcel of land that contained this site. It concluded that the majority of the zone is unsuitable for development as it provides a rural context to the settlement and connects to the wide farmland and has open views. However it did identify the potential for some development adjacent to the existing settlement edge around the Rugby Road / Coventry Road junction, providing it doesn't encroach further along the Coventry Road than the existing housing. It indicated that the field in question has a medium sensitivity and there is potential for development. There are no landscape issues arising from taking the development line up to the northern and western field boundaries. Field boundaries should be retained.
- e) Ecology: Assessed as low-medium value. The area has strong hedgerow features which will require protection.
- f) Community: the site has potential to dovetail with the existing village character and to support the viability of local services within the village. The Council contend that the site is located so that the separate identity of Cubbington is not undermined.

5) Is the scale of development proposed compatible with the capacity of the village to accommodate further growth in terms of its character and appearance, the level of services and existing infrastructure?

- a) The Village Settlement Hierarchy June 2013 (V01 to V03) sets out the Council's approach to the classification of villages and rural settlements. The report explores the size of settlements, availability of services and accessibility of services, facilities and employment from the settlement (see section 4.0). It applies a scoring system to these factors to reach an objective view on the relative capacity of each settlement to accommodate development. Table 4.4 of the report shows the resulting score for each village. (NB it should be noted that this score does not take in to account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability).
- b) Using this model, Cubbington is identified as the second most sustainable village.
- c) The Village Settlement Hierarchy goes on to classify each settlement. Following the Village Housing Options and Settlement Boundaries Consultation (November 2013), these classifications were simplified in three categories: Growth Villages (of which there are 10); Limited Infill Villages (of which there are 24) and other settlements. The Growth Villages and Limited Infill Villages are set out in paragraph 4.7 of the Submission Draft Local Plan.
- d) As a result Cubbington was identified as Growth Village with the potential to accommodate some housing growth and land for 100 dwellings was allocated in Cubbintgton including this site.
- e) Since the submission of the Local Plan, the Council has had to identify additional housing land for the modifications submitted in 2016. In preparing the modifications, the Council reviewed the potential of growth villages to accommodate a proportion of the additional requirement. This work is set out in the Village Profile and Housing Allocations Update February 2016 (V18PM).
- f) Village Profile and Housing Allocations Update February 2016 (V18PM) explored an indicative capacity for each of the Growth Villages. For Cubbington, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 294 dwellings. In combination with other sites being proposed for the village, this suggests that Cubbington has the capacity to accommodate development on this site.

6) What are the 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 H25 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	✓

7) 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 falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. There is a landowner who is willing to sell and who is working with a development partner. The land owner has indicated a willingness to release the site upon adoption of the Local Plan to enable it to be brought forward for development. The delivery of the site is dependent on provision of an alternative site for the allotments. The landowners have proposed a new allotment site of 3.06ha compared to the existing site of 2.32ha.
- c) Aside from the allotments, there are no major impediments to the site being developed quickly.

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

- a) The housing trajectory (see appendix 1 of the Housing Supply Topic Paper - HO27PM) indicates the first completions in 2021/22 with all 35 dwellings completed that year.
- b) As the allotments will need to be relocated, this site is expected to follow on from site H26 and the trajectory therefore shows completion in the year after H26 has been completed.

In addition to the above, for all sites apart from those in Barford, Bishops Tachbrook and Radford Semele:

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

- a) The area is within a Green Belt parcel (CB1) that plays an important role in safeguarding the countryside from encroachment, as well playing some role in preventing ribbon development and (like all parcels) a strategic role in assisting regeneration (see LA07PM).
- b) Overall, this parcel plays a less important role in the Green Belt than other parcels surrounding Cubbington. In relation to the specific site the Green Belt Critical Review 2013

(V14) concluded that

“the Sub-parcel partly contained by the Coventry Road, could accommodate a limited village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration will need to be given to ensuring that the boundaries fronting the open countryside are defined clearly, using existing physical features that are readily recognisable and likely to be permanent.”

10) 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 is considered to have only a moderate impact on the openness of the Green Belt due to the close relationships the site has with the built up area and physical features to the north and west of the site where it fronts open countryside. This
 - i) Ensures consistency with the Local Plan strategy
 - ii) Removes this parcel which is not essential to keep permanently open
 - iii) Uses physical features (a hedge-line) to provide a strong Green Belt boundary
- c) The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. As set out in V14, the development of this will have only a minimal impact on the extent to which parcel CB1 is consistent with the essential characteristics of Green Belt (NPPF para 79).

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

- a) The process for assessing exceptional has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out this exceptional circumstances that apply to all the village sites within the Green Belt that are identified through the 2016 Modifications.
- b) Specifically, exceptional circumstances for the allocations to Green Belt growth villages are identified as follows:
 - 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 5 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 5 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. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. as well as local housing needs for Cubbington.

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

Warwick District Council
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Proposed Housing Site Allocations
Growth Villages and Hockley Heath

H26 – Opposite Willow Sheet Meadow
Issue

Whether the proposed housing site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

August 2016

Policies DS11 and DS NEW3

NAME OF SITE: H26 – Opposite Willow Sheet Meadow

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

- a) Currently agricultural land. The majority the site has not been the subject of planning applications.
- b) A triangular area to the south west of the site has planning permission for 7 affordable houses: W/13/1550 “Erection of 7 affordable homes and associated landscaping and parking”.

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

- a) The site is within the Green Belt on the edge of Cubbington. Cubbington has been identified as a growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) **Criterion a)** N/A
 - ii) **Criterion b)** The site is consistent with criterion b), being located of the edge a built up areas (Cubbington).
 - iii) **Criterion c)** N/A
 - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence.
 - v) **Criterion e)** There are no significant heritage impacts associated with the site.
 - vi) **Criterion f)** The site falls within a wider parcel that has been assessed as High / Medium landscape value. The allocation of the site is therefore consistent with this criterion.
 - vii) **Criterion g)** The site is within the Green Belt. The Council has taken into account the overall spatial strategy; and the availability of alternative suitable sites outside the Green Belt and considers there are exceptional circumstances for releasing this area from the Green Belt (see question 11 below). This site would help meet housing needs in Cubbington and more generally and assist in a 5 year land supply through the provision of a range of sites. The site will help support services and facilities in the village of Cubbington.

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

- a) The sustainability appraisal (SA10 and SA11PM) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this are:
 - i) This site has the potential to support the ongoing viability of services in Cubbington

including the village shop, schools and public houses.

- ii) The site will be required to provide open space.
- iii) Land adjacent to this site and in the same ownership as both this site and H25 will be made available for replacement and expanded allotments – increasing the size of the allotments from 2.23ha to 3.06 hectares. The landowners have been in discussion with the Allotment Association regarding this proposal. The Allotment Association have not objected to the proposal.

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

- a) Transport and Traffic: The Highway Authority concluded that *“If the access point was positioned in the South-East corner of the site and a footway was developed, then the proposed development is achievable.”*
- b) Flooding: Cubbington has a history of surface water flooding. Any scheme will have to manage flooding impact and avoid adding to local problems. Surface water management is important. Severn Trent Water have not indicated any issues regarding the development of this site.
- c) Landscape: The 2013 Landscape assessment (V16) assessed a wider parcel of land that contained this site. It concluded that the majority of the zone is unsuitable for development as it provides a rural context to the settlement and connects to the wide farmland and has open views. However it did identify the potential for some development adjacent to the existing settlement edge around the Rugby Road / Coventry Road junction, providing it doesn't encroach further along the Coventry Road than the existing housing. It indicated that the field in question has a medium sensitivity and there is potential for development. There are no landscape issues arising from taking the development line up to the northern and western field boundaries. Field boundaries should be retained.
- d) Loss of agricultural land: The development of housing will result in the loss of grade 3 agricultural land. However, the Council contend that the public benefits of housing in this location out-weights the loss of agricultural land.
- e) Ecology: The area has strong hedgerow features which will require protection.
- f) Community: the site has potential to dovetail with the existing village character and to support the viability of local services within the village. The Council contend that the site is located so that the separate identity of Cubbington is not undermined.

5) Is the scale of development proposed compatible with the capacity of the village to accommodate further growth in terms of its character and appearance, the level of services and existing infrastructure?

- a) The Village Settlement Hierarchy June 2013 (V01 to V03) sets out the Council's approach to the classification of villages and rural settlements. The report explores the size of settlements, availability of services and accessibility of services, facilities and employment from the settlement (see section 4.0). It applies a scoring system to these factors to reach an objective view on the relative capacity of each settlement to accommodate development. Table 4.4 of the report shows the resulting score for each village. (NB it should be noted that this score does not take in to account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability).
- b) Using this model, Cubbington is identified as the second most sustainable village.
- c) The Village Settlement Hierarchy goes on to classify each settlement. Following the Village Housing Options and Settlement Boundaries Consultation (November 2013), these classifications were simplified in three categories: Growth Villages (of which there are 10); Limited Infill Villages (of which there are 24) and other settlements. The Growth Villages and Limited Infill Villages are set out in paragraph 4.7 of the Submission Draft Local Plan.
- d) As a result Cubbington was identified as Growth Village with the potential to accommodate some housing growth and land for 100 dwellings was allocated in Cubbintgton including this site.
- e) Since the submission of the Local Plan, the Council has had to identify additional housing land for the modifications submitted in 2016. In preparing the modifications, the Council reviewed the potential of growth villages to accommodate a proportion of the additional requirement. This work is set out in the Village Profile and Housing Allocations Update February 2016 (V18PM).
- f) Village Profile and Housing Allocations Update February 2016 (V18PM) explored an indicative capacity for each of the Growth Villages. For Cubbington, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 294 dwellings. In combination with other sites being proposed for the village, this suggests that Cubbington has the capacity to accommodate development on this site.

6) What are the 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 H26 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	✓

7) 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 falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. There is a landowner who is willing to sell and who is working with a development partner. The land owner has indicated a willingness to release the site upon adoption of the Local Plan to enable it to be brought forward for development
- c) As can be seen from answers to the questions there are no major impediments to the site being developed quickly

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

- a) The housing trajectory (see appendix 1 of the Housing Supply Topic Paper - HO27PM) indicates the first completions in 2018/19 with a build-out rate of up to 25 dwellings per annum and completion by 2020/21.
- b) Given the scale of the site and the fact that there are relatively few constraints on the timing of the development, this is considered to be realistic.

In addition to the above, for all sites apart from those in Barford, Bishops Tachbrook and Radford Semele:

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

- a) The area is within a Green Belt parcel (CB1) that plays an important role in safeguarding the countryside from encroachment, as well playing some role in preventing ribbon development and (like all parcels) a strategic role in assisting regeneration (LA07PM).
- b) Overall, this parcel plays a less important role in the Green Belt than other parcels surrounding Cubbington. In relation to the specific site the Green Belt Critical Review 2013 (V14) concluded that *“the Sub-parcel partly contained by the Coventry Road, could accommodate a limited village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration will need to be given to ensuring that the boundaries fronting the open countryside are defined clearly, using existing physical features that are readily recognisable and likely to be permanent.”*

10) 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 is considered to have only a moderate impact on the openness of the Green Belt due to the close relationships the site has with the built up area and physical features to the north and west of the site where it fronts open countryside. This
 - a. Ensures consistency with the Local Plan strategy
 - b. Removes this parcel which is not essential to keep permanently open
 - c. Uses physical features (a hedge-line, trees) to provide a strong Green Belt boundary
- c) The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. As set out in V14, the development of this will have only a moderate impact on the extent to which parcel CB1 is consistent with the essential characteristics of Green Belt (NPPF para 79).

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

- a) The process for assessing exceptional has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out this exceptional circumstances that apply to all the village sites within the Green Belt that are identified through the 2016 Modifications.
- b) Specifically, exceptional circumstances for the allocations to Green Belt growth villages are identified as follows:
 - 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 5 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 5 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. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations

also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need as well as local housing needs for Cubbington.

N.B. In responding to the above the Council should address key concerns raised in representations.

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

Matter 7d

Proposed Housing Site Allocations
Growth Villages and Hockley Heath

Site H50 - Land East of Cubbington

Issue

Whether the proposed housing site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

August 2016

NAME OF SITE: H50 – Land East of Cubbington

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

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

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

- a) The site is within the Green Belt on the edge of Cubbington. Cubbington has been identified as growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:
 - i) **Criterion a)** N/A
 - ii) **Criterion b)** The site is consistent with criterion b), being located on the edge of a built-up area (Cubbington).
 - iii) **Criterion c)** N/A
 - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence.
 - v) **Criterion e)** There are no significant heritage impacts associated with the site.
 - vi) **Criterion f)** The site falls within a wider parcel that has been assessed as high landscape value. However, the area to the south of Rugby Road is less sensitive to housing development. The allocation of the site is therefore consistent with this criterion.
 - vii) **Criterion g)** The site is within the Green Belt. The Council has taken into account the overall spatial strategy; and the availability of alternative suitable sites outside the Green Belt and considers there are exceptional circumstances for releasing this area from the Green Belt (see question 11 below). This site would help meet housing needs in Cubbington and more generally and assist in a 5 year land supply through the provision of a range of sites. The site will help support services and facilities in the village of Cubbington.

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

- a) The sustainability appraisal (SA10 and SA11PM) set out the sustainability benefits of each of the proposed allocations. The specific benefits relating to this are:
 - i) The Landscape Assessment 2016 (LA08PM) identifies the potential for development to the south of Rugby Road to soften the urban edge in this location.
 - ii) This site has the potential to support the ongoing viability of services in Cubbington including the village shop, schools and public houses.
 - iii) A sustainable urban drainage system will be implemented as part of the development

on this site. It is expected that this will be designed to ensure that flood risk is no worse than at present; however, this has the potential to reduce surface water flooding issues within the village.

- iv) The site will be required to provide open space.

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

- a) **Transport and Traffic:** The Highway Authority supports a housing development here. Safety concerns can be mitigated by providing a roundabout junction to access to both land parcels as the primary vehicular access to the development sites. The Highway Authority would also require the provision of footways and cycleways which connect with existing infrastructure provision within Cubbington enabling travel choice by all modes of transport. Representations raise concerns about increased traffic on Rugby Roads leading to congestion and highways safety issues resulting from access on to Rugby Road. However, the proposals put forward by the Highways authority address these issues.
- b) **Flooding:** Cubbington has a history of surface water flooding and the land to the east of village is sensitive in this regard. The area to the north of Rugby Road is on a fairly flat site that slopes from the south to the north eastern part of the site. The part of the site will not directly discharge to the south and will not cause increased flooding to Cubbington village although surface water runoff should be carefully managed.
- c) The area to the south of Rugby Road is not prone to flooding itself although the Pingle brook flows along the north eastern to south western part of the site. There is potential for this site to increase flooding into the Cubbington village and a surface water management plan should be implemented to control discharge to the Pingle Brook and reduce downstream flooding. The site therefore provides an opportunity to manage an existing problem through the provision of improved surface water flooding mitigation such as sustainable urban drainage system. This issue has been raised in many of the representations regarding this site, but the Council is satisfied that this issue can be fully mitigated and that there is potential to achieve improvements.
- d) The representations also indicate that there are issues with the capacity of the sewerage system within the village. Whilst Severn Trent Water have not indicated any issues regarding the development of this site, the Council would encourage the use of the sewer running along Rugby Road rather than those running through the village to service this site as a way of reducing further issues in relation to sewerage capacity in the village itself.
- e) **Landscape:** The 2016 Landscape Update (LA08PM) assessed the area to the north of Rugby Road as highly sensitive to housing development because any development here will be visually prominent as it would be on higher ground. The area to the south of Rugby is medium/high sensitivity to development and there is potential for a well-designed scheme to soften the built up edge of the settlement at this point. The allocation of this site will therefore seek to locate the vast majority of the development to the south of Rugby to ensure the more sensitive landscape areas are protected. Representations have raised concerns about the impact of development on the sensitive landscape to the east of the village, especially given proximity to HS2. The landscape report referred to above takes account of HS2 and indicates

that with appropriate siting and mitigation, the site is suitable for appropriate housing development.

- f) **Pollution and noise:** Concerns have been raised through representations regarding increased air pollution and noise pollution. There are no current air quality issues within Cubbington and the Local Plan air quality assessment (A04PM) indicates the air quality overall will improve during the Plan Period. With regard to noise, the eastern edge of the site could be affected by noise from HS2. However, due to the need to provide SUDS and a softer edge to the eastern edge of the settlement, it is anticipated that the housing will be kept away from the eastern edge of the site and that a landscape buffer can screen the site from HS2. It is also important to note that HS2 is in a cutting at this point which will mean much of the noise pollution is contained.
- g) **Loss of agricultural land:** The development of housing will result in the loss of grade 3 agricultural land. However, the Council contend that the public benefits of housing in this location out-weights the loss of agricultural land. Representations have indicated concern about the loss of farmland.
- h) **Community:** The area to the south of Rugby Road is well related to village core and through the provision of pedestrian and cycle links has the potential to dovetail with the existing village character and to support the viability of local services within the village. Representations have raised concerns about the impact on the atmosphere and identity of Cubbington. The Council contend that the site is located so that the separate identity of Cubbington is not undermined and successful integration with the village can be achieved.
- i) **Overall:** the need to protect highly sensitive landscape areas, provide landscape mitigation and flood-mitigation measures limits the capacity of this site. In total the Council are of the view that approximately four hectares of the site (predominantly to the south of Rugby Road) could be developed within the context of the required mitigation.

5) Is the scale of development proposed compatible with the capacity of the village to accommodate further growth in terms of its character and appearance, the level of services and existing infrastructure?

- a) The Village Settlement Hierarchy June 2013 (V01 to V03) sets out the Council's approach to the classification of villages and rural settlements. The report explores the size of settlements, availability of services and accessibility of services, facilities and employment from the settlement (see section 4.0). It applies a scoring system to these factors to reach an objective view on the relative capacity of each settlement to accommodate development. Table 4.4 of the report shows the resulting score for each village. (NB it should be noted that this score does not take in to account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability).
- b) Using this model, Cubbington is identified as the second most sustainable village.
- c) The Village Settlement Hierarchy goes on to classify each settlement. Following the Village

Housing Options and Settlement Boundaries Consultation (November 2013), these classifications were simplified in three categories: Growth Villages (of which there are ten); Limited Infill Villages (of which there are 24) and other settlements. The Growth Villages and Limited Infill Villages are set out in paragraph 4.7 of the Submission Draft Local Plan.

- d) As a result Cubbington was identified as a Growth Village with the potential to accommodate some housing growth and land for 100 dwellings was allocated in Cubbington.
- e) Since the submission of the Local Plan, the Council has had to identify additional housing land for the modifications submitted in 2016. In preparing the modifications, the Council reviewed the potential of growth villages to accommodate a proportion of the additional requirement. This work is set out in the Village Profile and Housing Allocations Update February 2016 (V18PM).
- f) The Village Profile and Housing Allocations Update February 2016 (V18PM) explored an indicative capacity for each of the Growth Villages. For Cubbington, in the context of the need for further growth to support Coventry's Housing need, the indicative capacity was 294 dwellings of which 100 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of 194 dwellings for the village (see para 7.11). This indicative capacity was adjusted to take account of policy and environmental constraints such as landscape, Green Belt and flooding. The availability of suitable sites was also taken into account. These factors suggested that the availability of suitable sites was limited to land east of Cubbington and that even here the combination of landscape and flooding constraints means there is limit on the site's capacity.
- g) Taking all these factors into account, the Council contend that the proposal to allocate Land East of Cubbington is sustainable and that the village is of sufficient size and has the range of facilities necessary to support this level of growth without significantly undermining to the character of the village. The location of the site to the east of the village means that the separate identity of the village is maintained and the appearance of the village from the east has the potential be enhanced.

6) What are the 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 H50 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	✓

7) 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 falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. There is a landowner who is willing to sell and who is working with a development partner. The development partner is actively drawing up plans for the site and has indicated an intention to submit a planning application soon after adoption.
- c) As can be seen from answers to the questions there are no major impediments to the site being developed quickly

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

- a) The housing trajectory (see appendix 1 of the Housing Supply Topic Paper - HO27PM) indicates the first completions in 2019/20 with a build out rate of 25 dwellings per annum and completion by 2023/24.
- b) Given the scale of the site and the fact that there are relatively few constraints on the timing of the development, this is considered to be realistic. Theoretically, it is possible that the site could come forward more quickly. However when considered in combination with other allocations in Cubbington it is sensible to be cautious about the ability of the market and the community to absorb all the housing proposed more quickly.

In addition to the above, for all sites apart from those in Barford, Bishops Tachbrook and Radford Semele:

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

- a) The area is within a Green Belt parcel (CB1) that plays an important role in safeguarding the countryside from encroachment, as well playing some role in preventing ribbon development and (like all parcels) a strategic role in assisting regeneration (LA07PM). Representations relating to this site raise concerns about the development being a **projection in to open countryside and constituting ribbon development**.
- b) Overall, this parcel plays a less important role in the Green Belt than other parcels surrounding Cubbington. Further, the route of HS2 lies only one field beyond the site boundary. This limits the weight that can be applied to the role this site plays in safeguarding

countryside from encroachment.

- c) The site forms a reasonably compact area adjacent to a significant length of the built up edge of Coventry. This minimises the extent to which it can be considered to be ribbon development. The eastern edge of the site bounded by a strong tree belt / hedge boundary, which along with the extent of the village to the north-west and south-west of the site forms a defensible Green Belt boundary.

10) 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. The role this site plays in terms of openness is already compromised to an extent by the footprint of the village which extends in to open countryside to the north-west and south-west of the site, particularly when viewed from the east. The existing hedge-lines provide a clear boundary to the east and the addition of further landscape features along this part of the site will strengthen the permanence of the Green Belt boundaries. As a result the removal of this area from the Green Belt will have only a moderate impact on openness This proposal
- i) Ensures consistency with the Local Plan strategy
 - ii) Removes this parcel which is not essential to keep permanently open
 - iii) Uses physical features (a hedge-line / tree belt) to provide a strong Green Belt boundary
- c) The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. The development of this will have only a minimal impact on the extent to which parcel CB1 is consistent with the essential characteristics of Green Belt (NPPF para 79) as the land to east, north and south will remain open in character.

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

- a) The process for assessing exceptional has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out this exceptional circumstances that apply to all the village sites within the Green Belt that are identified through the 2016 Modifications. However, representations suggest that exceptional circumstances for the release of this site from the Green Belt have not been demonstrated.
- b) Specifically, exceptional circumstances for the allocations to Green Belt growth villages are identified as follows:
- 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 5 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 5 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. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural 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 locations (proposed in 2016) are focused more on those villages which have stronger access to Coventry.

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