

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

H24 – Burrow Hill Nursery, Burton Green
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: H24 – Burrow Hill Nursery, Burton Green

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

- a) The site is currently identified as being in horticultural use, and has a long history of such activity. The Historic Environmental Assessment records the land as orchards and nurseries.
- b) There is no recent planning history for the site, but in 2005 permission was given to change the use of a building for equestrian purposes. This forms a small part of the overall site.
- c) The village is due to be bisected by HS2 if current plans go ahead, albeit that the plan is to “cut and cover” the line under the village.

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

- a) 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.
- b) The site is within a village that is close to the edges of both Kenilworth and the city of Coventry. Located centrally in the village, the site offers the potential not only to provide new housing in the most sustainable location, but also to provide much needed car parking for the village school and a well-located open green space for community use.
- c) The site is within the Green Belt. Burton Green has been identified as growth village within Policy H1. The site has been assessed in the Sustainability Appraisal (SA10 and A11PM) within the context of the Spatial Strategy.
- d) 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 (Coventry / Burton Green)
 - iii) **Criterion c)** N/A
 - iv) **Criterion d)** While the wider land parcel has a role to play in preventing coalescence the proposed site lies within the body of the village. It is already somewhat developed in nature, in its role as a nursery.
 - v) **Criterion e)** There are no significant heritage impacts associated with the site
 - vi) **Criterion f)** The 2013 Landscape Sensitivity and Ecological / Geological Study found

that all the landscapes around the settlement, particularly in relation to the Ancient Arden landscape, woodland and field trees, were of high and high-medium value with limited infill development more appropriate than large-scale allocation. However, the site appraisal for parcel BG_09 states that in terms of the site's sensitivity to new housing,

The northernmost corner of the zone (currently occupied by a garden nursery) would be suitable for development in order to link the two parts of the village which currently feel detached.

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. This site would help meet housing needs in the area and more generally assist in maintaining a five-year land supply through the provision of a range of sites. The site will help support services and facilities in the village.

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

- a) The village school is located nearby and is on a narrow lane which causes significant safety issues at school dropping off and picking up times due to parents/carers parking on the side of the lane. It is suggested that the intended residential site would contribute an area of land to provide off road parking for the school to avoid this congestion on street. In addition, the village residents favour a large village green to mark the village centre (there being a very linear village development pattern). Again, this would be a component of any new residential development here.
- b) The site is close to the village school, giving easy access for children of new residents.
- c) Residential development here would also consolidate residential uses in the village in the central core, providing a more traditional pattern of development rather than extending the less attractive and undesirable ribbon development that has evolved over the years.

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

- a) **Heritage:** There is a Listed Building on land to the southeast of the site, which is at a lower level and could therefore be impacted on by new development here. There is, however, a significant tree belt and other soft landscaping along the boundary which may mitigate the impact provided it is retained in any future development scheme. Planning conditions could ensure this.
- b) **Landscape:** Medium sensitivity - as the site rises to the north, there is a potential impact on views across the open countryside to the south. In view of this, careful planning of the site layout and landscaping will be required at the planning application stage to militate against

the impact.

- c) **Ecology:** the site itself has low ecological value. Representations have suggested that it is adjacent to a pond with Great Crested Newts. A detailed ecological survey will be required to accompany a future planning application.
- d) **Noise and disturbance from HS2:** this will need to be carefully mitigated in the layout and design of the site. Environmental Health have recommended that there should be a requirement for an EMP (construction & occupation) including monitoring.

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) Existing services and infrastructure are not particularly good, but there are services nearby and the site is in close proximity to the edge of Coventry, with considerable service and infrastructure provision, makes this a suitable and sustainable location.
- b) Furthermore, additional housing providing homes for more residents will help to support existing services and may lead to the provision of additional services hitherto not available. In particular, the local village school will be more sustainable.
- c) The appearance and character of the village could be improved by providing facilities at a central location, rather than preserving and extending the ribbon pattern of development which is currently predominant. Representations have suggested that the proposal **accentuates ribbon development**. However, the Council would contend that the opposite is the case and the location of this site provides opportunities to build a strong core to the village.
- d) In addition, there is considerable change due to occur to the character of the village related to the proposed route of HS2, which will effectively cut the village in half. Whilst this in itself is not a reason to develop further here, the existing character will be markedly changed by this national infrastructure scheme.
- e) The Sustainability Appraisal Addendum 2016 (SA11PM) considered the site and stated in Appendix IV that even given the expansion of the capacity of the site from 60 to 90 units,
The increase in capacity has been screened for significance, and the findings of the screening are presented in Appendix II. The increase is unlikely to significantly affect the previous findings of the SA. No further SA work required.

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 H24 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 site owners wish to cease the current horticultural use and are therefore keen to ensure that the site is fully available.

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

- a) The commencement of the site is expected in 2018/19 and completion by 2020/21 at a rate of ten units in the first year and 40 in each of the following two years. Given that the site is available and could be brought forward quickly, this is not considered unreasonable.

In addition to the above:

9) 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 within Parcel BG2 of the 2015 Joint Green Belt Study (JGBS) update (LA07PM). The JGBS identifies the site as having limited importance in protecting openness.
- c) The area was not considered essential in contributing to the historic character and setting of Coventry and the parcel does have a role in preventing coalescence.

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

- a) There would be an effect on the Green Belt when viewing the development from the land to the south which is at a lower level and could impinge on the more open views afforded currently by the existing uses, however, this could be mitigated with careful attention to the detail of the site layout and screening provided by both existing tree cover and new landscaping as part of the overall scheme. Some open space is intended as part of the development to provide a large village green and this should be located to address some of the potential loss of openness.
- b) The site lies within Parcel BG2 of the JGBS. The overall summary identifies that while the parcel has significance for preventing coalescence between Coventry and Kenilworth, its openness has been compromised to a degree by ribbon development along Hob Lane and Red Lane and the presence of built development such as farms, a primary school and the nursery itself.
- c) In overall terms, therefore, development within the settlement is felt less likely to have a significant adverse effect on the openness of the green belt than in other settlements.
- d) The residual Green Belt will continue to meet the essential characteristics set out in paragraph 79 of the NPPF. The development of this site will have only a moderate impact on the extent to which the rest of Parcel BG2 and the adjacent areas of Green Belt continue to be consistent with the essential characteristics of Green Belt (NPPF paragraph 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.

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, and to some extent, the City's housing need. This site has additional benefits as outlined in question 3 above and therefore has the potential to bring significant local benefits.

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