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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

H27 - South of Arras Boulevard

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: H27 - South of Arras Boulevard

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 Hampton Magna. Hampton Magna has been identified as growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (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 (Hampton Magna).
 - iii) Criterion c) N/A
 - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence nor would it undermine the separate identity of the settlement.
 - v) Criterion e) There are no significant heritage impacts associated with the site.
 - vi) **Criterion f)** The site falls within a 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 Hampton Magna 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.

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 Hampton Magna including the village shop, school, community centre and public house.
 - ii) 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) Traffic and Transport:

- i) Access into the site can be achieved from two different access points.
- ii) Access into Hampton Magna as a whole is constrained by narrow roads and the signal-controlled, single lane railway bridge. However Warwickshire County Council has commissioned work to consider the implications for the rail crossing of this site and other allocations in Hampton Magna (Appendix A to this statement). This study concludes that the junction will continue to operate effectively even in the context of the cumulative growth proposed for Hampton Magna.
- iii) Development at Hampton Magna, combined with other proposals at Hatton Park and the north of Warwick is likely to lead to increased traffic on the strategic highway network, particularly Birmingham Road and its junction with the A46 (Stanks Island). The traffic modelling undertaken in the final Phase Strategic Transport Assessment (TA14PM) indicates that the proposed mitigation measures for Stanks Island (which are fully funded) are sufficient to mitigate the additional traffic.
- iv) The traffic issues described above have been prominent in representations regarding all the proposed developments in Hampton Magna and Hatton Park. The Council is satisfied that the work undertaken by Warwickshire County demonstrates that this site is safely accessible and the highways network is able to accommodate the growth with suitable mitigation. Some representations suggest that a separate access would be needed from the A4189. The evidence does not support this view and the environmental and wider transport implications of this have not therefore been assessed.
- b) Drainage: Drainage and sewage systems in this locality are limited and of their time. Any new scheme will have to manage its impact and avoid adding to local problems. Effective surface water management is essential to avoid knock on impacts further down the water courses.
- c) Landscape: The 2013 Landscape Assessment (V16) identifies the zone that this site sits within as high / medium landscape sensitivity and concludes there is some scope for development adjacent to the existing settlement edge providing views from the existing settlement are respected and an appropriate landscape buffer is provided to the school playing fields. A strong landscape buffer needs to be extended along the southern edge (adjacent to the footpath).
- d) **Pollution**: There are no specific pollution issues relating to the site. Representations have raised concerns about noise, air and light pollution and resulting impacts on health. These issues will need to be addressed through the planning process in line with Policy NE5 of the emerging Local Plan

- e) **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 outweight the loss of agricultural land. Representations have indicated concern about the loss of farmland.
- f) Infrastructure: The additional housing proposed for Hampton Magna will increase pressure on local infrastructure. However the Infrastructure Delivery Plan address concerns raised in representations (see question 6 below).
- g) **Community**: The site is well-integrated with the existing built form of the village and is close to the village facilities. The development has the potential to support existing services and infrastructure in the village such as the shop, school and community centre.
- 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 and the availability 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. (n.b. it should be noted that this score does not take into account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability).
 - b) Using this model, Hampton Magna is identified as the 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 Hampton Magna was identified as a Growth Village with the potential to accommodate some housing growth; land for 100 dwellings was allocated on 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 Hampton Magna, in the context of the need for further growth to support Coventry's housing need, the indicative capacity was 180 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 80 dwellings for the village (see para 7.11). This indicative capacity was adjusted to take account of constraints and the availability of suitable sites. The availability of suitable sites adjacent to Hampton Magna indicated that there may be some potential to allow for growth above the indicative level.

- g) Taking all these factors into account, the Council contends that the proposal to allocate land south of Arras Boulevard 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 the character of the village. The location of the site to the south of the village and close to village services means that coalescence with Warwick is avoided at the same as containing the settlement to the south of Old Budbrooke Road.
- h) Representations have suggested that the level of growth proposed for the village is disproportionate and that the village is not well located to meet the housing needs of Coventry. Whilst the level of growth proposed for the village does exceed the indicative capacity, it has never been the intention that this capacity should be taken as a target or a maximum. In the case of Hampton Magna the excellent range of facilities in the village and the availability of suitable sites means that it is capable of supporting a greater level of growth than its population would suggest. Other representations have suggested the village is not well located for Coventry. The Council contend the village is well-located to support the housing needs of Warwick and that it has moderately good access to Coventry via the A46, particularly once the Stanks Island junction has been improved.

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 (Doc 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 H27 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. This site falls within an area that was assessed as being 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.
- 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 30 dwellings per annum and completion by 2022/23.
- 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 (WA2) that plays an important role preventing neighbouring towns merging as well playing some role in safeguarding the countryside from encroachment, in preventing ribbon development and (like all parcels) a strategic role in assisting regeneration (see LA07PM). Representations relating to this site raise concerns about the development reducing the gap between the village and Warwick.
- b) Clearly the parcel as whole plays an important role in the Green Belt. This role needs to be maintained. However the removal of the specific site does not reduce the gap with Warwick and is well integrated with the existing built form and so does not constitute ribbon development or significant encroachment in to the Countryside.

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 wider parcel plays a valuable role in maintaining openness. However, this sub-parcel could accommodate sensitively designed, with only a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt if particular consideration is given to ensuring that the boundary fronting the open countryside is consistent with the

proposed village inset boundary and is clearly defined using permanent physical features that are readily recognisable. 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 (hedge-lines) to provide a strong Green Belt boundary.
- c) 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 parcel WA2 and the adjacent areas of Green Belt continue to be consistent with the essential characteristics of Green Belt (NPPF para 79), particularly as the area of land proposed to be removed from the Green Belt is so closely integrated with the existing built for Hampton Magna. The site also well bounded by existing natural features (hedgerows) which provide a defendable boundary.

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) <u>Is there an essential need that has to be met?</u> 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.

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

Old Budbrooke Road/Warwick Parkway Station Access Junction – LinSig Assessment

Introduction

1.1 Vectos Microsim (VM) have been commissioned by Warwickshire County Council (WCC) to undertake a junction assessment of the Old Budbrooke Road/Warwick Parkway Station access junction. The testing relates to the impact of the proposed residential development in Budbroke, to the west of Warwick. The key objective of this assessment is to establish how the junction operates with an additional 130 residential dwellings located within Budbrooke.

Scenarios Assessed

1.2 Three scenarios will be tested within this assessment. These scenarios will be tested during the AM and PM peak hours (0800-0900 and 1700-1800). The details of the scenarios tested are provided below:

Scenario 1 - 2015 Base Scenario

1.3 Initially a 2015 Base scenario has been developed for testing. The traffic flows for inclusion within the Base scenario have been derived from a 2005 traffic survey at the junction. These survey counts have then been 'growthed' via the application of a localised unadjusted TEMPRO growth figure, which represents growth between 2005-2015. Additionally, all of the 2005 surveyed flows into and out of the station access have been doubled, based upon statistical analysis by the Office of Rail and Road (ORR).

Scenario 2 - 2015 'With Development' Scenario

1.4 For the purposes of this scenario, the development flows for the original proposed residential development within Budbrooke have then been extracted from the Warwick and Leamington Wide Area Local Plan Paramics Model. The number of trips exiting the residential site, and routing through the Old Budbrooke Road/Warwick Parkway Station access junction has been established from the Paramics model. The trips have then been added to the newly created 2015 Base scenario matrix, to create the 2015 'With Development' scenario.

Scenario 3 - 2015 Sensitivity Test Scenario

1.5 Additional to the 2015 With Development scenario, a 'Sensitivity Test' has been undertaken. This scenario assesses the impact of delivering 130 additional dwellings at the proposed development site within Budbrooke. In order to dervive the number of trips this amount of dwellings would generate, the WCC standard residential trip rates have been used. These trips have then been distributed as per the trip assignment for the proposed site within the Paramics model. This has enabled a matrix to be created for trips associated with the 130 additional dwellings, which has been added to the matrix levels created for Scenarios 1 and 2 to create the 2015 Sensitivity Test scenario.

Methodology

- 1.6 For the purposes of this assessment 'Linsig' software has been used. LinSig is used to indicate the performance of a signalised junction under a given set of traffic flows. The software calculates the 'degree of saturation' (DoS), expressed as a percentage, for each approach to a junction. Any approach where the DoS is forecast to exceed 90% are highlighted in red in the assessment table to indicate that these approaches are close to or over-capacity. Alongside this, the 'mean maximum queue' (MMQ), is calculated, to represent the average position of the furthest vehicle from the stop line in each cycle.
- 1.7 The 'practical reserve capacity' (PRC) for the junction as a whole is also calculated, which reflects the spare capacity across the junction for additional traffic. A positive PRC figure indicates that the junction has spare capacity whilst a negative PRC suggests that the junction is over capacity and will experience congested conditions.

Results Analysis

1.8 The scenarios described above have been tested in a LinSig model for this junction. The results for each scenario, in both the AM and PM peak are summarised in Table 1.

Table 1 Assessment Table

Approach	Scenario 1		Scenario 2		Scenario 3		
	Q's	DoS %	Q's	DoS %	Q's	DoS %	
AM Peak Hour Assessment							
A - Old Budbrooke Road N	17.4	90.9	20.1	95.5	24.6	100.3	
B - Rail Station Access	1.3	29.6	1.3	29.6	1.3	29.6	
C - Old Budbrooke Road S	18.5	93.7	23.3	98.3	25.7	99.7	
D - Overflow Car Park Access	0.0	0.0	0.0	0.0	0.0	0.0	
PRC (%)	-4.1%		-9.2%		-11.4%		
PM Peak Hour Assessment							
A - Old Budbrooke Road N	14.9	79.7	15.9	82.7	16.6	83.7	
B - Rail Station Access	6.0	76.5	6.0	76.5	6.8	83.6	
C - Old Budbrooke Road S	8.5	77.3	9.2	80.9	9.6	82.7	
D - Overflow Car Park Access	0.5	8.9	0.5	8.9	0.5	9.2	
PRC (%)	12.9%		8.8%		7.6%		

- 1.9 The results for Scenario 1 indicate that the junction operates at capacity during the AM and within capacity during PM peak periods. During the AM peak the degree of saturation on both the north and south Old Budbrooke Road approaches is around 90%, which suggest that the junction is operating close to capacity, whilst the negative PRC results also support this. The modelling results suggest that the junction available capacity during the PM peak.
- of queuing and the degree of saturation results increase, across both peaks in this scenario.

 The increase in the AM takes the Old Budbrooke Road approaches close to capacity at 95.5% degree of saturation on both the north approach and 98.3% on the south. The PRC results also suggest that the additional demands will increase congestion at the junction during the AM peak. During the PM peak the junction continues to operate well within capacity in this scenario, with a PRC value suggesting additional traffic in this scenario can be accommodated without issue.
- 1.11 With the inclusion of the Sensitivity Test demands in Scenario 3, the AM peak begins to reach capacity on the Old Budbrooke Road north and south approaches to the junction, however

this situation does not differ significantly from Scenario 2. The modelling results show a degree of saturation of 100.3%, and queues of around 25 pcu's on the northern approach. The PRC value of -11.4% also suggests that the junction is operating at capacity during the AM peak in this scenario. The Old Budbrooke Road S approach operates over capacity in this scenario, with a degree of saturation of 99.7%

1.12 The results for the PM peak demonstrate that the junction operates well within capacity on all approaches, with the additional demands accommodated without significant impact on the junction operation.

Summary

- 1.13 This junction assessment has revealed that with the proposed additional 130 dwellings included, the junction will operate at capacity during the AM peak, and it is likely that congestion will develop, with queues on the busiest approach of around 18 vehicles. The results however suggest that the junction operation does not differ significantly between Scenario 2 and 3.
- 1.14 The results indicate that the junction operates well within capacity during the PM peak with the inclusion of the 130 additional dwellings.
- 1.15 Upon reflection it is considered that this assessment represents a robust assessment, with the pedestrian stages at the junction called every cycle. In reality it is unlikely this will be the case, with the pedestrian stages being called frequently whenever a train arrives at the Warwick Parkway Station, and less frequently between train arrivals. On this basis it is likely that additional capacity will exist at the junction than has been modelled.
- 1.16 Additionally the level of growth applied to the 2005 count data, to create the 2015 base demands, is also considered robust, given that recent traffic counts undertaken in 2013 at the A4177 Birmingham Road/Old Budbrooke Road junction, to the north of the study area, reveals little to no growth between 2005 and 2013 at this location. Therefore it is likely that the level of growth applied to through traffic within this junction assessment may in fact be over-estimating the level of traffic. A further assessment of the LinSig model has been undertaken with the 2005 traffic counts for this junction included for the Old Budbrooke Road through traffic, without being factored up to 2015 levels. The resulting output brings

- the degree of saturation down from 100.3% to 93.3% on the busiest approach (Old Budbrooke Road N).
- 1.17 Finally this assessment includes traffic flows from the end of Local Plan period in Scenario 2, and it is likely that more detailed traffic flows will be available once further detail on this proposed site is available in due course.
- 1.18 On the basis of the above it is likely that there is more capacity available at this modelling exercise has demonstrated.

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

H51 – Land south of Lloyd Close, Hampton Magna

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: H51 - Land south of Lloyd Close, Hampton Magna

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 Hampton Magna. Hampton Magna has been identified as growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:
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3) In addition to housing provision, are there other benefits that the proposed development would bring?

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 - i) This site has the potential to support the ongoing viability of services in Hampton Magna including the village shop, school, community centre and public house.
 - ii) 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) Traffic and Transport:

- Access into the site can be achieved from three different access points and due to the size of the proposed development, at least two points of access would be preferable.
 The site is serviced by two bus stops within 200m.
- ii) Access into Hampton Magna as a whole is constrained by narrow roads and the signal-controlled, single lane railway bridge. However Warwickshire County Council has commissioned work to consider the implications for the rail crossing of this site and other allocations in Hampton Magna (see Appendix A for Site H27). This study concludes that the junction will continue to operate effectively even in the context of the cumulative growth proposed for Hampton Magna.
- iii) Development at Hampton Magna, combined with other proposals at Hatton Park and the north of Warwick is likely to lead to increased traffic n the strategic highway network, particularly Birmingham Road and its junction with the A46 (Stanks Island). The traffic modelling undertaken in the final Phase Strategic Transport Assessment (TA14PM) indicates that the proposed mitigation measures for Stanks Island (which are fully funded) are sufficient to mitigate the additional traffic.
- iv) The traffic issues described above have been prominent in representations regarding all the proposed developments in Hampton Magna and Hatton Park. The Council is satisfied that the work undertaken by Warwickshire County demonstrates that this site is safely accessible and the highways network is able to accommodate the growth with suitable mitigation. Some representations suggest that a separate access would be needed from the A4189. The evidence does not support this view and the environmental and wider transport implications of this have not therefore been assessed.
- b) Drainage: Drainage and sewage systems in this locality are limited and of their time. Any new scheme will have to manage its impact and avoid adding to local problems. Effective surface water management is essential to avoid knock on impacts further down the water courses.
- c) Landscape: The 2013 Landscape Assessment (V16) identifies the zone that this site sits within as high/medium landscape sensitivity and concludes the zone could accommodate some small scale development adjacent to the existing settlement edge. This should be set within a landscape framework of native tree planting to tie in with the adjacent rural zones. Whilst representations have suggested that the landscape here is highly sensitive, this is not supported by the evidence which indicate sensitive development is possible
- d) **Pollution**: There are no specific pollution issues relating to the site. Representations have raised concerns about noise, air and light pollution and resulting impacts on health. These issues will need to be addressed through the planning process in line with Policy NE5 of the emerging Local Plan
- e) **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-weight the loss of agricultural land. Representations have indicated concern about the loss of farmland.

- f) Infrastructure: The additional housing proposed for Hampton Magna will increase pressure on local infrastructure. However the Infrastructure Delivery Plan address concerns raised in representations (see question 6 below)
- g) **Community**: The site is well integrated with the existing built form of the village and is close to the village facilities. The development has the potential to support existing services and infrastructure in the village such as the shop, school and community centre.
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sites. The availability of suitable sites adjacent to Hampton Magna indicated that there may be some potential to allow for growth above the indicative level.

- g) Taking all these factors into account, the Council contend that the proposal to allocate land south of Lloyd Close 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 south of the village and close the village services means that coalescence with Warwick is avoided at the same as containing the settlement to the south of Old Budbrooke Road.
- h) Representations have suggested that the level of growth proposed for the village is disproportionate and that the village is not well located to meet the housing needs of Coventry. Whilst the level of growth proposed for the village does exceed the indicative capacity, it has never been the intention that this capacity should be taken as a target or a maximum. In the case of Hampton Magna the excellent range of facilities in the village and the availability of suitable sites means that it is capable of supporting a greater level of growth than its population would suggest. Other representations have suggested the village is not well located for Coventry. The Council contend the village is well located to support the housing needs of Warwick and that it has moderately good access to Coventry via the A46, particularly once the Stanks Island junction has been improved.

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 H51 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. This site falls within an area that was assessed as being 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 2021/2020 with a build out rate of 25 dwellings per annum and completion by 2025/26.
- 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 Hampton Magna 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 (WA2) that plays an important role preventing neighbouring towns merging as well playing some role in safeguarding the countryside from encroachment, 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 reducing the gap between the village and Warwick
- b) Clearly the parcel as whole plays an important role in the Green Belt. This role needs to be maintained. However the removal of the specific site does not reduce the gap with Warwick and is well integrated with the existing built form and so does not constitute ribbon development or significant encroachment in to the Countryside

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 wider parcel plays a valuable role in maintaining openness. However, this sub-parcel could accommodate sensitively designed, with only a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt if particular consideration is given to ensuring that the boundaries fronting the open countryside are carefully treated, the existing building lines of the village are extended but not breached and permanent physical features are established as part of the proposal. This proposal

- i) Ensures consistency with the Local Plan strategy
- ii) Removes this parcel which is not essential to keep permanently open
- The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. The development of this site will have only a moderate impact on the extent to which parcel WA2 and the adjacent areas of Green Belt" continue to be consistent with the essential characteristics of Green Belt (NPPF para 79), particularly as the area of land proposed to be removed from the Green Belt is so closely integrated with the existing built for Hampton Magna. In the Council's view this provides a strong basis for redrawing the Green Belt boundaries to align with the existing built up area. Even though this alignment lacks natural features to the east and south, clear Green Belt boundaries can be established as part of the proposals using tree planting and landscape features to soften the settlement edge.

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) <u>Is there an essential need that has to be met?</u> 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.

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