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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

H28 – North of Birmingham 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: H28 – North of Birmingham Road

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 Hatton Park. Hatton Park 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 (Hatton Park).
 - 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 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 Hatton Park 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 and the surrounding area.

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 Hatton Park and surrounding areas including the village shop and community centre.
 - 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) Safe access into the site can be achieved from Birmingham Road with potential for a secondary access from Ebrington Drive
- ii) Development at Hatton Park, combined with other proposals at Hampton Magna 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.
- iii) 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. In addition representations have suggested that development here will lead to dangerous parking on residential / rural carriageways. However, by ensuring the parking standards are met within the development, this issue can be fully mitigated

b) Flooding: Potential for substantial flooding along the Birmingham Road. Problems potentially caused by the ineffective operation of the existing flood storage area next to this site. Development may necessitate the further expansion of the existing flood storage area. Detailed hydrology and site analysis will be required as part of the planning application process. Representations have raised particular concerns about flooding on Birmingham Road. The mitigations set out above seeks to address this concern.

c) Landscape: The 2013 Landscape Assessment (V16) identifies the zone that this site sits within as medium landscape sensitivity and concludes that this site may be appropriate for development, subject to the existing avenue of trees along this drive being retained and enhanced by replanting if necessary. A buffer of public open space should be retained between this avenue and any new development. It is also imperative that a landscape buffer of native trees, preferably the extent of one field, should be created to maintain a visual link and wildlife corridor between Smith's Covert and the wider countryside to the east. The strong vegetation along the Birmingham Road should also be retained.

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) Ecology: The site has been assessed as being of medium ecological value. Smith's

Covert (a potential Local Wildlife Site) is to the north of the site and there are some strong linear landscape features along the Birmingham Road frontage, within the site and at Ugly Bridge Road which are of ecological value. The development of the site will therefore need to provide a buffer between the built area and Smith's Covert and along the eastern boundary adjacent to Ugly Bridge Road. In this way there is potential to provide improved linkages between the canal, and Smiths Covert. Some representations have argued that the impact on ecology means the site is unsustainable. However the ecological assessments suggest that sensitive development here can protect and possibly enhance its ecological value.

- f) **Loss of agricultural land:** The development of housing will result in the loss of grade 3b agricultural land. However, the Council contends that the public benefits of housing in this location outweigh the loss of agricultural land. Representations have indicated concern about the loss of farmland. They have also suggested that as the allocated area omits land to the north and east these will not be viable agricultural units. This latter point is understood and the Council will expect this to be addressed when a planning application come forward.
- g) **Infrastructure:** The additional housing proposed for Hatton Park will increase pressure on local infrastructure. However the Infrastructure Delivery Plan addresses concerns raised in representations (see question 6 below).
- h) **Community:** The site is well-connected 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. Concerns raised in representations suggest the village will become urbanised, that the density is too high and that there will be an impact on the quality of life for local residents. The proposals seek to ensure that the scale of development for the village is proportionate (see question 5 below) and assumptions about density are consistent with sites in other rural areas and there is no reason to depart from these assumptions in this location.

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, Hatton Park is identified as the tenth 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 Hatton Park was identified as Growth Village with the potential to accommodate some housing growth and land for 80 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 Hatton Park, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 240 dwellings of which 80 were proposed for allocation in the submission draft Local Plan. This suggested further capacity of 160 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 limited availability of suitable sites adjacent to Hatton Park indicated that there was not the scope to allocate sites to meet the full indicative capacity.
- g) Taking all these factors into account, the Council contend that the proposal to allocate land North of Birmingham Road is sustainable and that the village is of sufficient size and combined with other settlements in the surrounding area, has the range of facilities necessary to support this level of growth without significantly undermining to the character of the village.
- h) Representations have suggested that the level of growth will mean the local infrastructure will not cope with the demands. In the case of Hatton Park, the range of existing facilities within the settlement itself is limited in comparison with its population. Additional housing has the potential sustain existing facilities in the settlement as well as in neighbouring settlements such as Hampton Magna and Hatton Green.

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 H28 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	✓

- g) A number of objections raised concerns regarding **infrastructure** including:
 - Doctors surgeries are already under pressure and will struggle cope
 - The local schools are already under pressure and will struggle to cope
 - Loss of recreational facilities and impact on the village hall and the car park
 - The IDP does not identify how water supply, waste water and energy will be provided

for. The water pumping station is already beyond capacity.

Whilst these issues will be resolved through the planning application process, each has been addressed at a high level through the IDP (IN07PM), with the exception of utilities. It should however be pointed out that both Sever Trent Water and Western Power have indicated that, with mitigation, they can support the development proposed within the District.

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 2018/19 with a build out rate of 40 dwellings per annum and completion by 2021/22.
- b) The developer supports these timescales. 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 (HA1) that plays an important role in safeguarding the countryside from encroachment and a role preventing neighbouring towns merging, in preventing ribbon development and (like all parcels) a strategic role in assisting regeneration (see Doc 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 has only a marginal impact on the gap with Warwick (reducing the gap from approx. 1.6 km to 1.4 km) and given the strong boundaries provided by the lane, the woodland and the existing settlement, the development of the site has a relatively small impact on the openness of the green belt and its ability to prevent encroachment.

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) The sub-parcel is largely contained within the Birmingham Road (A4177) and Ugly Bridge Road and could accommodate a sensitively designed village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. It is proposed to remove this site from the Green Belt in line with paragraph 85 of the NPPF. 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 (the roads) 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 HA1 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 has such strongly defined boundaries.

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, particularly as local housing need has been identified at just 12 dwellings.
- 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.
 - 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**

Warwick District Council
Local Plan Examination
Response to Inspector's Initial Matter and
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Matter 7d

Proposed Housing Site Allocations
Growth Villages and Hockley Heath

H53 – Brownley Green Lane, Hatton Park

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: H53 – Brownley Green Lane, Hatton Park

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. The buildings immediately to the north west of the site (known as the Piggery) have been given planning permission for 4 live/work units (W/15/0670). This is currently being implemented.

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

- a) The site is within the Green Belt on the edge of Hatton Park. Hatton Park 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 on the edge of a built up area (Hatton Park).
 - 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)** The heritage implications were assessed in HE03PM. This concluded that 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 landscape value, although a further landscape assessment indicates that this specific site is less sensitive to development than the rest of the parcel. 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 Hatton Park 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 and the surrounding area.

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. This site has the potential to support the ongoing viability of services in Hatton Park and surrounding areas including the village shop and community centre.

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

a) Traffic and Transport:

- i) Access to the site could be achieved from Barcheston Drive in the vicinity of the existing bus layby. Issues that would need to be addressed include:
 - a. The need to relocate the existing bus stop - preference likely to be for another layby to the east of the Village Hall given the proximity of the traffic calming.
 - b. The access route would impact on the existing car park - additional car parking would need to be provided, and ramped access to Village Hall created from the car park as the access road currently forms a ramped access.
 - c. The site is at a lower level to the existing surrounding development; therefore additional land, over and above the amount that would generally be required, would be needed to provide for highway infrastructure into the site to achieve acceptable gradients.
 - d. An emergency access may be required and it is recommended that the access road and footways / cycleway be constructed to a width and standard to accommodate an emergency vehicle should the road be blocked.
- ii) Development at Hatton Park, combined with other proposals at Hampton Magna 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.
- iii) Concerns about access to this site have been prominent in representations. Finding a way of achieving suitable access has been a significant constraint on the development of this site and the concerns regarding the levels and impact on the village hall car park are understood. However, the advice from the Highway Authority is that with appropriate mitigation safe access can be achieved, albeit further detailed design work is required to show how the issues can best be addressed. In the locality, concerns have been expressed regarding the narrow nature of the roads and the impact the development could have on public transport, cycling and walking. The highways assessment indicates that local roads would be able to accommodate the vehicle movements. Further, as with all strategic developments proposed on the Local Plan, good connectivity for cycling and pedestrian will be required and the proximity of the site to some of the village facilities will encourage this. The site is close to an existing bus route.
- 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.

- b) **Landscape:** The 2013 Landscape Assessment (V16) identifies the zone that this site sits within as high landscape sensitivity. However specific analysis regarding the specific site concludes:

“The site could accommodate some development providing that: the rural, well vegetated nature of Brownley Green Lane is not affected; the old brick boundary wall to the south of the site is not affected and is sensitively incorporated into any development; the hedgerow boundary along the northern edge of the site is gapped up and strengthened to provide a green link / wildlife corridor between the community orchard, the vegetation alongside the office block and the vegetation along Brownley Green Lane; views towards the original hospital building and its clock tower are respected.”

Whilst representations suggest that development here will impact on the open character of the setting of the village and on views across open countryside, the Council contends that the landscape appraisal demonstrates that, with appropriate mitigation, the site can be integrated in to the built form without unduly affecting the setting of the village.

- c) **Ecology:** The site has been assessed as being of low ecological value. Whilst representations raise concerns about development having an adverse impact on wildlife, woodlands and hedgerows, the evidence indicates that with appropriate landscape proposals and the retention of key features, any impacts can be mitigated
- d) **Loss of agricultural land:** The development of housing will result in the loss of grade 3 and 3b agricultural land. However, the Council contend that the public benefits of housing in this location out-weigh the loss of agricultural land. Representations have indicated concern about the loss of farmland. They have also suggested that as the allocated area omits land to the north and east these will not be viable agricultural units. This latter point is understood and the Council will expect this to be addressed when a planning application come forward.
- e) **Infrastructure:** The additional housing proposed for Hatton Park will increase pressure on local infrastructure. However the Infrastructure Delivery Plan addresses concerns raised in representations (see question 6 below).
- f) **Community:** The site is well connected to the village facilities. The development has the potential to support existing services and infrastructure in the village such as the shop and community centre. Concerns raised in representations suggest the village will become urbanised, that the density is too high and that there will be an impact on the quality of life for local residents. The proposals seek to ensure that the scale of development for the village is proportionate (see question 5 below) and assumptions about density are consistent with sites in other rural areas and there is no reason to depart from these assumptions in this location.

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, Hatton Park is identified as the tenth 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 Hatton Park was identified as a Growth Village with the potential to accommodate some housing growth and land for 80 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) The Village Profile and Housing Allocations Update February 2016 (V18PM) explored an indicative capacity for each of the Growth Villages. For Hatton Park, in the context of the need for further growth to support Coventry's Housing need, the indicative capacity was 240 dwellings of which 80 were proposed for allocation in the submission draft Local Plan. This suggested further capacity of 160 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 limited availability of suitable sites adjacent to Hatton Park indicated that there was not the scope to allocate sites to meet the full indicative capacity.
- g) Taking all these factors into account, the Council contend that the proposal to allocate land at Brownley Green Lane is sustainable and that the village is of sufficient size and combined with other settlements in the surrounding area, has the range of facilities necessary to support this level of growth without significantly undermining to the character of the village.
- h) Representations have suggested that the level of growth will mean the local infrastructure will not cope with the demands. In the case of Hatton Park, the range of existing facilities within the settlement itself is limited in comparison with its population. Additional housing has the potential sustain existing facilities in the settlement as well as in neighbouring settlements

such as Hampton Magna and Hatton Green.

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 H55 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
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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)	Budbrooke Primary School has capacity to accommodate the level of growth
Contributions to Education (Secondary)	Secondary places can be provided at Aylesford School
Contributions to other infrastructure requirements in line with the CIL regs	✓

- g) A number of objections raised concerns regarding **infrastructure** including:
- Doctors surgeries are already under pressure and will struggle cope
 - The local schools are already under pressure and will struggle to cope
 - Loss of recreational facilities and impact on the village hall and the car park
 - The IDP does not identify how water supply, waste water and energy will be provided for. The water pumping station is already beyond capacity.

Whilst these issues will be resolved through the planning application process, each has been addressed at a high level through the IDP (IN07PM), with the exception of utilities. It should however be pointed out that both Sever Trent Water and Western Power have indicated that, with mitigation, they can support the development proposed within the District.

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 supports the allocation of this site for development and will seek to bring it forward for development immediately on adoption.
- c) Depending on the design of the access, it is possible that the solution will involve land in separate ownership. At this point in time, this has not been resolved. However, it is reasonable to expect that a solution can be found to enable the site to be developed within middle years of the Plan period.

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 2020/21 with a build out rate of 25-30 dwellings per annum and completion by 2021/22.
- b) Given the scale of the site this is realistic, particularly as it provides leeway to enable access issues to be resolved

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 (HA3) that plays an important role in safeguarding the countryside from encroachment, in checking unrestricted sprawl and (like all parcels) a strategic role in assisting regeneration (LA07PM).
- b) Whilst the wider parcel plays a role in the Green Belt which needs to be maintained, the removal of the specific site has only a marginal impact given that development is already taking place to the north west of the site and the strong boundaries provided by settlement to the south and west and the hedgerows to the north. As a result, the development of the site has a relatively small impact on the openness of the green belt and its ability to prevent encroachment.

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 nature and location of the site mean that there will be minimal impact on the openness of the Green Belt. Given the development to the north west and the existing settlement to the south and east. The site only links to open countryside to the north. Viewed from this direction, the site has a strong relationship with the built up area and would not significantly change the perception of openness for the remaining Green Belt. 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 (buildings and a hedge-line) to provide a 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 HA3 and the adjacent areas of Green Belt (Broad Area 4)

continue to be 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. However, representations suggest that exceptional circumstances for the release of this site from the Green Belt have not been demonstrated, particularly as local housing need has been identified as just 12 dwellings.
- 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.
 - 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**