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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**

**H29/H30 – Meadow House and Kingswood**  
**Farm**  
**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: H29/H30 – Meadow House and Kingswood Farm**

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

- a) This site is in mixed uses including residential and garden land, open fields and small scale agricultural uses. Previously the site included a retail use on the road frontage.
- b) An area surrounded by the sites was the subject of a planning consent in 2011: **W/11/0988**: “Conversion of part of retail warehouse to eight flats, with parking at ground floor.” This permission has been implemented and the access to these flats is encompassed within this site.
- c) Applications at Kingswood Farm have all been for extensions and alterations to the Listed Building farmhouse.

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

- a) The site is on the edge of a Growth Village. The village facilities are such that it is considered a sustainable location for additional residential development.

**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 Kingswood including the village shop, village hall and public houses

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

- a) Heritage: The site includes Kingswood Farm house which is a Grade II Listed Building. To mitigate impacts a limit to the amount of development (30 dwellings over a site area of 3.5 ha) is needed and special attention given to layout, views and landscaping. The listed locks on the Stratford Canal are some distance to the west. Due to the vegetation, there is unlikely to a significant impact on these. However, any proposals will need to give this detailed consideration.
- b) Ecology: Local Wildlife sites along both the Stratford Canal and the Grand Union Canal which runs along the eastern boundary near Kingswood Farm. These wildlife corridors will need to

be retained and if possible improved. This is a further reason to limit the scale of development on the site.

- c) Landscape: This zone is a small triangular plot that abuts the railway and canal corridors with an area of wet woodland to the south that is sunk beneath the level of the canal. It is almost completely screened from view and comprises small fields of pasture and a garden nursery that are hidden behind mature back gardens, garages and Severn Trent's property. Tree cover along the canal corridor is good, permitting only occasional glimpsed views into gardens / fields. The zone is generally tranquil with little road noise and occasional trains and attracts only a small number of walkers and canal boat users. The zone is physically separate from the wider farmed landscape because of the canal and railway corridors and the mature vegetation / fenced boundaries that restrict views into it. The zone could accommodate new development which should complement the local character and respect the canal setting. The strong perimeter vegetation must be retained and enhanced to ensure adequate screening from the canals and railway.
- d) Noise and contamination: There is some possible contamination linked to land use and proximity of railway line. Noise issues from railway line. These will need to be assessed in further detail and mitigated
- e) Flooding: The Old Warwick Road and the area around the garage and bridge has a history of flooding. The bridge acts as a 'pinch-point' for a significant flow of water from the north. The area has been subject to a further review of flood forecasting and this has constrained development capacity for the site.

**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, Kingswood is identified as the fourth 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 Kingswood was identified as a Growth Village with the potential to accommodate some housing growth and land for 43 dwellings was allocated in Kingswood.
- 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 Kingswood, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 95 dwellings of which 43 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of around 50 dwellings for the village (see para 10.10). This indicative capacity was adjusted to take account of policy and environmental constraints such as landscape, Green Belt and flooding. The availability of suitable sites was also taken into account and for Kingswood this indicated very limited additional capacity for ten dwellings, giving a total of 53 for the village.
- g) Taking all these factors into account, the Council contend that the proposal to this site 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.

**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 H29/H30 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
Provision of on-site open space and contributions to other open space requirements	✓
Contributions to Health (Hospitals)	✓
Contributions to Health (G.P. services)	✓
Contributions to Highways / Transport	✓
Contributions to Education (Primary)	✓
Contributions to Education (Secondary)	✓
Contributions to other infrastructure requirements in line with the CIL regs	✓

## 7) Is the site realistically viable and deliverable?

- a) The Viability Studies (IN06, EXAM3 and HO24PM) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policies, including affordable housing. The strongest viability is in rural areas. This site falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. A housebuilder has an interest in both parts and has undertaken detailed hydrology modelling to demonstrate the sites are capable of accommodating up to 30 dwellings if brought forward jointly

- 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) As there are no reasons why the site could not come forward quickly, it is estimated that development could commence on site in 2018/2019 with ten units completed in this year and the remaining 20 dwellings in 2019/2020. Given the availability of the land, this is 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 site has been assessed in the 2015 Green Belt Study (Doc LA07PM) – parcel KG3. Due to the strong green belt boundaries of this parcel it was concluded that the area plays only limited role in preventing neighbouring towns merging and encroachment in to the countryside. This accords with the conclusions of the Green Belt and Greenfield Review 2013 (Doc V13) in relation to parcel KW9: “a small green parcel which has been eroded over the years by primarily residential development”.
- b) The removal of the specific site from the Green Belt therefore not likely to seriously impact on the Green Belt purposes, particularly as the site has strong and clear boundaries. It is therefore included within the area that is being removed from the Green Belt at Kingswood.

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

- a) Parts of this parcel are not currently open in nature and it has strong boundaries (roads, railway, canal). As a result, its removal from the Green Belt is unlikely to have an impact on the openness of the residual Green Belt (predominantly Broad Area 4) and its ability to continue to meet the essential characteristics.

**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



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**Matter 7d**  
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**Growth Villages and Hockley Heath**

**H31 – South of the Stables, Kingswood**  
**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: H31 – South of the Stables

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

- a) The site is currently used for storage of machinery and an open area of grassland.
- b) There are no recent relevant planning permissions relating to the site.

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

- a) The site is within the Green Belt on the edge of Kingswood. Kingswood has been identified as growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:
  - i) **Criterion a)** N/A
  - ii) **Criterion b)** The site is consistent with Criterion b), being located of the edge a built up areas (Kingswood).
  - iii) **Criterion c)** N/A
  - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence and does not undermine settlement identity.
  - v) **Criterion e)** There are no significant heritage impacts associated with the site.
  - vi) **Criterion f)** The site falls within a wider parcel that has been assessed as medium/high 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 Kingswood 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 Kingswood including the village shop, village hall and public houses

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

- a) SHLAA: The SHLAA assessed the site constraints and concluded it was suitable subject to

retention of existing trees.

- b) Landscape: Assessed as having medium / high landscape sensitivity to development. Impacts can be mitigated through retention of existing trees on the frontage (V16).

**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, Kingswood is identified as the fourth 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 Kingswood was identified as a Growth Village with the potential to accommodate some housing growth and land for 43 dwellings was allocated in Kingswood.
- 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 Kingswood, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 95 dwellings of which 43 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of around 50 dwellings for the village (see para 10.10). This indicative capacity was adjusted to take account of policy and environmental constraints such as landscape, Green Belt and flooding. The availability of suitable sites was also taken in to account and for Kingswood this indicated very limited additional capacity for ten dwellings, giving a total of 53 for the village
- g) Taking all these factors in to account, the Council contend that the proposal to this site 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.

**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 H31 will be required to make a proportionate contribution to the following requirements:-

Infrastructure type	Comments (but only if clarification required)
Provision of on-site open space and contributions to other open space requirements	✓

Contributions to Health (Hospitals)	✓
Contributions to Health (G.P. services)	✓
Contributions to Highways / Transport	✓
Contributions to Education (Primary)	✓
Contributions to Education (Secondary)	✓
Contributions to other infrastructure requirements in line with the CIL regs	✓

**7) Is the site realistically viable and deliverable?**

- a) The Viability Studies (IN06, EXAM3 and HO24PM) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policies, including affordable housing. The strongest viability is in rural areas. This site falls within an area that was assessed as being clearly viable.
- b) The site is deliverable within the Plan period. The site is available and could be delivered in a short time frame.
- 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 site is expected to come forward and be completed in 2018/19. As there are no physical constraints and the land is available, this is considered realistic given the scale of development.

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 the built up area of Kingwood and adjacent to parcel KG2. It was not therefore directly assessed in the 2015 Green Belt Study (LA07PM). However it was assessed within the Green Belt and Greenfield Review 2013 (V13) as part of parcel KW1. This concluded that the parcel is a *“complex Green Belt parcel which has been eroded by residential development. It provides an important open field landscape from Station Lane.*

*There are some opportunities for improvement”.*

- b) Given the complex nature of the parcel and the fact that it is already eroded to an extent, the removal of the specific site from the Green Belt will not significantly impact on the Green purposes, particularly as the site has strong and clear boundaries. It is therefore included within the area that is being removed from the Green Belt at Kingswood

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

- a) Parts of this parcel, including land adjacent to the site are not currently open in nature and the inclusion of the site in the built up area of Kingswood in the LA07PM supports the views that the removal of om the Green Belt is unlikely to have an impact on the openness of the residual Green Belt and its ability to continue to meet the essential characteristics.

**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.

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**H32 – R/O Brome Hall Lane**

**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: H32 – R/O Brome Hall Lane

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

- a) The site is an open field. There has been no recent planning history on the site.

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

- a) The site is within the Green Belt on the edge of Kingswood. Kingswood has been identified as growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:
  - i) **Criterion a)** N/A
  - ii) **Criterion b)** The site is consistent with Criterion b), being located of the edge a built up areas (Kingswood).
  - iii) **Criterion c)** N/A
  - iv) **Criterion d)** The site is consistent with this criterion as it would not lead to coalescence and does not undermine settlement identity.
  - v) **Criterion e)** There are no significant heritage impacts associated with the site.
  - vi) **Criterion f)** The site falls within a wider parcel that has been assessed as medium/high 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 Kingswood 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. This site has the potential to support the ongoing viability of services in Kingswood including the village shop, village hall and public houses.

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

- a) The SHLAA: The site has been assessed in the SHLAA as suitable for small scale developments subject to access improvements and sufficient site screening.



- b) Landscape: The site is medium / high landscape value and is adjacent to an open field landscape that will need protecting. A small number of additional properties could be incorporated within this zone but attention should be given to retention of field boundaries, respecting the local character and retaining a landscape buffer to the canal. This could be done with adequate screening.
- c) Trees: There is a row of TPO trees on the north western edge of the site which would need to be protected and integrated into the setting of the new development. This could be achieved.
- d) Access: Access into the site will need to be improved. This is achievable from Old Warwick Road.

**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, Kingswood is identified as the fourth 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 Kingswood was identified as a Growth Village with the potential to accommodate some housing growth and land for 43 dwellings was allocated in Kingswood
- 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 Kingswood, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 95 dwellings of which 43 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of around 50 dwellings for

the village (see para 10.10). This indicative capacity was adjusted to take account of policy and environmental constraints such as landscape, Green Belt and flooding. The availability of suitable sites was also taken in to account and for Kingswood this indicated very limited additional capacity for 10 dwellings giving a total of 53 for the village.

- g) Taking all these factors into account, the Council contend that the proposal to this site 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.

**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 H32 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?**

- The Viability Studies (IN06, EXAM3 and HO24PM) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policies, including affordable housing. The strongest viability is in rural areas. This site falls within an area that was assessed as being clearly viable.
- The site is deliverable within the Plan period. The site is available and could be delivered in a short time frame.
- 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?**

- The site is expected to come forward and be completed in 2018/19. As there are no physical constraints and the land is available, this is considered realistic given the scale of development

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?**

- The area is within a broad Green Belt area (Area 4) and has not therefore been assessed in

detail as part of the 2015 Green Belt Study (LA07PM). However it was assessed within the Green Belt and Greenfield Review 2013 (V13) as part of parcel KW14. This concluded that the parcel has witnessed erosion to its open character due primarily to residential development. It concluded the parcel plays a low to medium role in the Green Belt.

- b) The removal of the specific site from the Green Belt therefore not likely to seriously impact on the Green purposes, particularly as the site has strong and clear boundaries. It is therefore included within the area that is being removed from the Green Belt at Kingswood.

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

- a) For the most part, this parcel is not currently open in nature and its removal from the Green Belt is unlikely to have an impact on the openness of the residual Green Belt and its ability to continue to meet the essential characteristics.

**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

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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**

**H33 – West of Mill Lane**

**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: H33 – West of Mill Lane

<p><b>1) What is the current planning status of the site?</b></p> <p>a) The site is under construction for the erection of eight dwellings - see application no. W/12/1018 as modified by applications W/15/0261 and W/16/0143.</p>
<p><b>2) How does it fit within the overall spatial strategy?</b></p> <p>a) The site is within the Green Belt on the edge of Kingswood. Kingswood has been identified as growth village within Policy H1. The site has been assessed within the Sustainability Appraisal (SA10 and SA11PM) within the context of the Spatial Strategy. The allocation of this site for housing development is consistent with the spatial strategy as follows:</p> <ul style="list-style-type: none"> <li>i) <b>Criterion a)</b> N/A</li> <li>ii) <b>Criterion b)</b> The site is consistent with Criterion b), being located of the edge a built up areas (Kingswood).</li> <li>iii) <b>Criterion c)</b> N/A</li> <li>iv) <b>Criterion d)</b> The site is consistent with this criterion as it would not lead to coalescence and does not undermine settlement identity.</li> <li>v) <b>Criterion e)</b> Heritage impacts have been addressed.</li> <li>vi) <b>Criterion f)</b> Landscape impacts have been addressed.</li> <li>vii) <b>Criterion g)</b> 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 Kingswood 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.</li> </ul>
<p><b>3) In addition to housing provision, are there other benefits that the proposed development would bring?</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>i) This site has the potential to support the ongoing viability of services in Kingswood including the village shop, village hall and public houses.</li> </ul>
<p><b>4) What are the potential adverse impacts of developing the site? How could they be mitigated?</b></p> <p>a) All potential adverse impacts have been successfully addressed through the planning</p>

application process.

**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, Kingswood is identified as the fourth most sustainable village.
- c) The Village Settlement Hierarchy goes on to classify each settlement. Following the Village Housing Options and Settlement Boundaries Consultation (November 2013), these classifications were simplified in three categories: Growth Villages (of which there are 10); Limited Infill Villages (of which there are 24) and other settlements. The Growth Villages and Limited Infill Villages are set out in paragraph 4.7 of the Submission Draft Local Plan.
- d) As a result Kingswood was identified as a Growth Village with the potential to accommodate some housing growth and land for 43 dwellings was allocated in Kingswood.
- 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 Kingswood, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 95 dwellings of which 43 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of around 50 dwellings for the village (see para 10.10). This indicative capacity was adjusted to take account of policy and environmental constraints such as landscape, Green Belt and flooding. The availability of suitable sites was also taken in to account and for Kingswood this indicated very limited additional capacity for 10 dwellings giving a total of 53 for the village.
- g) Taking all these factors in to account, the Council contend that the proposal to this site 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.
<b>6) What are the infrastructure requirements / costs and are there physical or other constraints to development? How would these be addressed?</b>  a) The infrastructure contributions associated with the site have been resolved through the planning application process
<b>7) Is the site realistically viable and deliverable?</b>  a) Yes, the site is under construction
<b>8) What is the expected timescale for development and is this realistic?</b>  a) The site is expected to be completed in 2016/17.

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

<b>9) What would be the effect of the proposal on the purposes of including land within the Green Belt?</b>  a) The site is a brownfield site within the green belt and planning permission has been granted on this basis
<b>10) What would be the effect on the openness of the Green Belt?</b>  a) There would be no impact on openness
<b>11) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?</b>  N/A