

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

H19 – Land north of Rosswood 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

NAME OF SITE: H19 – Land north of Rosswood Farm

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

- a) The land is predominantly agricultural. It includes one detached residential dwelling (Certificate of Lawfulness (W/11/0157)).

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

- a) The site is within the Green Belt on the edge of Baginton. Baginton 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 (Baginton).
 - 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)** The potential heritage impacts associated with the site were assessed in HE03PM. This recognised the potential for impacts on Baginton Conservation Area and recommended that details of mitigation would be required.
 - vi) **Criterion f)** The site falls within a wider parcel that has been assessed as high landscape value. However, the area to the south of Rugby Road is less sensitive to housing. development. The allocation of the site is therefore consistent with this criterion.
 - vii) **Criterion g)** The site is within the Green Belt. The Council has taken into account the overall spatial strategy; and the availability of alternative suitable sites outside the Green Belt and considers there are exceptional circumstances for releasing this area from the Green Belt (see question 11 below). This site would help meet housing needs in Baginton 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 Baginton including the village shop, village hall and public houses.

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) **Transport and Traffic:** Access can be achieved. For a development of circa 80 units it is recommended that a single point of access and an emergency access be considered.
- b) **Landscape:** The site falls within a landscape zone that has been identified as High / Medium sensitivity to development. The site includes a single storey residential property and garages with farm buildings set within open farmland. The site is beyond the settlement edge with good roadside hedges and insignificant hedgerow trees. It will be important to provide a strong landscape buffer between the development and the nursery site to maintain this degree of separation. Any development should also safeguard the roadside hedgerow and replace the hedgerow on the western boundary. Hedgerow planting should include native hedgerow trees.
- c) **Heritage:** The northern part of the site is adjacent to the Baginton Conservation Area. The Heritage Assets Assessment (HE03PM), along with Heritage England, emphasised the importance of ensuring any development comes forward in a way that does not negatively impact on the setting and character of the Baginton Conservation Area. The Landscape Sensitivity Study (V16) assessed this relationship the Conservation Area is framed by two triangular blocks of trees at the junction of Church Road and the Coventry Road. It notes that the zone has an established roadside hedgerow that ties into the western block of trees and that as part of the mitigation; this physical link should be retained. Further detail will be required as part of the assessment of a future planning application.
- d) **Ecology:** There are no international, national or local nature conservation designations on or adjacent the site; however, there is a potential SINC along the River Sowe. Development on the site could provide an appropriate buffer between any development and the River Sowe. The need to protect hedgerows and trees to maintain habitat value is important.
- e) **Noise and odour:** Coventry Airport and a large sewage works are within 1km of the site. This means there are likely to be negative effects with regard to noise, odour, light and air quality on any new residential development. The extent of the site has been limited to avoid the Coventry Airport flight path. However Environmental Health have recommended that suitable mitigation including appropriate noise attenuation resulting from a noise assessment and an EMP (construction & occupation) including monitoring should be carried out to address the negative effects.

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, Baginton is identified as 7th 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 Baginton was identified as a Growth Village with the potential to accommodate some housing growth and land for 35 dwellings was allocated in Baginton
- 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 Baginton, in the context of the need for further Growth to support Coventry's Housing need, the indicative capacity was 124 dwellings of which 35 were proposed for allocation in the submission draft Local Plan. This suggested further capacity, based on size, facilities and services of around 90 dwellings for the village (see para 3.14). 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 Baginton this indicated a limited additional capacity for 45 dwellings by extending the allocated southwards, giving a total of 80 for the village.
- g) Representations have raised concerns that this represents a 22% growth for the village and that this is not compatible with the nature of the village. However, the Council contends that in taking all the factors above in to account, the proposal to allocate 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 (Doc IN07PM). Most components of the IDP do not relate directly to a specific site within the Plan and it is anticipated that infrastructure contributions will be negotiated on a case by case basis in accordance with the CIL Regulations. Full details of infrastructure requirements and costs cannot therefore be set out for each site at this stage.
- e) It should be noted that the IDP is a continuously evolving document and will continue to be refreshed as data on infrastructure requirements are refined or new / changing priorities and needs are identified throughout the plan period. It should also be noted that the Council (in partnership with relevant partners) will continue to explore the availability of other sources of external funding to augment developer contributions.
- f) It is anticipated that housing site H19 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 has been made available for development. There are two separate landowners who are committed to working together to bring the site forward.
- 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 - Doc Ho27PM) indicates the first completions in 2018/19, with the site being built out by 2021/22.
- b) Given the scale of the site, the willingness of the landowners to release 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 BT1. This plays a role in preventing ribbon development, preventing neighbouring towns merging and safeguarding the countryside from encroachment. Like all parcels, it also plays a strategic role in assisting regeneration (see LA07PM).

- b) Overall, this parcel plays an important role in the Green Belt. However the part of the parcel that includes this site lies on the other side of Baginton from Coventry and can be brought forward without undermining the role the remainder of the parcel plays in preventing merging. Further, due to the nature of the land immediately opposite the site (a public house and access to airport facilities) this part of the parcel play a more limited role in safeguarding the countryside from encroachment.
- c) The site is bounded to the north by a coppice, the east by a road (with Coventry Airport on the other side of the road), to the west by field edge/hedgerow and to the south by the buildings of Rosswood Farm. Its removal from the Green Belt therefore has minimal impact on the openness of the remainder of the Green Belt in this area as it's only direct relationship with open countryside is to the south west

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. As set out in 9c) above, the site has only a limited relationship with the open countryside to the south west. Development of the site would therefore need to strengthen the physical boundaries to the west with additional landscape features such as trees and hedgerows to limit impact on openness in that direction. This proposal
 - i) Ensures consistency with the Local Plan strategy
 - ii) Removes this parcel which is not essential to keep permanently open
 - iii) Uses physical features (a road, a field boundary, a coppice and farm buildings) to provide) a strong Green Belt boundary
- c) The residual Green Belt will continue to meet the essential characteristic set out in paragraph 79 of the NPPF. The development of this will have only a minimal impact on the extent to which parcel BT1 and the adjacent "Broad Area 3" is consistent with the essential characteristics of Green Belt (NPPF para 79) as the land to west and south will remain open in character.

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

- a) The process for assessing exceptional has been set out in paragraph 14 of the Distribution of Development paper (HO25PM). Table 3, at paragraph 28 of this document sets out this exceptional circumstances that apply to all the village sites within the Green Belt that are identified through the 2016 Modifications. However, representations suggest that exceptional circumstances for the release of this site from the Green Belt have not been demonstrated.

- b) Specifically, exceptional circumstances for the allocations to Green Belt growth villages are identified as follows:
- i) Is there an essential need that has to be met? Yes, the HMA's and Coventry's housing need and the lack of capacity within Coventry; important in achieving a 5 year housing land supply on adoption; important in meeting local housing need (constrained by current planning policy)
 - ii) Are there any suitable sites outside the Green Belt that can meet this need? There are insufficient suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet both overall and 5 year supply housing need. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy or effective in meeting these needs.
 - iii) Is this the best site within the Green Belt to meet the need? It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. For this reason additional locations (proposed in 2016) are focused more on those villages which have stronger access to Coventry.

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