

**Matter 8****NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION  
STATEMENT ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND – ID  
SLP360****PHASE 1, STRATEGIC MATTERS****Matter 8, Viability and delivery****Preamble**

This Hearing Statement is made on behalf of our Client, the Church Commissioners for England (the 'Commissioners'), in advance of making verbal representations to the Examination in Public into the North Warwickshire Local Plan.

Our Client is the majority landowner of 'Land to the east of Polesworth and Dordon' which has a draft allocation for housing under Policy H7. Accordingly, our Client is keen to engage in the Local Plan Examination process and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

**Issues and questions****8.1 Is there appropriate evidence regarding viability, market conditions, and infrastructure funding to indicate that the level of development that the LP intends to enable would be delivered in practice?**

1. It is noted that the Council has published updated Viability Evidence, set out within the 'Review and Update of the Council's Affordable Housing Viability Assessment, Local Plan Allocations Viability Assessment and CIL Study' (NWBC13).
2. The report confirms at paragraph 35 that the proposed East of Polesworth and Dordon allocation is viable, creating a surplus of £3,617,052. These findings are supported by the Commissioners, confirming that the scheme has the capacity to deliver up to 40% affordable housing in accordance with draft Policy LP9 of the Local Plan.
3. Further details of the scheme's viability are set out at Appendix 8c of the Council's Assessment. This includes a number of contributions which would be payable as part of

any subsequent Section 106 Agreement. These contributions largely accord with the requirements for Polesworth and Dordon set out in the Infrastructure Delivery Plan (March 2018). As such the Commissioners raise no objections to their inclusion as part of the Viability Evidence. It is however noted that the timing of these contributions will be tied to the grant of planning permission and the phasing of the development.

**8.2 What is the relevance of paragraph 9.67 of the Greater Birmingham Strategic Growth Study [CD8/23] which sets out that there is 'no effective potential' for additional housing supply beyond housing growth of 1.8% per annum? (NB this replicates an earlier issue in matter 4).**

4. We do not have any specific comments to make in relation to the above question but do nevertheless reserve the right to comment further on this in so far as it may affect our clients land east of Polesworth and Dordon (H7).

**8.3 What is the relevance of paragraph 2.14 of the 2016 Employment Land Review [CD8/7] which sets out 'there are evident questions regarding the scale of development which can realistically be delivered'?**

5. We do not have any specific comments to make in relation to the above question but do nevertheless reserve the right to comment further on this in so far as it may affect our clients land east of Polesworth and Dordon (H7).

**8.4 Are anticipated delivery trajectories suitably comprehensive and thorough, including to enable appropriate monitoring [NWBC10, NWBC10a, NWBC10b]? What assumptions have been made in respect of delivery trajectories and are these robust (including in respect of lead-in times, lapse rates, build-out speeds etc.)?**

6. The proposed trajectory set out at NWBC10b confirms that the allocation can be built-out within the Plan period. This trajectory envisaged an application being submitted later in 2018. The Commissioners propose to submit an outline planning application at the end of the summer/ autumn 2019, with the following lead-in times:
  - Adoption of the Local Plan – Autumn/Winter 2018/19
  - Submission of Outline Planning Applications – Autumn 2019

- Approval of Outline Planning Permission – Spring / Summer 2020
  - Marketing, discharge of site-wide planning conditions, approval of reserved matters, discharge pre-commencement planning conditions and start on site – Spring / Summer 2022.
7. In light of the above, and the anticipated phasing it is expected that 85 dwellings will be completed within the 2022/23 monitoring year. The build rate then increases in the second year, builds up in the subsequent years and falls back down to deliver 2,000 dwellings by the end of the Plan period in 2033.
  8. The Commissioners are working collaboratively with Warwickshire County Council Highways and Vectos Microsimulation to undertake a trigger point study - the methodology of which has also been approved by Highways England. The findings of this study confirm that 40% of the total development can come forward before localised highway improvements are required to the A5. This will ensure the early delivery of dwellings from the Site.
  9. The Site would be constructed simultaneously from the north and the south, meeting 'in the middle' alongside the construction of the spine road. Accordingly, it is anticipated that up to four outlets will build-out the Site, providing a range of market and affordable homes that will appeal to the whole market.
  10. Indeed, the Site will deliver much needed market and affordable accommodation in an area that has seen limited growth over recent years. As such, there is considered to be high market demand for dwellings within this location. This was demonstrated most recently, through the delivery and sale of dwellings at the adjacent Taylor Wimpey scheme at Grendon Road.
  11. Therefore, whilst it is considered that an amendment is required to the trajectory at NWBC10b, to show first completions a year later in 2022/23, it is our view the Site can be delivered within the Plan period.

**8.5 Is viability evidence in support of the plan based on reasonable assumptions reflecting the particular nature of the Borough?**

**(a) Have the full range of expected requirements been taken into account (including developer contributions)?**

12. As set out above, it is considered that developer contributions have suitably been taken into consideration as part of the Council's updated Viability Evidence in respect of Land to the east of Polesworth and Dordon (Policy H7).

**(b) what consideration has been given to mineral resources/ mine working in respect of viability or delivery in practice?**

13. Given that the allocation is located on a former mine, the Commissioners have undertaken survey work to assess the effects on ground conditions. The findings of this work have identified the ground conditions would not impact upon the deliverability of the scheme. The Commissioners have a strong track record of promoting and delivering as master developer housing schemes on former mining sites and it is considered that the Site's former use will not preclude the future delivery of dwellings.

**8.6 Has all necessary infrastructure provision been costed and timetabled? If not, would that compromise either deliverability or development viability?**

14. We are content that all necessary infrastructure provision has been costed in the IDP [CD0/4] for allocation H7.

15. In respect of the Church Commissioner's land interests at site H7, the main landowner's highway consultants (Pell Frischmann and BWB Consulting) are working collaboratively with Warwickshire County Council Highways and Vectos Microsimulation to undertake a trigger point study - the methodology of which has also been approved by Highways England. This study, which will be completed in October 2018, will provide greater certainty in respect of the impacts that the development will have on the highway network at different phases of the development. This will allow the landowners with WCC Highways and Highways England to comprehensively phase the relevant highway improvements as development on the site is progressed.

16. In respect of allocation H7, appendix 'E' sets out what is required in respect of education provision. Whilst timings are not included in the IDP, the majority landowners, namely

the Church Commissioners for England, Cathedral Agricultural Partnership and White family have met with the Warwickshire County Council Education team and the timings for education provision have been clarified.

17. Appendix 'F' forecasts what is required in respect of health provision but does not include timings. We recognise that contributions for health care will be required and will continue discussions with the Care Commissioning Group to ensure these are delivered at the right time. This is considered to amount to a positive strategy as required by paragraph 157 of the NPPF (2012) (and paragraph 16 of the NPPF (2018)).

18. Appendix D of the IDP sets out that in Polesworth and Dordon the replacement/refurbishment of Leisure Facilities are required, in part to be funded by developer contributions. It is recognised that contributions for leisure services will be required and, as such, discussions will continue with the Council to agree the timing of these contributions. This is considered to amount to a positive strategy as required by paragraph 157 of the NPPF (2012) (and paragraph 16 of the NPPF (2018)).

**8.7 What is the interaction between the Infrastructure Delivery Plan and NWBC's intention to progress Community Infrastructure Levy ('CIL') (LP paragraph 6.18)? What bearing would CIL have on viability and delivery?**

19. We do not have any specific comments to make in relation to the above question but do nevertheless reserve the right to comment further on this in so far as it may affect our clients land east of Polesworth and Dordon (H7).