

## **Warwick District Local Plan. Examination.**

### **Statement on Behalf of Representor 12966; Dr P Thornton and Others.**

#### **Matter 7(d).**

#### **Proposed Housing Site Allocations. Growth Villages.**

#### **Introduction.**

1. My client's position on this specific matter may be summarised as follows;
  - a. The identification of sites in the Growth Villages should equate to some 15% of the overall allocated sites in the plan. (See response to modification 8 paragraph 6.2)
  - b. The growth village of Burton Green has capacity for further growth by the addition of an allocation on site reference Option 7 (Village Housing Options and Settlement Boundaries Consultation) or SHLAA reference R089; Land off Hodgetts Lane.
  - c. The imperative for further growth at Burton Green derives from the necessity to provide sufficient housing land to meet the agreed portion of Coventry's unmet housing needs.
  - d. Even if it were concluded that no further housing should be provided at Burton Green, it remains my clients view that their site at Hodgetts Lane/Cromwell Lane is the more appropriate and sustainable location for housing development.
2. In this submission I will focus on the approach the Council have taken towards identifying land for housing in Burton Green and their evaluation of my clients site. In so doing I will address the matters raised in questions 9, 10, and 11.

#### **Identification of Sites in the Growth Village of Burton Green.**

3. The approach taken by the council is set out in the Village Housing Options and Settlement Boundaries Consultation (November 2013)(VHOSB). It incorporates a summary evaluation of the options in Burton Green in part 7, and how the Council selected the allocated site at Burrows Nursery.
4. Burton Green has a resident population of 1508 persons (2011). Its population since 2001 has been more or less stable. However over that period there has been a significant increase in the number of persons in the 60-74yrs age group. It is therefore a village where there will be a demand for "downsizing" and this would enable more movement in the local housing market. Also in order to rebalance the profile of the population additional new family housing would be of help in that regard. This would also enable the local primary school to be sustained.
5. The village is located within a broad area of the West Midlands Green Belt between Coventry, Solihull and Kenilworth. It is washed over with the Green Belt designation in the 1996-2011 adopted Local Plan. The proposals in the plan, the subject of this examination,

include the determination of an inset boundary for the village and the allocation of land at Burrows Hill Nursery for housing, within that inset boundary. Allocation of my client's site would require similar changes to the development plan.

### **Land to the Rear of Hodgetts Lane/ Cromwell Lane**

6. A summary of the Councils review of the site options in Burton Green is set out in Chapter 7 of the VHOSB. In relation to my clients site it stated that the land was not incorporated in the plan as an allocation for reasons relating to;

- a. Deliverability
- b. Access.

7. Both these matters can no longer be regarded as constraints to the ability of this site to be brought forward as an allocation as is demonstrated in this submission.

8. Greater detail about the sites in the village are set out in Appendix 6 to the VHOSB (Site Appraisal Matrix) subsequently updated in 2016.

9. My clients have considered the findings set out in the updated matrix. Their comments in relation to a number of the Councils findings about site ref R89, Option Site 7, are set out in a table appended to this submission. For the purposes of clarity I would point out that this site' no longer includes a small parcel of land to the north, now referenced R089a. Therefore all references to option site 7 are based on the revised area of land referenced R089 in the updated SHLAA. The site extends to 1.9ha.

10. It is considered that the Updated Matrix, notwithstanding its shortcomings, concludes that the site is deliverable and would represent the use of land that is of no significant merit in landscape terms. On the matter of landownership there is an agreement in place amongst the site owners to ensure the site would be available and deliverable once any permission were granted for development.

11. However contrary to the Councils continuing assertion, it is considered that the site is not backland development in the accepted sense of that term which refers to a parcel of land to the rear of existing housing that is serviced by a contrived accessway alongside and within the former curtilage of an existing frontage property. My clients proposed development would have a properly engineered access road in to the site from Cromwell Lane as a result of the demolition of number 378 Cromwell Lane, which is owned by my clients. This proposal and its dimensions have been approved by the Highway Authority.

12 The design and layout of the proposed development would sustain and reinforce the existing substantial landscape features within and on the boundaries to the site, in order to create a discrete development parcel and to maintain the visual edge to the village hereabouts as viewed from the west. There would therefore be no visual impact on the wider Green Belt.

13 The site is a more sustainable location for new housing than the allocated site by reason of closer proximity to public transport routes and the proposed new local centre at Westwood Heath. It is within a convenient walking distance of the Primary School and the relocated village hall. It would therefore be suitable for the location of family housing and “smaller” homes to meet a demand for downsizing.

#### **Land at Burrows Hill Nursery.**

14. In contrast to the allocated site my client’s site could be brought forward more readily for development since it does not exhibit any of the physical constraints that impact on this site. In particular we would refer to:

- a. The presence of a high pressure gas pipeline.
- b. Possible land contamination from the previous/present agricultural uses.
- c. Proximity of the site to a Grade 2 Listed building, the setting of which must be respected.
- d. Closure and possible relocation of the existing business.
- e. The site falls within an area considered to be part of a strategically important area of Green Belt between the village and Kenilworth and Balsall Common.
- f. Regarded as an isolated development location in relation to the rest of the village.
- g. Located on higher ground such that the visual impact of any development would have to be mitigated.

#### **Effect on the Green Belt. Site at Hodgetts lane/Cromwell Lane. (Questions 9,10 and 11)**

15. In addressing Question (9) I confine my remarks to the impact of any development of my clients land, it having been removed from the Green Belt and set within the Settlement Boundary to Burton Green. I have also considered the advice in Chapter 9 of the NPPF.

#### **Purpose**

16. There are five purposes served by the Green Belt (see paragraph 80 NPPF). Of those I consider that safeguarding the countryside from encroachment represents the main purpose of the green belt hereabouts. It is the main purpose that would be infringed by the release of my clients land for development. However such a criticism is one that would apply to all the sites that this plan seeks to release for development from in the wider Green Belt. Ultimately the plan has had to strike a balance between maintaining the Green Belt as set out in the adopted Local Plan and securing sufficient development land to meet the assessed need for housing at the most sustainable locations in the District. In the particular instance of my client’s site the small area of unremarkable countryside can be deleted from the Green Belt without infringing or impacting on, the role of the wider area of Green Belt to the west and beyond the site which is more important in strategic terms for securing the separation of Burton Green from Balsall Common.

## **Openness**

17. As previously stated in the detailed assessment of this site it is not considered that this land is vital to sustaining the openness of the wider area of Green Belt hereabouts. In particular it is a well screened , discrete and relatively small parcel of land, set tight against existing housing along Cromwell Lane and Hodgetts Lane.

## **Exceptional Circumstances.**

18. I consider that there are exceptional circumstances that warrant the release of this land from the Green Belt. They are to some degree the same as those which have prompted the Council to allocate the site at Burrows Nursery and at Westwood Heath.

- a. The need to allocate sufficient housing land at the most sustainable locations in the District in accordance with a Development Strategy that recognises the need to sustain the larger villages in the District which have good links to the main urban areas.
- b. The need to allocate sufficient land to meet a portion of Coventry's unmet needs at locations well related to the City which will avoid the need for longer distance commuting back to the City's employment areas.

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August 2016  
Ref 020

**Appendix 1 Submissions on matter 7(d) Comments of Dr P Thornton and Others. Village Site Appraisal Matrix 2016.**

Matrix Heading	WDC Finding	Comment
Option Progress	Not progressed due to proximity of HS2 line	<p>This does not reflect;</p> <p>a. The summary site review in chapter 7 of the VHOSB 2014 which advises the site was not progressed for reasons of access and deliverability.</p> <p>b. The 2016 SHLAA update which considers that any noise from HS2 is no longer a significant issue in this area.</p> <p>c. The most recently published noise contours issued by HS2 Ltd support the observation at (b) above. The line is in tunnel for most of its length in proximity to this site. Site is 100m from the tunnel and separated from the line by properties on Hodgetts Lane</p>
Capacity Notes/Review	Site would require substantial environmental screening to the north and west	<p>It is agreed that some appropriate landscaping works would be required as part of any development. Screening to the north and west would be limited. However the existing residential premises backing on to the site are substantially screened by various hedgerows trees and shrubs and for the most part have substantial gardens. Any visual impact of the development would be minimal. The proposed development site no</p>

		longer includes SHLAA site R089, which is coincidental with a shallow ridgeline that runs north/south through the western part of the site. Views into the site from the north and west are obscured in part by existing mature trees and hedgerows.
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**Comments of DR P Thornton and Others; continued**

Highways and Transport Issues	New site access proposed which may be satisfactory	The representors own no 378 Cromwell Lane. This would be demolished to provide a fully engineered access road into the site with a junction on to Cromwell lane. Warwickshire CC have endorsed the access proposal. This entry in the matrix should confirm that an appropriate access can be secured.
Physical Constraints /Access/Infrastructure/ Layout	Site access resolved and agreement in place re availability and deliverability of the site.	Agreed. This endorses the view expressed above.
SHLAA. Potential Impact	The site has residential properties on two sides, within a relatively small area, and is essentially backland development. Development would be out of keeping with the landscape and would require substantial screening.	The site is not backland development. A fully engineered access with a two directional access road is feasible off Cromwell Lane. There are a number of examples of developments of this nature across the District. Any screening would not have to be substantial. This remark appears to derive from the visibility of the previously included land to the north now recorded as R089a.
SHLAA Overall Suitability	Not within any village envelop. Requires substantial screening and protection of	Issue of screening already addressed. Existing residential amenities will not be significantly

	existing residential amenities.	infringed, and would be properly taken into account as appropriate in preparing a development layout for the site.
SHLAA Achievability	Potentially achievable subject to overcoming layout and landscape considerations.	Development of the site is wholly achievable and the landscape issue is no bar to development.
SHLAA Timeframe	2024-2029	Unaware of any basis for this observation. In the event it is agreed that further housing sites are required to deliver in the short term, this site at Burton Green would be available to meet that need. A more realistic assessment would be 2019-2020.

**Comments of Dr P Thornton and Others; continued**

Sustainability Appraisal. Significant Effects	Potential site allocation has excellent access to public transport with a bus stop within 400m accessible by safe pedestrian access. Similar access to the village centre. Site is close to the proposed HS2 route which may mean future residential is affected by noise , light and air pollution. No obvious access as site to rear of third party land. Major negative effects on the landscape.	Assessment has not been updated to reflect the minimal impact of HS2. The prospect of light and air pollution from the scheme is difficult to understand as this is an electrified line in tunnel or deep cutting in proximity to this site. In that regard it is a significant error in the updating of the matrix. Highway access resolved. No third party land. Impact on local highway network would be minimal. Impacts
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		on landscape outlined at section headed SHLAA. Potential Impact above.
Green Belt/ Greenfield assessment	Site plays an important role in maintaining the Green Belt around Coventry and the open setting to Burton Green. Certain aspects of the parcel have been compromised by residential development.	The site lies within the Green Belt separating Coventry from Solihull. It is not integral to the setting of Coventry. Any view of the setting to Burton Green and towards this site is primarily a view of existing trees and hedgerows which will screen any development on the site. The openness of the wider Green Belt to the west and north will not be infringed or compromised.



**Comments of Dr P Thornton and Others; continued**

<p>Summary and Conclusions</p>	<p>Although technically deliverable and in a pocket of lower landscape value it is nevertheless backland development with no street frontage. It does not have the capacity to deliver the type of community hub facilities envisaged in the preferred site. Adverse impacts of backland development include loss of amenity overshadowing, overlooking, loss of sunlight/daylight, noise, loss of green links/vegetation, visual intrusion, loss of space between buildings, long driveways, difficulties servicing houses. It is understood there is multiple ownership.</p>	<p>It is agreed the site is deliverable and represents a pocket of land of lower landscape value. In so far as the other adverse comments are concerned these are addressed as follows;</p> <ul style="list-style-type: none"> <li>a. It is not backland development</li> <li>b. Street frontage cannot be an imperative for all forms of small scale development.</li> <li>c. The preferred site no longer delivers the new village hall, and a new freestanding site for that facility is now proposed.</li> <li>d. Overshadowing and overlooking can be addressed by the design and layout of the site.</li> <li>e. There will be no loss of space between the houses on Cromwell Lane as the access is formed from an existing residential plot of sufficient width to sustain the existing spaces between the adjoining houses and the access road.</li> <li>f. There will be no long driveways to individual homes.</li> <li>g. Servicing will be via a fully engineered highway.</li> <li>h. The conceptual layout for the development of this site includes a residential home for the elderly.</li> </ul>
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