

Land at Hodgetts Lane, Burton Green.

SHLAA reference R089

Review of Warwick District Council SHLAA assessment matrix.

Warwick District Council hold a matrix, in the form of a spreadsheet in pdf format, of information about all potential housing sites in their SHLAA.

The current, recently published version of the matrix is on line at

http://www.warwickdc.gov.uk/download/downloads/id/3208/village_sites_appraisal_matrix_2016.pdf

The matrix document requires a number of corrections in respect of the above site.

Some corrections have been made since submissions that we made to Warwick District Council under cover of a letter dated 25th October 2015 (attached as an appendix to this). That letter that was copied to the Inspector. Our comments in that letter related to the criticisms of the WDC local plan that we submitted to the Inspector. Particularly our representation on the publication draft, document 12966-1R.pdf, which is linked off this page

<http://warwickdc.jdi-consult.net/localplan/viewrepfull.php?repid=66201>

i.e. here;

<http://warwickdc.jdi-consult.net/localplan/download.php?action=download&uploadid=23080>

And most recently the submission to the inspector in respect of revised local plan

<http://warwickdc.jdi-consult.net/localplan/viewrepfull.php?repid=70280>

However, the corrections that have been made to the matrix are substantially insufficient, incorrect or internally inconsistent

Some of the comments have not been properly and fully amended to take account of the confirmed approval by the WCC Highways department of the road access arrangements for the site. This includes inappropriate criticisms of the site as “back land development” see below.

The need for some of these corrections has arisen because council officers initially amalgamated consideration of this site with an adjacent site under separate ownership. That adjacent site has now been separated for separate consideration under the SHLAA designation R089a. While some amendments have been made to the SHLAA matrix to take account of the two plots now being considered separately, that amendment has not been completed across all components of the matrix in respect of R89. Some of the comments were initially based on criticism of the part of the site now separated and so no longer apply in respect of the property.

This is particularly the case in respect of the site being critically described as “back land” development. We have no clarification of the authoritative planning guidance by which WDC defines “back land” development nor the criteria that deems it to be inappropriate. We cannot see that building to the rear of

existing residential areas can of itself be criticised. The only alternative, “ribbon development” –new developments along existing roads, is clearly to be avoided in planning guidance.

In respect of our site, R89, the matrix describes some “adverse impacts that backland developments *can* include”. These are listed as a loss of amenity, overshadowing, overlooking, loss of sunlight / daylight, noise, loss of green links / vegetation, visual intrusion, loss of space between buildings, long driveways and difficulties servicing housing (recycling / waste collection etc). These are all features of development where new dwellings are created in the back gardens of existing properties, very close to those existing properties and accessed via the entrance driveway of that existing property. The development that we understand was proposed for the area of land adjacent to our property, would have had those features. The criticism might therefore have been reasonably included when both sites were being considered as one. But, now consideration of the sites has been appropriately separated, those critical features absolutely do not apply in respect of our site. As set out below, the SHLAA matrix still requires up dating at several points in this regard as set out below.

The following table has been created by taking the column header and the relevant entry for the site from the above matrix. These are transposed into the second and third column of the table below. The fourth column in the table below includes a suitable form of words to replace that in the existing matrix. The fifth column provides additional commentary, analysis, evidence or references to support the recommended amendment.

Other SHLAA documentation in respect of this site derives from the entries in this matrix. That additional documentation requires amendment accordingly.

Messrs, Thornton, Vernon, McTurk, Foster & Jones.

15 November 2016

| | Matrix heading | Current Record | Entry should read | Additional Comment |
|----|---|------------------------------|--------------------------|------------------------------------|
| 1 | Local Plan Housing Site | No | | |
| 2 | Previous Consultation / Publication Reference | VHOSBC Discounted Option (7) | | |
| 3 | Settlement | Burton Green | | |
| 4 | Parish | Burton Green PC | | |
| 5 | Previous Site References | BG3*O / R137 | | |
| 6 | New SHLAA Reference | R89 | R089 | |
| 7 | Green Field / Belt References | BG 6 | | |
| 8 | Site Name and Description | Land off Hodgetts Lane | | |
| 9 | SHLAA Form Progress | SHLAA document updated. | | |
| 10 | ha (gross) | 2.18 | 1.9 | Correction due to removal of R089a |
| 11 | Developable Area ha (gross) | 2.18 | 1.9 | |
| 12 | Original DA (net) (less than 0.5ha not netted down) | 1.46 | ?? | Requires redetermination |
| 13 | Updated Gross to Net (Revised Methodology) | 1.64 | ?? | Requires Redetermination |
| 14 | Nearby Density Levels (dph) | | | |
| 15 | Capacity (30dph) | 49 | ?? | Requires redetermination |
| 16 | Capacity (40 dph) | 65 | ?? | |
| 17 | Capacity (50 dph) | | | |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
|----|-------------------------------|---|--|--|
| 18 | Capacity (Revised) | 38 | ?? | |
| 19 | Capacity Notes / Review | Site will require substantial environmental screening to the north and west. It is also located within close proximity to existing residential properties. Part of the original option site also included land put forward for development from another interested party. | The slope of the plot and the existing boundary trees and hedges are such that little additional screening is required to the north and west is required. Such that is required will be easily established | Highlighted text is correct but should be removed with the creation of a matrix entry for that plot to be treated separately. The removed area of the site, R89a, was the part that gave rise to visibility to the north and west that would have required screening.. The site is presently hidden from view from the north, east, south east, south and south west by the existing housing and vegetation. Views from north and west directions are mostly obscured by the natural topography of the land and by numerous mature trees and hedgerows in the surrounding fields. Additional screening from all directions can very easily be provided by additional planting within the site. The proximity of the field to existing residential properties is addressed at line 27 below. The site has residential properties on two sides but the impact on them is minimal. |
| 20 | Highways and Transport Issues | Highway Observation: New site access proposed which may be satisfactory. | Highway observation; Site access proposed has been fully approved by Warwickshire County Council Highways department. There are no Highways and Transport issues. | This matrix entry has been amended since the council received confirmation of approval by WCC Highways for the site access arrangement. There were and are no grounds for this entry to have been left with any ambiguity. |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
|----|-------------------------------------|---|--|---|
| 21 | Environmental Health Issues | Although the site is located within close proximity to the HS2 line, noise maps suggest that noise pollution may not be a significant issue in this area. | Although the site is located within close proximity to the HS2 line, their environmental Statement noise contour maps confirm that noise pollution will not be a significant issue in this area. | The line is in tunnel in most of the proximity to this site. Where it is not in tunnel it is in deep cutting with the further provision of sound bunding and barriers. At the nearest point the site is 100meters from the tunnel and separated from it by Hodgetts Lane which has existing houses on both sides. Map attached Appendix 1 |
| 22 | Flooding, Water and Drainage Issues | Generally high ground water levels in the Burton Green area. | | This is applicable to all sites in Burton Green |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
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| 23 | Site and Planning Application History (part or all of site / 1990-2013) | W/13/1409 - General PD - Proposed single storey extension. W/06/0003 - Refusal - Erection of two storey side/rear extension. W/08/0773 - Duplication in Error - Conservatory to the Rear. W/06/0305 - Refusal - Erection of two storey side and rear extension. W/06/07/02 - Granted - Erection of two storey side/rear extension . W/08/0782 - Granted - Erection of rear conservatory . W/08/1461 - Granted - Erection of Rear Conservatory. W/97/0775 - Granted - Erection of a kitchen extension and reconstruction of porch. | | These need to be reviewed. None relate to developments on the site. Some may relate only to R089a |
| 24 | SHLAA – Location | Land to the rear of properties off Hodgetts Lane and Cromwell Lane, Burton Green Village. Burton Green has been identified as a growth village with a range of services and facilities. | | |
| 25 | SHLAA: Policy Context / History | Green Belt. Policy direction supporting limited new housing the more sustainable village locations. | | |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
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| 26 | SHLAA: Physical Constraints: Access / Infrastructure / Layout / Configuration / Flooding | Site access has been resolved and an agreement is in place regarding the majority of the land detailed in the consultation document. | No physical constraints. Site road access arrangements approved. A land owner’s agreement for development is in place. | Highlighted yellow text correct. Entry under Highways and Transport above should have been amended. Highlighted Blue; the removal of R089a from the site removes the requirement for this text in the matrix. |
| 27 | SHLAA: Potential Impact | Impact on residential amenity - 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. | Very limited impact on residential amenity - Site has rear gardens of residential properties on two sides substantially screened by hedges. Subject to appropriate planning consent conditions, development would be wholly in keeping with the landscape and would require minimal additional screening. | This site no longer involves any “Back land development” of the type that might be deserving planning criticism which involves building in back gardens with restricted highway access sharing single track driveway access with existing properties. All the new properties will be wholly accessible via correct new road with approved highway access. See further note re back land development in the introduction to this document. The existing comments derive from a site visit not having been undertaken. |
| 28 | SHLAA: Environmental Conditions | Satisfactory | | Criteria not known. Why not “good”? |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
|----|----------------------------|--|--|--|
| 29 | SHLAA: Overall Suitability | If parts of the site were located within the inset village envelope, it may have some very limited opportunities for residential development, but will require substantial environmental screening and the protection of existing residential amenity. | The site would fall naturally within an extended village envelope being bordered on two sides by existing properties. Protection of existing residential amenity wholly deliverable through planning approval processes. | The perceived need for substantial environmental screening is exaggerated and derives from the visibility of the area now removed from the site. There is no substantiation that the site only provides “very limited” opportunities for residential development. The claim of detriment to residential amenity is incorrect. All of those properties have substantial rear gardens between the houses and the site boundary. It is unlikely that there will be any need for building to be undertaken at the site boundary. The proximity of new houses to existing houses would be a matter for planning consents. |
| 30 | SHLAA: Availability | The owners have expressed a willingness to release the site for development | The owners have expressed a willingness to release the site for development and a documented agreement between the landowners is in place to that effect. | |
| 31 | SHLAA: Achievability | Potentially achievable subject to overcoming layout and landscaping considerations. | Wholly achievable. Layout and landscaping considerations can be incorporated into planning consents. | |
| 32 | SHLAA – Timeframes | 2024/29 | 2017/22 | The delayed date given was determined by council officers. It is contrary to previous timeframe indication submitted by the landowners. Council officers may have been influenced by a need for delay arising from HS2 construction which will impact the preferred Burrows Hill site in Burton Green because of proximity and the HS2 construction site opposite that site on Cromwell Lane and Red Lane. No such considerations impact on our site. The timeframe should be brought forward. |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
|----|--------------------------------------|--|--|--|
| 33 | Employment Land Review | Primarily garden uses. | | The use of the predominant part of the land is as recreational agricultural field. |
| 34 | Parish Council Feedback | PC is aware of option. Recognition of potential impact on nearby residential properties. | PC is aware of option. Claimed potential impact on nearby residential properties can be addressed through planning consents. | The development will have no more, or less, impact on nearby existing residential properties than already exists between neighbouring properties. Local opposition was fuelled by a misunderstanding that “affordable housing” was “social housing”. Issue as line 29 above. |
| 35 | Sustainability Appraisal: Assessment | Economy ? / Sustainable Transport ++ & - - / Reduce the Need to Travel / Waste & Recycling - / Prudent use of land and Natural Resources - / Natural Environment and Landscape - - & - / Built Environment + / Historic Environment ? / Air, Water & Soil Quality - - / Climate Change Mitigation - / Climate Change Adaptation (Flood Risk) = / Housing Needs ++ / Local Services and Community Facilities ? / Health and Well Being + & = / Poverty and Social Exclusion + / Crime ? | | The highlighted values are critical of the site but are unsubstantiated or incorrect. What are the criteria against which these parameters are assessed? There is no rationale for these judgements to be pejorative in comparison to the other Burton Green Sites. |

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| <p>36</p> | <p>Sustainability Appraisal: Significant Effects</p> | <p>All potential allocations are likely to lead to major positive long term effects on housing needs as all sites make provision for housing. Potential site allocation has excellent access to public transport with a bus stop within 0-400 m and there are pavements which provide safe access for pedestrians into the village centre or to public transport. If all sites are taken forward this may have a major negative effect on traffic given the small size of the village. Site BG3*O is in close proximity to the proposed HS2 route, which could mean that in the future, new residential properties may be affected by noise, light and air pollution leading to major negative effect. No obvious highways access, as the site is located at the back of third party land and therefore development would not support SA Objective 2 leading to major negative effects. Major negative effects on landscape.</p> | <p>All potential allocations are likely to lead to major positive long term effects on housing needs as all sites make provision for housing. Potential site allocation has excellent access to public transport with a bus stop within 0-400 m and there are pavements which provide safe access for pedestrians into the village centre or to public transport, particularly including Tile Hill railway station . SA Objective 2 effects are positive</p> | <p>Highlighted yellow: This reference must be removed. It is wholly inconsistent with the environmental statement provisions provided by HS2 Ltd. Noise contours are shown not to impact upon the site. The train is to be electrically powered and will be in tunnel and deep cutting. The suggestion of light and air pollution is a completely erroneous. Note Row 21 above.</p> <p>Highlighted Turquoise: The traffic flow through the village is between Solihull/ Balsall Common and Warwick University/Business park peaking substantially, and only, at standard commuting times. At all other times, traffic flows are minimal. There is an established 30mph speed limit. The impact of the small scale development here on the traffic flow cannot be proportionately significant. Residential construction close to Coventry generally, and at these locations specifically, will overall reduce commuting distance and numbers.</p> <p>Highlighted green: As above Rows 20 and 26. Highways access proposal wholly approved by WCC Highways Dept.</p> <p>Highlighted Grey: See comments re back land development in introduction and row 27. SA Objective 2 relates to sustainable transport. The site has better access to better bus and rail services.</p> <p>Highlighted Blue: Incorrect see rows 27, 29,31</p> |
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| | Matrix heading | Current Record | Entry should read | Additional Comment |
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| 37 | Agricultural Land Evaluation | Not assessed | | |
| 38 | Overall Greenbelt / Greenfield Parcel Assessment: Summary | This parcel plays an important role in maintaining the wider strategic Green Belt around Coventry and has a significant role to play in maintaining the open setting of Burton Green. It is however acknowledged that certain aspects of the parcel have been compromised by residential development. | The site lies in one corner of this parcel of the strategic Green Belt around Coventry. But the topography of this part of the parcel is such that the slope is contrary to that in most parts of this parcel and the site is substantially enclosed on two sides by existing housing, and elsewhere by established mature trees and hedges. Consequently, while the wider parcel has a significant role to play in maintaining the open setting of Burton Green, this part of the parcel does not fulfil that function. | This form of words derives from the November 2013 Green Belt and Green Field Review. http://www.warwickdc.gov.uk/download/downloads/id/1648/appendix_8_-_green_belt_and_green_field_review Map page 59 Commentary Pages 75-77 Within this review, the area of our site was deemed to lie within the Green belt Area BG6 The inadequacy of this assessment was recognised and an update was commissioned and published in April 2014 discussed at Row 42 below. |
| 39 | Greenbelt / Greenfield Overall Value Assessment (OVA) | Medium to High | | Needs correction |
| 40 | Greenbelt / Greenfield Sub-Parcel Assessment: Review (MM) | Not assessed | | The fact that this assessment has not been made explains the error in row 38. |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
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| 41 | Green Belt / Greenfield Sub- Parcel Overall Value Assessment (OVA) | Not assessed | | Ditto |

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| <p>42</p> | <p>Landscape Character Assessment: Summary</p> | <p>Lies within Land Parcel - BG_10 The field boundaries are hedged allowing only glimpsed views into the site of garden sheds and mature trees / vegetation. This zone is on gently sloping ground falling northwards towards the railway line and Nailcote Lane. It comprises a sub-regular pattern of predominantly medium scale mixed farmland within the Ancient Arden landscape. However, evidence remains of the former small scale landscape structure with relic hedgerow trees and individual smaller fields. There is a partially visible settlement edge with properties on both Hodgetts Lane and Cromwell Lane backing onto the zone. The zone includes a working farm and a small number of Grade II Listed buildings and grounds (Nailcote Hall Hotel, Arnold Farmhouse, Barn Range, an unnamed thatched cottage, Cromwell Cottage and Westwood</p> | | <p>The site does not lie within Land parcel BG-10 (see below) Some of the comments here derive from an updated Landscape Sensitivity and Ecological & Geological Study Landscape Assessment Update dated April 2014. http://www.warwickdc.gov.uk/download/downloads/id/1889/landscape_sensitivity_and_ecological_and_geological_study_-_landscape_assessment_update_april_2014.pdf This document seems to be the first iteration describing an area of Green Belt as “BG_10”. The map of Burton Green in this assessment (Page 9) shows clearly that the part of the green belt that includes our site was not included in the BG_10 area. Our site is shown to be in an area “BG Ur” (presumably an abbreviation for “urban”) Sensitivity to Housing development for our site area was explicitly “not recorded” in this document. The majority of the commentary under this matrix heading relates to features wholly distinct from the site proposed. To the extent that there is evidence of direct investigation, Highlighted yellow, it appears this may have been restricted to viewing the adjacent site R89a from the North West perspective. Again, that site should have been considered separately. Comments highlighted in Grey describe the topography of the majority of the Green Belt parcel but fails to take account of the “summit” at the North-western border of the site such that the slope of the site is contrary to that described with substantial benefit in respect of screening, in combination with the established screening individual trees, woodland and established hedges. The visible settlement edge (text highlighted pink) refers to properties that, on Hodgetts Lane are closer to Berkswell, and on Cromwell Lane are closer to Coventry, than the</p> |
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| | | <p>Farmhouse). There are also several scattered field ponds. Tree cover comprises over mature trees on remnant / lost hedgerow lines, small copses and roadside hedgerow trees. Roadside hedgerows are trimmed but the structure is becoming gappy with fewer hedgerow trees. The primary hedgerows such as those adjacent to Public Rights of Way have been lost as well as a number of internal hedges that provided the small scale irregular field pattern associated with Ancient Arden. The loss of these hedgerows has created a relatively open but framed landscape with scattered over mature hedgerow trees punctuating the skyline. The zone has no relationship to the settlement and is part of the wider farmed landscape. Site 7 comprises long narrow strips of land, possibly garden extensions, and pasture/paddocks to the back of properties on Hodgetts Lane / Cromwell</p> | | <p>proposed site. Properties bounding the proposed site are not visible from the perspective of the analysis described because of the topography and the vegetation. Development of our site would be similarly screened. Comment highlighted in blue that the zone has no relationship to the settlement is clearly incorrect in respect of this site.</p> |
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| | Matrix heading | Current Record | Entry should read | Additional Comment |
|----|--------------------------------------|---|-------------------|--------------------|
| | | <p>Lane. The nearest public footpath is via a narrow gap between two garden boundary hedges off Cromwell Lane. The PROW is extremely narrow until you pass beyond the first field, this appears to be the result of encroachment of garden / field boundaries, but the route is well used. This part of the zone is less sensitive to development given its slightly more domesticated character.</p> | | |
| 43 | Landscape Sensitivity to Development | Medium | | |
| 44 | Habitat Assessment: Summary | No major observations - certain hedgerows and vegetation may require protection. | | |
| 45 | Habitat Assessment: Value | Low | | |

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| <p>46</p> | <p>Site Specific Consultation Headlines</p> | <p>The following objections to site 7: The construction phases of both HS2 and a housing development would cause an upheaval for many years. Both proposals would financially impact our property. The community would not benefit from the site with regard to the relocation of the village hall as envisaged on Site 1. The rear gardens of the adjacent houses would be overlooked by the new properties. Additional access onto Cromwell Lane would make accessing our property more dangerous. Construction of HS2 will make Cromwell Lane busier, thus exacerbating the danger. Fundamentally, this site creates no new outgrowth of the village as it lies enclosed by boundaries of the existing residential area. It will accommodate new development without changing the character and the qualities of the village. It does not contribute to further ribbon development. It is in the core of the village</p> | | <p>We make the following observations in respect of these consultation comments to the extent that they are relevant. Construction of this site can proceed concurrently with and independent of that for HS2. The overall period of construction will be reduced. The only community facility that was suggested in the preferred Burrows Hill site was a replacement site for the Village Hall. This was always an obligation for replacement by HS2 Ltd and an alternative site is now intended for this. The Burrows Hill site is no longer proposing the inclusion of any community facilities. The rear gardens that border the site are quite large such that of themselves they protect of the amenity of existing dwellings which can be enhanced further through appropriate planning permissions. Proposed access arrangements have been approved by WCC highways department in respect of an established 30mph zone. We agree.</p> |
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| | Matrix heading | Current Record | Entry should read | Additional Comment |
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| | | <p>community within easy walking distance of the existing village hall, the school, the public house, the Tile Hill railway station, and the established nearest Tile Hill shops. It is within 200m of all the bus services that pass through the village, particularly the only service with multiple journeys through the day between Coventry and Balsall Common/Berkswell Rail Station. This site is in close proximity to the National Cycling Network Route to Balsall Common and to Kenilworth and Warwick University that will remain post HS2 Construction. The site is deliverable.</p> | | |

| | Matrix heading | Current Record | Entry should read | Additional Comment |
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| 48 | Summary and Conclusions | <p>Although technically deliverable, in a central location, and in a pocket of lower landscape value, it is nevertheless a classic backland development with no street frontage. It also does not have the capacity to deliver the type of community hub facilities envisaged on the preferred housing site. Adverse impacts of backland developments can include: a loss of amenity, overshadowing, overlooking, loss of sunlight / daylight, noise, loss of green links / vegetation, visual intrusion, loss of space between buildings, long driveways and difficulties servicing housing (recycling / waste collection etc). It is understood that site 7 includes multiple land ownerships.</p> | <p>Technically deliverable in a central location in a pocket of lower landscape value. Approved highways access creates a roadway on the site so that all properties developed have correct street frontage. There is no back land development. The site is under a small number of ownerships and a development agreement exists between the owners.</p> | <p>Highlighted yellow. Incorrect commentary re back land development. See again comment in the forward to this document and at Row 27</p> <p>Highlighted Blue The site does have capacity to deliver community facilities of limited scale. A residential home for the elderly was included in the conceptual diagrams submitted. The only community facility that was suggested in the preferred Burrows Hill site was a replacement site for the Village Hall. This was always an obligation for replacement by HS2 Ltd and an alternative site is now intended for this. The Burrows Hill site is no longer proposing the inclusion of any community facilities.</p> |