

17 January 2014

Delivered by email and post

Development Policy Manager
Development Services
Warwick District Council
Riverside House
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Dear Sir/Madam

VILLAGE HOUSING OPTIONS AND SETTLEMENT BOUNDARIES CONSULTATIONS

These representations are submitted on behalf of our client, David Wilson Homes, in respect of the Village Housing Options and Settlement Boundaries Consultation. David Wilson Homes have an interest in land off Cromwell Lane in Burton Green, and Westwood Heath Road as shown on the attached site location plans. Further detail on these sites is provided in the appropriate section later in these representations.

Contextual and Policy Overview

In June 2013, Warwick District Council published its Revised Development Strategy. This document sets out an amended housing target of 12,300 dwellings to be delivered in the period 2011 to 2029. The Strategy seeks to concentrate growth within and at the edge of the existing urban area, but acknowledges that some growth also needs to be focused on the most sustainable villages in order to meet the housing requirements for the District and to widen housing choices (including affordable housing) and sustain existing services and facilities. Burton Green has been identified as a Secondary Service Village with an indicative housing target of 70-90 homes over the plan period.

The current consultation document seeks to 'fine-tune' development levels for the villages and identifies the Council's Preferred Housing Options. The proposed housing options are based on the interim level of growth of 12,300 dwellings set out in the Revised Development Strategy.

Since the publication of the Village Housing Options Consultation Document, the Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) has become available. The SHMA, which was published in November 2013, shows that Warwick District will have to provide between 660 and 720 dwellings per annum to meet requirements arising within the District. The proposed housing target of 12,300 homes (683 dwellings per annum) is within the SHMA parameters. However, it fails to take account of the fact that more housing may have to be accommodated in Warwick District to deliver some of the unmet requirements from neighbouring authorities within the SHMA area.

The Village Housing Options Consultation document recognises that discussions are continuing in respect of the required housing growth across local authority boundaries. We consider that as a result of these discussions, the housing requirement for Warwick District may increase.

Considering the existing capacity of the non-Green Belt areas in the District, we consider that some of the additional requirement will need to be accommodated in the Green Belt villages (including Burton Green) in line with the Council's development and locational strategy.

As highlighted in the Village Housing Options Consultation document, Burton Green benefits from having a number of local facilities including a school, nurseries, a pub, a village hall and excellent public transport connections (both by bus and rail). Tile Hill Station is located within walking distance of the village and provides convenient access to local, regional and national destinations. Moreover, Burton Green is located close to Warwick University, one of the most prestigious universities in the country and major local employer. The Coventry Gateway development is also located within easy reach of Burton Green. We therefore agree that Burton Green is a sustainable village. It can and should accommodate additional housing if the overall housing requirement for the District increases. We consider that the Council needs to give further thought to alternative and/or additional sites in the villages to accommodate some of the likely increases in the District's housing requirements.

The Revised Development Strategy seeks to provide 1,000 dwellings in the identified Primary and Secondary Service Villages. The Village Housing Options Consultation document, however, only makes provision for 835 dwellings. There will therefore be a shortfall in housing provision in the villages, further emphasising the need to allocate additional sites in the villages to the meet housing requirements.

Preferred Options and Village Boundaries: Burton Green

The Village Housing Options Consultation document identifies the 'Burrow Hill Nursery' site as the Preferred Option for housing growth in Burton Green. The Preferred Option site is located at the southern end of the village and consists of a collection of buildings and areas of hardstanding associated with the use of the site as a commercial nursery. The development of this site will necessitate the relocation of existing businesses and will result in the loss of a number of local jobs. The consultation document notes that this medium sized village site has the benefit of helping better connect the village (including the primary school) and providing the opportunity to potentially relocate the village hall and create a new village green.

Whilst there are some merits in allocating this site for housing, particularly its partly developed nature, we consider that the site's location, which is repeatedly highlighted as one of the key advantages of the site in the consultation document and accompanying evidence, is actually a key weakness.

The village of Burton Green stretches along Cromwell Lane with some further housing located along Red Lane and Hobb Lane. The Preferred Options site is situated at the southern end of the village. Although Burton Green Church of England School is located close to the Preferred Options site, the majority of the village's homes and its facilities (children's nursery, pub and train station) are located to the north of Red Lane along Cromwell Lane.

The proposed route of HS2 passes through Burton Green and will dissect the village necessitating the demolition of a number of properties at Cromwell Lane and Hodgett's Lane. Some existing housing, the Preferred Options site and the school will be located to the south of the HS2 line, whilst the majority of the remaining village will be located to the north. Far from connecting the village, any housing delivered on the Preferred Options site will feel separated from the heart of Burton Green. Moreover, as noted in the Council's own assessments, new residential properties on this site may be affected by noise, light and air pollution as a result of HS2 leading to major negative effects.

We consider that other sites are available in Burton Green to deliver the required housing for the village, which do not suffer from the same constraints imposed by HS2.

David Wilson Homes have an interest in two sites in the vicinity, one off Cromwell Lane and the other adjoining site off Westwood Heath Road, which have been assessed as part of the Village Housing Options Consultation and accompanying evidence under Site Reference 5) (Land south-west of Westwood Heath Road) and 6) (Land off Cromwell Lane) (SHLAA sites C02 and C05).

These two sites currently comprise agricultural land and former private playfields bounded by hedgerows and mature trees. The land lies to the back of housing along Cromwell Lane and Westwood Heath Road and is bounded by residential uses on two sides. Old Lodge Farm is located at the eastern site boundary and there are agricultural fields to the west and south. Access to the site can currently be gained off Cromwell Lane to the west via a gated track previously used in connection with the playing fields. There are a number of local amenities close by including the Hedgerow Nursery, Peeping Tom Pub, a number of bus stops on Cromwell Lane and Westwood Heath Road and Tile Hill Railway Station, which is located approximately 1km to the north of the site.

The Council's Sustainability Appraisal affords these two sites exactly the same score as the Preferred Options site for every aspect of sustainability assessed as part of the Council's appraisal. In terms of accessibility, we consider that the land is actually better located as it is closer to local services and facilities (except for the local primary school) and has a better relationship to the village. The school is located approximately 1.5km to the south of the site and could be accessed by cycle/bus.

The Village Housing Options Consultation document suggests that the Preferred Option site provides an opportunity to relocate the village hall and create a new village green. These facilities could equally be provided on land off Cromwell Lane, part of which was previously used as private playing fields and as such has had a community use in the past. The location would arguably provide better accessibility for the public. We therefore consider that the Preferred Options site does not offer any advantages over the Cromwell Lane land in this respect.

One reason the land off Cromwell Lane has been discounted is on vehicular access grounds. A Transport Assessment has been carried out, which confirms that the access is adequate to serve potential future development.

The key reason the two sites have been discounted is on landscape and Green Belt impact grounds. The Council's Green Belt review includes the land within Green Belt Parcel BG1. This Green Belt parcel is considered to be of mixed character with a major role to play in maintaining the linear character of Burton Green. The Green Belt review also notes that this parcel has a high potential environmental value.

The Preferred Options site lies within a different Green Belt Parcel (Parcel BG3) and was initially assessed as part of the Council's Green Belt Review as having an overall high Green Belt value. The Green Belt Review noted that this parcel consists of strategically important areas of Green Belt which maintains the character of Burton Green. Similarly to Green Belt Parcel BG1, this parcel was considered to have a high potential environmental value.

The Council commissioned an independent adviser to provide a critical assessment of its Green Belt Review. The Green Belt Critical Review clearly states on Page 21 that:

"There also needs to be a clear distinction made in the evaluation process between an assessment of the parcels and the individual sub-sites reviewed within the parcels. In particular, on how the preferred options were chosen, and what reasonable alternatives were considered and why they were not chosen."

The Green Belt Critical Review provides an assessment of the Preferred Options, but does not consider any of the sites that have been dismissed. In contrast to the Council's Green Belt Review, it focuses on specific sites. This more detailed approach results in very different conclusions. Whilst the Green Belt Review considers Parcel BG3 (within which the Preferred Options site is located) to be of high Green Belt value, the Green Belt Critical Review considers the Preferred Options site to be of low to medium value. It concludes that given the characteristics of the site, it could be removed from the Green Belt with a modest impact on the fundamental aims, essential characteristics and purposes of the Green Belt.

We object to the Council's selective approach in considering the contribution specific site options make to the Green Belt. A detailed assessment should have been carried out of all the options under consideration.

David Wilson Homes have commissioned their own expert to carry out a high level Landscape and Visual Impact Assessment in respect of the land off Cromwell Lane to establish what contribution the site makes to the landscape and the Green Belt in particular.

The report shows that in terms of sensitivity, the land of Cromwell Lane lies within a portion of Green Belt Parcel BG1, which has a different landscape character to the rest of this parcel. The proximity of housing on the western and northern boundaries and the deciduous and coniferous planting on the boundary with Lodge Farm to the east provides a significant degree of enclosure. Whilst the remainder of this Green Belt Parcel may have rural characteristics, the report considers that the land off Cromwell Lane is more developed and therefore less sensitive to residential development given its location and characteristics.

The assessment demonstrates that views into the proposed site from the north and west are truncated by adjacent housing. The site is potentially visible from a number of locations to the south and east. However, views towards the proposed site are filtered by mature boundary vegetation and the buildings of Lodge Farm. The outline of a number of properties can be made out on the skyline when viewed from Bockendon Road. The presence of the water tower and redbrick housing on Westwood Heath Road are the dominant features on the horizon. Beyond Bockendon Road to the east, views are distant and often obscured by blocks of woodland.

The report concludes that development in certain parts of Green Belt Parcel BG1 would be extremely visible from the surrounding area and therefore unsuitable for development. However, this is unlikely to be true of the land off Cromwell Lane which is not visible from much of the surrounding area.

Considering the Green Belt as a Landscape Receptor, the attached report demonstrates that developing the land for housing would not significantly compromise the openness of the landscape or detract from any of the elements which combine to create the local landscape character. As the development is an extension to existing adjacent housing the integrity of the space as a whole is retained.

The proposed site is not typical of the larger Green Belt landscape character. Part of the site has been used as playing fields in the past; the footpaths are restricted and show sign of heavy footfall. The grass is overgrown and neglected. The space is partially separated from the larger landscape by the position of Lodge Farm.

The report notes that the proposed development represents an opportunity to create a new robust 'green boundary' to the village edge, which could enhance the Green Belt definition.

A copy of the Landscape and Visual Impact Assessment report is attached to these representations.

We consider that the land off Cromwell Lane provides a better option to deliver the required housing for Burton Green. It is located close to local facilities and services, has a good relationship to the existing village and the impact of HS2 on any new development on the site will be limited given the distance to the proposed route. Similar to the Preferred Options site, the land off Cromwell Lane offers an opportunity to provide a new village hall and village green.

As shown by the attached landscape report, there is no danger that development on the site will result in unrestricted sprawl or encroachment into the countryside given the contained and defined nature and location of the site and opportunities to reinforce defensible boundaries within the site. It would not lead to neighbouring towns merging into one another, have any impact on the setting or special character of a historic town or limit urban regeneration. We consider that the land could be removed from the Green Belt without impacting the fundamental aim of Green Belt policy. The Council should therefore consider allocating the land off Cromwell Lane for housing and include it within the settlement boundary of Burton Green.

David Wilson Homes, part of the country's largest house builder Barratt Developments Plc., are committed to bringing sites such as this forward to meet current and future housing requirements. They take great pride in their approach to public consultation, and endeavour to work with local communities to deliver schemes and facilities that sit harmoniously with the character of the area and address shortfalls in provision.

We hope that you will give full consideration to David Wilson Homes' representations outlined in this letter. Should you have any questions or queries or wish to discuss these representations further, please do not hesitate to contact me.

Yours sincerely



Karin Hartley
Senior Planner

