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A 12765

**alasdair jones** BA MRTPI  
chartered town planner

Planning Policy Manager  
Warwick District Council.  
Riverside House,  
Leamington Spa  
CV34 5HQ

Ref: 010  
Date: 21.04.2016

Dear Sirs

Warwick District Council Local Plan (Consultation on Proposed Modifications)

Dr P Thornton and Mrs D Vernon et al.

I refer to the above.

I have been appointed to act on behalf of the above parties to prepare and submit representations in response to the above plan modifications, which are enclosed.

I should be grateful if you would acknowledge the safe receipt of these on or before the deadline of 4.45pm ,22<sup>nd</sup> April 2016.

Yours faithfully



## Consultation on Proposed Modifications (2016) Response Form

For Official Only	
Person ID	
Rep ID	

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

If your comments relate to more than one proposed Modification you will need to complete a separate Part B of this form for each representation.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the Modifications have been made available (see the table below). You can also respond online using the Council's e Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be returned by **4.45pm on Friday 22 April 2016**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or **email: [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)**

### Where to see copies of the documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and also at the following locations:

- Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa;
- Leamington Town Hall, Parade, Royal Leamington Spa
- Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
- Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
- Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
- Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
- Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
- Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa
- Finham Community Library, Finham Green Rd, Finham, Coventry, CV3 6EP

# Part A - Personal Details

## 1. Personal Details\*

## 2. Agent's Details (if applicable)

\* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title	DR	MR
First Name	PAUL	ALASDAIR
Last Name	THORNTON.	JONES.
Job Title (where relevant)		CHARTERED TOWN PLANNER
Organisation (where relevant)	obh self and landowner.	
Address Line 1		A6
Address Line 2		GLASHTOWIE LANE
Address Line 3		KENILWORTH
Address Line 4		
Postcode		CV8 2AJ.
Telephone number		07788 495077
Email address		alasdair.jones@ntlworld.com

## 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Modifications to the appointed Inspector

Yes  No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes  No

The adoption of the Local Plan.

Yes  No

For Official Use Only

Person ID:

Rep ID:

# Part B - Your Representations

Please note: this section will need to be completed for each representation you make

## 4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?

Modification or SA:	<input type="text" value="MODIFICATION."/>
Mod. Number:	<input type="text" value="4"/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

## 5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5.2 Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

## 6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:

(Please tick)

Positively Prepared:	<input type="checkbox"/>
Justified:	<input type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

See paragraph 4.1 of the attached statement.

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

see paragraphs 4.2 - 4.4 of the attached statement.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

see paragraph 4.5 of the attached statement.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### 11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:



Date:

20.04.2016.

Copies of all the comments and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

For Official Use Only

Person ID:

Rep ID:



## Part B - Your Representations

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Please note: this section will need to be completed for each representation you make

**4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?**

Modification or SA:	<input type="text" value="MODIFICATION"/>
Mod. Number:	<input type="text" value="5."/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

**5. Do you consider the Local Plan is :**

5.1 Legally Compliant?

Yes  No

5.2 Sound?

Yes  No

**6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:**

(Please tick)

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:



7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

see paragraph 5.1 of the attached statement

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the last you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

see paragraph 5.2 of the attached statement.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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Person ID:

Rep ID:

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

see paragraph 5.3 of the attached statement.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

#### 11. Declaration

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Signed:



Date:

20 04. 2016.

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For Official Use Only

Person ID:

Rep ID:



## Part B - Your Representations

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Please note: this section will need to be completed for each representation you make

**4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?**

Modification or SA:	<input type="text" value="MODIFICATION"/>
Mod. Number:	<input type="text" value="8"/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

**5. Do you consider the Local Plan is :**

5.1 Legally Compliant? Yes  No

5.2 Sound? Yes  No

**6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:**

**(Please tick)**

Positively Prepared:	<input type="checkbox"/>
Justified:	<input type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

See paragraphs 6.1 to 6.9 of the attached statement.

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See paragraphs 6.10 and 6.11 of the attached statement

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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Rep ID:

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

see paragraph 6.12 of the attached statement.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

#### 11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:



Date:

20.04.2016

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Rep ID:



## Part B - Your Representations

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Please note: this section will need to be completed for each representation you make

**4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?**

Modification or SA:	<input type="text" value="MODIFICATION"/>
Mod. Number:	<input type="text" value="10"/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

**5. Do you consider the Local Plan is :**

5.1 Legally Compliant? Yes  No

5.2 Sound? Yes  No

**6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:**

**(Please tick)**

Positively Prepared:	<input checked="" type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

For Official Use Only

Person ID:

Rep ID:



7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

See paragraphs 7.1 to 7.6 of the attached statement.

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the last you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See paragraph 7.7 of the attached statement.

Continue on a separate sheet if necessary

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For Official Use Only

Person ID:

Rep ID:

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

see paragraph 7.8 of the attached statement.

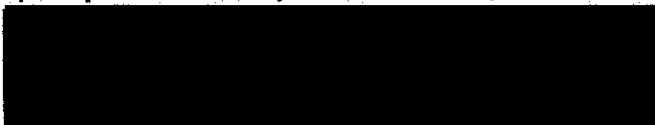
Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

#### 11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:



Date:

20. 04. 2016.

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For Official Use Only

Person ID:

Rep ID:



## Part B - Your Representations

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Please note: this section will need to be completed for each representation you make

**4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?**

Modification or SA:	<input type="text" value="MODIFICATION"/>
Mod. Number:	<input type="text" value="19."/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text" value="6."/>

**5. Do you consider the Local Plan is :**

5.1 Legally Compliant? Yes  No

5.2 Sound? Yes  No

**6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:**

**(Please tick)**

Positively Prepared:	<input type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See paragraphs 8.1 and 8.2  
of the attached statement.  
See also accompanying plan.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

For Official Use Only

Person ID:

Rep ID:

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

see paragraph 7.8 of the attached statement.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

#### 11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

[Redacted signature]

Date:

20.04.2016

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For Official Use Only

Person ID:

Rep ID:



**Proposed Modifications to the Publication Draft Local Plan.**

**Warwick District**

**January 2016**

**Representations by Dr P Thornton and Mrs D Vernon et al.**

**Prepared and Submitted by**

**Alasdair Jones BA MRTPI  
Chartered Town Planner**

**April 2016**



## **1. Introduction**

1.1 I act for Dr Thornton and Mrs D Vernon and others who are the owners of land to the west of Cromwell lane and to the east of Hodgetts Lane, Burton Green. The site is referenced no 7 in the Village Housing Options and Settlement boundaries Consultation (November 2013), save for that most north westerly parcel of land within the option site.

1.2 The owners have previously made submissions to the Council about the potential of this site for housing development during various stages of the preparation of this plan, culminating in a representation in response to the Publication Draft plan (April 2014); ref 66201. The site referenced R89 in the SHLAA which includes the north west parcel noted above.. It extends to some 2.18ha.

## **2. Publication Draft Local Plan.**

2.1 In commenting on the Publication Draft Plan my clients submitted that the allocation of land for housing in the Growth village of Burton Green was neither justified or effective and for those reasons that aspect of the plan, namely Policy DS11/Site HS 24 was unsound. The allocated site at Burrows Hill Nursery is not an appropriate location for housing development and the "selection" of the site appeared to be based on, inter-alia, unsubstantiated assertions about the unsuitability of the Option 7 site in the village.

2.2 In summary the key points made in representation 66201 in relation my clients site were;

- a. The development of the site would not be affected by either the construction phase or the operation of the HS2 High Speed Rail Link, by reason of noise or the routing of construction traffic.
- b. The market for homes on the site would not therefore be diminished by the proximity of the site to this rail link. Any residual "railway" noise at this site location will be substantially diminished by the line being in tunnel in proximity to this location, and by being further sheltered by existing properties. The rail proposal would not justify any delay to the construction of new homes on this site.
- c. The site can be accessed directly on to Cromwell lane via land presently occupied by 378 Cromwell Lane, which is in the ownership of my clients. The proposed access has the approval of the highway authority, Warwickshire C.C.
- d. The development of the site is viable and deliverable within the timescale of the plan. The five landowner parties are committed to an appropriate sale of the site for new housing.

## **3. Modifications to the Publication Draft Local Plan (2016)**

3.1 The modifications have been prepared to address the issues of soundness identified by the Inspector appointed to examine the plan and to consider the various representations submitted to the Council about the plan. These are set out in his letter of 1.06.2015. In so

far as my clients interests at Burton Green are concerned the following modifications are of relevance and are therefore the subject of the detailed representations set out below.

Modification 4. Policy DS6. Level of Housing Growth.

Modification 5. Paragraph 2.20. Updated Assessment of Need.

Modifications 8 Policy DS10. Broad Locations of Growth

Modification 10. Allocated Sites.

Modification 19. Policies Map

3.2 in submitting these representations my clients are aware that the earlier representations made in response to the Publication Draft plan remain for consideration at the re-opening of the examination by the Inspector.

#### **4. Modification 4. Policy DS6 Level of Housing Growth**

( Consultation Form Part 7)

4.1 it is considered that the wording of this policy should be further modified so that it incorporates a clear understanding as to the components of the level of housing growth. Because this is not shown in the policy it is not effective. It should reflect the outcome of the joint working with adjoining authorities on the matter of housing need and provision; in particular Coventry City Council.. As presently drafted therefore it is considered unsound.

( Consultation Form Part 8)

4.2 The following wording is suggested to make Policy DS6 sound.

**The Council will provide for a minimum of 16776 new homes between 2011 and 2019 of which 10,800 are to meet the District's objectively assessed needs over the plan period and 5976 represent a contribution towards Coventry City Councils needs, but to be provided between 2015 and 2029.**

4.3 It is considered that the above re-wording would make clear that until 2015 the Council had sought to prepare plan that made provision to meet the Districts needs 2011-2019 as set out in the Joint Coventry and Warwickshire SHMA. Any housing development that was progressed from 2011 onwards, as recorded in modified policy DS7 would have been assessed on the basis of that emerging policy background. None of the housing completions to 2015 would have contributed to meeting Coventry's needs. In consequence the assessed contribution to meeting the City's needs which is now put forward will be accommodated from 2015 onwards. The build rate for that provision will be about 427 per annum.

4.4 For the above reasons the suggested rewording of the policy will make it more effective, reflecting the outcome of the joint working noted above.

(Consultation Form. Parts 9 and 10)

4.5 My clients would wish to be represented during the oral part of the Examination dealing with this matter, because it closely relates to other concerns set out in these representations about the scale and timing of development on some of the new allocations and the resulting implications for Policies DS10 and DS11.

#### **5. Modification 5. Paragraph 2.20**

(Consultation Form Part 7 )

5.1 The following wording change as set out in part 8 below, is consequential to the wording change suggested for policy DS6.

(Consultation Form, Part 8)

5.2 Amend line 5 of paragraph 2.20 as follows;

**However in recognition that Coventry City Council is unable to accommodate its housing needs in full, within the City boundary, the Local Plan seeks to provide for 427 dwellings per annum (5976 over the period 2015-2029) towards Coventry's housing needs.**

(Consultation Form parts 9 and 10 )

5.3 My clients would wish to be represented during the oral part of the examination in relation to this issue for the reasons set out noted in relation to their representations on modification 4.

#### **6. Modification 8 Policy DS10. Broad Location of Allocated Sites.**

(Consultation Form Part 7)

6.1 Policy DS10 outlines the broad location of the allocated sites which could provide for a total of 9369 dwellings. Of this some 1146 are in the Growth Villages in the rural area. This is about 12.3% of the allocations. A similar proportion was evident in the Publication Draft plan (763 dwellings of a total of 6188 dwellings-see Policy DS10 page 23).

6.2 It is considered that the capacity for housing development in the growth Villages is of a higher order. Overall the provision should be in the order of at least 15% of the total new sites. The reasons for this relate to the identified capacity for further growth in these villages and in particular the role that Growth Villages close to the city of Coventry can play in meeting some of the City's acknowledged needs.

6.3 The present broad distribution of growth is therefore not the most effective and may place at risk the delivery of sufficient homes over the plan period for the reasons set out

below. In consequence therefore a detailed change to policy DS10 is set out below (Part 8 of the consultation form).

6.4 The plan identifies a number of non-strategic sites in the growth villages. Two of the villages lie close to the City of Coventry and have consistently met some of the housing demand emanating from the City; Baginton and Burton Green. Both have allocations in this plan which the 2016 Trajectory anticipates will deliver new homes in the first five years of the plan period, as follows.

Baginton. Rosswood Farm. 2017/18 to 2020/21 80 dwellings.  
Burton Green. Burrow Hill Nursery. 2018/19 to 2020/21 90 dwellings.

6.5 Beyond 2020/21 the plan does not envisage any further development on sites at these villages beyond some infill within the village boundaries. I understand these homes will fall to be considered as part of the windfall allowance. The two village sites together with the strategic allocations set out in Modification 20, will bring forward sites as follows over the next five years of the plan period.

	2016/7	2017/8	2018/9	2019/20	2020/21
Westwood Heath	0	0	25	100	100
Kings Hill	0	0	0	0	200
Baginton	0	15	25	25	15
Burton Green	0	0	10	40	40

6.6 Westwood Heath will be completed, the plan anticipates, in 2022/23. Kings Hill will continue to deliver new homes at a rate of 200 per annum to the end of the plan period. Note that the Councils position on delivery from Burrows Nursery site contradicts the advice given to the Examination in 2015 which was that the scheme would not deliver until 2026/27 reflecting the exceptional and very localised impact of the construction of the HS2 scheme adjacent to that site. (see Written Submissions. Matter 3. Warwick DC. Appendix 3.3; Villages)

6.7 The above figures show that at best, in 2020/21, the sites where demand for homes from Coventry will be met will be no greater than 355 per annum. Beyond 2022/23 it is envisaged only Kings Hill will provide new homes for Coventry at a rate of 200 per annum; 227 short of a required annual provision of 427 per annum (see comments on Modification 4).

6.8 It is therefore considered that the plan is deficient in providing sufficient identified sites to meet the acknowledged demand for new homes from the City of Coventry which is to be met in the District. The deficiency appears to arise across the plan period. It is also reliant in the first five years between 2016 and 2021 on the strategic sites at Kings Hill and Westwood Heath being brought forward in "short order" and delivering new homes in line with the 2016 trajectory. I am not confident that this expectation will be realised having had some considerable past experience with the delivery of homes from strategic sites.

6.9 Whatever the actual delivery programme turns out to be there will be a shortfall in the delivery of homes to meet the demands arising from the City. In my clients view the further

capacity in the growth villages near to the City should be acknowledged by the plan and further land identified for the delivery of new homes during the plan period to meet that shortfall. It is also considered that the sites that can be brought forward in the Growth Villages are more readily available and capable of delivering new homes both in the short and longer terms of the plan period, because they are smaller in scale and therefore will, not be characterised by the more complex development issues that are evident with the delivery of land and new homes from larger scale strategic sites.

(Consultation Form Part 8)

6.10 Modified Policy DS10 should be amended in lines 5 and 6 to read;

**Greenfield Sites on the Edge of Coventry                    2000.**  
**Sites within Growth Villages and the Rural Area    1400.**

6.11 The figure for the edge of Coventry sites reflects the view noted in part 7 above that the delivery rates from the strategic sites are optimistic and should be tempered to better reflect the timescales for planning permissions, agreements and site preparation works.

(Consultation Form parts 9 and 10)

6.12 My clients would wish to be represented at any discussions during the examination about policy DS 10 and the programmed delivery of sites to meet the demand for housing and the role that the Growth Villages can play in meeting that demand.

## **7. Modification 10 Policy DS11. Allocated Housing Sites.**

(Consultation Form part 7)

7.1 Modified policy DS 11 allocates a single site at Burton Green; ref H24 Burrow Hill Nursery. It has a capacity to provide 90 dwellings. This contrasts with the assessed capacity of the site as 60 dwellings in the Publication Draft Plan. This may arise from the removal of proposals for a Village Hall/Village Green and a parking area for these facilities from the site.

7.2 In response to the Publication Draft Plan my clients stated that they considered the proposed allocation to be unsound and not justified in any proper way by reference to the various factors that would impact on the development of this site. They remain of that view.

7.3 They further consider that their site , village option site 7, is the more appropriate and sustainable location for housing development in the village. Its potential to meet the demand for housing in the village is further reinforced by the matters that are rehearsed in relation to Modification 8, policy DS10 and my clients contention that the provision of land for housing in the growth villages is understated in relation to their capacity for growth and the particular role two of the villages could play in meeting some of the acknowledged demand for housing that cannot be satisfied within the City of Coventry.

7.4 It is clear that the plan is unsound in its approach to showing how the demand for housing arising from the City can best be accommodated. The plan needs to show where the demands that are not met by the strategic sites will be accommodated. In relation to that matter it is my clients' case that additional site(s) can be identified at Burton Green and should be shown on Local Plan Policy Map 6. Such further modifications should include my clients land as shown on the attached plan.

Burrows Hill Nursery.

7.5 The site lies to the south of the village with frontage to Hob lane and Red Lane. The primary school on Hob Lane is immediately to the south of the site. Whilst the Council consider the site represents a sustainable location for housing development my clients do not consider that it demonstrates any particular advantages over their own site in that regard such that it represents the most appropriate location for new housing in the village.

- a. The nearest regular bus service to Coventry and Balsall Common passes along Hodgetts lane and Cromwell Lane to the north close to option site 7
- b. Whilst the school and the relocated village hall will be adjacent to the site, these facilities will also be within a convenient walking distance of option site 7.
- c. The railway station at Tile Hill on the Coventry to Birmingham line is 2.09 km (1.3 miles) from the allocated site but within 1.62 km (1.01 miles) of option site 7.
- d. Option site 7 will be within 1.3 km of the strategic site at Westwood Heath where the scheme will incorporate new local facilities (see site H42. Modified policy DS11. Proposals for a Health Centre and retail facilities)
- e. By virtue of its proximity to the tunnel portal the allocated site falls in part within the noise contour arising from the operation of HS2 which is described as likely to have a significant effect on groups of dwellings. Option site 7 lies beyond those contours.
- f. The sustainability Assessment of Potential Village Allocations (2013) refers to Burrows Hill Nursery as site BG04. The assessment points out that a high pressure fuel pipeline runs through the north east corner of the allocated site, which will require mitigation works if the development proceeds. The allocated site is also on a minor aquifer of medium/high vulnerability. Protection of this resource will need to be incorporated within any development scheme. Finally the site is recorded as sitting in a landscape of medium value whereby development would have potential for a minor negative effect on this resource.
- g. None of these constraints apply to Option site 7. The revised development potential of Option Site 7 undertaken by the Council in 2016 (see update to appendix 6 to the Village housing Options and Settlement Boundaries Consultation) shows that;
  - i Whereas previously it was considered that the site had no ready access to the highway network this is now resolved.
  - ii There is a landowner agreement in place to allow the development to proceed if allocated.
  - iii The site is in an area of lower landscape value, which is also less sensitive to development due to the more domestic character of the parcels within the option site, and the influence of existing domestic premises.
  - iv Development of the site is achievable subject to appropriate landscaping.

7.6 My clients remain unconvinced that the allocation of the site at Burrows Hill Nursery remains the most appropriate housing allocation in the village. Their own site, Option 7 remains in their view the more appropriate. It is also available to bring forward much needed homes in the short term, whereas the allocated site will not, on the basis of evidence to the Examination bring forward new homes until 2026/27. This is presumably because of the uncertain impact of HS2 on the market for homes on the site during the construction phase of that scheme. However in the meantime part of the demand for homes to meet the City's unfulfilled needs, at this growth village location, will remain unsatisfied.

(Consultation Form part 8)

7.7 It is therefore considered that policy DS11 should be further modified to

- a. Delete site H24 and replace it with the site at Hodgetts Lane/Cromwell Lane with a capacity of about 50 dwellings
- b. Allocate further sites at Burton Green to provide in the order of up to 70 dwellings thereby providing a total of 120 dwellings in the village.

(Consultation Form part 10)

7.8 My clients would wish to be represented at any oral session of the examination to discuss in further detail the capacity for growth at Burton Green and the more suitable locations for new housing.

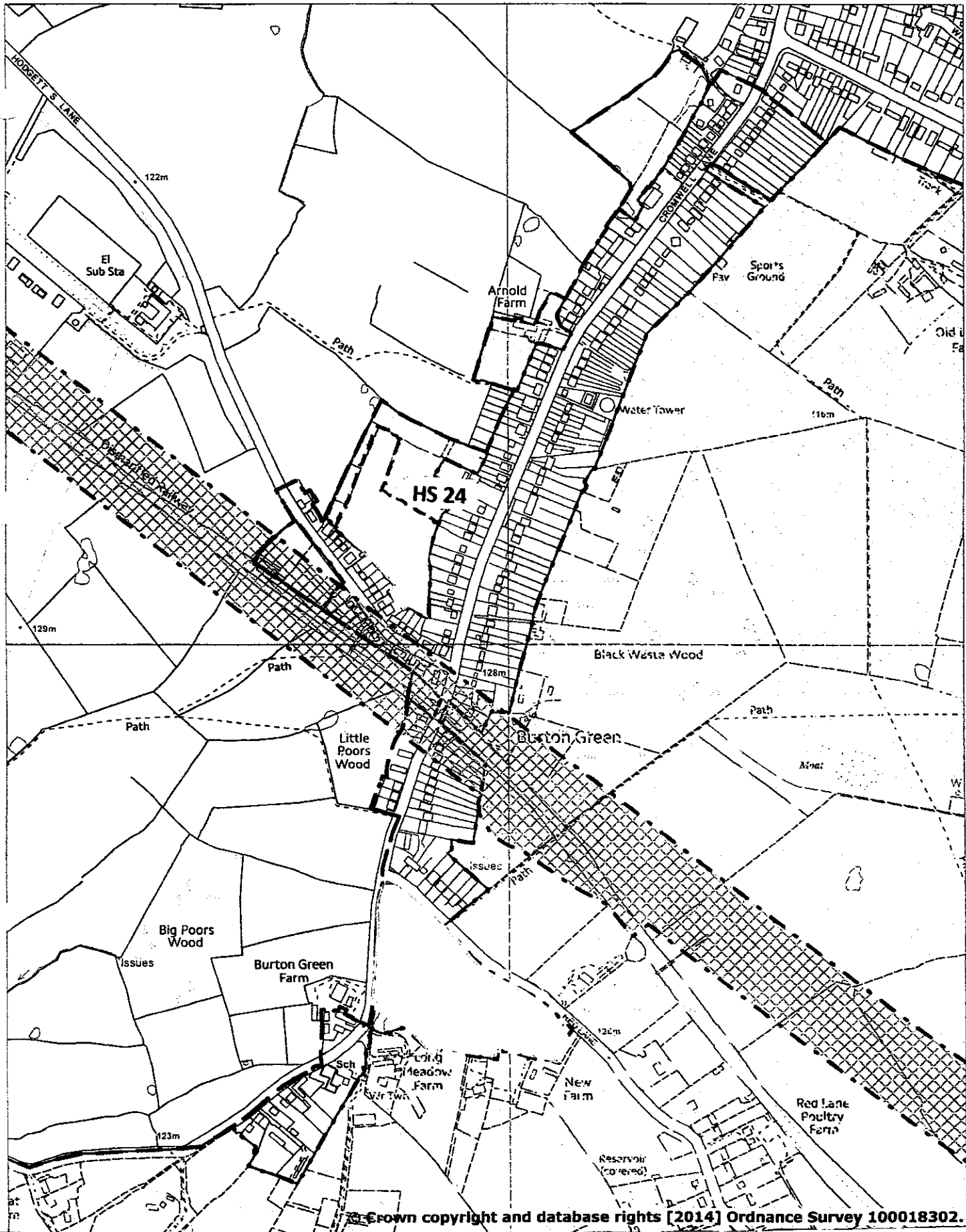
## **8. Modification 19 Maps**

(Consultation form part 8)

8.1 As consequence of the changes sought to Policy DS11 the following changes will need to be made to map 6

- a. Amend the village envelop to embrace option site 7.
- b. Delete option site 7 from the Green Belt
- c.. Allocate option site 7 as allocation HS24.
- d. Delete the site allocation for housing at Burrows Hill Nursery, and show as Green Belt

8.2 These changes are shown on the attached plan.



**Modification 19. Policies Map 6**

**Publication Draft Local Plan.**

**Warwick District.**

**April 2016**

**Plan to accompany representations by Dr P Thornton,  
and Mrs D Vernon et al.**

**Burton Green. Site allocation HS24.**



