

Village Housing Options Response Form 2013

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Village Housing Options and Settlement Boundaries.

If you are commenting on multiple sections of the document you will need to complete a separate copy of either Part B and/or Part C 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 plan has been made available (see back page). You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		Mr
First Name		Des
Last Name		Dunlop
Job Title (where relevant)		
Address Line 1	Crest Strategic Projects Ltd	D2 Planning Limited
Address Line 2	C/o Agent	Suites 3 & 4 Westbury Court
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Postcode		BS9 3EF
Telephone number		0117 3731659
Email address		info@d2planning.co.uk
Would you like to be made aware of future consultations on the new Local Plan?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44	
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 65+	
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, parish council?		

Part B - Commenting on the Village Housing Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

Page Chapter Paragraph
 Table or Figure Village Plan

What is the nature of your representation?

Support Object

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See separate sheet

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1. Duty to Cooperate

At the outset we note that this consultation exercise is primarily to deal with housing development proposals for a number of identified growth villages. However, we note in paragraph 3.14 of the document that the Council are continuing to discuss matters with neighbouring authorities regarding housing growth. The paragraph states: -

“This work is still to be concluded on whether there are alternative non green belt locations which would accommodate a limited degree of Warwick District’s housing growth.”

Crest are concerned that discussions about housing strategy and quantum are being taken without all of the necessary evidence base being in place. Furthermore, in order to comply with the Duty to Cooperate it can be presumed that Warwick District will have to accommodate a considerable percentage of Coventry City’s housing provision and this has not been considered at this stage.

Whilst Crest are supportive of the Planning Authority moving forward with their new Local Plan they consider that this consultation is somewhat premature pending the outcome of the Joint Strategic Housing Market Assessment work undertaken by Coventry City Council and adjoining authorities. The SHMA has identified a higher housing provision for Coventry of 23,500 than the previously identified 11,500 in their withdrawn Core Strategy. Indeed Crest consider that the housing figure is substantially greater for Coventry than that currently identified i.e. the overall provision should be 33,500 new dwellings. However the SHMA has implications for Warwick District in that it may be that some of the housing provision for Coventry cannot be met within its administrative boundary and land to the south of Coventry (within Warwick District) will need to be identified and released from the Green Belt for housing. Indeed previously the Council have had to accommodate up to 3,500 dwellings and Crest believe that this level of provision will still need to be made on land within the greenbelt to the south of Coventry. If the Duty to Cooperate is not met the LP will be found unsound as it fails to comply with national policy contained in the NPPF. The LPA will need to identify more land to accommodate this.

Crest control land at Lodge Farm, Westwood Heath Road, Warwick which they consider is eminently suitable for housing development. The site was assessed as Site Reference C13 Lodge Farm, Westwood Heath Road, Warwick. In terms of the site’s overall suitability it was assessed as: - (see attached)

“Potentially suitable in part only (18.5 hectares) excluding southern extensions to site which could impact upon potential SNICs. Any development would be subject to satisfactory measures to mitigate against impact on area of high landscape value.”

Accordingly in terms of the advice in the NPPF the site is considered available, suitable and achievable. Clearly the land could contribute to meeting housing needs if land currently in the green belt needs to be released to meet housing development of Coventry.

Recommendations

In such circumstances it is considered premature to consider the potential housing capacity for growth villages when additional land may have to be identified.

Site Ref	C13	Site Name	Lodge Farm, Westwood Heath Road
Site Size (Hectares)	30.48	Settlement	Coventry
Source	SHLAA08	Land Type	Greenfield
Adjacent/ Overlapping Site	C02, C03, C05, C09		

Suitability for Housing						
Location	Adjacent to Coventry urban area					
Policy Restrictions	Green Belt					
Physical Constraints	Public footpaths through site					
Potential Impacts	Extending development beyond a definable boundary into an area of high landscape value with no strong recognisable boundary to south. Brockendon Grange Pond & Black Waste Wood are potential SINC's Loss of Grade 2 Agricultural Land					
Environmental Conditions	Satisfactory					
Overall Suitability	Potentially suitable in part only (18.5 hectares) excluding southern extensions to site which could impact upon potential SINC's. Any development would be subject to satisfactory measures to mitigate against impact on area of high landscape value					
Availability						
The owners have expressed a willingness to release the site for development						
Achievability						
Housing Capacity						
Development Mix	Housing	50%	Other Uses	50%		
Potential Capacity	30dph	278	40dph	370	50dph	462
Timeframe (in terms of practicality only)	2014/19	0	2019/24	325	2024/29	0



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Chapter

Paragraph

Table or Figure

Village Plan

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2. Revised Development Strategy

Policy RDS 4 of the Council's Revised Development Strategy identified 4 broad locations to meet the then housing provision for the District, namely: -

- Concentrated within existing urban areas – 380 dwellings
- Site on the edge of Warwick, Leamington & Whitnash – 4,150 dwellings
- Sites on the edge of Kenilworth – 700 dwellings
- Village development – 1,000 dwellings

Crest have consistently made representations to indicate that the overall housing provision of for the District is too low and will not meet the objectively assessed housing needs and that part of Coventry's housing provision will need to be met on land within Warwick District. This work is still ongoing and the outcome is awaited.

Crest however support the identification of Burton Green as a settlement capable of accommodating additional residential development. However Crest object to the identification of Burton Green within the Secondary Service Category, capable of accommodating 70-90 dwellings. A proper analysis of the services and facilities in Burton Green indicates that it should be identified within the Primary Settlement Category. The settlement has a range of facilities including a primary school with spare capacity. It also has good public transport links both by bus and rail to larger centres. It is unclear from the evidence base exactly why Burton Green is identified as a Secondary Growth Centre and it is considered that a proper analysis of the evidence indicates that it should be a Primary Growth Centre.

We note that paragraph 4.10 states that: -

“Following the outcome of the detailed site assessment work this has had a substantial impact on some village locations reducing the number of suitable housing options. The implications of this work is a reduction in the total number of village housing. This is down from about 1,000 dwellings across the originally identified 10 settlements ... to approximately 837 for the same settlements ...”

Crest are concerned to see the reduction in housing numbers of 163 units with no apparent indication as to how or where the additional housing numbers are to be met. This is against a backdrop that Crest considers that insufficient housing provision has been identified if Warwick Council are to meet its objectively assessed housing needs.

As stated Crest control land at Lodge Farm which is eminently suitable for housing development. Such land is capable of being delivered to meet the Council's identified housing provision.

Recommendations

- i. Identify Burton Green as a Primary Service Settlement;
- ii. Identify sufficient land to meet the Council's objectively assessed housing needs;
and
- iii. Identify land at Lodge Farm for residential development.

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3. Summary of Findings

Crest object to the summary of findings in respect of Burton Green as follows: -

i. Green Belt/Green Field Function

This section has had no regards to the findings and recommendations in the Coventry Joint Green Belt Review (July 2009). The land Crest control at Lodge Farm is identified as Site C14C (see attached). It was reviewed in relation to the 5 green belt functions identified in the then PPG2 Green Belts (now paragraph 80 of the NPPF) this assessment concluded that the land was one of the least constrained parcels south of Coventry and potentially suitable for release from the Green Belt. In such circumstances it is difficult to understand how it can be concluded that the site would maintain the setting and character of Burton Green.

ii. Landscape & Habitat Impact

The SHLAA concludes with regards the Crest site that the land is suitable, achievable and deliverable. It states: -

“Potentially suitable in part only (18.5 hectares) excluding southern extensions to site which could impact upon potential SNICs. Any development would be subject to satisfactory measures to mitigate against impact on area of high landscape value.”

Clearly the SHLAA did not conclude that the site represented an area of high landscape value. It concluded that some 18.5 hectares could be developed with satisfactory mitigation.

In addition the site has been intensely farmed for many years and there is little of biodiversity interest within the land itself. Indeed development would provide the opportunity to provide biodiversity enhancements.

iii. Environmental Issues

The HS2 link would not restrict the development of the site. There is still a substantial area of land which could accommodate development i.e. at least 18.5 hectares.

iv. Site Access & Deliverability

Crest have instructed SK Transport Planning to consider the issue of access and transportation issues. They have concluded that site access can be obtained for the requisite standards to serve a development of up to 800 dwellings. This does not

represent a constraint to development. Furthermore there are no other technical or environmental issues that would prohibit the delivery of the site.

v. Options & Impact

The land at Lodge Farm offers a realistic and deliverable option for residential development at Burton Green.

In view of the above a proper analysis of the key issues reveals that land at Lodge Farm is eminently suitable for residential development. Crest therefore object to the summary of findings in terms of how it affects their site. They would request that a reassessment is undertaken.

Study Area	C14a/b/c
Study Area Description	An area to the southwest of Coventry defined by Burton Green and field boundaries to the west, the A452 Birmingham Road to the south, field boundaries and Crackley Lane to the east. Although this is principally agricultural land with blocks of woodland - the notable feature is a long stretch of inter-war and/or post-war ribbon development through Burton Green and down Red Lane.
Landscape Character	C14 is in the <i>Arden</i> character area and the <i>Arden Parkland</i> character type. A medium scale field system with a number of woods and scattered farms.
Visual Issues	More of the relatively enclosed landscape (topographic variety, woodland, hedges and hedge trees) and the ribbon development also encloses' views from one of the principal routes. Burton Green is on a ridge. Two water towers are prominent.
Historic and Cultural Issues	No data gathered. 'Bockendon Grange' suggests monastic agricultural past. Some ancient woodland. Two moated sites and fish ponds. 'Black Waste' Wood might suggest charcoal or mining (?) Various paths including the Coventry Way long distance path along the old rail line (former Berkswell-Kenilworth line).
Ecological Features	Woodland (including wet woodland); watercourses; hedges and hedge trees; permanent pasture, field ponds.
Landscape Condition	Some decline in field pattern due to modern arable - but generally the impression is that green belt policy has arrested the urban sprawl and current farming practice is retaining existing hedges and trees.
Conclusion / Recommendation	Another strategically important section of the Green Belt located between Coventry and Kenilworth - and due to earlier ribbon development one of the narrowest sections of the 'gap'. Our recommendation is to retain all of C14 within the Green Belt. However there may be some opportunities for minor infill and widening of the Burton Green settlement footprint (near the centre of the village ?) as long as it doesn't extend the ribbon development. Consider for further detailed study.
Score for Landscape Value	C14a - 3 (High Value) C14b - 3 (High Value) C14c - 3 (High Value)

Study Area Reference	C13c
Primary Constraints	Parcel C13c contains Tocil Wood which is an Ancient Woodland and part of the Finham Brook which in this location falls predominantly within Flood Zone 3a indicating a high probability of flooding.
Secondary Constraints	Parcel C13c contains Tocil Wood which is a Site of Important Nature Conservation and a Regionally Important Geological Site. It has the A45 on its northern border and the parcel is a Green Wedge.
Existing Developments and Permissions	There are no known existing or proposed developments within parcel C13c.
Landscape Value Study	This parcel is considered to be a green corridor within the urban structure of the southwest of Coventry and forms part of the Canley Brook Corridor. Management initiatives are apparent and it is considered that the parcel provides an important recreational and conservation resource within the urban area as well as river and flood management opportunities.
Connectivity	Parcel C13c is directly connected to the urban area.

Study Area Reference	C14c
Primary Constraints	Parcel C14c contains Black Waste Wood which is an Ancient Woodlands.
Secondary Constraints	Parcel C14c contains a main footpath and it borders a Green Wedge.
Existing Developments and Permissions	Parcel C14c contains more modern (inter/post war) residential ribbon development towards Burton Green.
Landscape Value Study	<p>The Countryside Agency's Character of England Map identifies that this parcel is located within the Arden Landscape Character Area. This is an area of former wood pasture and ancient farmlands which lies on the eastern side of the Birmingham plateau. Although there are few dramatic physical features, the Arden countryside is considered to have a historic character. The natural vegetation of Arden is thought to have consisted of dense broadleaved woodland, dominated by oak. Woodland clearance, from earliest times, resulted in the development of grassland and wood pasture over much of the area. Within the Warwickshire Design Guidelines, it is further identified that the landscape character type is Arden Parklands which is described as typically showcasing an enclosed, gently rolling landscape defined by woodland edges, parkland and belts of trees.</p> <p>The Landscape Study identifies that this is predominantly an agricultural landscape but with inter-war and/or post-war ribbon development. It is a generally enclosed landscape which the ribbon development contributes to. There is some decline in field pattern due to modern farming techniques but many hedges and trees have been retained.</p>
Connectivity	Parcel C14c is directly connected to the urban area.

COVENTRY

Least Constrained Parcels

LEGEND

■ - Least Constrained Parcels

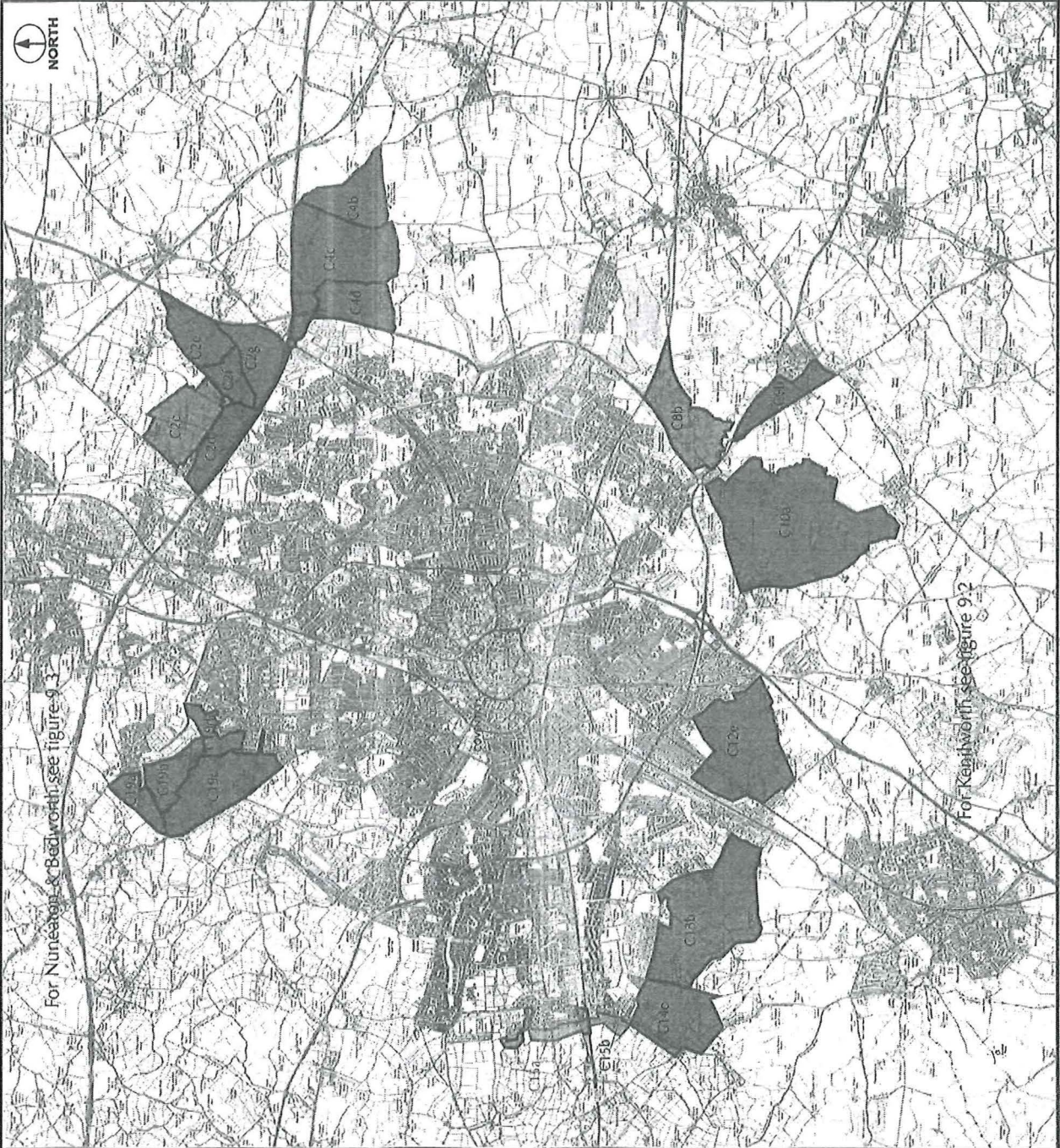


Figure 9.1

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Part C - Commenting on the Indicative Settlement Boundaries

If you are commenting on multiple sections of the document, you will need to complete a separate sheet for each representation

Sheet of

Which settlement are you responding to?

What is the nature of your representation?

Support

Object

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4. **Burton Green**

Crest object to the identification of land at Burton Hill Nursery as the preferred housing site. It would appear that the justification for this site is to better connect the village. However it is unclear how this will be achieved with the proposed HS2 railway line running to the north of this site and thus segregating the settlement. In such circumstances the justification for this allocation is flawed.

It is noted that the Crest site was discounted due to high landscape impact concerns and potential access difficulties (i.e. Appendix 6 Site Appraisal Matrix). Both of these objections are incorrect. As stated in previous representations: - (see Summary of Findings)

- i. Access can be achieved to the requisite standard to service the site. Furthermore the County Council previously assessed the potential traffic impact in their Traffic Flow Model System. That work concluded that there would be no problems in terms of traffic impact from a residential development of 880 dwellings.
- ii. With regards landscape impact the SHLAA concluded that with satisfactory mitigation the site could be developed with no adverse impacts.

Crest therefore strongly object to the conclusions reached in respect of their land at Lodge Farm which are incorrect and do not take into account the actual evidence. In the circumstances it is recommended that the Council reassess the site options for Burton Green and identify land at Lodge Farm for residential development.