

Warwick District Local Plan Proposed Modifications 2016**Supporting Statement to Accompany Response to Proposed Modifications Refs.
Mod 6, 7, 8, 10, 11, 16 and 19****On behalf of Kler Group**

This statement is prepared on behalf of Kler Group who have interests in land at and to the rear of Peeping Tom Public House, Cromwell Lane, Burton Green (SHLAA Ref. R91). Detailed representations with accompanying evidence were submitted to the Warwick District Local Plan Publication Draft in June 2015 and subsequently we appeared at the Initial Examination Hearing for Matter 3.

This statement provides a composite response in relation to the following **Proposed Modifications: Ref. Mods 6, 7, 8, 10, 11, 16 and 19.**

Background

- 1.1 In the context of Burton Green being identified as a Growth Village in the emerging Local Plan, a draft allocation at Burrow Hill Nursery (Site Ref. H24) for up to 60 dwellings has been identified.
- 1.2 Burton Green is affected by the proposed HS2 as the confirmed route passes through the south of the village with works comprising a 'cut and cover tunnel'. Construction works within Burton Green are programmed to commence in 2018 and continue until completion in 2024. During this period, significant traffic, noise and air quality issues have been identified by the HS2 Environmental Statement (HS2ES).
- 1.3 We consider that the impacts arising from the construction of HS2 on the Burrow Hill Nursery site indicate it is unlikely that this site will come forward before the construction of HS2 is complete, as is acknowledged by the SHLAA (Ref. R90). The Council's Plan includes no flexibility for the delivery of housing within Burton Green should the completion of HS2 be delayed to the end of, or even beyond the end of the Plan period in 2029. The Local Plan also fails to consider the impacts HS2 will have, once completed, on the deliverability of this site including noise and vibration as detailed within the HS2ES.

- 1.4 Furthermore, we have highlighted that the Plan does not take account of the likely loss of and abandonment of homes as a result of HS2 in Burton Green. We have estimated that around 55 dwellings most affected by the works could be vacated, as assisted by blight related schemes by the Secretary of State for Transport to buy their property prior to the construction of HS2. There are about 263 homes in the village, so a loss of 55 dwellings represents a decrease of **20.91%** of housing stock in the village.
- 1.5 To address the above circumstances, we have maintained that the Council should allocate further land within the village for residential development. In particular a further site or sites should be allocated within Burton Green to address the significant loss of dwellings amounting to 20.91% of the village's housing stock. As a minimum, these sites should be deliverable and achievable within the first 5 years of the Plan's adoption to address this net loss of dwellings in the short term and provide an alternative location for local residents vacating their properties in Burton Green to live, away from the southern part of the village where the impacts of the HS2 construction works will be most significant.
- 1.6 The site at and to the rear of the Peeping Tom Public House in Burton Green (SHLAA Ref: R91), which has been promoted through the Local Plan process, would be a suitable site for release from the Green Belt to accommodate some of the village's housing needs. The site is isolated from the HS2 route, both during the construction phase and once operational, and is in a sustainable location, being centrally located and well connected to the rest of the village, it is within walking distance of both a bus stop with an hourly service, Tile Hill Railway Station and employment opportunities at Westwood Heath and Warwick University.
- 1.7 Evidence has previously submitted to the Council to demonstrate its suitability for development, including a detailed Green Belt and Landscape and Visual Impact Report and Concept Master Plan. Agreement has been reached in principle with adjacent landowners to secure a vehicular access to the site. The site is therefore considered to be available, suitable and achievable, and as such capable of being delivered within the first 5 years of the Plan period.

Further Information

- 2.1 As part of the Proposed Modifications to the Warwick Local Plan, the current draft allocation at Burrow Hill Nursery Site Ref. H24 is proposed to be increased in capacity by 30 dwellings. Whilst this acknowledges the sustainability of the settlement to accommodate a greater level of housing, this does not respond to our previous concerns regarding the impact of the HS2 construction works on the displacement of local residents, the delay in delivering new housing at Burrow Hill Nursery until the HS2 works have been completed and the resultant lack of short term, deliverable alternatives to help meet the needs of local residents elsewhere within the village.
- 2.2 The Coventry Local Plan – Publication Draft 2016 as submitted for Examination has identified land for release from the Green Belt directly north and immediately adjacent to our client’s land west of Cromwell Lane. The draft allocation, Site Ref. H2:8 is for a total of 240 dwellings on a greenfield site, with proposals to create a new woodland area along its western boundary to create a new defensible boundary to the Green Belt. The SHLAA 2016 indicates that the site is unlikely to deliver housing until 2020/2021 at the earliest and will be subject to the Examination process in due course, so is therefore unlikely to provide a timely alternative location for Burton Green residents displaced by the HS2 works. However, this further demonstrates the suitability of our client’s land for release from the Green Belt, subject to similar landscape treatment along its western boundary to supplement existing vegetation, as detailed within previous Concept Master Plans issued to the Council.
- 2.3 As part of the Proposed Modifications to the Warwick Local Plan, a new allocation Site Ref. H42 is proposed on land at Westwood Heath, a short distance to the east of our client’s land. The proposal involves the release of some 36 hectares of Green Belt land for 425 dwellings, alongside a range of new community facilities – additional land further to the east is also safeguarded for longer term development. Again, housing is unlikely to be delivered until 2019/20 at the earliest and is in any case separate from the confines of Burton Green, but it is of relevance having been considered suitable for release in Green Belt terms in a similar location, albeit of a significantly greater scale, to our client’s site. Furthermore, alongside the services and facilities within Burton Green and elsewhere within close proximity to the site, the additional community facilities proposed at Westwood Heath have the potential to further improve the general sustainability credentials of the area, which would be of benefit to the future residents at our client’s site later in the Plan period.

Why the Proposed Modifications are considered to be Unsound

- 3.1 For the reasons detailed above, we consider that additional land should be released from the Green Belt at land at and to the rear of the Peeping Tom Public House, Cromwell Lane, Burton Green and allocated for residential purposes.
- 3.2 The Plan, as amended by the Proposed Modifications, is not considered to adequately address the issues raised and as such, we maintain the Plan to be unsound in that it is not positively prepared, justified, effective or consistent with national policy.

What Changes are proposed to make the Plan Sound

- 4.1 The following changes are sought to make the Plan Sound:
- **Mod 6** – amend Policy DS7 to increase the figure under ‘Sites allocated in this Plan’ by 30 dwellings to 9,399 and amend Total to 17,607
 - **Mod 7** – amend paragraph 2.21 to revise the figure quoted to 9,399
 - **Mod 8** – amend Policy DS10 by increasing the figure under ‘Sites within Growth Villages and the rural area’ to 1,176 and Total to 9,399
 - **Mod 10** – Amend Policy DS11 to include reference to land at Cromwell Lane, Burton Green
 - **Mod 11** – Amend accordingly as above
 - **Mod 16** – Amend paragraph 2.81 to include land at Cromwell Lane, Burton Green as land removed from the Green Belt
 - **Mod 19** – Amend the Policies Map to identify land at Cromwell Lane, Burton Green

Why is it considered necessary to attend the Oral Examination

- 5.1 We consider it is necessary to attend the oral examination in order to present the detailed proposals and justification for the release of our client’s land from the Green Belt and its allocation for housing, as well as respond to any questions from the Inspector and/or Council that may arise.