

## **Burton Green Parish Council**

### **Submission of Evidence for the re-inclusion of Safeguarded Land within the Green Belt as part of the new South Warwickshire Local Plan**

#### **SUMMARY**

Burton Green Parish Council proposes that land currently designated as Safeguarded Land – shown on the map in Section 2.1 below – is returned to Green Belt, for the following reasons:

1. The decision to remove the safeguarded land from Green Belt was based on false assumptions about population growth in Coventry, used to form the current Local Plan and these errors have since been acknowledged. The development of a new Local Plan for South Warwickshire provides an opportunity to at least partially remedy this mistake.
2. The Green Belt, which serves to protect communities like Burton Green and Kenilworth from the continued expansion of Coventry, has been substantially eroded in the current Local Plan, with large development sites identified at Westwood Heath and Kings Hill. Retaining what is left of the Green Belt is therefore even more important. This proposal contains a local assessment of how the Safeguarded Land contributes to the five specified purposes of the Green Belt.
3. The Call for Sites consultation by WDC indicates an ambition for even more residential development south of Coventry. The safeguarded land provides an important barrier to the continued urbanization of the gap between south Coventry and Burton Green / Kenilworth
4. Warwickshire County Council (WCC) has previously indicated that the safeguarded land could not be developed without significant additional infrastructure spending, for which it has no business case or funding.
5. The safeguarded land is mostly good quality agricultural land, as assessed using the Agricultural Land Classification (ALC) method. Where development is required, priority should be given to developing lower grade land, which will have less impact on reducing local food production.
6. The safeguarded land contains the BG allotments and sports field, local amenities which are potentially at risk if the safeguarded land is designated for housing in the new Local Plan.

November 2024

## 1.0 Introduction

Burton Green Parish Council formally requests that the safeguarded land, previously set aside in the current Local Plan for residential development, is reinstated into the Green Belt.

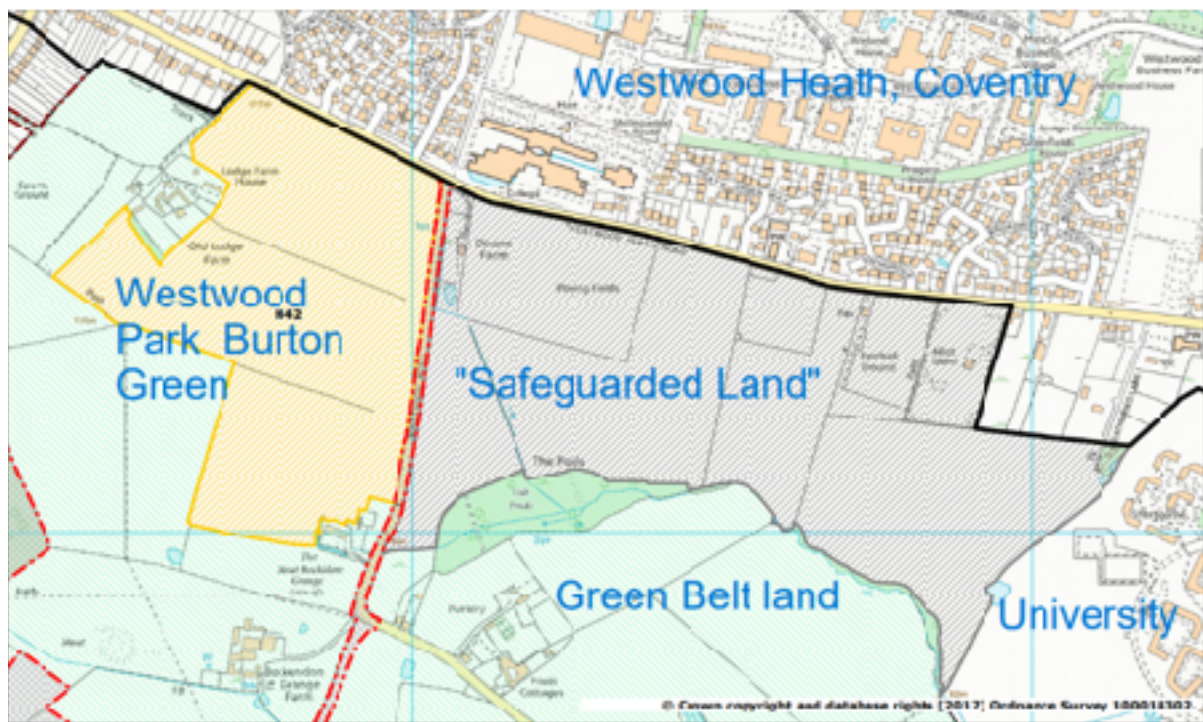
Any changes to Green Belt boundaries can only be considered through a Local Plan review, which is timely in the context of the development of the South Warwickshire Local Plan, a new Local Plan which includes the parish of Burton Green and which is scheduled to be adopted from January 2028.

This report outlines the evidence and arguments supporting our position.

## 2.0 Background

### 2.1 Current Designation

The extent of the safeguarded land is shown on Adopted Local Plan Map 33 – Westwood Heath – which can be found here: [https://www.warwickdc.gov.uk/downloads/file/4578/33\\_westwood\\_heath](https://www.warwickdc.gov.uk/downloads/file/4578/33_westwood_heath). You will see that allotment gardens for Burton Green are shown within the area of safeguarded land. The policy relating to safeguarded land is Policy DS21 and can be found on page 34 of the [adopted Warwick District Local Plan](#).



For additional context, the adopted Coventry City Council Local Plan also identifies areas of safeguarded land, some of which are within the vicinity of Westwood Heath Road. This is addressed in further detail on pages 87-88 of the [Local Plan](#) (adopted Dec 2017) and their [supporting policies map](#).

In the event that WDC does not propose to develop the safeguarded land, our understanding is that the safeguarded land in Coventry, to the South of Westwood Heath Road, would also revert to Green Belt, thereby providing a defensible boundary to curb future development.

Land along the southern boundary of Coventry is therefore designated as safeguarded land for consideration as part of the next Local Plan review i.e. the SWLP. It was previously established that this will have regard to explicit development proposals within Warwick District that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' and therefore render the Green Belt policy designations in these areas inappropriate.

In this context, the safeguarded land sites (the other site being land south of Westwood Heath Road, within the boundary of Coventry City Council – see Policy GB2 p87) are safeguarded in so far as their long-term designation as Green Belt is dependent upon the development of adjoining land in a neighbouring local authority. As already highlighted, the sites themselves are largely utilised for a small number of low-density homes, education provisions or undevelopable due to the presence of ancient woodlands. Should such development proposals not materialise within Warwick District however, it is intended that these sites should be considered for a formal return to the Green Belt due to the issues raised above.

## **2.2 Burton Green Neighbourhood Plan**

The Burton Green Neighbourhood Plan (BGNP) was made by Warwick District Council in 2022. The BGNP identifies 2 village facilities on this safeguarded land to which the Policy BG9 refers. The Village Character appraisal (para 3.1.2) emphasises the importance of the Green Belt to the Burton Green community.

In supporting the development of the new SWLP and preparing a Preferred Option, we are making the case that the Safeguarded Land, north of Bockendon Road and close to the border with South Coventry, should be returned to Green Belt, as part of a coherent response to growth needs and spatial development strategy.

## **2.3 Historical Context**

The current Warwick District Local Plan 2011-2029 was adopted in 2017 following a rigorous process, including an Examination in Public led by an independent Inspector.

Concerns have been raised by Council for the Protection of Rural England (CPRE) and others about the accuracy of the housing forecasts for Coventry and the knock-on implication for the number of 'overspill' houses Warwick District has been required to meet. It has subsequently been acknowledged by the Office of National Statistics (ONS) that errors were made, resulting in a significant over-projection of about 34,000 people. This resulted in the "over-supply" of land required to provide housing for this number of people.

As a result of the miscalculations, land between Kenilworth and South Coventry was taken out of Green Belt. Some of this was allocated for residential development (e.g. Westwood Park, Kingshill) and some land was set aside – “Safeguarded” – for potential residential development, should it be required.

Warnings that the numbers were mistaken were ignored in 2017 by officers preparing the new Local Plan and the Inspector at the public examination, but then confirmed by the 2021 Census.

Further evidence is included as Appendix a

### **3.0 Strategic Importance of Green Belt**

Land designated as Green Belt serves five purposes, as outlined in the National Planning Policy Framework (NPPF):

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns from merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

In the current Local Plan, Green Belt designated land that protected Burton Green from the unrestricted urban sprawl from South Coventry was removed from the Green Belt and either designated for housing development (E.g. Westwood Park) or “safeguarded” for possible future development. Since then, Planning approval has been granted for 425 houses at Westwood Park and 2500 new homes at the Kingshill site. These decisions substantially reduced the Green Belt, narrowing the protective gap it affords between Burton Green/ Kenilworth and South Coventry. Whilst Westwood Park is technically within Warwickshire (WDC), the development is marketed as a development of Westwood Heath (the other side of Westwood Heath Road) which is South Coventry and the houses have Coventry postcodes. Access to local services– schools, medical facilities, leisure facilities - from Westwood Park requires driving a short distance into Coventry.

Currently the Safeguarded Land provides a barrier to prevent development between South Coventry and Burton Green. If the safeguarded land were to be developed there would be continuous development south of Westwood Heath Road all the way from Coventry to the Burton Green boundary. Burton Green would become attached to Coventry through urbanisation. Hence it is our view that it is critical that the land is returned to Green Belt, to prevent such urban sprawl, the merger of Burton Green into Coventry and to offer some balance, through countryside, to the extensive local urbanisation that is occurring through the current Local Plan.

There is also an opportunity to strengthen the remaining Green Belt by taking opportunities to reconnect ancient woodlands in the area, on remaining Green Belt land, thereby

reinforcing the Green Belt and safeguarding the countryside from further encroachment. This approach would be further undermined by the provision of even more housing on the safeguarded land.

Further consideration is included as Appendix 2.

## **4.0 Local Impact Analysis**

### **4.1 Environmental Impact**

The land is currently mostly agricultural land with some Ancient Woodland and bordered by the local road network. The University of Warwick has consulted on a Master Plan for redevelopment of its site, which borders the safeguarded land and which includes the longer term development of an Eco Park on this adjacent land.

### **4.2 Landscape and Visual Impact**

The safeguarded land is predominantly categorized as Grade 2 agricultural land. This classification is part of the Agricultural Land Classification (ALC) system used in the UK, where Grade 2 indicates good quality agricultural land with minor limitations that affect crop yield. This is evidenced in research commissioned by WDC from Arup (“Assessment of Carbon Sequestration and Habitat baseline and opportunities” – e.g. Figure 17, 6 March 2024).

The physical limitations of land have four main effects on the way land is farmed. These are:

- the range of crops which can be grown;
- the level of yield;
- the consistency of yield; and
- the cost of obtaining the crop.

The ALC gives a high grading (Grades 1, 2 and 3a) to land which allows more flexibility in the range of crops that can be grown (its 'versatility') and which requires lower inputs, but also takes into account ability to produce consistently high yields of a narrower range of crops. This is sometimes termed as the “best and most versatile (BMV)” agricultural land.

It is currently the policy of the NPPF (reference Annex 2) that development of Grade 1, Grade 2 and Grade 3a agricultural land should be avoided. Where development is required (e.g. to meet housing needs) priority should be given to developing Grade 3b, 4 or 5 agricultural land.

### **4.3 Community Well-being**

The Safeguarded Land provides local amenity in the form of allotments and a local football pitch. For historic reasons, the Burton Green allotments are managed by the Coventry

Allotments association, although the land sits within the Burton Green (WDC) parish boundary.

The value of the safeguarded land could be further enhanced, whilst retaining a focus on agriculture, through an element of reforestation, part of a local aspiration to reconnect ancient woodland. A proposal has been discussed within the Parish Council (“Reconnecting Ancient Woodland”), which highlights the benefits of improving biodiversity and creating some improved local amenity (walkways, cycle routes), primarily for the benefit of students (as the safeguarded land borders the University of Warwick and its proposed Eco Park) and future residents of the Westwood Park and Kingshill developments. It could also serve to reinforce Green Belt delineation (with harder boundaries) and help to rebalance the impact of extensive urbanisation on the local community.

## **5.0 Planning Considerations**

### **5.1 Sustainable Development**

Re-designating the Safeguarded Land as Green Belt would enable more sustainable development in adjacent areas, by retaining local amenities (otherwise to be lost to housing) and retaining a rural environment separating the City of Coventry from Burton Green Parish.

The utility of the Green Belt land could be further enhanced by restoring some (or all) of it to woodland, providing additional local amenity through e.g. woodland trails, cycleways, enhanced connectivity to residential sites to the South (Westwood Park) and University of Warwick (with a potential Eco Park adjacent to the land) to the North and East. This alternative would rapidly increase local biodiversity, improve carbon sequestration and serve to offset the considerable environmental impact likely to result from 4500 new homes planned on nearby residential land.

Conversely, proposals for the development of Westwood Park and Kingshill contain very little local amenity and future residents of these “edge of town” developments will be largely dependent upon travel by car to access most local services. Further extension of this housing model of intensive urbanisation without provision of balancing infrastructure and public amenity is not sustainable.

### **5.2 Alternative Development Sites**

We argue that the Green Belt designation (as to be defined in the SWLP) should endure beyond the Plan period and that defensible boundaries are maintained. The land in question has previously been considered unsuitable for removal from the Green Belt due to the inability to create defensible boundaries that would endure beyond the plan period.

It has also been considered inappropriate (and no longer needed) for residential development as a result of (1) a lack of infrastructure and (2) the population demand forecasts being shown to be in error (Appendix 1 refers)

The 2017 Local Plan already allows for 4,500 homes at Kings Hill, none of which has yet been built and, indeed, the deadline for reserved matters for the first 2,500 to be given outline approval in December 2019 was set at 15 years, not the usual three years. So 4,500 homes are already planned to meet future requirements into the 2030s in the area north of Kenilworth/south of Coventry.

This is in addition to development of 450 new homes at Westwood Park (129 homes in Phase 1 nearing completion), adjacent to the safeguarded Land in question. This provides more than ample new housing to meet the housing needs of local people and those living in Coventry wanting to “move out locally” into nearby Warwickshire.

These two sites above - Kingshill and Westwood Park - have previously been considered as better sites for residential development and have already obtained Outline Planning Consent. We argue that the development of these sites now require mitigation through redesignation of the Safeguarded land as Green Belt in line with the Green Belt purposes 1-3 described above in paragraph 3.0 i.e. protecting the communities of Burton Green and Kenilworth from further encroachment from South Coventry, thereby retaining the separate identities of these communities as more than simply suburbs of South Coventry.

There may be future development options within Warwick District, although given the nature of the areas involved and its location on the border with Coventry, the retention and delivery of infrastructure, most notably for highways, education or green spaces is likely to be the main focus. This reflects the existing nature of these sites which largely comprise existing low-density homes, existing education provisions or ancient woodland.

### **5.3 Infrastructure and Services**

Very little infrastructure has been planned to support the 2 developments noted above comprising up to 5000 new homes. A convenience store is planned at Westwood Park and Kingshill includes plans for a new Primary School.

There is a significant concern about the adequacy of infrastructure to support housing development on the Safeguarded land. It is certainly unlikely that the present roads (Gibbet Hill Road, Westwood Heath Road, Bockendon Road and Crackley Lane) could cope with the demands from, say, another 750-900 homes. The current proposal for an A46 link road was rejected due to an inadequate business case. We doubt that housing developers would be prepared to fund such a road when, currently, there is no business case for WCC to put before the DfT. The University of Warwick has assumed in its current master Plan that this road will not be built. As an alternative, the University of Warwick has proposed a new light railway to its campus with a primary focus is on connecting the University with Coventry city centre and railway station. Proposals for a park-and-ride railway station at Crackley, between Kenilworth and Coventry, which could have served Warwick University, were not adopted in the recent West Midlands Rail Executive’s future plans (a new station at Binley/Willenhall being preferred instead).

Also, more innovative community design might also reduce the need for new road infrastructure. Modern planning principles support the notion of a 20-minute neighbourhood to reduce car use and limit infrastructure requirements. However, given very little infrastructure within existing housing developments e.g. Westwood Park and Westwood Heath, there may need to be a much more substantial investment in schooling and other neighbourhood facilities, e.g. shops, surgery, etc. required to develop the Safeguarded land into a 20-minute neighbourhood.

## **6.0 Policy and Legal Framework**

### **6.1 National and Local Policies**

This Government consultation on revisions to the NPPF is aimed at achieving sustainable growth in the planning system. Many of the proposals appear to us relevant and helpful in achieving this goal e.g.

1. Reverse changes to the NPPF made in December 2023 which were considered by the new Government to be detrimental to housing supply.
2. A renewed commitment to deliver 1.5 million new homes in this term of parliament.
3. Identify 'grey belt' land within the Green Belt, to be brought forward into the planning system through both plan and decision-making to meet development needs. This implies de-classifying some Green Belt land where it is already "brownfield" or does not sufficiently serve the stated purposes of Green Belt.
4. Deliver affordable, well-designed homes, with new 'golden rules' for land released in the Green Belt to ensure it delivers in the public interest.
5. Deliver community needs to support society and the creation of healthy places.
6. Support clean energy and the environment, including through support for onshore wind and renewables

However, this proposal, regarding the Safeguarded land, forms an anomaly and sits outside new government guidance. Our proposal seeks to remedy a previous mistake (widely acknowledged) in the earlier calculation of the need for housing land.

Furthermore, based on work undertaken recently by WDC/SDC as part of the South Warwickshire Local Plan, in reviewing the usefulness of Green Belt, we would argue that this particularly parcel of land (the Safeguarded Land) has a high value in terms of its usefulness as part of the Green Belt and so should be restored to that designation. This is entirely consistent with the intention under point 5 above to declassify some Green Belt land that does not perform a useful function. See again Section 3.0 above and Appendix 1.

WDC and SDC will be jointly consulting upon a Preferred Option, to be further developed and then adopted by January 2028 to replace the current Local Plan. A Public Consultation on the Preferred Option is planned for nearly 2026. It is not often that occasions present when (rare) mistakes like this can be corrected, but the development of the SWLP provides such an opportunity and we do not believe that this is in any way contradictory to the current thrust of government policy towards the Green Belt, or the more local aims contained within the SWLP.



## **7.0 Conclusion**

Based upon the evidence and arguments presented, we strongly urge Warwick District Council and the South Warwickshire Local Plan Team to re-designate the Safeguarded Land as Green Belt. This proposal should be added as an amendment to the Preferred Option that forms the current basis of consultation by WDC. We believe that this change is essential to preserving the environmental, social, and economic well-being of our community.

## **Appendices**

1. Mistaken assessment of population growth
2. Green Belt Review analysis
3. Public Consultation Results (to follow)
4. Supporting Letters and Endorsements (to follow)

## Appendix 1 – Mistaken calculation of population growth

### Summary

The current Local Plan is based on mistaken population forecasts provided by the Office of National Statistics (ONS). The Coventry population was forecast to grow from 316,900 people in 2011 to 379,400 people by 2021. This large increase of 20% growth over 10 years could not be met from within Coventry itself, so land was required beyond its borders, into Warwickshire. As a contribution, land was taken out of the Green Belt between Burton Green / Kenilworth and allocated to meet this overspill housing need. A parcel of this land was to be held in reserve – “safeguarded” – for future use once other parcels (e.g. Westwood Park, Kingshill) had been developed and subject to further review of suitability e.g. infrastructure requirements.

Subsequently it became clear that the ONS population forecasts were inaccurate. Arguments based on a range of empirical evidence were made at the time, indicating that the actual growth in population was much less than forecast. However, these objections were put aside and the Planning Authorities continued to use the ONS projections. This is how the parcel of land east of Bockenden Road and south of Westwood heath road was taken out of Green Belt and became “safeguarded” (for future development).

Following the 2021 census the scale of error became clear, as Coventry had actually only grown from 316,900 people to 345,300 people (9%). Therefore, the Local Plans based on ONS data had over-provided for approximately 34,100 people, making new land available for around 14,800 homes that were not required to meet local needs. This includes the sites at Kingshill and Westwood Park.

The table below provides a summary of the scale of the miscalculation:

<b>Projected and actual population estimates for Coventry</b>				
2011 - 2021				
source: ONS				
	<u>Projection</u>	<u>Actual</u>	<u>Difference</u>	<u>Housing requirement (1)</u>
Coventry 2011	316900	316900		
Coventry 2021	379400	345300		
Growth of Coventry	62500	28400	-34100	-14826
As a %	20%	9%	-11%	
(1) - estimated over-provision of housing land, based on an average size of 2.3 people per household.				

Further detail is provided below in an extract from the SWLP HEDNA, which forms the basis for calculating need in the development of the new SWLP, including evidence provided by the Campaign for the Protection of Rural England (CPRE) and further references including the Office for Statistics Regulation (OSR).

## Extract from the Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) – Icenl Consultants - Final Report 2022

5.39 On the 13th November 2020, Sir Andrew Watson (Chair of CPRE Warwickshire) and others wrote to Ed Humpherson (Director General for Regulation at the Office for Statistics Regulation (OSR)) and Sir David Norgrove on the topic of ‘population projections and mid-year population estimates for Coventry’. In the correspondence it was requested that the United Kingdom Statistics Authority (UKSA) conduct a review of population estimates and projections for Coventry as it was believed that figures had been greatly inflated for Coventry with impacts on planning policy development and decisions being made on the back of bad data.

5.40 In particular, and relevant to the HEDNA, it was stated by CPRE that *“projections and associated household projections are used as the basis for forward planning by all local planning authorities, the very high figures for Coventry have led that authority and neighbouring Warwickshire authorities to over-allocate land for housing in their local plans. This has resulted in major incursions into the countryside, both in Coventry itself and in those parts of Warwickshire immediately surrounding it. Large amounts of the historic Forest of Arden – precious for history, biodiversity, landscape, heritage, flood control, recreation and providing the green lungs of a crowded urban area – have been removed from green belt in and around Coventry and allocated to unnecessary housing. It is a case of bad data leading to bad decisions.”*

5.41 The correspondence suggests when “a very wide range of administrative data for Coventry is examined, it fails to show any sign of exceptional growth in the City. All the vital signs of the town – births, deaths, voters, cars registered, pensioners, school admissions, houses built, benefits claimed, A&E attendances, gas and electricity used, and domestic waste produced are completely average for the region”. A copy of correspondence setting out some of the CPRE analysis can be found in a letter dated 13th November 2020.

5.42 Mr Humpherson first replied to Mr [Sir Andrew] Watson in December 2020, noting “in light of the matters raised within your letter we have decided to undertake a review of the population projections and population estimates produced by the Office for National Statistics (ONS) and how they are used”. This was followed up with the publication of a document “Review of population estimates and projections produced by the Office for National Statistics” on the 10th May 2021.

5.43 That concluded that estimating population is not straightforward and figures are challenging to produce. It was recognised that projections use past estimates and that such data is important in policy making. It was also suggested that ONS takes a sensible approach to population estimates but that they may miss the ‘bigger picture’ of what the population data informs; it was suggested that ONS should be more open to reflecting any local challenges highlighted and that any feedback should be used to help sense check the official figures. Overall it was concluded that ONS should a) improve methods; b) enhance communication; and c) embrace challenge. The OSR asked for ONS to report back with its plans for addressing the findings in July 2021.

5.44 On the 29th July, ONS published its response setting out a work plan to address the OSR recommendations. ONS recognised that there were concerns about population estimates and projections (specifically mentioning Coventry) and that this can have an impact on household projections and therefore calculations of housing need. **It is notable that both ONS and the OSR have acknowledged issues with the population estimates for Coventry and its impact on the City's calculated housing need.**

**Relevant on-line references:**

- <https://www.cprewarwickshire.org.uk/local-planning-matters/coventry-city-council/coventry-news/>
- <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrovepopulation-projections-and-mid-year-population-estimates-for-coventry/>
- <https://osr.statisticsauthority.gov.uk/publication/review-of-population-estimates-and-projections-produced-by-the-officefor-national-statistics/>

## **Appendix 2 - Green Belt Considerations**

There are 5 specific purposes to the Green Belt and we have considered the Safeguarded Land against each of these purposes:

### **Purpose 1 – to check the unrestricted sprawl of large built-up areas**

The Safeguarded land is defined as a separate parcel of land bordered by Westwood Heath Road (to the North) with the large built-up area of Coventry along its northern boundary, and Bockenden road (a single-track lane) to the West, separating it from new housing at Westwood Park. To the South and East lies agricultural land (Warwick District Green Belt) and open space around Warwick University's halls of residence within Coventry. Note that the University halls of residence adjacent to the safeguarded land are also in Burton Green parish.

There is no evidence of existing sprawl within the parcel, which consists of agricultural land, allotments and recreational fields, and it is considered to be open.

The Safeguarded land has clearly defensible boundaries to the North and West, however it is only separated from wider areas of Green Belt (Termed "Cov 1" in WDC's recent Green Belt Review) by a small, wooded area and established hedgerows.

Overall, the parcel makes a strong contribution to checking unrestricted sprawl.

### **Purpose 2 – to prevent neighbouring towns or districts from merging into each other**

The parcel is located in a gap between the defined neighbouring towns of Coventry and Burton Green. This gap was approximately halved as a result of the decision to make land available for housing at Westwood Park (immediately to the west of the Safeguarded land).

The remaining Green Belt is therefore vital to prevent further urbanisation linking Coventry to Westwood Park (Burton Green). Overall, the parcel makes a strong contribution to preventing neighbourhood towns from merging.

### **Purpose 3 – to assist in safeguarding the countryside from encroachment**

The existing land use consists of open countryside and agricultural land. There is a recreational field and community allotments within the north western section of the parcel.

The Safeguarded Land has little built form. There are open views from the allotments across the parcel looking East and North, the Safeguarded Land therefore has a strong degree of openness.

The boundary to the South and East is primarily tree belts and hedgerows, with the southern border defined by the single-track Bockenden Road, Therefore, it is well connected to the countryside along its eastern and southern boundaries. It is not directly impacted by HS2.

There are defensible boundaries at Westwood Heath Road (North) and at Bockenden Road (west), with the East bordering open space at Warwick University and the South adjacent to agricultural land and a semi- defensible boundary consisting of some woodland, and established hedgerow adjacent to the green Belt parcel labelled COV 1 (WDC Green Belt review)

Overall, the Safeguarded Land makes a strong contribution to safeguarding the countryside from encroachment.

#### **Purpose 4 – to preserve the setting and character of historic towns**

The parcel is adjacent to the defined historic town of Coventry. To the West, the land is within a short distance of Westwood Park, Burton Green recently given planning permission for the development of 425 new homes.

If the Safeguarded Land becomes allocated for residential housing (or other development) it would directly compromise the separate identities that exist between Coventry and Burton Green.

The further development of land at Westwood Heath has much narrowed the remaining Green Belt between South Coventry and Kenilworth / Burton Green. If further development takes place, as seems likely and the Safeguarded Land is made available for housing or industry, the remaining Green Belt will be much reduced with Westwood Heath (Burton Green) becoming attached to South Coventry.

Therefore, we believe that the Safeguarded land makes a strong contribution to preserving the setting and character of Burton Green village from encroachment from South Coventry.

#### **Purpose 5 – to assist in urban regeneration and recycling of urban land**

This does not apply, as the Safeguarded land is essentially rural in character.