

## APPENDIX A

### THE RESPONSE OF THE BURTON GREEN PARISH COUNCIL TO THE AMENDED WARWICK DISTRICT LOCAL PLAN

Dear Inspector,

I am writing to you on behalf of the Burton Green Parish Council in response to the Amended Local Plan and in particular to the proposed development of 425 houses at Westwood Heath.

#### INTRODUCTION

I begin with a description of the main features of Burton Green and some of the problems we face, especially that of increased traffic on our roads.

I will endeavour to ascertain whether the proposal is legally compliant and whether it is in accord with the present Government's policy towards Green Belt and the National Planning Policy Framework. (NPPF) The subject of legal compliance is not always clear cut and is often a matter for the courts to determine but it does seem that the development at Westwood Heath rests uneasily with national policy and is at odds with the principles enshrined in the NPPF.

Thirdly, and perhaps more importantly, I question whether the development is sound and whether all the infrastructure implications have been addressed, especially in relation to sustainable transport. I will argue that the figure of 425 houses is not properly evidence based and that other information is needed for this proposal to go forward.

Finally I will examine other concerns we have about this proposal and the changes made to the original development at Burrow Hill Nursery.

#### BURTON GREEN

The village of Burton Green is a ribbon development which covers a wide area, including parts of Crackley but the parish boundaries have now been extended to include the ward of the University. Burton Green is a community of 387 houses, lying in a semi-rural, elevated position between Coventry and Kenilworth. Surrounded by Green Belt, the village benefits from open views across the countryside including ancient woods and hedgerows. Westwood Heath is an essential part of the landscape. It sits in the Crackley Gap and separates Burton Green from Coventry. Environmentally it is of a very high value. It is perhaps the most important open space in Burton Green with fantastic views towards the university. It is enjoyed by residents, walkers and even motorists and it provokes a feeling of well-being which will be lost forever if this proposal is accepted. Already Burton Green has been severely impacted by HS2 which goes straight through the heart of the village. Many residents have left because of the proximity to the route and their houses are now rented out by HS2 Ltd. A considerable amount of land has been set aside for the route while our special amenity, the Greenway, is irreparably damaged. Despite these setbacks, the sense of community remains very strong. We have taken on board the projected 30 mobile homes in Red Lane and have supported the development of 80 houses at Burrow Hill Nursery. However we believe that the Westwood development, which is far in excess of our present housing stock, is a step too far and threatens our community sustainability.

In our Parish Plan, Planning for the Future, April 2014, the aspirations and the concerns of our residents were noted. The respondents (at least 75% of households) "rated the openness/views, rural nature, village environment, trees, fields, verges, wildlife and Greenway as the most important

*aspects of the village” and it was considered essential that “people’s views on what is really important to them about BG are reflected in the Neighbourhood Plan.” (Page 8) Sadly this hope has been extinguished by the Revised Local Plan and certainly residents would be shocked and disappointed by the comments in Appendix 6, on the Site Appraisal Matrix, that **“Burton Green has been identified as a growth village with a range of services and facilities.”***

In the Parish Plan, there were concerns about traffic, mainly on speeding and parking, but there was little mention of the volume of traffic on our roads. The situation is very different in 2016 from the time the Steering Group came together in 2012 and produced their report in 2014. Traffic levels are much higher as motorists drive along Cromwell Lane towards Westwood Heath Rd. on the way to the A45 or to the Science Park or to the University etc. I know from personal observation. I live in Cromwell Lane, opposite the water tower about 350 yards from Westwood Heath Rd. Today, Monday, April 11<sup>th</sup>, I did a simple survey of traffic between the hours of 8-25 and 9-25 travelling in the Coventry direction. Between 8-25 and 9-05, there were 361 motorists at an average of 45 motorists every 5 minutes with over 50 motorists in the time slots, 8-25 to 8-30, 8-30 to 8-35 and 9-00 to 9-05. Between 9-05 and 9-25, there were 101 vehicles at an average of 25. During the whole time, only 4 intrepid cyclists braved the traffic.

It may well be that the number of motorists is not that different from previous years but the problem has been compounded by the much higher levels coming from Tile Hill village, many from the new Bannerbrook Estate. Motorists coming from the opposite direction cannot turn right and consequently you can get a huge congestion of cars, very often outside my house. Burton Green residents are acutely aware of this problem. They have difficulty in getting off their drives and more seriously, pupils experience danger when they cross the road for the school bus to the Heart of England Comprehensive School in Balsall Common. I have spent some time looking at road transport in Burton Green at the present time but I will return to this subject when we look at the impact of the Westwood development of a further 425houses on transport links.

#### **COMPLIANCE WITH THE LAW, GOVERNMENT POLICY AND THE NPPF.**

As I intimated in the introduction, it is not always easy to interpret the law and I have not the legal expertise to tackle this subject. However it is the task of governments to determine policy and shape the law. In the Coalition Government, Eric Pickles, the Communities Secretary, and Brandon Lewis, the Housing and Planning Minister issued guidance to Councils on how to use their Local Plan. They were to draw on *“protections in the National Planning Policy Framework to safeguard the local area against urban sprawl and protect the green lungs around towns and cities.”* Of course the Coalition is no longer with us but it would seem that the present Conservative Government is still intent on safeguarding Green Belt. In their Manifesto, there was a strong commitment to the Green Belt; *“We will ensure local people have more control over planning and protect the Green Belt”* and were ready to publish *“planning guidance which reaffirms the importance of the Green Belt during Local Plan preparation.”* Of course, promises in manifestos may be ignored but to be fair to the present Conservative Government, ministers have shown a relish to implement Manifesto proposals.

But what about the guidance of the NPPF and what light does this show on the development at Westwood Heath? The answer is simple. This proposal to build 425 houses is in complete contradiction to the principles of the NPPF as is absolutely evident in Appendix 8 of the Green Belt and Green Field Review of November 2013. A series of questions are posed on a possible development at Westwood Heath which show conclusively that this development is not fit for purpose and here are a few of them.

Question 3. Would development in this area impact negatively on the visual amenity of the Green Belt?

Question 6. Would the loss of this Green Belt parcel lead to or constitute ribbon development?

Question 11. Would the loss of this Green Belt parcel result in a small settlement being absorbed into a large built up area?

Question 16. Would the loss of this Green Belt parcel reduce the defensible boundary between the existing urban area and open countryside?

Question 25. Would the loss of this Green Belt parcel reduce the character, identity or setting of a village or hamlet?

**The answers are obvious and it would have been a massive shock if the District had supported an earlier development at Westwood Heath but are circumstances so exceptional to allow such an environmentally damaging proposal now? Does the duty to cooperate with Coventry mean that all environmental considerations are discarded?** Moreover it is likely that this development will lead to changes in our boundary with Coventry and it would be no surprise if Coventry were to extend to the HS2 line. Burton Green has always been a target for Coventry and in the 1960s, an attempt was made to include it in Coventry's boundaries. The attempt failed but it now seems that the District is acquiescing in their demands. In their recommendations, they seem to suggest that the integrity of Burton Green has been protected by maintaining space between the development and the back gardens of properties in Cromwell Lane. But this development is in Burton Green but for how much longer? Of course, such a situation would be really attractive to Coventry as it seeks to extend its finances. With 70% of all Coventry homes within Council Tax bands A and B, (Coventry Local Plan, p45), the building of aspirational homes would be a great triumph for Coventry.

#### **IS THE WESTWOOD HEATH PROPOSAL SOUND?**

Warwick District seems to have absolute confidence that 425 houses can be built without any adverse impacts on road transport. It follows a "Do Nothing Option Scenario". It does recognise that there would have to be significant improvements to the strategic highway network, including the construction of a new link road between the A46 junction and Kirby Corner and onwards towards the A452 or the A45 if, for example, the safeguarded land lower down Westwood Heath were developed. **But how can the Planners be so confident and how can they be so sure that 425 houses can be built without adverse impacts? Despite all the magic formulae, such as the Geoffrey E. Havers statistic, or all the advanced computer technology, predicting transport patterns is surely not an exact science.** In Appendix 1 of the Sustainability Appraisal Addendum Report, it states that *"there is an element of uncertainty for all the options as the precise nature and level of the provision or improvements to associated facilities/services and sustainable transport modes is not known at this stage."* Likewise in the Strategic Transport Assessment by Vectos Microsim in Appendix A, 4-53, Crackley Lane would come under significant pressure at this time but it was not possible to identify what additional impacts may occur or what an appropriate mitigation strategy could be. Indeed the situation on the Crackley route appears precarious and in the Supplementary Analysis of the W.D.C.Strategic Assessment Phase 5, **it concluded that with 425 dwellings, this route "is likely to be nearly over capacity."** Yet despite these reservations, Warwick District have complete faith that 425 houses could be built without having any impact on existing transport links. Perhaps councillors and planners should consult the Warwick District Phase 5 Supplementary Analysis by Vectos Microsim. In the introduction, it notes *"that some of the area of network which may be affected by the allocation of these sites is missing from the existing microsimulation models meaning it is not currently possible*

*to fully assess impacts of these sites.”* On the other hand, it may be prudent to ignore the technical language of the planning fraternity and concentrate on more simple issues.

Warwick District focusses on housing within their area but seem oblivious of developments across their borders. The development at Westwood Heath is closely linked to that at Kings Hill but what about the possible housing developments in Coventry? Within a stone’s throw of Westwood Heath Rd., Coventry could build 236 houses. If this proposal goes ahead, many motorists will head towards the University and will join up with the residents from the 425 houses in Westwood Heath. At the same time, Berkswell and Balsall Common will also need to build more houses under a revised Solihull Local Plan, and motorists from those areas will head for the already congested Cromwell Lane route and will join forces with motorists from the 90 houses at Burrow Hill Nursery. Faced with these pressures on our transport infrastructure, would it not be prudent for Warwick District to consider more carefully their proposal to build 425 houses at Westwood Heath? Perhaps understandably, Warwick District has rushed to find a solution without proper consideration in an attempt to secure a Local Plan which will stop property developers riding roughshod in the Leamington and Warwick area where there are ample opportunities to build on land which is not Green Belt. **But it seems that there are sufficient grounds for rejecting the Westwood Heath proposal as unsound and surely if this consultation is to be meaningful, all interested parties should know what additional roads will be needed and where they will be located if Kirby Corner is to be joined up with the A46 and subsequently to the A45 or the A452.**

In deciding on a figure of 425 houses, I am not sure what weight has been given to improvements in public transport. Obviously planners want to optimise public transport, but it is still doubtful, even with bus shelters at key stops, that residents will forsake their cars to join car clubs or participate in car sharing. (Appendices. Sustainable Transport Strategy Overview). It is perhaps a similar situation with cyclists. Burton Green would support improved cycle paths but how achievable is this objective? At this moment in time, if I were a parent, I would make sure that my children kept well away from Cromwell Lane and Westwood Heath Rd during week days. We also recognise that pedestrians should have access to green corridors but the reality is that pavements in Burton Green are in a very poor state and there is no money to repair them. It may be that some residents from the Westwood Development would walk to Tile Hill railway station, especially as it is increasingly difficult to park there, but it is doubtful whether improvements in public transport, cycle paths or in green corridors will have any real effect on the number of motorists going to work or dropping their children at school, thus increasing the numbers on Westwood Heath Rd. and Bockenden Road.

#### **OTHER ISSUES AT WESTWOOD HEATH AND CHANGES TO THE BURROW HILL PROPOSAL**

If the development at Westwood Heath does goes ahead, we would welcome a Health Centre and a retail facility but we do have serious concerns about educational provision in Burton Green. At first, we were alarmed to see that significant changes were made to the original Burrow Hill proposal. We were concerned that provision for parking had been removed and no mention was made of a playing field for the Burton Green Primary School but it now seems that the concessions to the School remain. However we are concerned that the increase to 90 houses is excessive and may have a negative impact on the development. The acquisition of the playing field does give the school some scope to expand but it is highly unlikely that the school can cope with the increased demand from a development of 425 houses at Westwood Heath.

In the Table of Proposed Modifications to the Publication of the Draft Local Plan, emphasis was placed on the need for educational capacity in a coordinated manner. But that is easier said than done. There is a shortage of places in Coventry’s Primary Schools while the merging of Woodland

Boys with Tile Hill Girls reduces the number of places in Secondary Schools, despite the emergence of Finham 2 at Torrington Avenue. It seems that there may be 2 Primary Schools at King's Hill but does that mean children from Westwood Heath will attend these schools? If they do, of course, it means that even more cars will be travelling on Westwood Heath Rd. than hitherto considered, making it imperative that additional roads will be required. **Surely, if this consultation is meant to be transparent, knowledge of these roads should already be in the public domain.**

### CONCLUSIONS

- 1) The Westwood Heath development will have a massive impact on our community, already beleaguered by HS2. The projected houses, both at Burrow Hill Nursery and Westwood Heath, will be far in excess of our present housing stock and the openness of our village, which residents value so much, will be severely compromised. Burton Green's genuine concerns about the volume of our traffic will even more be exacerbated by this new development.
- 2) It is probable that the proposal is compliant with the law, (it is a matter for lawyers) but it certainly runs counter to supposed government policy and contradicts the guidance of the NPPF. The duty to cooperate with Coventry is a binding commitment but should it be at the complete expense of the environment?
- 3) It is doubtful if the proposal is sound and it would be a really interesting experience if planners were called to justify its soundness. Predicting transport patterns is not a precise science as some of their own literature makes clear. There are serious doubts about their research, especially on the Crackley route, and at times the Revised Local Plan seems rushed and incomplete.
- 4) The statement that 425 houses can be built without additional roads does not stand up to scrutiny and the failure to identify routes of possible roads to Kirby Corner and beyond is a serious failure and puts at risk the democratic process.
- 5) The Local Plan ignores the housing developments of our neighbours, whether in Coventry, Berkswell or Balsall Common which will impact considerably on Cromwell Lane and Westwood Heath Rd. All Authorities are under pressure to build more houses and it is likely that the pace will be unyielding in the years to come.
- 6) It is almost certain that improvements in public transport and in cycle and pedestrian pathways will have little effect in reducing the volume of traffic along Westwood Heath Rd., making it even more likely that the existing transport infrastructure will be unable to cope.
- 7) The development at Westwood Heath will have serious implications for educational provision in Burton Green. It could well be that the solution to these problems, especially in the primary sector, will result in further traffic on our roads.

Archie Taylor. M.Ed. Chair of Burton Green Parish Council.