

**Representations on the Warwick
District Local Plan
Proposed Modifications February 2016**

Land at Old Budbrooke Road, Hampton Magna

Centaur Homes





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1.0 Introduction

- 1.1. McLoughlin Planning are instructed by Centaur Homes to submit representations on the proposed modifications to the Warwick Local Plan 2011-2029. This document will take each relevant modification in turn and where necessary, refer to the Evidence Base, National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and other material considerations.
- 1.2. By way of context, Centaur Homes has an interest in Land at Old Budbrooke Road, (also referred to as Maple Lodge or land north of) as shown on the enclosed site location plan and seek its allocation for residential development within the emerging Local Plan. These representations cover policies relevant to the allocated housing sites at Hampton Magna.
- 1.3. Centaur's site is adjacent to the settlement boundary on the western side of the village. Hampton Magna is identified within the Local Plan as a 'Growth Village' and suitable for development. It is ideally located to provide sustainable housing development in accordance with the Framework paragraph 55 and has excellent connectivity to Warwick and the wider area.
- 1.4. The Old Budbrooke site extends to 5.5 hectares in size. This consists of a mix of brownfield and greenfield land, with approximately 1.5 hectares of this being brownfield. The site already benefits from an access fronting onto Old Budbrooke Road and facing the existing village. The site is contained by the existing road network to the south, east and west, with mature field boundaries to the northern edge. The site sits within a valley that rises up to east and the village.
- 1.5. The existing uses on the site create a significant number of lorry movements and associated noise and disturbance. The allocation and redevelopment of the site will bring the land into a use that is more suitable to its village location.



2.0 Modifications 1 & 2, 4 & 5

- 2.1. Centaur Homes support the Council in meeting its Duty to Cooperate and the increase in housing need to accommodate the unmet need from outside of the District. However, this unmet need should not be separated out from the actual need for Warwick DC.
- 2.2. As acknowledged, the 2015 SHMA has a critical role to perform in helping the Council prepare a Local Plan, which is sound. However, it is noted that the SHMA covers a 20-year period, but the plan period is only 18 years. To allow for this, the Council has applied a pro-rata figure to the plan period. Centaur's concern with this is that although the total need over the 20 year period is known, the breakdown of demand for housing during the period is not, it is not a constant perfect linear line, but dynamic.
- 2.3. Therefore, the Plan's target of 16,776 new dwellings is not justified and potentially could not be delivered in the short term. Failure to provide the required level of housing will further compound supply problems as well as hinder economic growth and fail to address affordability concerns. This is further supported by the affordability of market housing data shown in table 46 in the SHMA, which identifies that Warwick District is less affordable, than the England average.
- 2.4. If the Council insist on using a figure different to that in the full OAN identified in the SHMA, This figure needs to be justified for the shorter period. It is also considered that in accordance with the need to "boost" housing supply that the housing target should be expressed as a minimum to provide for additional flexibility to make for any under-delivery on allocated site.



3.0 Modification 3

- 3.1. Centaur Homes supports the change to Policy DS4. This clarifies that allocations can occur to a wider range of settlements across the district.



4.0 Modifications 6 & 7

- 4.1. Following on from the Inspector having found the windfall figure as previously put forward unjustified, the Council have lowered the figure.
- 4.2. However according to the letter from the Council leader, Cllr Andrew Mobbs, to the Inspectorate dated 14th October 2015, work is still on going “regarding a justifiable level of windfalls” and the figure put forward is “just an estimate” and no further evidence has been provided within the proposed modifications to support this figure, even though it is lower than the previous allowance.
- 4.3. As a result, Centaur consider the Plan’s approach towards windfalls to still be unsound as it is clearly contrary to national guidance and the fact that the Plan is supported by a robust SHLAA. Given the detail in the SHLAA, further housing allocations can be made to further reduce any risk of the housing target being met. In addition, subject to other representations looking for the Plan’s target to be expressed as a minimum, it would provide the necessary flexibility for windfalls to come forward.
- 4.4. It is considered that the concerns about the windfall figure can be redressed (in part) through the allocation of additional land at Maple Lodge at Hampton Magna for housing development.



5.0 Modifications 8 & 9

- 5.1. Centaur Homes supports the revised distribution and the increase of dwellings to the Growth Villages. Such an approach is consistent with paragraph 55 of the Framework.



6.0 Modifications 10, 11, 16 and 19

- 6.1. Centaur Homes objects to these modifications on the basis that they are unsound as they are inconsistent with national policy and not justified by the evidence base.
- 6.2. Centaur Homes do not dispute the need for additional housing in Hampton Magna as reflected by earlier representations supporting the development of land on the western side of the village. However, these modifications underline the flawed approach the plan has made to development in the village in respect of:
 - The Green Belt.
 - Landscape Impact.
 - Sustainability Appraisal.
- 6.3. Each is addressed in turn below.

The Green Belt

- 6.4. The green belt is the key issue relating to the modifications is that both sites are proposed to be removed from the green belt. In so doing, the additional release proposed and intensification of the allocated site, have to be justified by the evidence base.
- 6.5. In this respect, the modifications are flawed as there is no cross-reference to the appropriate evidence base to support the allocations. As per earlier representations, Centaur Homes is unconvinced about the Modifications put forward as Core Document CD V13 and makes a more robust case for the release of land on the western side of the village, rather than on the eastern side, where the two allocations are proposed.
- 6.6. Whilst it is unreferenced in the EiP Core Documents list, the 2015 Warwickshire Green Belt review does provide an analysis of the green belt around Hampton Magna in terms of parcels WA2 (where allocations H27 and H51 are sited) Old Budbrooke Road (HM2).
- 6.7. A general criticism of the approach by the 2015 document is that it is too broad brush, that the assessment parcels are too large, encompassing areas with different sensitivities to the green belt. This is especially the case with HM2, where the southern part of the parcel is not close to Warwick, unlike the northern part. In contrast, CD V13 does look to provide a more fine grain analysis of development areas.



6.8. In terms of allocation H27, the Modifications impose an arbitrary additional 30 dwellings on the site, with no evidence suggesting how this could be accommodated or what the associated impacts are.

6.9. In the case of H51, the concerns are more fundamental, in that the extent of the allocation does not account for the whole of the field in which the allocation sits. This is considered to be a serious misjudgement in terms of how a site should be allocated for housing development, when releasing it from the green belt and the need to make use of clearly defensible boundaries.

6.10. Making specific reference to the guidance in paragraph 80 of the Framework, the following analysis of the intensified H27 and newly allocated H51 is as follows:

Check unrestricted sprawl

6.11. Both allocations are identified in an area in CD V13 that are characterised as being very open. Therefore, their development will have an immediate impact on the green belt. In the case of H51, given the arbitrary extent of the allocation, not using the whole of the field in which it sits, its development would lack context and effectively sprawl.

Prevent neighbouring towns merging

6.12. Notwithstanding the presence of the Warwick bypass, this is a critical area of the green belt, where the gap between Warwick and Hampton Magna is as little as 1km (2015 GBR). Clearly the intensification of development on H27 and the development of H51 will clearly increase the perception of Hampton Magna and Warwick merging.

Safeguarding the Countryside from Encroachment

6.13. The key concern here is the openness of the allocated sites. Their development, topography and lack of a layered approach to multiple field boundaries means that development will clearly encroach into the green belt and be heavily reliant on the creation of new boundaries. Whilst the presence of sports pitches in assessment area WA2 are noted, their presence does not confer that housing development would be equally acceptable as sports pitches are appropriate development in the green belt, whereas housing is not.

Prevent the setting of historic towns

6.14. Core Document V13 makes reference to the inter-visibility of the area in which these sites sit on the Warwick conservation area. Especially as these sites have an elevated location overlooking Warwick.

Assist in urban regeneration

6.15. Clearly, given the scale of Warwick's housing challenge, there is a need to allocate additional greenfield sites.



Strong & defensible boundaries

- 6.16. Following on from the critical assessment of the Green Belt Assessment, and it having been undertaken at an appropriate scale, it is clear that the Council has not identified the allocations in accordance with the final bullet point of NPPF paragraph 85. This requires boundaries to use physical boundaries that are clearly recognisable and likely to be permanent.
- 6.17. With allocation H51, the allocation boundary does not follow any existing boundaries at all. It sits within an asymmetric shape field and the allocation cuts off the bottom and eastern sections of the field. This will leave areas of land that are not connected to the neighbouring field and may lead to further hedgerow loss as they are incorporated into the neighbouring fields having a very significant landscape impact and making the developments even more visible from the long distance views of the site from the south and east.
- 6.18. For both allocations the likelihood of the permanence of the boundaries should be questioned. Apart from H51 having no boundaries at all, allocation H27 is only contained by field boundaries on its two longest sides, these are generally considered to be weak and are easily broken through, especially as they are not particularly dense, deep or contain a significant number of mature trees. The location of a public right of way along the southern boundary does not add any weight to the boundary as this could be incorporated within a development.
- 6.19. As such, the allocation, as it is put forward within the modifications version of the Local Plan is not NPPF compliant.

Landscape Capacity Study/ Assessment Concerns

- 6.20. The second area of concern with the Modifications is the compatibility of the Modifications with the landscape evidence which underpins the Plan.
- 6.21. The main Landscape Sensitivity and Ecological & Geological Study dated November 2013 considered the sensitivity of all sites around Hampton Magna. This located Land South of Arras Boulevard (site H27) within land parcels HM_05 and HM_06 and Land South of Lloyd Close within land parcel HM_07.
- 6.22. Regarding land parcel HM05, the study focus on land to the east of the village, down to the A46, however, it does state that new development should not extend beyond the current settlement edge to the east, or to the south of public right of way WB12. This public right of way links into public right of way W84, this is not mentioned in the commentary on land parcel HM_05. This study acknowledges that there is:
- "some potential for a very small amount of development in this zone providing that views towards Warwick from the existing settlement are preserved."*



- 6.23. Based on this evidence document, how can the intensification of allocation H27 comply with this Landscape Sensitivity Assessment? Any development of allocation H27 will restrict existing (public) views from the settlement towards Warwick, as these are currently open and far reaching. Therefore it is not possible for these to be preserved as new development will break up the view and sight lines, especially the current open view from Arras Boulevard and the intensification of development on the site will further compound this loss.
- 6.24. The commentary on land parcel HM_06 provides further evidence against the intensification and development of the whole, again it notes that there is some scope for “limited development adjacent to the existing settlement edge” and the graphic provided within the Landscape Sensitivity Assessment acknowledges that this should be limited to the northern half of the eastern field. Any intensification of this allocation will significantly alter the key views within land parcel HM_06, the evidence document notes that existing mature trees break up the “hard edge” of the settlement to some extent and a significant landscape buffer will be required to mitigate any development of this site and to maintain the existing relationship between urban and rural that will greatly impact on the density of development across the main site and therefore, further compound the problem.
- 6.25. The Landscape Sensitivity Assessment for Allocation H51 again acknowledges the scope for some small scale development and the graphic within the assessment suggests that this should be within the extremities of the existing development and not push the settlement boundary further into the rural landscape. Public views from the existing settlement boundary are far reaching and it is possible to see Warwick from this point. The site is on the high point in a rolling landscape and therefore, it would be highly visible from a significant number of viewpoints including the surrounding public rights of way and Warwick to the east.
- 6.26. Centaur are concerned that the Landscape Assessment’s conclusions that H51 could accommodate “small scale development” does not reflect the level of development which is proposed in the allocation (115 units). The allocation covers an area of land measuring some 5.5 ha, in an open field parcel measuring 10ha in size. With this latter point, the size of the 10ha field parcel could be more than able to accommodate the whole of the housing allocation for Hampton Magna without the need for allocation H27. This fact underlines, the difficulty associated with the allocations made by the Plan in the village and why both allocations are considered unsound.



6.27. In contrast, the Centaur site sits within a natural depression and is visually contained, unlike the land to the south of the village (allocations H51 and H27), although the site sits within a green landscape, it does not benefit from the rolling landscape views that make it highly visible. Therefore, it should be considered a suitable location for development on two grounds. The first being partly brownfield and therefore the allocation of this site would see it redeveloped and save a greenfield site from being lost. The second is the contained nature of the site makes it more suitable in landscape terms than the allocations being put forward within these modifications.

Sustainability Appraisal

6.28. An addendum SA has been provided with the modifications to the Local Plan. There is very little content within this addendum regarding the allocated sites beyond the content within the original Submission Local Plan SA Report February 2015. Within the 2015 SA, allocation H51 was rejected based on it having

"some connectivity to the main settlement but potentially significant impact on nearby residents and little regenerative impact"

6.29. There is no justification provided within the modifications documents to justify how these sustainability concerns have been overcome.

6.30. Within the justification for the intensification of H27, the SA addendum states that the site has a medium to high landscape value, but that the intensification will save the loss of greenfield land elsewhere and that mitigation can overcome any significant effects. There is no justification for how any significant effects might be overcome, especially against biodiversity, or what the mitigation might be.

6.31. Referring to the 2015 SA, the reason for the Old Budbrooke Road site being rejected was:

"located within a parcel of high landscape value – disconnected from the main village and its core services / facilities."

6.32. As highlighted above, the landscape assessment for the site is flawed as it has not considered the site itself, but combined it with a land parcel and the analysis of this has focused on the land to the north of the village. Therefore, the evidence base does not find the site itself as of high landscape value, in fact the evidence base is silent when regarding this site.

6.33. As for the site being disconnected from the main village, this analysis has not taken into account the wording within Appendix Vi of the SA. This clearly states:



"With regard to travel and transport, the potential allocations have excellent access to public transport with a bus stop within 0 - 400 m and there are pavements which provide safe access for pedestrians into the village centre or to public transport"

- 6.34. It continues to note the distances for some of the sites from Warwick Parkway, namely the sites within 1km. It should be noted that the shortest walking distance from the represented site to Warwick Parkway is 1.2km, whilst for allocation H51 this distance is 1.4km. Likewise to the local shops and primary school both sites are equidistant.

Material Considerations : The Brownfield Register

- 6.35. It should also be highlighted that the modifications to the Local Plan does not appear to have considered the requirements of the emerging Planning and Housing Bill currently progressing through Government. This will require all authorities to maintain a register of brownfield sites that it considers suitable for housing development. As such, it is possible that the brownfield element of the represent site may come forward through this process anyway. However, if the Council were to allocate the whole of the Old Budbrooke Road site it could create a more suitable form of development that could to be comprehensively planned as one whilst delivering a level of housing suitable to the settlement.

Summary

- 6.36. Therefore, the Plan's evidence base clearly continues to contradict the allocations made in the plan.
- 6.37. In conjunction with previous representations, whilst Centaur seek the de-allocation of H51 in preference to its site, it also objects to the intensification of development on H27 and seeks this modification to be deleted.



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