



Definitions in this document :

LPF = Local Planning Framework; **LPA**=Local Planning Authority, **LDF**= Local Development Framework, **SSSI**= Sites of Special Scientific Interest. **JSMA** = Joint Strategic Housing Market Assessment

Introduction

This paper is a response to the local consultation process with the objections specifically in relation to the village of Hampton Magna

NOTE: This response may appear similar to responses submitted by other like-minded residents. However, it contains much original material representing my own personal views, and I have carefully reviewed all 'borrowed' material before including it.

General commentary about proposal in Hampton Magna – OBJECTION

Housing Numbers and Duty to co operate with other district councils: The outcome of the Gateway and other research initiatives into housing numbers particularly the JSHMA may well change the housing needs in the district. This is acknowledged in the document but importantly any reduction in numbers of houses deemed necessary through this must immediately lead to removal of any building on village green belt areas.

Parish Councils view important: The document highlights the importance of agreeing any development with the Parish Council. Budbrooke PC has been communicating its objection since the start of the process against the development including the scale, but its views have not been taken into account. Appendix 6 implies that the preferred site has the tacit approval of the Parish Council but, from my own discussions with councillors, this is clearly not the case. At the very best, the Parish Council considers the preferred site to be the "least worst option".

Residents' View: Planners and the council must stop ignoring the opinion of residents in these consultation processes. The voices of 830 resident in Hampton Magna who signed a petition with good arguments against proposals in the village have been cast aside despite reasoned argument and local knowledge of the issues faced. The overwhelming response to the earlier "Preferred Options" consultation was that the proposed housing numbers were far too high, and that Green Belt land should be fully protected – but all such responses have been totally ignored. To quote Cllr Caborn on the local plan website *".....it is important that we move forward as quickly as possible with our local plan and these consultations will give us the chance to do that with an understanding of what people think...."* That is, in effect, saying that this plan will be implemented regardless, and that the only purpose of the consultation is to gauge the strength of the opposition. **If the consultation is to have any credibility at all, WDC will need to show clear examples of changes which have been made to the plan as a result of the views expressed by residents.**

Village discrimination: It is biased and therefore unfair that villages are having houses built on green belt land when other potential development areas such as Milverton have been removed from the proposals due to green belt issues there. Again an independent review of the decision making process is necessary. In addition, I fully concur with the views expressed by many of those present at the recent Warwick Rural West Forum that no villages in the District should have been excluded from consideration, and that the burden of extra houses should be more fairly shared out.

Sustainability –Appendix 6 says that *"Hampton Magna has been identified as a growth village with a range of services"*. Whilst it may *tick all the boxes* in a cursory paper-based exercise, no account has been taken of the adequacy – let alone the expandability – of the existing services. The reality is that the proposed level of growth in Hampton Magna is unsustainable with infrastructure and transport unable to cope. As stated in Chapter 2, Hampton Magna has had considerable expansion in past years. In addition there have been many developments in the surrounding district impacting on sustainability of the area. The scale of the development is at best too large.

Infrastructure: There has not been sufficient planning and analysis of infrastructure issues to be able to make a reasoned judgement on the viability of the potential sites. Sewerage and Drainage issues have been a particular concern consistently from many residents who have experienced the problem. The sewerage and electricity systems in Hampton Magna make the village a special case as they are already in need of major upgrading and the proposed numbers of additional housing will make matters even worse. There are major problems with the drains all over Hampton Magna. Even when they were newly built Severn Trent refused to accept them because of the standard of construction. The electricity system dates back to the old Barracks and is inadequate. When these concerns have been raised by residents, the response from WDC has been along the lines of "Our experts say that it will be alright on the night". As made clear by many of those present at the recent Warwick Rural West Forum, **this is not good enough**. If the currently identified sites are included in future versions of the plan, much greater detail must be provided as to how the infrastructure issues will be addressed.

Transport/congestion: A major issue that has to be considered in choosing a site is the increase in traffic which if brought within the village estate would be dangerous (see comments under specific site sections later). This needs a proper independent assessment, which has hitherto not been carried out. It is my view that any such assessment is likely to reach a conclusion which is very different from the current one.

Village development in green belt: It is a concern that the proposal has more houses proposed on green belt compared to non-greenbelt villages. This position must be reviewed again for other non-green belt opportunities. By default development on green belt cannot be justified under the "exceptional circumstances" caveat within government policy. Seemingly, all but 500 of the proposed 12,000 houses throughout the district can be accommodated without encroaching on the green belt. Since many people – myself included – have challenged the need for so many houses, a relatively minor reduction in overall numbers would completely remove the need to use any green belt land.

Local school capacity: This is already undergoing expansions with plans for further classrooms. School run parking is already leading to serious traffic congestion and safety problems – and frequently features in regular police reports. Additional numbers will inevitable make this far worse, resulting in total gridlock at each end of the school day.

Independent Inspector examination of the site options: Planners' opinions should be independently tested as the planning department's site conclusions are too "blinkered".

Hampton Magna Site Area 1 Preferred location (land south of Arras Boulevard) – OBJECTION – site is not considered appropriate against others

Land Usage and Covenants: The site has previously had footpaths in existence. It is also believed that there are covenants in place restricting use of the land through the original land Endowment to King Henry VIII Endowment Trust.

General Transport: Access to this site is dangerous if Arras Boulevard is used to access the site and significant changes to roads are against policy in the current LP (chapter 8) RAP10 which states that 'development would not be permitted which would require major modification to surrounding rural roads'. Importantly there are 3 blind corners along Blandford Way and the southern part of Arras Boulevard adjacent to the site where presumably access to the houses would be. Also the exit from Curlieu Close is a blind sharp exit on a corner itself which would be dangerous with increased traffic volumes up and down Blandford Way/Arras Boulevard. There have already been motor accidents at this location. It should also be noted that driving schools use Arras Boulevard extensively and also worryingly conduct manoeuvres between and around the blind corners. Bringing large increases in traffic through the village estate roads, when children walk to school and to the recreational park area at the end of Curlieu Close, would create considerable dangers. Curlieu Close is used by many as an alternative drop off point to the school because of the congested area immediately outside the school which will only get worse as it is forced to expand, creating more dangers and residential impact.

Public Transport: Appendix 6 says "*Potential site allocation has excellent access to public transport with a bus stop within 0-400m*". This is extremely misleading! The 400 metres presumably refers to the site entrance, but many of the properties built on the site would be at a far greater distance than this. Furthermore, the existence of a bus **stop** is no guarantee of a bus **service**. It should be noted that there is a **limited** daytime bus service between Hampton Magna and Warwick/Leamington with no buses at all on Sundays or after about 6pm on other days.

Flooding: Whilst not on the Environment Agency flood map, parts of the field regularly flood and this would only be worse with development on it. Increased numbers of houses on the scale proposed could increase this risk and so a full study of flood risk should be undertaken so that residents are not subjected to greater risk of flooding from large amounts of the area being concreted over.

In addition, there is a serious issue with sewage. Appendix 6 says "*Drainage and sewage systems are limited and of their time. Any new scheme will have to manage its impact and avoid adding to local problems*". The current 6" foul sewer is patently inadequate in respect of current needs, and frequently gets blocked, resulting in surcharging from inspection chambers – including several located in the field earmarked for development. My own garden borders the south-west corner of the proposed development site, and has been flooded with raw sewage on numerous occasions – the most recent of which was just over a year ago. [Please see the photograph below]. The cost of upgrading the sewers to cater for an additional 100 houses would be very high, and may well render the project non-viable.



Garden at Daly Avenue flooded with raw sewage from surcharging manhole – December 2012

Ecology: There are bats in the hedgerows which are protected under legislation. This has been highlighted by the two land owner investigations in summer 2013. There are also wild birds and birds of prey and wild foxes. Animals were “moved on” when the Warwick Parkway Station was built (on green belt) and should not be disturbed again. Protected species of frogs, toads, newts, etc. are also known to be in the area. A thorough study should be undertaken and the rules which are applied to individual householders should be applied equally stringently to developers

Residential Impact: The report implies that residential impact will be minimal. Closer inspection would show that this is not true with at least 60 houses being impacted (for just 100 new ones on the site). In particular, Appendix 6 says "The zone is overlooked by the edge of the settlement of Hampton Magna, which is built on higher ground. Whilst that may possibly apply to properties in Curlieu Close, it is patently untrue in respect of properties in the lower part of Daly Avenue – whose open views towards Warwick, including glimpse of the Castle – would be completely destroyed.

Landscape Impact: Contrary to the report, the impact on the landscape would be significant with fantastic open views across the countryside looking outward to the South. That open character should be protected in line with the NPPF paragraph 86. Other potential sites – notably Site 6 have been discounted due to their claimed high landscape impact but, in my view, Site 1 has a landscape impact which is at least as high as any of the other sites.

Site of Special Historical Interest - The Gog Brook ponds and ancient hedgerows should be preserved and protected. They are one of the few remaining links with the past and belonged to the old monastery which used to stand there

Buried armaments from the old Barracks / First World War Hospital: Hampton Magna is built on the site of the old Budbrooke Barracks and therefore has a unique problem with buried armaments. Several have been uncovered over the years. The Copse on the preferred site should have entry forbidden since it is believed that armaments are buried there. A First World War hospital was situated on the proposed site and as a result there may be buried bodies in the surrounding area. These factors are not recognised in the Consultation, and their impact must be assessed

Potential Conflict of Interest: The land is owned by King Henry VIII Trust who are believed to have a financial interest in land around Europa Way which WDC apparently wish to see developed within the Local Plan. There is clearly scope for a conflict of interest to arise whereby WDC's decision to 'prefer' Site 1 may have been influenced by factors not related to the suitability of the site. A fully independent review of the decision to prefer Site 1 in Hampton Magna should be undertaken to ensure there has been nothing prejudicial to the process from such potential conflicts of interest.

Hampton Magna Site area 4 (West of Stanks Farm) – OBJECTION AGAINST REJECTION – site has not been equally considered against others

Detachment from the village: The statement in the report that this area is detached from the main settlement is incorrect. On review of the map it is clear the area is as close to the school and other central facilities as the existing areas at the south-west end of the village, near Hampton on the Hill.

Landscape impact: Impact would in fact be relatively low with use of appropriate screening along perimeter road on access to the village area under the railway bridge. Some natural screening already exists. This site would also naturally extend the village housing perimeter along the main access road.

Ecology: Low impact on wildlife compared to other sites. Much of the wildlife was disturbed and has moved on and resettled following building of the Warwick Parkway Station.

Coalescence: The site has a natural permanent break from further expansion to other areas with the railway, Parkway Station and main Birmingham Road infrastructure between Warwick and Hatton.

Residential Impact: Relatively low plus the land naturally falls away from existing housing.

Location: Being close to the railway station would attract professional people (a quoted reason for expansion) who commute to Birmingham/London without the need for driving/parking at the station, thus reducing congestion and alleviating further car parking pressures on the station facilities.

Traffic: The site would significantly reduce dangerous traffic flow as vehicles would not need to travel along the estate roads themselves if access were provided from Old Budbrooke Road.

Summary: This site should be carefully re-considered since many of the reasons for rejecting it are invalid and/or apply equally to the 'preferred' site.

Hampton Magna Site Area 6 (Maple Lodge) – OBJECTION AGAINST REJECTION – site has not been equally considered against others

Residential Impact: Minimal due to the position and outlook of existing houses on the estate.

Landscape Impact: The report commentary is incorrect. There is already natural “screening” from the main road so impact on landscape views from the village and Old Budbrooke Road is very little. There are also few houses or main approaches to the village on the North West flank of the proposed site so visual landscape impact is small. The falling nature of the site would help here as well. Use of this site would protect the open character of the village (NPPF paragraph 86).

Traffic: A further 100 to 150 houses using their vehicles through the single carriageway main access to the village would put a vast amount of strain on these minor roads. As a result they may require modification which would be against policy in the current LP (chapter 8) RAP10 which states that 'development would not be permitted which would require major modification to surrounding rural roads'. It is suggested that Site 6 is much more appropriate for development as there is access via the A4189 onto Hampton Road rather than just the traffic controlled railway bridge and minor roads. The same principle would reduce dangerous traffic impact as vehicles would not need to come through the centre of the village unlike the preferred option Site 1. There is good access off the main perimeter road to the site, since entry would be off a straight piece of road near Maple Lodge, lending itself well to a roundabout system with existing estate roads. Other access plans could also be formulated. This would also help to reduce the speed of traffic using the Old Budbrooke Road as a 'rat run' through to Warwick Parkway Station or as a diversion when there are problems on the M40/A46. There is also an alternative access to the area off the main Birmingham Road via Ugly Bridge which would help to a degree with traffic diversification in addition to the access off Hampton Road.

Site Suitability: This site should be one of the most relevant sites for any development to occur, since it conforms to many of the existing policies outlined in the LDF and policies contained within the LP which are still in existence. In particular, chapter 8 of the LP (Rural area policies) sets out some key policies for rural development that are still in use, RAP1 states that development will only be permitted where it is on previously developed land within limited growth villages (Hampton Magna is one of these limited growth villages). All of the selected sites, bar Sites 3 and this Site 6 are previously undeveloped sites, therefore if the new housing development is to conform to this policy it should immediately make Site 6 much more attractive to the LPA than any of the other 4 sites. WDC claims that Site 6 is located within a very sensitive landscape area, and uses this as a reason for dismissing the site. However, all of the sites around Hampton Magna are sensitive landscape areas, all are zoned as greenbelt with no additional policies or protections (such as SSSI or Site of Nature Conservation Interest) on any of the sites. Further to this, Site 6 is an area already developed (25% of the site already contains buildings/development of some sort). Therefore the impact on the current landscape will be much less on this site than on any of the green field sites. Since this is the only reason given for dismissing this site it MUST be reconsidered.

Roger Mills – January 2014