

17 January 2014

Delivered by email and post

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

Dear Sir/Madam

VILLAGE HOUSING OPTIONS AND SETTLEMENT BOUNDARIES CONSULTATIONS

These representations are submitted on behalf of our client, Centaur Homes, in respect of the Village Housing Options and Settlement Boundaries Consultation. Centaur Homes have an interest in land off Old Budbrooke Road as shown on the attached site location plan. Further detail on this site is provided in the appropriate section later in these representations.

Contextual and Policy Overview

In June 2013, Warwick District Council published its Revised Development Strategy. This document sets out an amended housing target of 12,300 dwellings to be delivered in the period 2011 to 2029. The Strategy seeks to concentrate growth within and at the edge of the existing urban area, but acknowledges that some growth also needs to be focused on the most sustainable villages in order to meet the housing requirements for the District and to widen housing choices (including affordable housing) and sustain existing services and facilities. Hampton Magna has been identified as a Primary Service Village with an indicative housing target of 100-150 homes over the plan period.

The current consultation document seeks to 'fine-tune' development levels for the villages and identifies the Council's Preferred Housing Options. The proposed housing options are based on the interim level of growth of 12,300 dwellings set out in the Revised Development Strategy.

Since the publication of the Village Housing Options Consultation Document, the Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) has become available. The SHMA, which was published in November 2013, shows that Warwick District will have to provide between 660 and 720 dwellings per annum to meet requirements arising within the District. The proposed housing target of 12,300 homes (683 dwellings per annum) is within the SHMA parameters. However, it fails to take account of the fact that more housing may have to be accommodated in Warwick District to deliver some of the unmet requirements from neighbouring authorities within the SHMA area (i.e. Coventry).

The housing requirement for Coventry identified in the SHMA ranges between 1,040 and 1,180 dwellings per annum. This is significantly in excess of the target identified in the now withdrawn Core Strategy of 669 dwellings per annum.

The Village Housing Options Consultation document includes a brief paragraph on the Duty-to-Cooperate, which states that discussions are continuing in respect of the required housing growth across local authority boundaries. It goes on to note that work is still to be concluded on whether there are alternative non-Green Belt locations, which could accommodate a limited degree of Warwick District's housing growth.

Given Coventry's high housing requirements and the constrained nature of the City, it is likely that Coventry City Council will be looking to its neighbours to accommodate some of the City's growth. In contrast to Warwick District Council's assertion at Para 3.14, we consider that it is unlikely that neighbouring authorities will accommodate a limited degree of Warwick District's housing growth. On the contrary, we consider that Warwick District Council's overall housing requirement is likely to increase to deliver some of Coventry's unmet requirements.

Considering the existing capacity of the non-Green Belt areas in the District, we consider that some of the additional requirement will need to be accommodated in the Green Belt villages (including Hampton Magna) in line with the Council's development and locational strategy. As highlighted in the Village Housing Options Consultation document, Hampton Magna benefits from having a good range of community facilities and services including a village shop and post office, village hall, public house, doctor's surgery, early years nursery and primary school and excellent public transport connections (both by bus and rail). Warwick Parkway Railway Station is located in close proximity of the village and provides convenient access to local, regional and national destinations. We consider that Hampton Magna is one of the most sustainable villages in the District. It can and should therefore accommodate additional housing if the overall housing requirements for the District increase. We consider that the Council needs to give further thought to alternative and/or additional sites in the villages to accommodate some of the likely increases in the District's housing requirements.

The Revised Development Strategy seeks to provide 1,000 dwellings in the identified Primary and Secondary Service Villages. The Village Housing Options Consultation document, however, only makes provision for 835 dwellings. There will therefore be a shortfall in housing provision in the villages, further emphasising the need to allocate additional sites in the villages to meet housing requirements.

Preferred Options and Village Boundaries: Hampton Magna

The Village Housing Options Consultation document identifies 'Land south of Arras Boulevard' as the Preferred Option for housing growth in Hampton Magna. The Preferred Option site is located at the south-eastern edge of the village and comprises agricultural land.

Whilst we agree that there are some merits in allocating this site for housing, particularly its relationship with the existing built up area and proximity to local facilities, we consider that the site's sensitive location and potential landscape impact are key weaknesses. The Council's own assessment of the site acknowledges that this large greenfield site will need to be very carefully designed to minimise landscape impacts.

We consider that other sites are available in Hampton Magna to deliver the required housing for the village, which would have a lesser impact on the landscape and Green Belt.

Centaur Homes have an interest in land of Old Budbrooke Road, which has been assessed as part of the Village Housing Options Consultation and accompanying evidence under Site Reference 6) (Maple Lodge).

Located between Hampton on the Hill to the south and Hampton Magna to the east, the site comprises the last remaining part of the Budbrooke Barracks that still remains largely undeveloped. The old parade

ground and drill hut have been developed as an equestrian centre and a highway depot. It now includes a farm house, large stable block and improved grassland fields used for grazing. There is also a substantial area, which is currently used to store roadstone. The last remaining protectable element of the historic Budbrooke Barracks lies within the Maple Lodge site - a wall used in the firing range. The site is currently accessed off Old Budbrooke Road approximately 50 metres to the north of the Old Budbrooke Road/Damson Road junction. All facilities and services in Hampton on the Hill and Hampton Magna are within easy walking distance of the Maple Lodge site.

The Council's Sustainability Appraisal affords the site exactly the same score as the Preferred Options site for every aspect of sustainability assessed as part of the Council's appraisal. This further re-emphasises the fact that the Maple Lodge site is just as sustainably located as the Preferred Option site.

The Village Housing Options Consultation document notes that the reason the Maple Lodge site has been discounted is on landscape and Green Belt impact grounds.

The Council's Green Belt Review includes the land within Green Belt Parcel HM4. This Green Belt parcel is considered to play an important role in preserving the setting and character of Hampton Magna in particular. However, the Green Belt Review notes that the parcel is of a less 'strategic' role than eastern parcels (where the Preferred Options site is located).

The Preferred Options site lies within a different Green Belt Parcel (Parcel HM1) and was initially assessed as part of the Council's Green Belt Review as having an overall high Green Belt value. The Green Belt Review noted that this large Green Belt area provides a valuable role in maintaining the openness of the landscape and protects the character of Hampton Magna and Hampton on the Hill.

The Council commissioned an independent adviser to provide a critical assessment of its Green Belt Review. The Green Belt Critical Review clearly states on Page 21 that:

"There also needs to be a clear distinction made in the evaluation process between an assessment of the parcels and the individual sub-sites reviewed within the parcels. In particular, on how the preferred options were chosen, and what reasonable alternatives were considered and why they were not chosen."

The Green Belt Critical Review provides an assessment of the Preferred Options, but does not consider any of the sites that have been dismissed. In contrast to the Council's Green Belt Review, it focuses on specific sites. This more detailed approach results in very different conclusions. Whilst the Green Belt Review considers Parcel HM1 (within which the Preferred Options site is located) to be of high Green Belt value, the Green Belt Critical Review considers the Preferred Options site to be of medium value. It concludes that the site could accommodate a sensitively designed village extension with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, it goes on to stress that particular consideration will need to be given to ensuring that the boundary fronting the open countryside is clearly defined using permanent physical features that are readily recognisable.

We object to the Council's selective approach in considering the contribution specific site options make to the Green Belt. A detailed assessment should have been carried out of all the options under consideration.

We consider that the Maple Lodge site would have a lesser impact on the Green Belt than the Preferred Option site. It comprises land which has been partially developed and includes a number of large built structures, hardstanding and a substantial roadstone storage area. We consider that the development of this partially developed site would safeguard against the loss of valuable agricultural land elsewhere within

the area. Moreover, it would result in the removal of the highway depot, which currently has a negative visual impact on the area and results in a number of lorry movements with its associated noise and disturbance.

The Maple Lodge site is bounded by established landscaping including hedges and mature trees which limit the views into the site from the surrounding countryside. It has clearly defined boundaries with roads and a natural stream on three of its sides. We therefore consider that there is no danger that development on the site will result in unrestricted sprawl or encroachment into the countryside given the contained and defined nature and location of the site and opportunities to reinforce defensible boundaries within the site. It would not lead to neighbouring towns merging into one another, have any impact on the setting or special character of a historic town or limit urban regeneration. We consider that the land could be removed from the Green Belt without impacting the fundamental aim of Green Belt policy.

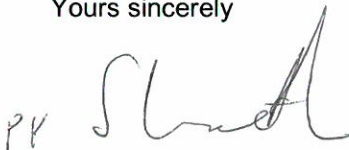
The Revised Development Strategy sets out a housing target for Hampton Magna of 100-150 dwellings. At a development capacity of 100 dwellings, the Preferred Options site can only accommodate the minimum requirement identified in the Revised Development Strategy. This does not provide any flexibility in delivering housing in this village or take account of the fact that more housing may have to be provided in Hampton Magna, one of the most sustainable villages in the District, to deliver the unmet requirements of neighbouring authorities. We are of the view that the Council should therefore consider allocating a second site in Hampton Magna to meet the area's housing needs. By allocating the Maple Lodge site, the Council would minimise impacts on the amenities of local residents and safeguard against a concentration of vehicle movements in one location. It would also limit the further encroachment into the countryside to the east and south of Hampton Magna, which forms part of a relatively prominent landscape with views towards Warwick.

The Council should consider allocating the Maple Lodge site for housing and include it within the settlement boundary of Hampton Magna. It provides a good alternative to the selected Preferred Options site with good access to local services and facilities and the potential to connect the original settlement of Hampton on the Hill with the post-war village of Hampton Magna. If the Council decide the continue allocating land south of Arras Boulevard for approximately 100 homes, the Maple Lodge site could provide an additional housing location.

We hope that you will give full consideration to Centaur Homes representations outlined in this letter. We have also attached another copy of the Maple Lodge Promotion document to these representations, which we originally submitted to the Council in July 2013.

Should you have any questions or queries or wish to discuss these representations further, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'KH' followed by a stylized name, likely Karin Hartley.

Karin Hartley
Senior Planner