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Mr M J Alexander



18 April 2016

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

RE: Planning applications H27 and H51 Proposed Modifications to Warwick District Local Plan

I wish to object to the following modifications:

- 1. Increase in housing density to the land (H27) South of Arras Boulevard from 100 to 130 homes**
- 2. Allocation of land (H51) South of Lloyd Close for 115 homes**

I strongly believe modifications to the Local Plan are not legally compliant, positively prepared, justified and are not in accordance with National Policy and detail my reasons below.

Legal Compliance

Warwick District Council (WDC) has breached the Statement of Community Involvement (SCI) in failing to consult with Budbrooke Parish Council and residents of Hampton Magna over the modifications. WDC has failed to make documents available for residents to consider, made getting hold of said documents overly complicated and adopted an unfair timetable for the consultation process.

Failure to Consult

Warwick District Council have been aware of the need to provide additional housing since 1st June 2015 when Planning Inspector Kevin Ward found the plan unsound (EXAM23).

Various communications followed this decision and on 13th August 2015 Warwick District Council conceded the need to allocate additional housing sites (EXAM25). By 14th October 2015 Warwick District Council confirm in a further letter that all sites contained in the 2014 SHLAA have been revisited to consider their suitability, this process was completed by 25th September 2015.

At no time during the processes between 13th August 2015 and Warwick District Council passing the revised local plan on 24th February 2016 were residents or the Parish Council at

Hampton Magna notified or consulted. It was not until 22nd March 2016, some 11 days after the consultation commenced that the Parish Council received a specific formal briefing from Warwick District Council. The final briefing was held on 5th April 2016, well into the consultation process.

The term legal compliance includes whether the plan has been prepared in accordance with the Warwick District Council Statement of Community Involvement.

A new Statement of Community Involvement (SCI) was adopted by Warwick District Council on 27th January 2016, one month ahead of the council meeting where the modifications to the local plan was agreed. Proposed modifications to the local plan would have been known by the time of the SCI publication which requires consultation with bodies such as the Parish Council during key stages in the production of Local Plan documents.

Modifications to the local plan to accommodate a significant increase in housing provision can only be classed as a key stage in the local plan and WDC have failed to comply with the SCI in their lack of consultation.

Documentation

The SCI states WDC 'i) *aims to make the process as simple as possible by writing in plain English and explaining any planning terms that are used*' and 'ii) *ensure that the information you need is available on our website*'.

- The majority of documents published by WDC are confusing, full of jargon and not understood by a wide section of the public they directly affect. The consultation response form is difficult to navigate and people do not know what to write, they are designed to meet the needs of developers and planning professionals rather than the wider public audience. Many residents have become confused, frustrated and simply given up. Only when directly communicating with the programme officer was it established that the response form is not mandatory and simple letters can be sent.
- As recorded in the 'Failure to Consult' section, WDC have known for some time that modifications were required and certainly by 24th February 2016, the exact nature of these modifications. WDC failed to publish key documents until the day the consultation commenced on 11th March 2016, even then the documents were not available until at least after 3.00 p.m. WDC could have easily published this information immediately following the meeting on 24th February 2016 allowing at least some research to be conducted ahead of the consultation.

Feedback was given to WDC in the initial consultation process through an 831 signature petition that encompasses the same points, WDC have failed to take these relevant views on board.

Timescales

The SCI notes consultations on planning documents usually last for six weeks, however the Council recognises that there are certain times of the year when this may need to be extended, such as Easter. This consultation period falls across Easter and has directly affected awareness and research into the multitude of difficult to understand documents

the council made available on the day the consultation commenced.

Conclusion

The Planning Inspector's recommendations following the submission of the local plan was to withdraw the plan rather than adopting a period of suspension. This was fought by the council who then embarked on a streamlined process to make the suspension fit the circumstances instead of following their own SCI.

An example of this is the slippage in the timetable for the whole modification process. The consultation was due to start in January/February 2016 according to EXAM25 dated 13th August 2015. By 14th October 2015 in EXAM26 it had been put back to February/March 2016 and it finally commenced two months later than originally planned. It was noted by WDC that the appeals on The Asps and Gallows Hill were not decided until 14th January 2016 however this still allowed time for some publication of considerations to the wider public.

If WDC had acted expeditiously there would have been sufficient time to adhere to the SCI. At best WDC have failed to grasp the magnitude of work involved in this modification process, at worst an inference could be drawn that these processes were intentionally used to minimise objection to the modifications and make significant cost savings.

Justified

The allocation of extra sites at Hampton Magna and Hatton Park together with the increase in Housing intensity on previously allocated sites conflict with the Spatial Strategy, are disproportionate and are in excess of the housing requirement for the district.

WDC have incorrectly classified Bubbenhall as a limited infill village when this location is a growth village, within close proximity to Coventry and sites around the village should have been objectively assessed.

Distribution of Development

Several points are contained within the Distribution of Development Strategy Paper 2016 to evidence why the sites conflict the policy:

Paragraph 8 b) Hampton Magna cannot sustain the proposed increases in housing allocations within Hampton Magna and Hatton Park (**see sustainability**).

Paragraph 8 g) Exceptional circumstances do not apply in these circumstances:

- WDC have adopted a streamlined approach in the modification process by eliminating any previous sites that are now unavailable and ruling out Compulsory Purchase Orders. They have afforded a very limited timescale to identify new sites. This approach has decreased the availability of suitable alternative sites.
- The specific housing needs can be met elsewhere at more suitable locations in the green belt which are sustainable and have greater links to Coventry.
- Hampton Magna is not a deprived area. Paragraph 14) With a surplus of over 800 homes in the modifications versus the housing requirement there is not an essential need that has to be met in allocating this greenbelt site. This is also not

the best site within the green belt to justify the exceptional circumstances (see sustainability and alternative options).

Paragraph 16 The development in and around Hampton Magna is grossly disproportionate with an increase of 41% in housing provision in the village (see sustainability):

Settlement	Dwellings (2011)	Initial Proposal	Initial Increase	Proposed Modification	Total	Distance from Coventry Centre	Total Increase
Baginton	356	35	10%	45	80	4.9m	22%
Barford	606	106	17%	75	181	14.3m	30%
Bishop's Tachbrook	737	150	20%	30	180	14.2m	24%
Burton Green	263	60	23%	30	90	5.9m	34%
Cubbington	980	100	10%	95	195	7.3m	20%
Hampton Magna	602	100	17%	145	245	11.8m	41%
Hatton Park	798	80	10%	95	175	12.0m	22%
Kingswood	381	43	11%	10	53	14.3m	14%
Leek Wotton	381	26	7%	94	120	9.1m	32%
Radford Semele	803	120	15%	60	185	11.1m	23%

Paragraph 25) Hampton Magna has limited connectivity with Coventry, the only means of travel to Coventry is by car through heavily congested routes. Despite bus and rail services noted in the village profile, neither of these service Coventry which almost 12 miles away. The proposals in Hampton Magna are by no way 'small' or account for 'some growth' but account for a significant increase in housing and pressure on services far exceeding any other growth village development including those closer to Coventry.

Paragraph 26) Further sites to the South of Warwick and Leamington Spa are ruled out due to poor connectivity with Coventry and less suited to their needs. The sites within Hampton Magna share this position in their connectivity problems and if green belt development is justified then sites closer to Coventry are best placed to deal with this need.

Paragraph 27) Hampton Magna is neither adjacent to Coventry or has good connectivity with the City.

Paragraph 28) Infrastructure impacts cannot be readily mitigated around Hampton Magna

and the only plans to improve transport fall outside of the Parish on the A46/Birmingham Road roundabout (see sustainability).

Overall Housing Provision

In the letter from WDC to the Planning Inspector (EXAM29) dated 24th February 2016 paragraph 2.6 notes that the current proposals are to accommodate 17,577 homes across the district. This is in excess of the 16,776 homes that are required in line with the Coventry and Warwickshire Housing MOU. This figure also includes a reduction in the projected number of windfall sites.

This leaves an excess of at least 800 homes across the district during the plan period.

Due to this significant excess, exceptional circumstances cannot be relied upon when allocating the additional site at Hampton Magna and increasing the housing density.

Bubbenhall

Modifications to the local plan arise from the shortfall of housing provision in Coventry. The theme throughout many documents is that these homes should have strong links to Coventry; after all they are to account for the City's need. The Village Profile and Housing Allocations 2016 document rules out the village of Bubbenhall, it scores 35 and is ranked 11th whilst Hatton Park scores 37 and is ranked 10th (the top ten being included for thorough site examination).

Bubbenhall is 6.7 miles from Coventry City Centre and contains 272 homes. The village has two public houses, a shop/post office, takeaway, five nurseries, and the Royal British Legion. There is also a playground and village hall according to the draft Bubbenhall Neighbourhood Plan (January 2016).

Bubbenhall has a greater range of facilities than Hatton Park and has been incorrectly scored. The proximity to Coventry, main road infrastructure, airport and the planned strategic employment site make it an ideal location for significant housing provision.

As the site was incorrectly classified as a limited infill village, it was not subject to the same level of site scrutiny as the growth villages resulting in increases on housing to Hampton Magna and other growth villages.

Whilst land around Bubbenhall is in the green belt, it has a much lower landscape and green belt value than that around Hampton Magna. This is because it is close to Coventry airport, the planned employment centre and opposite the large scale Smith's concrete facility which may also offer opportunities to build on previously developed land.

Positively Prepared

Modifications to the local plan use evidence from 2014 assessments based on proposals for a 100 home single site. Site assessments have not been properly updated, are contradictory and have been made in isolation; the wider impact has not been considered. Whilst strategic transport assessments exist there is no assessment of local transport issues. The evidence base is therefore flawed and should not be relied upon to determine the levels of housing required.

The call for alternative sites was limited and may have eliminated further options.

The following contain extracts from the 'Village Sites Appraisal Matrix 2014' and the 'Village

Sites Appraisal Matrix 2016’;

The content of these matrices are in part generic, contradictory and assessments of sites are dealt with in isolation. The position of Hatton Park and Hampton Magna is unique, they are categorised as separate growth villages in their own right however rely on the use of the same services. This is a unique situation across the Growth Villages recorded in the local plan proposals.

The 2014 matrix was generated when Warwick District Council was considering an increase of 100 Homes to Hampton Magna and 80 homes at Hatton Park rather than the now 245 and 175 respectively. The 2016 matrix contains much the same information as this initial exercise and does not make a true assessment of the impact of multiple sites on the sustainability of Hampton Magna.

An example is the referral to transport problems on the proposed sites:

‘Potential for major negative effects on traffic is all sites are taken forward. Could have the potential for major negative transport effects given that the site has capacity for over 100 dwellings.’

This is listed against both of the sites in Hampton Magna, it fails to cater for the fact there will be 245 dwellings. If there is a potential for major negative effects on just 100 dwellings it is clear this threat will be realised if 245 homes are built. This threat is not taken into account in deciding upon modifications to the housing allocation.

The assessment also fails take into account traffic generated by the 175 homes at Hatton Park when they have to use the services at Hampton Magna, namely the shop, school, post office and GP surgery. There is no assessment of this on the appraisal of Hampton Magna or Hatton Park.

The disproportionate increase in housing will place much greater pressure on local services such as the GP and school which already service Hatton Park and surrounding areas and will have a huge impact on traffic on what are already severely congested roads.



This photo was taken at school pick up time - the roads around the school become dangerously congested at busy times.

This school is in the same vicinity as the GP surgery and is already dangerous due to the complete lack of visibility when attempting to cross this road during busy times. There is no safe place to cross the road and a crossing and restrictive parking bays need to be considered.

This route is serviced by buses which quite often cannot get through all the parked cars and emergency vehicles would struggle to get through to the GP surgery at busy times.

The appraisal also refers to other infrastructure problems in isolation when considering 100 homes:

'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. Effective surface water management essential to avoid knock on impacts further down the water courses.'

Hampton Magna has for some time suffered with water supply, sewerage and draining problems, again these comments relate to individual sites for 100 houses rather than the proposed 245 homes which will make the limited and aged system significantly worse.

The matrices also note *'Hampton Magna has been identified as a growth village with a range of services and facilities.'*

Whilst on paper there is a range of services and facilities, these amount to a small shop which encompasses a post office, a beauty salon, a café, a public house and a GP Surgery. There are two playgrounds and a school.

This 'range' is limited, the services and facilities provided in Warwick need to be used for day to day living therefore the village is far from sustaining daily life. The generic nature of these assessments is also documented in the fact Hatton Park is also assessed as having 'range of services and facilities' when in fact it has one very small village shop.

The matrices also note there *'Might be some options for enhancing community facilities locally'* however there are no plans to provide or enhance community facilities (SA04).

In relation to the land South of Lloyd Close (Site H51) this was previously ruled out in the 2014 matrix as *'Not suitable due to major impact on residential amenity'*.

The 2016 report however contradicts this in assessing it as suitable based purely on a shortfall of housing.

The matrix notes the green belt overall value assessment is high for the site. It is assessed as a *'Large Green Belt area which provides a valuable role in maintaining the openness of the landscape and protects the character of Hampton Magna and Hampton on the Hill.'*

The 2014 report notes there is a *'High residential impact. Major impact on open field landscape'* with the 2016 report noting there is a *'Major impact on residential amenity. The site levels require re-engineering.'* The conclusions of the reports are also contradictory. The 2014 Report states: *'This site does have a number of potential access points but does not provide any physical regenerative impact, being quite separate from the main village services and facilities. Potentially significant residential amenity impact.'*

However the 2016 report states: *'The site has been assessed as suitable. It is not the highest level of landscape sensitivity and although it is contained within a parcel that plays an important role in the Green Belt, its development would not reduce the distance between the village and Warwick. It has the potential to be well connected to the main settlement.'*

The Village Profile and Housing Allocations Report 2016 also refers to points which directly contradict the infrastructure and allocation of housing:

Paragraph 8.7) The report correctly highlights the constraints of the railway bridge on

Budbrooke Road but has failed to take into account any other road restrictions such as Ugly Bridge Road and Hampton Road which are used as much, if not more, than Budbrooke Road as a means of access. There has been no assessment of these roads, their use and constraints.

Paragraph 8.15) Conclusions concerning the sites note Hampton Magna could offer additional capacity and the apportionment model suggests 180 dwellings. Even if the village is considered sustainable, which it is not (see sustainability), WDC assert it is reasonable to extend the indicative capacity to a *degree*. The increase is wholly disproportionate making the total allocations greater than any other growth village in the district.

Alternative Sites

Timescales concerning the call for sites are contained in the letter from WDC to the Planning Inspector dated 14th October 2015 (EXAM26). This shows the call for additional sites lasted 15 working days starting on 6th October 2015.

This limited duration mirrors the legal compliance issues around timescales in that WDC have adopted the minimum permissible processes to demonstrate they have considered alternatives.

Due to the limited timescales on this consultation process, further information cannot be reasonably obtained to identify sites that would have been for sale during this period. One such location that was first advertised for sale on 10th August 2015 is an area of 43 acres of land off Hampton Road, Warwick as advertised by Sheldon Bosley, Land & Farm Houses.

By this date it was clear to WDC of the need to provide additional housing in the letter dated 14th August 2016 (EXAM25).

Following a freedom of information request WDC confirm this site had not been promoted to the Council through the Call for Sites process and had therefore not been assessed. If sites were only considered where specific responses had been received within the 15 day period it shows a disappointing lack of proactive site research by WDC.

I am awaiting communication with the land vendor to establish if they were aware of the call for sites and whether this would have been submitted. Although the site is within the green belt, it is a large parcel of land with good transport links that could have been a self contained development.

Starting a call for sites process is not resource intensive and could have commenced much earlier in the process with the same deadline, we will never know if this would have identified other more suitable sites. Again an inference can be drawn that WDC were not realistically interested in proper alternatives.

There are a number of potential brownfield sites in Warwick, the Linen Street car park is an example. A costing analysis may indicate that this is too expensive to repair so may give scope for further houses which would enhance the surroundings as the car park is currently acknowledged as an eye sore.

Consistent with National Policy

Redefining the green belt boundaries around Hampton Magna to accommodate unsustainable development is not exceptional circumstances and inconsistent with

National Policy.

Paragraph 83 National Planning Policy Framework is clear in that Green Belt boundaries should only be altered in exceptional circumstances. Parliamentary briefing paper SN00934 reinforces this position and notes the concept of exceptional circumstances is further elaborated as being "*for example when planning for larger scale development such as new settlements or major urban extensions.*" Hampton Magna is a location which can sustain the original plan for 100 homes but not an additional 245 homes (see **sustainability**) the criteria for exceptional circumstances is not met.

Sustainability

The Sustainability Appraisal Report non-technical summary outlines a number of objectives that are not met through modifications to the local plan around Hampton Magna.

Objective 1 - To have a strong and stable economy

The position of Hampton Magna next to a mainline train station will attract commuters to Birmingham and London. As previously noted there are no easy public transport links to Coventry whilst Birmingham is as little 26 minutes by train and London 1 hour and 15 minutes. Hundreds of people a day already commute from Warwick Parkway train station to London and the affordability of housing outside the capital is likely to attract further commuters. Therefore, housing modifications in Hampton Magna are unlikely to meet the employment needs of the local community.

Objective 2 - Enable a range of sustainable transport options

Objective 3 – Reduce the need to travel

There are three routes into Hampton Magna which all have constraints and have not been properly assessed in light of the proposed modifications, the site locations will make residential roads more dangerous and significantly increase congestion.

There are only three roads in and out of Hampton Magna, all have constraints and are not suitable for the uplift in housing:

- Old Budbrooke Road narrows to a single lane at the railway bridge which is also controlled by a four way traffic light junction. This is the only road that has sufficient width to cater for normal two way traffic in and out of the village.
- Ugly Bridge Road is a country road with no markings, it is narrow and goes down to one lane underneath the railway bridge. Vehicles regularly encroach on the verges to pass each other.
- Hampton Road is also a country road with limited markings and also travels through Hampton-on-the-Hill where it is single lane and has further traffic calming measures. The road through Hampton-on-the-Hill is single lane due to parking throughout the village.

All three routes are regularly used depending on direction of travel i.e Warwick/Coventry,

access to M40/Stratford or towards Solihull/Balsall Common.

The road network may be able to cope with the proposed 100 homes or approximately 174 cars (DoT Table NTS9902 average 1.74 cars per household Rural Village, Hamlet and Isolated Dwellings 2013/4) however it cannot cope with a vast increase of approximately 252 to make 426 cars in total.

This would be in addition to the extra use of Budbrooke School, GP surgery and other facilities by Hatton Park. Due to the age and lack of transport assessments on all three routes, the evidence base in respect of transport issues is flawed. The Hampton Road/Ugly Bridge Road is now used as a cut through to the main Birmingham Road by the development of Chase Meadow. This has seen a significant increase in traffic along these roads. This impact was not considered at the time of preparing the assessments as Chase Meadow continues to be built.

The position of the sites and increasing housing density will make the roads within the village more congested and dangerous. Evidence is available through the Parish Council and Budbrooke School meetings and newsletters going back years concerning problems over parking around the school and by commuters using the train station. These problems see dangerous parking around junctions into and out of the village and the centre of the village. The modifications are set to significantly increase vehicular traffic through these already congested and dangerous locations.

If there is more traffic on unsuitable roads it will make them more dangerous and discourage walking and cycling. Public transport will be affected, the local bus already struggles to pass through the residential streets and is held up on a daily basis due to congestion and parking problems. Parking provision across the village is poor, the estate was designed in the 1960s and cannot now accommodate the amounts of vehicles per household, there is limited parking around the school and facilities.

Dispersing modifications throughout the district will increase the need to travel, particularly in those quite some distance from Coventry. Office for National Statistics record the average commute in distance is a little over 9 miles however some sites, including Hampton Magna are well over this distance and only have one realistic means of travel, by car. Travelling to Coventry using public transport from Hampton Magna requires a 15-25 minute walk and either two bus or two train journeys taking a minimum of one hour.

Objective 5 - Ensure the prudent use of land and natural resources

Objective 11 - To adapt to the predicted impacts of climate change including flood risk

The modifications do not cater for existing physical infrastructure with roads, sewerage, water supply, electricity and drainage systems requiring overhaul to cater for this significant extra demand.

Sewerage and drainage problems persist around Hampton Magna with roads regularly flooding during spells of heavy rain, this will become worse with additional housing.

The supply and sewerage systems also encounter regular problems as noted in the sustainability appraisal. Supply pipes have burst several times over the past twelve months along with blockages to the sewerage system. The Parish Council have relevant documents concerning issues and have met with Severn Trent water.

Objective 6 - Protect and enhance the natural environment

Bats species are present in and around the proposed site South of Lloyd Close, the modifications will have a significant detrimental effect on this protected species and their habitat. In the planning process for the A46 Longbridge bypass bats were discovered that resulted in a modification to the plan by moving the development 200m due to the importance of a roosting site and to mitigate disturbance during the development. A thorough survey should have been conducted through the SA process.

Objective 7 - To create and maintain safe, well designed, high quality built environments

The significant increase in housing will reduce the sense of identity of Hampton Magna, it will not enhance the landscape of the village and not improve safety, particularly road safety.

Objective 9 - To create good quality air, water and soils

The modifications will result in increased congestion and car usage having a detrimental effect on air quality. The sites are closer to the A46 and M40 than the existing settlement, they will make a negative noise and light pollution impact on the existing settlement and the new housing will suffer light and noise pollution from the A46 and M40.

Objective 10 - To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.

Increasing a population of a rural village (especially with housing requirements for a City 12 miles away) will result in increased car usage thereby increasing greenhouse gases.

Objective 13 - Protect, enhance and improve accessibility to local services and community facilities There are no plans to provide or enhance community facilities (SA04) as part of the modifications, in fact the disproportionate increase in housing will place much greater pressure on local services that will suffer as a result. The initial plans noted Hampton Magna could cope with 100 homes, approximately 240 people (2011 Census average 2.4 people per household). The modifications seek an increase of nearly 350 to make a total approximate population increase of 588. This level of growth is unsustainable and will reduce the availability of services such as the GP and schooling than the present situation, it will reduce access to health and social care services

Objective 14 - To improve health and well being

The site now proposed is regularly used by the community from dog walkers to the rambler's association and has a public right of way across it, there will be a detrimental effect on the provision of this open space

Alternative Options

Reduce housing allocations in growth villages

The modifications contain a surplus of 801 homes over the required need for the district. Growth Village housing provision modifications should be reduced or eliminated altogether based on their proximity to Coventry.

Villages with limited connectivity to Coventry could have their modifications eliminated, i.e those with no direct public transport links or those over 10 miles away (considering the ONS

average commute statistics).

Referring to the table in the 'Justified' section this would result in the following surplus reduction: Eliminate Growth villages over 10 miles from Coventry: -415 homes Cap total increase in housing to villages closer to Coventry to 20%: -90 homes This option would still maintain a surplus of 296 homes.

A further option could be to cap total Growth village increases at 20%, this is a reasonable figure based on the additional pressure such housing would place on village services and infrastructure. This would result in the following surplus reduction: Cap total increase in housing provision across growth villages at 20%: -323 homes This option would still maintain a surplus of 478 homes.

Define Bubbenhall as a Growth Village

If correctly assessed, this location would score higher than Hatton Park in relation to facilities and would therefore be defined as a Growth Village within close proximity to Coventry. An appraisal of sites around this location should be conducted and sites identified for housing.

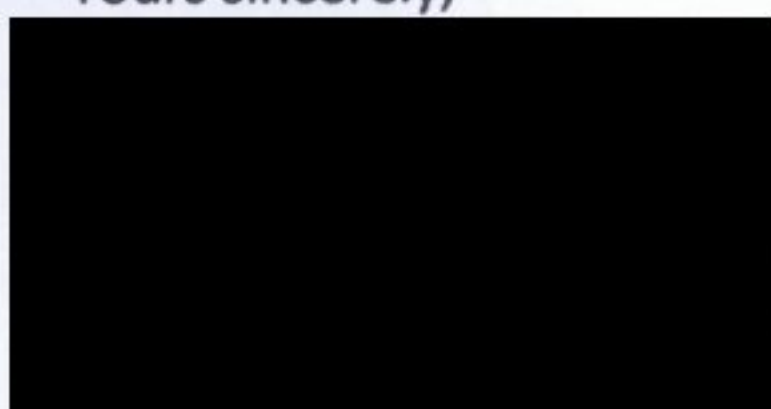
Whilst land around Bubbenhall is in the green belt, boundary changes would be justified as the location is likely to have less landscape value. Sites would have good transport links to Coventry and the employment allocation making this a much more sustainable location than Hampton Magna.

Target Development to make villages sustainable

Instead of development around currently sustainable locations making them unsustainable, development should be made around villages with fewer services to ensure their future sustainability. S.106 agreements can be used to provide services, facilities and infrastructure which are lacking in many small villages. Locations such as Stoneleigh and Weston under Wetherley are closer in proximity to Coventry than many other sites and should be assessed as part of the modification process.

I look forward to receiving your response.

Yours sincerely,

A large black rectangular redaction box covering the signature of Mr M J Alexander.

Mr M J Alexander