Geoffrey Knibb

## **CONSULTATION – LOCAL PLAN**

## Objections to proposed modifications

I believe modifications to the local plan are not legally compliant, positively prepared, justified and are not in accordance with National Policy. I wish to object for the following two main modifications affecting Hampton Magna:

- 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 also object to two further modifications that will also affect the village as additional housing in Hatton Park will have to use services such as the school, GP and roads around Hampton Magna:

- 3. Increase in housing density to the land (H28) North of Birmingham Road from 80 to 120 homes (Hatton Park)
- 4. Allocation of land (H53) Brownley Green Lane for 55 homes (Hatton Park)

I believe the plan is not legally compliant or sound for the following reasons:

There has been no further consultation with the community and Parish Council in making significant changes to the plan. It is being submitted in its current state with no further changes despite the views of residents.

The council have also failed to publicise the modification process, failed to communicate with residents, have made documents difficult to find and so full of jargon that many residents simply give up.

They have also conducted the shortest possible consultation over an with documents unavailable until after the consultation had started.



The amendments have been compiled over the course of a few months and have taken a streamlined approach where only land available for sale has been considered and compulsory purchase ruled out.

Due to the limited timescale in this consultation process Warwick District Council were not very proactive in seeking alternative sites. They should have carried out widespread advertising within the district to make land owners aware they were seeking land for additional housing, not just Brown Field site areas but also consideration would be given to areas within the Green Belt.

This may have eliminated sites more suitable for development than Hampton Magna resulting in the Council proposing amendments to the Green Belt. Paragraph 83 National Planning Policy Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances where there is sustainable development.

I believe the plan is not **justified** because the allocation of extra sites at Hampton Magna and Hatton Park together with the increase in Housing intensity on previously allocated sites are in excess of what is actually needed. There is a shortfall of housing in Coventry and none of the sites are well connected to the City. The allocation of housing in Hampton Magna is disproportionate and the highest increase across any growth village at a 41% total increase in housing.

The Council have not fully considered Bubbenhall as a growth village within close proximity to Coventry and sites around the village should have been objectively assessed for housing. Warwick District Council have incorrectly classified Bubbenhall as a limited infill village when this location is a growth village within close proximity to Coventry.

Locations such as Stoneleigh and Weston under Wetherley are closer in proximity to Coventry than other sites and should have been assessed as part of the modification process.

I believe the plan is not **positively prepared** because the new sites and increase in housing density is based on evidence from 2014 assessments for proposals on a 100 home single site. Site assessments have not been properly updated, contradict one another and the wider impact on additional housing has not been considered. Whilst strategic transport assessments exist there is no assessment of local transport issues. I also believe it was not positively prepared as alternative sites have not been sufficiently sought and some, such as that opposite Central Ajax football club, may have been overlooked.

I do not believe the plan is **consistent with National Policy** as there needs to be exceptional circumstances to justify removing land from the green belt which are not met because the modifications are not sustainable.

## The modifications are not **sustainable** because:

- There are three routes into Hampton Magna which all reduce to single lanes 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.
- The modifications do not cater for existing physical infrastructure with roads, water supply, electricity, sewerage 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. Supply pipes have burst several times over the past twelve months along with blockages to the sewerage system. This will become worse with additional housing
- 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
- Increasing a population of a rural village will result in increased car usage thereby increasing greenhouse gases and reducing air quality. There will be an increase in light and noise pollution.
- There are no plans to provide or enhance community facilities as part of the modifications, in fact the disproportionate increase in housing will place much greater pressure on local services such as the GP and school that will suffer as a result
- 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

I understand that my comments submitted will be considered in line with this consultation and may be made public by name.

Signed:

14th april 2016 Date: