

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

Our Reference – 32792/gc 010
Your Reference –

Dear Sir / Madam

WARWICK DISTRICT COUNCIL – LOCAL PLAN, VILLAGE HOUSING OPTIONS AND SETTLEMENT BOUNDARIES CONSULTATION, NOVEMBER 2013.

On behalf of our client, the King Henry VIII Endowed Trust (Warwick), AMEC welcomes the opportunity to submit representations in response to the above Consultation.

It is the Trust's considered view that new development should be concentrated within, and on the edge of, the existing urban areas (i.e. Leamington, Warwick and Kenilworth). However, as part of a balanced and sustainable spatial growth strategy for the District, the Trust also considers it is appropriate for some of the larger villages to accommodate new development and that, where necessary, Green Belt boundaries should be altered to facilitate this, including at Hampton Magna.

Background and context

The KH8 Trust is a local charity which has land interests at Hampton Magna, one of a number of villages originally identified in the District Council's Preferred Options version of the emerging new Local Plan (May 2012) as a suitable location for future housing development. However, as the village lies within the Green Belt, the Council has stated that a new Green Belt boundary should be drawn around the settlement to allow for land within, and on the edge, of the village to be removed from the Green Belt to allow for the development of 100 new dwellings.

More recently as a settlement which performs well against sustainability criteria, in the Revised Development Strategy (June 2013) Hampton Magna is ranked as a Category 1 village where land will be allocated for between 100 and 150 new dwellings over the Local Plan period. With regards to what site(s) would be released for development, the RDS states that decision will be subject to the findings of ongoing work on ecology, landscape and a review of Green Belt boundaries.

The District Council's decision to review Green Belt boundaries is consistent with national planning policy guidance:

- The NPPF at paragraphs 83-84 states that, once established, Green Belt boundaries

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should only be altered in ‘exceptional circumstances’, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Further, when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

- To boost significantly the supply of housing, the National Planning Policy Framework (NPPF) (Paragraph 47) requires local authorities, in preparing their local plans, to ensure that the full objectively assessed needs for housing are met as far is consistent with policies set out in the Framework. Seeking to meet such needs is part of the soundness test of development plans being positively prepared (Paragraph 182).

According to the Warwick District Council, the full objectively assessed housing needs for the District is 12,300 dwellings¹; a scale of development for which WDC considers there is insufficient suitable and available sites outside of the Green Belt to meet. The lack of suitable and available sites to meet objectively assessed housing needs provides the exceptional circumstances for a review of Green Belt boundaries. However before land can be released from the Green Belt for development it has to be shown that doing so would not be in conflict with the fundamental aim of Green Belt policy nor the stated five purposes it serves (refer NPPF paragraphs 79 – 80).

The Trust’s land interest at Hampton Magna is identified in Figure 1.

Figure 1 Extent of the Trust’s Land Ownership at Hampton Magna



¹ Based on the findings of the recently published Coventry & Warwickshire Joint Strategic Housing Market Assessment (SHMA) with neighbouring authorities (November 2013), it has been recommended that the housing requirement for Warwick District should be increased from between 13,200 dwellings (660dph) and 14,400 dwellings (720 dph) over the period 2011 to 2031.

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Housing Options and Settlement Boundaries Consultation – general comments

Having regard to the aforementioned guidance in the NPPF, and the latest evidence base on District's housing need and housing land supply, AMEC welcomes the Council's decision to undertake a Green Belt review and of its approach to identifying suitable land to be released from the Green Belt.

Importantly the District Council's decision to undertake the review is not only consistent with the NPPF but also with advice issued by Inspector's at a number of recent Local Plan Inquiries (e.g. Waverley, Stevenage and St Alban's) where local authorities had failed to undertake a Green Belt review to demonstrated how objectively assessed housing needs might be met. At these LPIs, the Inspector's in charge called on the local authorities to conduct reviews so that they had a robust evidence base to either demonstrate why development of potential sites in the Green Belt would be inconsistent with the policies of the Framework or to establish where land in the Green Belt could be released for development and new boundaries established that are capable of enduring beyond the plan period.

AMEC also welcomes research undertaken by the Council into the changing nature of rural areas within the District. This includes important information which has been highlighted in the consultation document about key demographic changes such as the aging age structure, which has significant implications for the future vitality and sustainability of settlements in the rural area as demand for certain facilities e.g. primary schools, which often act as a focal point for many communities, declines, and demand increases for costly outreach support services.

Based on the evidence presented, AMEC supports the Council's recognition in Chapter 2 (and Chapter 4, s4.6) that to help 're-balance' the population profile of rural areas and villages in the District, this will require the supply of new sites for housing, which will not only help address indigenous local housing requirements (including affordable homes) but also support the wider housing growth demands for the district. This approach to the distribution of housing is also consistent with the NPPF's support for local authorities promoting sustainable development in rural areas through their local plans (Paragraphs 28 and 55).

Based on AMEC's experience of undertaking similar work on behalf of landowners and local authorities, we consider that the site selection process and methodology, which has been developed by WDC for appraising village site options, is appropriate, suitably thorough and robust. Similarly, based on our own experience of undertaking objective Green Belt appraisal work for other local authorities, we consider the approach adopted in the Green Belt study to be sound and the key findings robust.

AMEC also supports the District Council's decision to limit options for growth, notably in and around the villages of Barford, Bishop's Tachbrook and Radford Semele, based on the research findings relating to the 'environmental limits' of developing in non-Green Belt areas.

Green Belt Villages and Insetting

In order to accommodate limited growth through the preferred housing options, AMEC supports the Council's proposal (Chapter 6, s6.6) to remove the identified villages from the

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Green Belt and establish village boundaries or inset plans. It is acknowledged and agreed that by inseting a village in the Green Belt, this provides a slightly less restrictive planning policy environment and, importantly, will support opportunities to develop the identified preferred option sites.

Village Boundaries and Non-Green Belt Villages

AMEC supports both the rationale and logic presented in the report for identifying indicative village boundaries for non-Green Belt villages (Chapter 6, s6.9).

Preferred Options and Village Boundaries - Hampton Magna

Chapter 7 of the consultation introduces the preferred site options for the 10 villages required to support housing growth in the plan period. Within the village of Hampton Magna, the Preferred Option presented is:

1) Land south of Arras Boulevard – 4.32 ha developable area with a reduced development capacity of 100 dwellings to provide sufficient screening.

AMEC on behalf of King Henry VIII Endowed trust welcomes the inclusion of the site as a preferred option for development within Hampton Magna. AMEC concurs with the broad findings of the report and supporting technical studies which, amongst other things, state that our client's site "could accommodate a sensitively designed village extension with a modest impact on the fundamental aim, essential characteristic and purposes of the green belt". We also acknowledge and support the conclusion of the site assessment which states a need for careful masterplanning to minimise landscape impact and the scope to link the site to the wider village environment, including local schools and community facilities.

The King Henry VIII Endowed Trust are committed to undertaking a detailed masterplanning exercise for the site and have commenced a range of technical studies to inform the design evolution process. Additionally we have undertaken our own green belt review (September 2013) which assesses the extent to which land surrounding Hampton Magna still fulfils the purposes of green belt (as defined by the Framework) evaluating the sensitivity of parcels of land to development and change. The results of this study (Hampton Magna Green Belt Review, AMEC) are consistent with those of the Council's and can be made available upon request.

With particular regard to the identification of the Trust's land as a suitable site to be released from the Green Belt, in our study we highlighted which of the five stated Green Belt purposes in the NPPF are applicable to the development context at Hampton Magna. Three purposes were identified and are reprovided below, together with our considered view on how well the Trust's site performs against each purpose:

- checking the unrestricted sprawl of large built-up areas

Proposed development on the Trust's landholding immediately to the south of the village performs well against this purpose, in that the important area of green belt between the village and Warwick would not be compromised.

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- preventing neighbouring towns merging into one another

Unlike potential development sites to the north and east of the village, proposed development on the Trust's landholding immediately to the south of the village performs well against this stated purpose. In fact, development on the Trust's site would avoid both further ribbon development along the Old Boodbrooke Road and the coalescence of the village with Warwick whose outer urban limits are now defined by Warwick Parkway Station.

- helping safeguarding the countryside from encroachment

Proposed development on the Trust's landholding immediately to the south of the village would represent a natural 'rounding-off' of the settlement, with well defined field boundaries which can be strengthened by additional tree planting. Development at this location would therefore help safeguard the wider countryside from encroachment.

At this stage in the planning process it is understandable that some people resident within the Hampton Magna community have concerns over the potential environmental and character impact of new development in the village. However, having met with members of the Parish Council on this issue and listened to their concerns, and having also undertaken some initial site assessment work AMEC considers that by focusing development at Hampton Myton and on the Trust's site, a number of important opportunities can be realised for the village and the wider Parish; opportunities which will help ensure that the village retains the services it currently has and attracts more to help ensure that it remains a vibrant and an attractive place to live within the District. In Appendix A, we have provided a short note summarising some of the issues which we are aware of and associated opportunities which can come with development.

Hampton Magna - Stewardship and Legacy

The landowner of the site at Hampton Magna, which has been identified by WDC as the Preferred Option to be released from the Green Belt, is a charitable trust which has established strong links with the local community. Trustees are therefore keen to bring forward development that is built to a high standard of design and environmental performance, which the Charity, Hampton Magna and the District Council can be proud.

If the site is allocated for development, then the Charity would be keen to work closely with Budbrooke PC and the wider community to bring forward development proposals which have been informed by and respond to community needs and aspirations. Assuming outline planning permission is secured, the Trust would then select a preferred developer and would look to remain involved in the scheme by vetting the reserved matters application(s) to ensure that quality in the final scheme is maintained and commitments in the outline planning permission delivered.

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Conclusions

In order to meet the full needs of a growing population and maintain a focus upon sustainable development, we support the Council's approach a more distributive approach to housing, including looking at options in the District's more sustainable Green Belt located villages. In particular, on behalf of the King Henry VIII Endowed Trust, AMEC is supportive of the approach to establishing new settlement boundaries at named villages set out in the consultation, and with regards to the village of Hampton Magna, we support the preferred site option as a logical site for development.

Not only is Hampton Magna considered a suitable location for additional growth, we strongly believe that the village can benefit greatly from well planned development of an appropriate scale. Measuring 6.5 hectares our client's site has the capacity to deliver 100 dwellings in a location which would not undermine the stated purposes of the Green Belt. As equally important, given the site's size, sufficient land is available to accommodate new tree planting to help screen the development and create a well defined edge to the southern part of the village without pushing up site density and compromising design quality. By focusing development on land owned by the KH8 Charity, opportunities also exist for establishing, amongst other things, an additional 'secondary' vehicular access into Budbrooke Primary School which will have a number of benefits for existing users of the school as well as neighbouring residents.

Overall, from our preliminary assessment of Preferred Option site and of potentially competing sites, we consider that our client's site is not only a logical location for new development at Hampton Magna but the best site based on the following factors:

- Least impact on the Green Belt
- Least landscape and visual impact
- Physically well connected to the village, with good vehicular access
- Physically well located to the primary school and existing local facilities
- Physically set back from the A46 and the railway line – sources of visual and noise impact
- No known physical or environmental constraints to development

Finally, we can confirm that our client's site is available now, offers a suitable location for development now, and is viable and achievable, with a realistic prospect that housing will be delivered on site within five years.

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Recommendations

To ensure that this important development opportunity is realized, we wish to make the following recommendation:

- That land held by The King Henry VIII Endowed Trust at Hampton Magna, the District Council's Preferred Option, is removed from the Green Belt and allocated in the Local Plan to accommodate up to 100 dwellings.

AMEC on behalf of KH8 Trust are in the process of progressing potential development options for the site and would welcome the opportunity to discuss any of the above matters further with officers at the District Council and Members of CPC.

Yours Faithfully

Michael O'Connell
ASSOCIATE DIRECTOR

Direct Line – 01926-439039
E-mail – michael.oconnell@amec.com

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AMEC Environment & Infrastructure UK Limited
Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
Fax +44 (0) 1926 439 010

Registered Office
Booths Park
Chelford Road
Knutsford
Cheshire WA16 8QZ
Registered in England no. 2190074
amec.com/ukenvironment

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**APPENDIX A -
LAND AT HAMPTON MAGNA:
BRIEFING NOTE ON DEVELOPMENT OPPORTUNITIES**

AMEC Environment & Infrastructure UK Limited
Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
Fax +44 (0) 1926 439 010

Registered Office
Booths Park
Chelford Road
Knutsford
Cheshire WA16 8QZ
Registered in England no. 2190074
amec.com/ukenvironment

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**THE KING HENRY VIII ENDOWED TRUST
Land at HAMPTON MAGNA
BRIEFING NOTE**

Site Description

The site measures 6.5 hectare and is in the single ownership of the Charitable Trust. Located adjacent to the southern built up area of the village, the site is currently used for agricultural purposes. Although the exact agricultural land quality is uncertain at the site, based on a review of published ALC maps, it is understood to be Grade 3.

Access to the site is achievable via Arras Boulevard and there are no overriding physical constraints to development. The landholding is also free of any known statutory ecological or heritage designations, and not being situated within a flood plain is not at risk of fluvial flooding. The site is also suitably distant from the A46 that noise impact is not considered to pose a constraint on development.

Despite the site's size, the number of potential visual receptors is actually relatively low due to a combination of factors:

- neighbouring residential properties being one storey and/or having their gable end directed towards the site; and
- Part of the site being set back from existing housing by intervening playing fields and hedgerow planting.

It is, however, recognised that our client's site – like the majority of greenfield sites on the edge of existing settlements – will require landscaping/screen planting to help mitigate the visual impact of development. Importantly though given the site's size, we consider sufficient space will be available to accommodate more than sufficient structural landscaping/ screen planting and still deliver the proposed 100 dwellings without compromising on the overall quality of development.



View looking to the south



View looking eastward along the site's northern boundary

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Development Potential

Gross Site Area	Net Developable Area	Appropriate Density
6.5 Hectares	4.2 Hectares assuming a gross to net discount of approx 35%	The net developable area provides ample space to accommodate 100 dwellings at an average density in keeping with the rest of the village, and still provide for structural landscaping and screenplanting. The average density on site would be no greater than 30 dph.

Opportunities

By focusing development at Hampton Myton and on the Trust's site, we consider that a number of important opportunities can be realised for the village and the wider Parish.

In the following table we highlight what some of these opportunities could be and have done so against: 1) stated key objectives in the adopted Parish Plan; and 2) in response to the Parish Council's stated grounds for objecting to the allocation of development at Hampton Magna in the emerging Local Plan.

Please note that in highlighting what opportunities can be realised through new development at Hampton Magna, we consider that many of these opportunities will not be secured unless an appropriate level of development is allocated. If too few dwellings are provided for, insufficient funds will be available from the development to help address existing local concerns over infrastructure capacity or meet Parish Plan objectives.

By allocating 100 dwellings at Hampton Magna we consider that the District Council is taking a proactive step to help ensure rural services are maintained and the village remains a vibrant place to live for all sections of the community, for young and old. However, the need for new and expanded local facilities will very much depend upon the existing capacity of existing facilities and demands likely to arise from the new development, with the scale of any financial contribution also being determined by the overall scheme viability.

Parish Plan 2011 to 2016: A Vision for the Future (key objectives)	AMEC Development Opportunities
Keep Green Belt intact	As noted above, we consider that development can be accommodated immediately to the south of the village on land held by The King Henry VIII Endowed Trust, without compromising an important stated purpose of the Green Belt in this location, namely maintaining the physical separation of Hampton Magna and Warwick.

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Parish Plan 2011 to 2016: A Vision for the Future (key objectives)	AMEC Development Opportunities
Help maintain all local amenities	<p>We are aware that over recent years the number of shops in the village has declined. It is our considered view that in these challenging economic times other local services could be lost and therefore believe that new residential development will help maintain the viability of local community facilities and services, including :</p> <ul style="list-style-type: none"> • Shops • Doctors • Public House <p>It is worth noting that the café in the village is supported by the parish church of St Michael's, which is itself is a beneficiary of charitable donations made by The King Henry VIII Endowed Trust (approx £1.9 million over the last 20 years)</p>
Keep community buildings in good order	<p>As part of planned new development the opportunity exists for s106 (or CIL) monies to be directed to provide for and/or help maintain and improve local community infrastructure, which could include:</p> <ul style="list-style-type: none"> • Sport and Recreational facilities (e.g. an all-weather pitch to function as a dual-use facility used by the primary school and wider community) • Improved Community Hall or new facility provided as part of an expanded primary school • Informal and formal open space • Allotments • Facilities for teenagers e.g. youth centre, skateboard park etc.
Retain and enhance existing bus services	<p>The success and viability of rural bus services very much depends on levels of patronage. New development at Hampton Magna will bring more demand for such</p>

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	services and additional revenues.
Ageing population profile/housing+ issues	The scale of new development proposed at Hampton Magna will mean that a mix of dwelling types, sizes and tenure can be delivered. A mix which will provide an opportunity for young families to move into the area.

BPC objected to the Preferred Options of the Local Plan – key reasons are represented here	AMEC Development Opportunities
Local housing need – 5 dwellings @ 2010	The District Council's preferred option is to require 40% of new dwellings on development of 5 or more dwellings in the rural area to be affordable. Therefore a significant contribution to meeting rural and district wide affordable housing needs can be met with an allocation of 100 dwellings at Hampton Magna; whether the full quota of affordable housing is delivered in the village or is provided off-site by way of a financial contribution, is a matter that can be dealt with at the planning application stage.
Existing amenities at capacity	Whilst we are unable, at this time, to confirm whether existing amenities in the village are at capacity, the landowner/developer will be required to make a financial contribution through s106 agreement or CIL to ensure that amenities have the capacity to support the needs arising from the development.
Budbrooke School oversubscribed	Budbrooke Primary School is oversubscribed and has been for some time. Although designed as a 1FE school, 293 children currently taught there and this number is to go up to 314 by September 2014. Although a small extension is planned to help accommodate the additional pupils, the school is operating as a 1.5 FE school, with different age groups being taught in joint classes. As noted below, the Local Education Authority, the Head Teacher and Chair of Governors have indicated that they keen to see the school expand to a 2FE school, and believe that this can best be achieved if new housing development (of a

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	suitable scale) is allowed to take place in the village.
Electricity and sewage at capacity	Whilst we are unable, at this time, to confirm whether existing amenities in the village are at capacity, the landowner/developer will be required to make a financial contribution through s106 agreement or CIL to ensure that the capacity of service infrastructure is adequate to support the needs arising from the development. Any improvement to electricity and sewage infrastructure will have benefits to existing residents.
Road traffic and safety	The opportunity exists as part of planned new development to secure, as appropriate, improvements to the local highway network. Improvements which could include traffic calming measures on Old Budbrooke Road to help control traffic speeds through the village, plus improvements to pedestrian and cycle path infrastructure e.g. cycle route to Aylesford School and 6th Form College. Opportunities also exist to improve access to Budbrooke Primary School by providing an alternative /secondary access via our client's site to the school.

END