

**WARWICK LOCAL PLAN EIP
STATEMENT**
Matter 7D
**Proposed housing site allocations - Growth
Villages**

In respect of:
Land at Old Budbroke Road, Hampton Magna

On behalf of:
Centaur Homes





1.0 Introduction

- 1.1. McLoughlin Planning have been appointed by Centaur Homes to submit representations on the Warwick Local Plan 2011-2029.
- 1.2. Centaur Homes have an interest in Land at Old Budbrooke Road, (also referred to as Maple Lodge or land north of) as shown on the enclosed site location plan and wish to see this site allocated for development within the emerging Local Plan.
- 1.3. The Centaur Homes site is land adjacent to the settlement boundary of Hampton Magna, a settlement identified within the emerging Local Plan as a 'Growth Village' and suitable for development. It is a partially brownfield site ideally located to provide sustainable housing development in accordance with the Framework paragraph 55 and has excellent connectivity to Warwick and the wider area.
- 1.4. Centaur Homes original representations on the draft Local Plan, which include objection to Policy DS11 and the allocation of H27, are maintained. Objection to H27 identified harm to the green belt because the site is located within the strategic gap between Hampton Magna and Warwick and development here would contribute to the coalescence of the settlements. Objections were also made on the basis that the site does not conform to the Sustainability Appraisal or the Spatial Strategy to avoid coalescence and to protect important heritage assets.
- 1.5. Centaur Homes representations on the modifications to the draft Local Plan are also maintained. In respect of site allocations, their continuing view is that the site at Old Budbrooke Road should be allocated within the Local Plan for housing development in preference to H51, which should be de-allocated. Centaur Homes also maintains its objection to the intensification of development on H27 through an increase in housing numbers, for the reasons given in previous representations. The modifications to policy DS19 Green Belt were objected to as the proposed changes to the Green belt around Hampton Magna are not supported or considered to be compliant with the NPPF.
- 1.6. Within this statement cross-reference is made to the NPPF (NPPF), the Evidence Base and Core Documents (CDs) previously submitted to the Examination.



2.0 Matter 7d - Proposed housing site allocations - Growth Villages

- 2.1. The matter before the inspector is whether the proposed site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy. The relevant modified draft policy for the Growth Villages is Policy DS11 Allocated Housing Sites
- 2.2. This statement is made only in respect of Growth Village Hampton Magna where two sites have been allocated, H27 – South of Arras Boulevard and H51 – Land south of LLOYD Chase.
- 2.3. The draft Local Plan originally allocated a single housing site at Hampton Magna, H27 with an expected capacity of 100 dwellings. During the EiP when it emerged that the plan was unsound as it would not meet housing needs over the plan period, the consequential proposed modifications included an additional site H51 at Hampton Magna for 115 dwellings. In addition, an extra 30 dwellings were proposed to be added to the expected capacity of H27, increasing the allocation for this site to 130 dwellings.
- 2.4. Hampton Magna is a green belt village and Inspector Questions 9, 10 and 11 of Matter 7d apply to the site allocations H27 and H51, as both are land proposed to be removed from the green belt. Our following responses to these questions demonstrate the ways in which the allocations of H27 and H51 are inconsistent with NPPF green belt policy.
- 2.5. Centaur Homes support for the provision of additional housing in Hampton Magna to meet an undisputed need, but identified that the evidence base does not support the allocation of land to meet all of the housing requirement on land on the eastern side of the village, based on consideration of matters of green belt policy, landscape impact and sustainability appraisal. Our position on these matters is unchanged. This statement specifically addresses in more detail the objection on green belt grounds and sets out a reply to each of the Inspector's questions as follows.

Question 9 - What would be the effect of the proposal on the purposes of including land within the green belt?

- 2.6. The effects of the proposed site allocations H27 and H51 at Hampton Magna village on the purposes of green belt land are considered under the following sub-headings, which are the purposes defined in paragraph 80 of the NPPF.
- 2.7. Reference is made in answer to this question to the evidence base provided by the findings of the West Midlands Joint Green Belt Review Study 2015 (unreferenced in



the EiP Core Documents list), the updated Village Sites Appraisal Matrix 2016 (unreferenced in the EiP Core Documents list) and the Green Belt and Green Field Review 2013 (CD V13), and Landscape Sensitivity and Ecological & Geological Study 2013 (CD V16).

- 2.8. As a general point, we consider that the evidence base assessment of the green belt around Hampton Magna shows some variation between CD V13 and the 2015 Joint Study.
- 2.9. In respect of parcel size, green belt parcel HM1 of the 2015 study covering land to the north of Hampton Magna was significantly increased in size by combining parcels HM4 and HM3 of CD V13, and in so doing has skewed the analysis of the purpose of the green belt to the north west of the village where Centaur Homes Old Budbrooke Road site lies. CD V13 provides a finer grained analysis of the green belt in this area.
- 2.10. To the south and east of Hampton Magna, green belt parcel WA2 of the 2015 study and parcel HM1 of CD V13 are similarly extensive and include both allocations. However, the written assessment of CD V13 is more detailed and reference is made to its findings and conclusions in the following analysis.
- 2.11. It is also of note that in the Village Sites Appraisal Matrix 2016, only allocation H27 is recorded as being assessed at a green belt/green field sub-parcel level. H51 and Centaur Homes site are not recorded with a sub-parcel assessment value and this goes to the heart of our concerns over selection of allocated sites. All three sites were accorded a high value for their overall green belt/greenfield worth but the Matrix does not provide evidence of their relative sub-parcel value. The starting point taken from the summary of overall green belt value should have been that the Centaur Homes site (listed as Maple Lodge in the Matrix) on the west of Hampton Magna is identified as having a less strategic green belt role than sites on the east of the village. A sub-parcel assessment should have been carried out and would have allowed the partially brownfield status of the site to be properly taken into account.

To check the unrestricted sprawl of large built-up areas

- 2.12. Paragraph 79 of NPPF identifies the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. The allocation of the open land comprising H51 and H27 de facto conflicts with this purpose.
- 2.13. The evidence of neither the Green Belt and Green Field Review (CD V13), nor the Joint Green Belt Review Study 2015 support major housing land allocations in this part of the green belt.
- 2.14. Both allocations are within green belt parcel HM1 of CD V13. The detailed assessment of HM1 in CD V13 describes the parcel as open fields and identifies an impact on



green belt openness from development in this parcel and also a significant visual impact on the “very open landscape” which additionally provides a countryside setting for Hampton Magna. Clearly, development here will have an immediate and detrimental impact on the green belt.

- 2.15. Although the Joint Study 2015 assessment of the role of parcel WA2 noted the open character of the wider parcel, the contribution of that openness to checking unrestricted sprawl was significantly depressed in the final evaluation by developments along the Warwick bypass. Insufficient emphasis was given to the undeveloped fields character of the remainder of this extensive parcel.
- 2.16. CD V13’s assessment of the impact of development in parcel HM1 on green belt permanence describes how the tight built form of Hampton Magna on this side of the village currently creates a recognisable permanent feature defining the green belt boundary on the eastern side of the settlement. This defining permanent feature would be eroded by allocations H51 and H27 and weaken the ability of the Green Belt to endure, contrary to NPPF. CD V13 identifies the main threat to the permanence of this parcel of Green Belt as the potential eastern and northern extension of Hampton Magna and allocations H51 and H27 are contrary to this evidence.
- 2.17. In the case of H51 in particular, given the arbitrary extent of an allocation that does not encompass the whole of the field within which it sits, development here would lack context and effectively sprawl. While accepting the need for housing land allocations in the green belt to meet housing needs over the plan period, selection of sites to be removed from the green belt must seek to minimise unrestricted sprawl now and in the future, and the allocation of H51 does not secure a defensible boundary to endure beyond the plan period.
- 2.18. Hampton Magna is separated from the large built up area of Warwick by a strategic gap of green belt land. H27 and H51 together represent a major extension of the village in an easterly direction, reducing the narrow strategic gap between the settlements and bringing built development closer to the edge of Warwick, with an increased prospect of future merger. Development on the western edge of Hampton Magna would alternatively not threaten this green belt gap and is less damaging to the green belt purpose of preventing urban sprawl. CD V13 concludes in respect of the Green Belt parcel to the west of the village that it has a less strategic role than the eastern parcels.
- 2.19. The allocations have not been identified in accordance with the final bullet point of NPPF paragraph 85, which requires use of physical boundaries that are clearly recognisable and likely to be permanent. Preventing urban sprawl requires defensible



green belt boundaries. Even if it were argued that the allocations 'round off' Hampton Magna, it is clear that the combined allocations are of a scale that is beyond an acceptable rounding off of the settlement. In this regard it is important to note that the new green belt boundary that would be created, especially in respect of H51, would not be based on the strongly defined natural or man-made features required by national guidance.

- 2.20. The combined effects of a significant physical easterly extension of the village and its impact in views across the rising open landscape towards the village from the east, without defensible and recognisable boundary limits, would create a perception of development sprawling towards Warwick and the threat of future further erosion and would therefore be inconsistent with this green belt purpose of preventing sprawl.
- 2.21. Centaur Homes notes that the CD V13 assessed that the green belt parcel HM4 to the west of Hampton Magna, which includes their site, as well connected to the village and its loss would not constitute sprawl.

To prevent neighbouring towns merging into one another

- 2.22. The Hampton Magna allocations are both on the eastern and south-eastern side of the village and within a green belt gap which has the strategically important purpose of maintaining separation between Warwick and Hampton Magna, as identified in the CD V13. This is a critical area of the green belt, where the gap between Warwick and Hampton Magna is as little as 1km (2015 GBR). Parcel WA2 is accorded maximum weight for its role in preventing neighbouring towns merging in Joint Study 2015.
- 2.23. The inconsistency with NPPF green belt policy on boundaries, identified above in paragraph 2.18 in relation to urban sprawl adds weight to our concerns that the allocations undermine the purpose of the green belt for preventing towns merging. Neither of the allocated sites are defined by strong enduring boundaries that would limit future further easterly outward expansion of the settlement towards Warwick.
- 2.24. This is particularly notable in respect of H51, which has been carved out of a larger open field and has no defining physical boundaries in its own right. The allocation sits within an asymmetric field and cuts off sections of the field. This leaves areas of land unconnected to the neighbouring field and may lead to further hedgerow loss as they are incorporated into the neighbouring fields.
- 2.25. It also the case that the long boundaries of H27 are based on weak hedgerow and a footpath. This is inconsistent with NPPF paragraph 83 advice on the longevity of green belt boundaries and paragraph 85 advice on defining boundaries using recognisable and permanent physical features.



- 2.26. Centaur Homes Old Budbrooke Lane site offers an alternative option for village growth to the west of Hampton Magna and outside of a green belt area that serves the strategic purpose of preventing settlements merging.

To assist in safeguarding the countryside from encroachment

- 2.27. Both allocated sites are visually and functionally part of the open countryside setting around the village (CD V16), and while some encroachment into the countryside around Hampton Magna to accommodate housing growth is accepted as inevitable to achieve the emerging spatial strategy, it is submitted that insufficient regard was had to the partially brownfield status of our clients site in the selection of allocations. CD V13's assessment of parcel HM4, failed to identify the brownfield status of part of the Old Budbrooke Road site in considering the role of the wider parcel in safeguarding from encroachment.
- 2.28. Allocating Centaur Homes site would reduce the extent of encroachment and safeguard more countryside. National policy at paragraph 89 of the NPPF identifies the redevelopment of brownfield land as an exception to the inappropriateness of new building in a green belt. Clearly prioritising the re-use of brownfield land reduces encroachment on open countryside.
- 2.29. Encroachment into the countryside from the physical extent of proposed development, and its visual impact within the open rural landscape, has been compounded by the modifications allocation of H51 adjacent to H27, and by the increase in housing numbers on H27 which will inevitably give rise to a higher density of development with less scope for landscaping to soften the appearance and intrusion of development into the countryside or, importantly, to create a new clear landscape boundary of substance to define the green belt in this location.
- 2.30. The presence of sports pitches in green belt assessment area WA2, within which H51 and H27 lie, was noted but their presence does not confer that housing development would be equally acceptable as sports pitches are appropriate development in the green belt, whereas housing is not.

To preserve the setting and special character of historic towns

- 2.31. Joint Study 2015 makes reference to the good inter-visibility of the area in which H27 and H51 lie with the Warwick conservation area in evaluating the role of the green belt here in preserving the setting and character of an historic town. These sites have an elevated location overlooking Warwick. Development on the eastern side of Hampton Magna would remove part of the rural hinterland setting of the historic market town of Warwick, in conflict with this purpose of the green belt.



To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 2.32. Given the scale of Warwick's housing challenge, there is a need to allocate additional greenfield sites but preference should be given to making use of brownfield sites. Allocation of both green field sites H27 and H51, and the intensification of allocated housing numbers on H27, does not conform with the green belt purpose of assisting urban regeneration and to recycle derelict land.
- 2.33. The option of re-using the part brownfield Centaur Homes site, which accords more closely with this green belt purpose has not been given sufficient weight in the evaluation of potential sites for housing growth in Hampton Magna. Allocation of this site would reduce the amount of green field land taken from around Hampton Magna. CD V13's assessment of parcel HM4, failed to identify the brownfield status of part of the Old Budbrooke Road site.
- 2.34. It is a core planning principle of the NPPF, as specified in paragraph 17, that planning should encourage the effective use of land by reusing brownfield land.

Question 10 - What would be the effect on the openness of the Green Belt?

- 2.35. Proposed allocation H27 would remove 6.45 hectares of open green field land from the green belt and H51 would remove 5.5 hectares of open green field land.
- 2.36. By comparison, allocation of Old Budbrooke Road site would remove 5.5 hectares of land from the green belt, but of this approximately 1.5 hectares comprises previously developed brown field land.
- 2.37. Both the housing site allocations are on open land on the village edge, in an area defined as being of a very open character area in CD V13. Development here would introduce new built development onto green field land and permanently remove that open character. The resulting urbanisation would be readily perceived in views of the village as the built up area of the settlement sprawling out over the surrounding countryside and reducing the strategic gap. The eastern side of Hampton Magna is particularly prominent in views from the A46 Warwick Bypass due to rising topography.
- 2.38. CD V16 Landscape Sensitivity and Ecological & Geological Study 2013, identified only limited development potential in the areas of the two allocations.
- 2.39. H51 is in an area where the landscape assessment concluded only small-scale future development would be appropriate and this should not extend the settlement boundary further into the rural landscape. The allocation of H51 for 115 dwellings is beyond small scale and visually would create urbanisation of open countryside that is



not justified by the findings of the landscape assessment and given the arbitrariness of the site boundary is also inconsistent with the purpose of the green belt in this location for preventing the sprawl, with consequent harm to the visual amenity of the Green Belt.

- 2.40. H27 is in an area where the landscape assessment concluded potential for a very small amount of development and the importance of retaining important views towards Warwick. Intensification of housing numbers on this site will reduce the scope for landscaping and retaining views, and result in development with a more intensely urban appearance on high ground outside the village in the rural landscape. The increase in housing allocated on H27 is not justified by the findings of the landscape assessment and would increase the degree of harm to the Green Belt from loss of openness and impact on visual amenity.

Question 11 - Are there any exceptional circumstances which justify altering the Green Belt? If so, what are they?

- 2.41. At a District wide level, the amount and availability of housing land required to meet housing needs amounts to the exceptional circumstances that justify altering the Green Belt in the context of this Local Plan review. Centaur Homes contention is, however, that at the detailed local level, the alteration of the Green Belt boundary to the east of Hampton Magna in the manner proposed by the allocation of H27 and H51 is flawed and is not justified by the evidence or any additional exceptional circumstances.
- 2.42. The sites have been selected following a Green Belt assessment which evaluated large parcels of land with a too broad brush approach, and which has resulted in the sensitivity of Green Belt land on the east of Hampton Magna being downgraded. The finer grained landscape analysis identified capacity for only a small amount of development here, which in the vicinity of H51 should not extend the settlement boundary and in the vicinity of H27 should preserve views of Warwick. While protecting landscape quality is not a function of the Green Belt, the loss of openness in a sensitive landscape area prominent in key views would be seen as sprawl and encroachment into the countryside in a gap important for preserving the setting of historic Warwick and for preventing settlements from merging, and be harmful to visual amenity. Both allocations are considered unsound.
- 2.43. There can be no claim that a lack of alternative sites is a circumstance that exceptionally justifies altering the Green Belt around Hampton Magna in the manner proposed by the allocations. Centaur Homes land at Old Budbrooke Road is available and developable and suitable for residential development for the reasons previously



given, and in our assessment less harm would be caused to the purposes and openness of the Green Belt from allocation of this sustainable site.





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