

BLOOR HOMES

**REPRESENTATIONS TO THE WARWICK
DISTRICT COUNCIL REVISED
DEVELOPMENT STRATEGY JUNE 2013 ON
BEHALF OF BLOOR HOMES**

JULY 2013

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CONTENTS

		Page No
1	RDS1. LEVEL OF HOUSING GROWTH 2011 – 2029	1
2	RDS2. MEETING THE HOUSING REQUIREMENT	2
3	RDS3. DISTRIBUTION OF NEW HOUSING	3
4	RDS4. & RDS5. BROAD LOCATION AND ALLOCATIONS	4
	BISHOP’S TACHBROOK	6
	LEEK WOOTTON	7
	HATTON PARK	9

1. RDS1. LEVEL OF HOUSING GROWTH 2011 – 2029

- 1.1 These submissions relate to the proposed level of housing provision for the period 2011 – 2029, for 12,300 new homes as set out in Policy RDS1. This equates to an annual average rate of provision of about 700 dwellings per annum.
- 1.2 Paragraph 4.1.1 of the plan notes that following receipt of the advice from the Inspector appointed to examine the now withdrawn Coventry Core Strategy, the Council, together with Coventry City, Nuneaton and Bedworth and Rugby Borough Councils, have initiated the preparation of a Joint Strategic Housing Market Assessment (SHMA). The first stage of the Assessment is not due to report until August 2013.
- 1.3 By reference to those circumstances, it is therefore the case that the provision of 12,300 homes 2011 – 2029 across the District can be seen as no more than an interim working figure for the purposes of establishing the Revised Strategy for growth. It will be superseded by the level of provision that will be set out in the submitted draft plan on the basis of the SHMA and the need to accommodate housing requirements from other authorities which cannot wholly be met within their own areas, in accordance with paragraph 179 of the National Planning Policy Framework (referred to as the ‘Framework’).
- 1.4 Bloor Homes are therefore unable to comment on whether it considers this proposal would meet the requirements of paragraph 182 of the Framework in respect of meeting the full and objectively assessed needs in the housing market area.

2. RDS2. MEETING THE HOUSING REQUIREMENT

- 2.1 These submissions relate to the proposals for meeting the housing requirement referred to in Policy RDS1. In light of the comments made to Policy RDS1, this proposal will need to be reviewed by the Council following the proper assessment of the housing requirement for the District. However, the following comments are made on the basis of the proposal at this stage.
- 2.2 The proposal contains a heavy reliance (23%) on sites not identified or to be allocated within the final plan (i.e. windfalls), and it is questioned whether such an approach is consistent with the Framework in requiring the Council to demonstrate it is planning positively to meet the development requirements of the area. Moreover, the evidence base to support the assumptions about windfall rates does not justify the level of growth indicated as it is primarily informed by past trends in a stronger economic climate and a far more relaxed planning policy context towards windfalls.
- 2.3 By way of example, on the basis of the evidence put forward in the GL Hearn Employment Land Review Update 2013, the vast majority of employment sites will be protected by the Council for such uses in the future and therefore rates of redevelopment of large sites for residential development are not likely to return to previous levels seen prior to 2007 and the adoption of the current Local Plan Policy SC2.
- 2.4 Bloor Homes comment that if the Council are to rely on such levels of windfalls delivering the housing growth it requires to meet its needs in its draft Plan, it will need to demonstrate that the other policies of its Plan are framed in such a way as to enable such proposals to come forward.

3. RDS3. DISTRIBUTION OF NEW HOUSING

3.1 The distribution of new housing provision is described in Policy RDS3 of the strategy.

3.2 Bloor Homes continue to support the general direction of the strategy, and its distribution of growth across the District including within and/or on the edge of some villages. This continues to represent the most appropriate strategy having regard to the sustainability appraisal and evidence of the nature of the urban areas and their capacity to accommodate and deliver the scale of housing growth required over the plan period in accordance with the definition of sustainable development. However, in light of the comments made to Policy RDS1 and RDS2, the proportion of the growth distributed to the villages will need to be reviewed by the Council following the proper assessment of the housing requirement for the District.

4. RDS4. & RDS5. BROAD LOCATION AND ALLOCATIONS FOR DEVELOPMENT

4.1 Policies RDS4 and RDS5 set out the broad locations for development and detailed site allocations. These include the distribution of 1,000 dwellings to ‘village development’, and allocations of 100-150 dwellings to primary service villages, and 70-90 dwellings to secondary service villages. In light of the comments made to Policies RDS1 and RDS2, this proposal will need to be reviewed by the Council following the proper assessment of the housing requirement for the District.

4.2 However, the following general comments are made on the basis of the proposal at this stage as informed by evidence within the Settlement Hierarchy Report (Draft). The purpose of the proposals within RDS4 and RDS5 are to allocate sites and promote housing development in accordance with the Framework in order to meet the objectively assessed housing needs within the area within the plan period to 2029. The Council’s development strategy and preceding proposals within RDS1, RDS2 and RDS3 will fail to be effective and sound unless the proposed housing allocated to the villages is delivered.

4.3 It is noted at paragraph 4.3.16 that the Council intends to allocate specific sites adjacent to the relevant villages, including those within the Green Belt, within its draft Plan. Bloor Homes endorse this approach as it is critical to the soundness of the plan that these sites are allocated in order to demonstrate the plan is deliverable in accordance with the Framework, and to enable these sites to come forward in a timely manner through the plan period.

4.4 It is also essential therefore that when determining the choice of allocation of housing to the villages significant weight is attached to the availability of suitable land for development, particularly land that is being promoted by a developer or house builder who is able to clearly demonstrate to the Council its ability to deliver the housing

required within the plan period.

- 4.5 By way of example, a large rural village may have a range of services and facilities, be accessible to the main towns, and have its own ambitions to grow. However, if there are no suitable sites that are available and evidenced as being able to be developed within the plan period, the village or its allocation will not contribute towards delivering the strategy to meet the housing need.
- 4.6 The draft Settlement Hierarchy Report and the proposals that currently flow from it within the Strategy do not have regard in detail to land availability and suitability, although it is acknowledged at paragraph 4.3.15 that the Council are currently undertaking detailed assessments of potentially suitable sites that will inform further iterations of the Report and the content of the draft Plan.
- 4.7 In preparing its draft Plan, the Council must ensure that the settlement hierarchy chosen does not constrain the potential of suitable and available sites in sustainable locations from being developed to meet the housing need. The availability and accessibility of existing services today is an indication of whether a village can be regarded as sustainable in transport terms, however, the scale of growth appropriate to allocate to the village must be led by the suitability of land available and its relationship to the size and character of the existing settlement. This is particularly important given one of the purposes of allocating housing to the villages is to make a difference to rural service provision by improving or sustaining services over the plan period.
- 4.8 Bloor Homes therefore consider the output from this further detailed work will be a critical component in determining the scale of housing growth allocated to the villages, and urge the Council to review a fresh its proposals' present arbitrary groupings of settlements and apportionment of growth as referred to in the Settlement Hierarchy Report (Draft) following the completion of this further work.

- 4.9 In addition to the general comments above, Bloor Homes have specific comment on three villages. In making these comments, it has sought to guide the Council in its further consideration of the suitability of the settlements for housing growth by looking beyond the raw evidence of services and accessibility.

Bishop's Tachbrook

- 4.10 The proposals in RDS5 identify Bishop's Tachbrook as a primary service village based upon its size, services, and accessibility to services. Bloor Homes support the categorisation of Bishop's Tachbrook as a sustainable location for new housing, and have the following comments on its assessment.
- 4.11 In assessing the suitability of the village as a settlement for growth, it should also be noted there is a Branch Surgery of the Croft Medical Centre that serves the village, but this is not recorded within the Settlement Hierarchy Report (Draft). It is considered this compliments the range of existing services available within the village which support its growth.
- 4.12 Whilst it is noted the village may benefit in accessibility terms from the range of services and facilities proposed within the southern strategic urban extensions, the Strategy clearly seeks to avoid the coalescence of settlements and to retain the individual identity of the villages. In this respect, Bishop's Tachbrook as a village in its own right and with a good range of services is clearly a sustainable location for new housing irrespective of whatever decisions are to be taken in respect of urban extensions to the south of Warwick and Whitnash.
- 4.13 Bloor Homes have already indicated to the Council and Parish Council their interest in land immediately adjacent to the village and its primary school, and would be happy to share its evidence on the suitability of

the land for residential development, and their ability to deliver housing within the plan period.

Leek Wootton

- 4.14 The proposals in RDS5 identify Leek Wootton as a secondary service village based upon its size, services, and accessibility to services. Bloor Homes support the categorisation of Leek Wootton as a sustainable location for new housing, and have the following comments on its assessment.
- 4.15 The village benefits from a number of services and facilities, with the main exception being the absence of a village shop. The previous post office/stores closed many years ago, and the proximity of Warwick and Kenilworth has been cited as making it difficult commercially to re-introduce a new shop, although there is community interest in such a venture as set out in the Parish Plan. Leek Wootton is the largest village in the District without a local shop, and new housing development could make a significant contribution to addressing this shortcoming through potentially assisting with delivery of a new shop, as well as increasing its chance of being viable through an increased customer base within the village.
- 4.16 The presence of a well run and popular primary school on the southern edge of the village supports its identification as a location for housing growth. However, it is noted that the majority of pupils are from outside of the village due to the limited number of pupils now living within the village. Whilst this has enabled the school to sustain itself during this period, it does not support a sustainable pattern of development in the longer term. The characteristic of falling pupil numbers from the village may be explained by the nature of housing within the village, serving predominantly successful professionals and retirees as characterised within the mosaic groupings within the Settlement Hierarchy Report (Draft), and the implications that has on

the age profile of the village. These groups are clearly unlikely to contribute to sustaining the school in the longer term, and further residential development in the village such as that proposed at the Police Headquarters serving these mosaic groups will not address this issue.

4.17 Whilst the assessment therefore correctly identifies the current position in respect of services within the village, Bloor Homes consider that behind this evidence there is concern that this position may stagnate or indeed deteriorate unless the provision of new housing is of the right scale, type and mix to make a difference to the age and demographic profile of the community. The Council should therefore review the allocation to Leek Wootton in order to ensure the strategy is the most appropriate having regard to the particular circumstances of the village and its services.

4.18 Bloor Homes have already indicated to the Council and Parish Council their interest in land immediately adjacent to the village and its primary school, and would be happy to share its evidence on the suitability of the land for residential development, and their ability to deliver housing and other infrastructure/services within the plan period.

Hatton Park

- 4.19 The proposals in RDS5 identify Hatton Park as a secondary service village based upon its size, services, and accessibility to services. Bloor Homes support the categorisation of Hatton Park as a sustainable location for new housing, and have the following comments on its assessment.
- 4.20 Hatton Park is one of the largest villages within the District, and therefore is considered of a scale to be able to accommodate limited housing growth on suitable and appropriate sites without having a significant impact on the character or appearance of the settlement. This is in contrast to the nearby village of Hatton Green, which although benefiting from a primary school and church, is of a scale where new housing would have a significant detrimental impact on its character and appearance. Hatton Park is not constrained in this way, but of course benefits from the close proximity to those services within Hatton Green as well as the regular train services serving nearby Warwick Parkway.
- 4.21 It should also be noted that the Hatton Arms is within easy walking distance of the village, and this should be recognised within the Settlement Hierarchy Report (Draft).
- 4.22 Bloor Homes have already indicated to the Council and Parish Council their interest in land immediately adjacent to the village, and would be happy to share their evidence on the suitability of the land for residential development, and their ability to deliver housing and other infrastructure within the plan period.
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