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WARWICK DISTRICT COUNCIL

REVISED DEVELOPMENT STRATEGY CONSULTATION

REPRESENTATIONS ON BEHALF OF

BURMAN BROTHERS

July 2013

Regulated by RICS

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1. INTRODUCTION

- 1.1. Our Clients, the Burman Brothers, Freehold own and farm land at Hatton Park. We have previously supplied details of their three ownership parcels which immediately adjoin the built-up boundary of the settlement of Hatton Park together with an adjoining parcel of land which is mature woodland Smiths Covert that sits within the Hatton Park boundary. We enclose herewith an old Title plan with those areas identified edged red. Excluding the woodland area the three other parcels are included in your SHLAA 2009 Main Report, site references R38, R37 and R36 with the major parcel being site reference R38.
- 1.2. We have previously commented on this emerging Local Development Framework Plan seeking the release of their land at Hatton Park for market housing and related uses. In particular we have sought the early release of their main parcel of land, site reference R38, fronting Birmingham Road, Hatton having a site area of about 7.5 hectares (18.5 acres approx.).
- 1.3. We acknowledge that the settlement of Hatton Park has previously had substantial housing development in the late 1990s / early 2000s and that housing development has now been established for over 10 years. The settlement is now established and thriving in its present form. Future extensions of Hatton Park, as envisaged through the Revised Development Strategy will be expected to blend and bond in with the existing development so that the extension integrates properly in planning and environmental terms.
- 1.4. In particular the inclusion of Smiths Covert as a potential public open space facility will need to link with the environmental green space to be provided as part of the housing scheme to provide continuity and proper functional green facilities for the benefit of Hatton Park as a whole. This can be accommodated quite properly in both Masterplan and detailed design at the appropriate stage.
- 1.5. All three parcels of our Clients land are sustainable in form and extent given the large settlement of Hatton Park albeit that it has been categorized as a Secondary Service village, essentially a Category 2 village.
- 1.6. In order for land to be properly released for housing, it should meet the criteria of suitability, availability and achievability / deliverability.
- 1.7. In terms of suitability, there is nothing in the location, extent or form of any of the three landholdings which would cause concern in their release for housing. Quite the reverse, it is both suitable and sustainable as they adjoin an existing category "Category 2" village as identified in this LDF document.
- 1.8. We can confirm that all three parcels of land are immediately available for development once an appropriate planning permission has been granted. The owners are committed to the early release of all three of those parcels subject to planning permission.
- 1.9. All three parcels of land are achievable / deliverable, there being no unforeseen environmental or service constraints. The SHLAA indicates that the environmental conditions are "satisfactory". In terms of physical constraints, the SHLAA indicates that access might be a constraint. We can confirm that all these parcels of land can be properly and reasonably accessed off the existing road system including off the Birmingham Road for the main parcel of land. Further, as referred to in the SHLAA, Affordable housing at the right and appropriate level can be provided on these parcels of land.

Strategic Vision

- 1.10. We confirm that we support the District Council's Strategic Vision for their District in the Plan period.
- 1.11. We raise with you the fact that the Plan period only runs until 2029, which if this Strategy is adopted in 2014 will realistically only give some 15 years maximum. We believe that it would more appropriate to adopt a longer time period over which to plan the future of the Borough.

Revised Development Strategy

- 1.12. We cannot understand the rationale of planning for an "interim level of growth of 12,300 homes between 2011 and 2029" when the Strategic Housing Market Assessment projections showed figures of between 11,300 and 14,300 and the employment-led population and household projections pointed to a need for between 13,300 and 13,800 additional homes in the same Plan period.
- 1.13. It would be more appropriate to plan for a growth of 13,300 dwellings in the Plan period at this stage rather than wait a further Review of the Plan and then find that the requirement is considerably higher and there is a shortage of time before the end of the Plan period. There is sufficient potential housing land within the District to cater for the growth of 13,300 dwellings and we would request further consideration be given to adopting this higher figure and incorporating the additional 1,000 dwellings in the strategic releases.

Table 1 in Paragraph 4.2

- 1.14. This table should be amended indicating a total of 13,300 and the table should reflect the need to provide sites to accommodate these extra 1,000 dwellings.
- 1.15. Similarly, table 2 needs to be amended in line with our paragraph 1.9 above.

Broad Location of Development Housing – Policy RDS3

- 1.16. We broadly support the thrust of this policy and the reference to the hierarchy of growth, subject to our comments about Hatton Park later in this submission.
- 1.17. We would refer you to Policy RDS4 Broad Location of Development is identified in this table. Bearing in mind our comments above and our submission that Warwick District should be planning for a higher growth, ie an extra 1,000 dwellings, these could be spread appropriately and proportionately across the strategic sites, including some additional development in those villages that are able and capable of accommodating some additional housing development.

Policy RDS5: Housing Allocations

- 1.18. We have looked at the proposals for the housing allocations and would draw your attention to the primary service villages as well as the secondary service villages where Warwick District have sought to set out threshold levels of between 100 to 150 dwellings for the primary service villages and 70 to 90 in the secondary service villages. There does not appear to be any detailed rationale for these threshold levels. They seem to have been applied arbitrarily across the board without any real consideration for the villages, their existing form and extent, themselves. We make the point sincerely that some of these villages may be able to accommodate, properly and reasonably, a higher level of growth than envisaged by the thresholds without compromising either the settlement itself or unreasonably taking land from the Green Belt. Again because of the

length of the Plan period these threshold levels could be implemented in phases and therefore reducing any compromise for the settlement which a single large development scheme might have.

- 1.19. For instance at Hatton Park it would be possible with our Clients sites to deliver closer to 175 dwellings as well as some supporting community facilities allowing the village to properly be re-classified as a primary service village bearing in mind the nearby Warwick Parkway railway station, the surrounding motorway links and the existing community facilities.
- 1.20. Bearing in mind our thoughts on Hatton Park, appropriate development could take place in other settlements, without compromise. In particular there appears to have been no overall allocation to meet small schemes in the “other villages and settlements” as listed in table 3. We would have thought that these villages in total may have accommodated additional growth to help sustain them of a total of 100 to 150 dwellings over the Plan period.
- 1.21. Therefore in summary our proposal that Warwick District should provide for an additional 1,000 dwellings in the Plan period, at this time and in this LDF document, can reasonably be accommodated without undue harm either to the Green Belt or to the settlements accommodating planned growth can we submit, be properly supported by our contentions above.

Hatton Park

- 1.22. We support the allocation proposed by the District of 70 to 90 new dwellings at Hatton Park which could be accommodated without compromising any of the important planning considerations for development and without undue affect upon the Green Belt, where the line of the Green Belt can reasonably be re-drawn with strong defensible boundaries and with access off the Birmingham Road.
- 1.23. We simply make the point that Hatton Park in terms of our Clients main parcel of land, can accommodate not only the 70 to 90 new dwellings but could also reasonably accommodate, for the benefit of the District as a whole, a Continuing Care Retirement Community incorporating a nursing home and specialist new housing to Lifetime Care Standards in the form of bungalows, semi-bungalows and some apartments.
- 1.24. The argument which is supported by the District’s demographics for the Plan period shows that during that time some 25% of the population of the District will be over 55 years of age. In particular there is a very substantial increase in the very elderly age range and as a consequence the requirement will be there for substantial housing for those persons in need of care either in their own home, with Lifetime Care, or in institutions such as nursing homes or retirement homes.
- 1.25. Our suggested small CCRC would support the existing village of Hatton Park, as well as meeting the ageing population requirements both for this village and the surrounding area. In addition it would complement the existing range of housing with accommodation for the elderly and those in need of care. This is obviously subject to the market conditions for this type of specialist housing at the time of any allocation of the land for this use. However, so saying, there are companies in the market at the present time looking for opportunities of this type.
- 1.26. In addition there are two other smaller parcels of land owned by our Clients that could be considered for release without compromise later in the Plan period for a range of market and Affordable dwellings appropriate at that time.

Summary

- 1.27. We have set out above our support for the proposed allocation of housing for Hatton Park of 70 to 90 dwellings through this LDF document.
- 1.28. In addition we have indicated that a case can be made out for a higher level of housing requirement at 13,300 dwellings for the Plan period, ie an additional 1,000 dwellings.
- 1.29. We have referred to the fact that in our view Hatton Park could properly and reasonably accommodate up to 175 new dwellings within the Plan period without undue harm or unreasonable affect upon the Green Belt with a new long term defensible boundary.
- 1.30. We have made the point that the District requires accommodation for the elderly given the forecast demographics and the substantial increase in the number of 80 and 90-year olds during the Plan period. Hatton Park could accommodate some appropriate provision to assist in meeting an element of those needs reasonably and properly.
- 1.31. Finally the three parcels of land owned by the Burman brothers properly meet the criteria for sustainable development and are available immediately, suitable and deliverable.