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

Dear Sir / Madam

## WARWICK LOCAL PLAN: REVISED DEVELOPMENT STRATEGY

We write on behalf of our client Centaur Homes and are instructed to submit comments on their behalf in respect of the above consultation document.

## **Housing Growth and Distribution**

Policy RSD1 of the Revised Development Strategy document proposes an Interim Level of Growth of 12,300 homes between 2011 and 2029. Allowing for completions, commitments, small urban sites identified in the Strategic Housing Land Availability Assessment, windfall development and the consolidation of existing employments areas, a balance of 6,622 dwellings need to be allocated. It is welcomed that the Council recognise that the interim housing position may change as work continues on the joint Strategic Housing Market Assessment (SHMA) with neighbouring authorities including Coventry and Rugby Borough.

Policy RSD3 'Broad Location of Housing' acknowledges the need to distribute growth across the District, including "within and/or the edge of some villages". A hierarchy of growth in the rural areas is set out through identification of a series of 'Primary Service Villages' and 'Secondary Service Villages'. In addition, Policy RSD4 sets out the overall split of dwellings between the urban areas, sites on the edge of the main settlements and the villages. The policy proposes 1,000 dwellings to be located within the villages.

Notwithstanding the recognition that the interim housing position may change, we consider that insufficient housing is being directed to the villages and hamlets. An appropriate quantum of housing needs to be delivered in the rural areas in order to support the sustainability and viability of the villages, and to meet housing need in the location which it is generated.

## Policy RSD5

Under Policy RSD5, Barford is identified as a 'Secondary Service Village' which is proposed to deliver between 70 and 90 new dwellings over the plan period. We note that the status of the village has been revised down from the Preferred Options document, where it was considered as a 'Category 1 village'.

We support the identification of Barford as a village which will deliver a proportion of the 1,000 dwellings to be located at the villages over the plan period. Barford has a range of local services including a village shop/post office, community hall, Primary School, and two local pubs, all of which demonstrate the sustainable credentials of the village as a location for housing development. It should also be recognised that development will play an important role in helping to safeguard the long-term future of the local services and facilities in the village.

The approach to establishing the proposed village hierarchy in Policy RSD5 is largely based on the Draft Settlement Hierarchy Report (June 2013). The report refers to the downgrading of Barford from its original 'Category 1 village' status, and suggests that this due to issues over school capacity based primarily upon Parish Council feedback. We question whether this issue alone justifies the downgrading of Barford to a 'Secondary Service Village', and consider that more detailed analysis of school capacity and potential to expand is required to ensure the village classification is robust and justifiable.

In addition, we note that paragraph 4.4.3 of the supporting text of the Revised Development Strategy lists a series of criteria which housing development will need to satisfy, including a requirement to be located within the village envelope. Whilst the document recognises that village envelopes will need to be reviewed for villages 'washed over' by the Green Belt (paragraph 4.4.2), and for the smaller rural settlements (paragraph 4.4.6), it does not refer to establishing new village envelopes for the Primary and Secondary Service Villages outside of the Green Belt. Such a review will need to be undertaken in order to enable those villages to deliver the level of housing growth required and as identified in Policy RSD5, and the approach should be clearly set out in subsequent stages of the Local Plan.

Finally, we consider that land between Bridge Street and the A429 Bypass, at the north of Barford can contribute towards the identified housing growth for the village. The site is available and suitable for development, and should be considered through review of the village envelopes / village allocations in subsequent stages of the Local Plan.

We respectfully request that these comments are taken into account in preparing the next stage of the Plan.

Yours sincerely

Damien Holdstock Senior Planner

